OSHA Walking-Working Surfaces Rule Update

On Nov. 17, 2016, Occupational Safety and Health Administration issued a final rule updating its general industry Walking-Working Surfaces standards specific to slip, trip and fall hazards (29 CFR part 1910, subparts D and I). The rule also includes a new section under the general industry Personal Protective Equipment standards that establishes employer requirements using personal fall protection systems (29 CFR part 1910, subpart I).

The final rule incorporates advances in technology, industry best practices and national consensus standards to provide effective and cost-efficient worker protection. Specifically, it updates general industry standards addressing slip, trip and fall hazards (subpart D), and adds requirements for personal fall protection systems (subpart I).

Who and What Does the Final Rule Cover?

The final rule applies to all general industry workplaces and covers all walking-working surfaces, which includes horizontal and vertical surfaces such as floors, stairs, roofs, ladders, ramps, scaffolds, elevated walkways and fall protection systems.

How Does the Final Rule Increase Worker Protection?

- Eliminates the hazard of workers climbing extended heights on fixed ladders without fall protection by phasing out the use of qualified climbers in outdoor advertising.
- Adds a requirement that fixed ladders (more than 24 feet) be equipped with ladder safety or personal fall protection systems to prevent workers from falling or arresting their fall before contact with a lower level.
- Provides performance criteria for personal fall protection equipment in general industry.
- Requires the use of body harnesses, and prohibits body belts, in personal fall arrest systems to distribute fall arrest forces over a larger area of a worker’s body.
- Requires workers who use personal fall protection and other equipment to be trained, and retrained as necessary, in fall and equipment hazards before working at elevated heights.

Key provisions of the updated regulation

The final rule includes revisions to the existing general industry standards. These changes are:

- **Fall protection flexibility.** The final rule allows employers to choose from a range of accepted fall protection systems, including personal fall protection systems. This eliminates the use of guardrails as the primary fall protection method and gives employers flexibility to determine what method they believe will work best in their particular workplace situation. The final rule allows employers to use non-conventional fall protection practices in certain situations (§1910.28(b)(1) and (b)(13)).
- **Fall protection options.** Employers are required to protect workers from fall hazards along unprotected sides or edges that are at least 4 feet above a lower level. The rule sets requirements for fall
protection in specific situations, such as hoist areas, runways, areas above dangerous equipment, wall openings, repair pits, stairways and scaffolds. It also establishes requirements for the performance, inspection, use and maintenance of personal fall protection systems. Employers can choose from the following fall protection options:

- **Guardrail system**
- **Safety Net system**
- **Personal fall arrest system (body belts are not allowed)**
- **Positioning system**
- **Ravel restraint system**
- **Ladder safety system**

- The final rule replaces the outdated general industry scaffold standards with the requirement that employers comply with OSHA's construction scaffold standards.

- **Ladder safety systems or personal fall arrest systems on fixed ladders.** The final rule requires to equip fixed ladders (that extend more than 24 feet) with ladder safety or personal fall arrest systems and prohibits the use of cages and wells as a means of fall protection. The final rule grandfathers in cages and wells on existing ladders, but requires during that employers equip new ladders and replacement ladders/ladder sections with ladder safety or personal fall arrest systems.

- **Personal fall protection system performance and use requirements.** The final rule, which allows employers to use personal fall protection systems (i.e., personal fall arrest, travel restraint and positioning systems), adds requirements on the performance, inspection, use and maintenance of these systems. Like OSHA’s construction standards, the final rule prohibits the use of body belts as part of a personal fall arrest system;

- **Inspection of walking-working surfaces.** The final rule requires that employers inspect walking-working surfaces regularly and as needed and correct, repair, or guard against hazardous conditions; and

- **Training.** The final rule requires employers ensure workers who use personal fall protection and work in other specified high hazard situations are trained, and retrained as necessary, about fall and equipment hazards, including fall protection systems. Employers must provide information and training to each worker in a manner the worker understands. A qualified person must train workers to correctly:
  - Identify and minimize hazards
  - Use personal fall protection systems and rope descent systems
  - Maintain, inspect, and store equipment or systems used for fall protection

- **Ladder requirements include:**
  - Ladders must support their maximum intended load and mobile ladder stands and platforms must support four times their maximum intended load. Each ladder must be inspected before initial use in a work shift to identify defects that could cause injury.
  - Employers must ensure that portable ladders rungs and steps are slip resistant; ladders are secured and stabilized on slippery surfaces; ladders are not used as steps; ladders are not fastened together to provide added length unless designed for such use; and ladders are not placed on boxes, barrels or other unstable bases to obtain added height.
# Compliance Dates

The rule became effective Jan. 17, 2017.

<table>
<thead>
<tr>
<th>Industry</th>
<th>Responsibility</th>
<th>Compliance Date</th>
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</thead>
<tbody>
<tr>
<td>General Industry</td>
<td>Employers must train workers on fall and equipment hazards</td>
<td>May 17, 2017</td>
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<tr>
<td>General Industry</td>
<td>Installation of fall protection (personal fall arrest systems, ladder safety systems, cages and wells) on existing fixed ladders (more than 24 feet) that do not have any fall protection</td>
<td>Nov. 19, 2018</td>
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<tr>
<td>General Industry</td>
<td>Installation of ladder safety or personal fall arrest systems on new fixed ladders (more than 24 feet) and replacement ladders/ladder sections</td>
<td>Nov. 19, 2018</td>
</tr>
<tr>
<td>General Industry</td>
<td>Installation of ladder safety systems or personal fall arrest systems on all fixed ladders (more than 24 feet)</td>
<td>Nov. 18, 2036</td>
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</tbody>
</table>

States with OSHA-approved state plans have six months to adopt standards that are at least as effective as Federal OSHA standards. Many state plans adopt standards identical to OSHA, but some may have different or more stringent requirements.

**Resources**

- [osha.gov/Publications/OSHA3903.pdf](http://osha.gov/Publications/OSHA3903.pdf)