



OSHA REVISES ITS FIXED LADDER STANDARD

Overview of the Rule

Applicability - Federal OSHA revised the fixed ladder standards under [29 CFR 1910.28\(b\)\(9\)\(i\)](#), specifying updated fall protection for fixed ladders. OSHA specifies fixed ladders are permanently attached to a structure, building, or equipment. Manhole steps are not included in this definition. In accordance with the state plan agreement with federal OSHA, Cal/OSHA must adopt this standard or one more stringent. As of the publication date, Cal/OSHA has not adopted this standard.

Primary Change - According to OSHA's revised fixed ladder standard, safety cages and wells will no longer be accepted as compliant fall protection, requiring a shift to active systems such as personal fall arrest systems (PFAS), ladder safety systems, or stairways.

Concerns - Cal/OSHA will not adopt the standard until the last minute, leaving agencies with a very short timeframe to meet compliance requirements and limiting options.



Federal OSHA Implementation Timeline

Date	Requirement
January 2017	The general rule went into effect.
November 2018	New or replaced ladders exceeding 24 feet (*Cal/OSHA is 20 feet) must include a PFAS or ladder safety system; cages/wells may only be retained if installed prior to this date.
November 2036	Final deadline: All permanently attached ladders exceeding 24 feet (*Cal/OSHA is 20 feet) must be retrofitted with a PFAS, ladder safety systems, or stairs; cages/wells are no longer acceptable.

**Cal/OSHA standard currently requires fall protection on fixed ladders above 20 feet.*

Transition Details

- **Pre-2018 Ladders:** Cages are premissible until replacement is needed, or until 2036--whichever comes first.
- **New/Replacement Ladders (post-2018):** Must include a PFAS, stairs, or ladder safety system; cages or wells are not acceptable.
- **Cal/OSHA** has yet to adopt this federal standard but will likely address this closer to 2036.



Why Cages Are Being Phased out

- **Studies** and OSHA analysis concluded that cages do not prevent falls and may even increase injury severity -- especially if a worker becomes unconscious or trapped mid-fall.
- **Research** showed cages offer no positive fall-arrest capability and may impede rescue efforts.

OSHA Letter of Interpretation

[Fixed Ladders, Rest Platforms, Personal Fall Protection, Ladder Cages, and Wells](https://www.osha.gov/sites/default/files/publications/OSHA3903.pdf)

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Checklist for Compliance

- **Inventory for Fixed Ladders with Cages:** Note installation or replacement dates.
- **Install PFAS, Ladder Safety Systems, or Stairs:** On new/replacement ladders--the federal OSHA requirement is immediate post-November 2018. It is not recommended that agencies install new cages, as Cal/OSHA may require their removal in the future.
- **Plan Retrofits:** Before November 18, 2036, even if the existing cages remain in place.
- **Train Workers:** Hazard recognition, proper use of safety systems, and inspection protocols.
- **Document Inspections:** Conduct visual inspection before each use, and formal verification annually by a competent person.

