**Fixed Ladder Standard Changes-**

By Gary Auman and Kristi Gotwald

 Protection from falls is very important for the safety of any business. According to OSHA, “Falls from ladders account for 20 percent of all fatal and lost work-day injuries in general industry.” (<https://www.osha.gov/Publications/OSHA3903.pdf>.) It is with this in mind that OSHA published new rules in November 2016 regarding fall protection in general industry. The rules involve several aspects of fall protection with varying timeframes for compliance. The first set of rules went into effect in November 2017 regarding training employees, providing equipment, and certifying permanent anchorage points. However, the second set of rules, which involve ladder safety, went into effect just a few months ago in November 2018.

 Specifically, the changes affect fixed ladders, not portable ones. Fixed ladders are defined by OSHA as “a ladder with rails or individual rungs that is permanently attached to a structure, building, or equipment.” (29 CFR § 1910.21(b).) Many businesses incorporate the use of fixed ladders in their work. Employers will want to be sure all fixed ladders are made compliant to the new rules or risk OSHA citations, as well as the safety of your employees.

There are really three stages for fixed ladders provided in the changes. If a business currently has a fixed ladder that is over 24 feet, they must now be equipped with a cage, well, personal fall arrest system or ladder safety system. This gives employers options for fall protection on existing fixed ladders. However, if a new fixed ladder over 24 feet has been installed since November 2018 or will be installed in the future, it must have a personal fall arrest or ladder safety system installed in addition to a cage or well. The option on how to provide fall protection to employees is being taken away over time by the new standard. Employers will no longer get to choose, but rather must install personal fall arrest systems or ladder safety systems. Further, if a portion of a fixed ladder must be replaced, or has been replaced since November 2018 the new portion may not depend on a cage or well to satisfy fall protection. Rather, any new portions that are installed, whether as a replacement or an addition, must have a personal fall arrest or a ladder safety system. The final stage for implementation of the new standard for fixed ladders won’t become effective for some time. In November 2036 all fixed ladders, no matter when they were installed or whether they have cages or not, must be equipped with a ladder safety or personal fall arrest system if the fixed ladder is over 24 feet. If any cages or wells remain on fixed ladders, they may remain, but they must not interfere with ladder safety or personal fall arrest systems. OSHA is letting industry know that cages and wells are no longer considered adequate to protect workers in the event of a fall.

What qualifies as a ladder safety system? According to an OSHA publication a ladder safety system is “a system attached to a fixed ladder designed to eliminate or reduce the possibility of a worker falling off the ladder. A ladder safety system usually consists of a carrier, safety sleeve, lanyard, connectors, and body harness. Cages and wells are not considered ladder safety systems.” (<https://www.osha.gov/Publications/OSHA3903.pdf>.)

 Safety needs to be every employer’s top priority. The changes to these rules are intended to reduce fatalities and injuries due to falls when employees use fixed ladders and were made with advances in technology and national consensus standards in mind. Do not forget that you still have an obligation to inspect any fixed ladder before it is used to ensure that it is in good condition and has no defects such as rust or other damage. Remember the OSHA standards change frequently and all employers must be aware how they affect their businesses and the safety of their employees.