

# HONEYWELL REPLIES:

## Self-Retracting Devices in Aerial Lift Application

What kind of SRDS- should I use for Fall Protection in Aerial Lift work?

- Gabriella. 47. TX – OSHA AP (Authorized Person)

Dear Gabriella,

Thanks for reaching out to our team with such an interesting question. Let's start by saying that there's no black-or-white answer to this. One important question is "What standard or Work at Heights requirement(s) is your organization following?"

In the US, there are usually regulatory references to consider:

1. "Under **OSHA requirements**<sup>1</sup>, employers are responsible for providing a safe and healthful workplace for their workers, which includes protecting workers at heights. As such, there are specific callouts related to Fall Protection requirements in Aerial Lifts contained in 29 CFR Part 1926, Subpart L stating provisions as the following: "A body belt shall be worn and a lanyard attached to the boom or basket when working from an aerial lift". This provision does not go into details on SRDs, but can be a helpful starting point to guide you relative to MEWPs<sup>2</sup>. An OSHA AP should then have experience in the use, training and performance of SRDs to be able to correlate the data provided by the manufacturer and and set up a Personal Fall Arrest System in accordance with all applicable legal and regulatory requirements. It would require a pre-assessment based on product documentation and actual working conditions to successfully address the risk and help you protect your workers.
2. On the other hand, if you are also following ANSI/ASSP Z359.14-2021<sup>3</sup> you should be aware that this new standard release came with a categorization of SRDs based on their compatible tie-off position, as shown on the right. Those standards can be used as guidance to answer this question as well.

To be clear on the potential concerns of using an incorrect SRD, please reference the keynotes below:

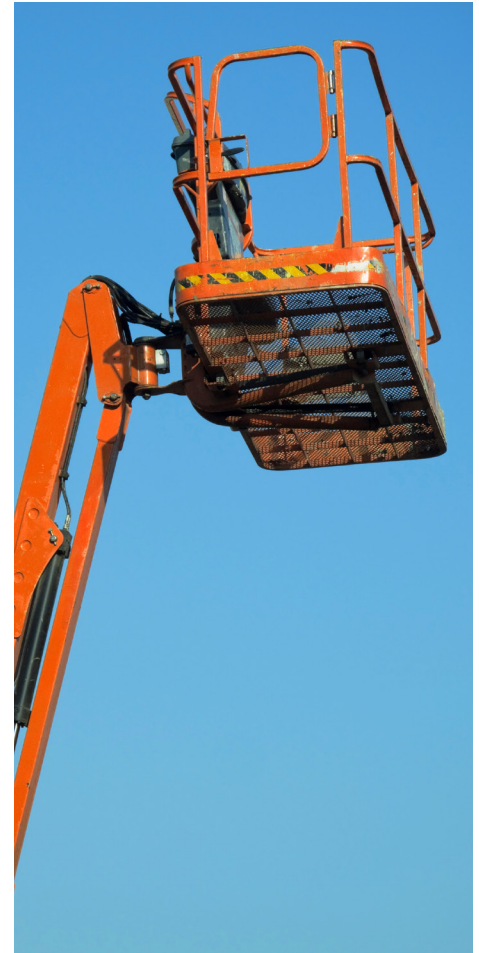
- According to ANSI/ASSP Z359.14-2021, Class 1 SRDs are aimed to be used only when the anchor point is at or above dorsal D-Ring of the harness; however, many models of MEWPs do not provide this anchor point feature. In that case, one product selection could be our Class 2 products to tie-off to a rail-mounted



or floor level anchorage inside the MEWP. Although we have extensive offerings in this segment, the most compatible product (depending on the application) is often our Turbolite+ Edge series because of its compact size.

- One of the best practices that harmonize with OSHA requirements is to combine SRDs and Restraint systems whenever possible. Restraint systems help to limit movement when the user is actively working and provide extra protection against potential ejection incidents which represent the most critical hazard in Aerial Lift work.
- Finally, it is important to clarify that Class 1 SRDs are not qualified to arrest a fall when sharp edges could be present in a free fall event. Conversely, a Class 2 SRD compliant with ANSI/ASSP Z359.14-2021 has been tested for when sharp, uneven, or irregular surfaces come into play during a free fall arrest event. This should be a key feature of any ANSI-compliant Class 2 device that you can use in Aerial Lift applications under the ANSI/ASSP Z359 regulatory framework.

In summary, depending on your regulatory scheme, whether it's OSHA as a legal requirement or also ANSI/ASSP Z359.14 as a voluntary standard, the details of your application, hazards, user, and other important conditions (as provided in our User Guides), must be considered in order to choose the appropriate fall protection product for your application. In case of doubts, please bear in mind that all **Fall Protection Programs**<sup>4</sup> must be led by **OSHA-Competent Persons**<sup>5</sup> designated in your organization to ensure ensure compliance with OSHA safety requirements<sup>6</sup>.



<sup>1</sup>OSHA 1926 Safety and Health Regulations for Construction

<sup>2</sup>MEWPS= Mobile Elevated Work Platform

<sup>3</sup>ANSI/ASSP Z359.14 – Safety Requirements for Self-Retracting Devices for Personal Fall Arrest and Rescue Systems

<sup>4</sup>Refer to ANSI/ASSP Z359.2 – Minimum Requirements for a Comprehensive Managed Fall Protection Programs for specific details under ANSI standards.

<sup>5</sup>Refer to OSHA's definition of a "Competent Person"

<sup>6</sup>Proper choice, use and maintenance of Honeywell Fall Protection products is the sole responsibility of the customer and end user. Honeywell can provide high-level guidance, such as this document, but Honeywell bears no responsibility for improper choice, use or maintenance of products by a customer or end user.

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