

Standard Interpretations (/laws-regs/standardinterpretations/publicationdate)

/ Fall protection requirements for workers on guardrail-equipped platforms.

- **Standard Number:** [1926.451\(g\)\(1\)](https://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=0&src_anchor_name=1926.451(g)(1);) ([https://www.osha.gov/pls/oshaweb/owalink.query\\_links?src\\_doc\\_type=STANDARDS&src\\_unique\\_file=0&src\\_anchor\\_name=1926.451\(g\)\(1\);](https://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=0&src_anchor_name=1926.451(g)(1);)); [1926.451\(g\)\(4\)](https://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=0&src_anchor_name=1926.451(g)(4);) ([https://www.osha.gov/pls/oshaweb/owalink.query\\_links?src\\_doc\\_type=STANDARDS&src\\_unique\\_file=0&src\\_anchor\\_name=1926.451\(g\)\(4\);](https://www.osha.gov/pls/oshaweb/owalink.query_links?src_doc_type=STANDARDS&src_unique_file=0&src_anchor_name=1926.451(g)(4);)).

OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov/>.

November 29, 2005

Mr. Stewart Best  
[By e-mail]

Re: Fall protection requirements for workers on guardrail-equipped scissor lift platforms.

Dear Mr. Best:

This is in response to your letter dated August 29, 2005 to the Occupational Safety and Health Administration (OSHA). You ask for a clarification of the fall protection requirements for workers working on a guardrail-equipped scissor lift platform that extends beyond the wheelbase of the lift. Your letter was forwarded to this office for handling on September 8, 2005.

We have set forth your question below:

**Question:** *Scenario: Employees are working on a guardrail-equipped scissor lift platform that extends beyond the wheelbase of the lift. The scissor-lift meets all the applicable requirements in Part 1926 Subpart L. The workers are on the scissor lift only when the scissor-lift is stationary. In this scenario, are such workers required to be tied-off?*

**Answer:** No. 29 CFR 1926.451(g)(1) introductory text and (vii) state:

(g) *Fall protection.* (1) Each employee on a scaffold more than 10 feet (3.1 m) above a lower level shall be protected from falling to that lower level. Paragraphs (g)(1)(i) through (vii) of this section establish the types of fall protection to be provided to the employees on each type of scaffold.

\* \* \*

(vii) For all scaffolds not otherwise specified in paragraphs (g)(1)(i) through (g)(1)(vi) of this section, each employee shall be protected by the use of personal fall arrest systems or guardrail systems meeting the requirements of paragraph (g)(4) of this section.

In a letter to [Mr. Dennis Vance \(/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=22611\)](https://www.osha-slc.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22611), dated July 21, 1998, OSHA responded to a similar question regarding whether an employee working from a scissor lift equipped with guardrails needed to wear a safety harness:

[W]hen working from an elevated scissor lift (ANSI A92.6 series), a worker need only be protected from falling by a properly designed and maintained guardrail system. However, if the guardrail system is less than adequate, or the worker leaves the safety of the work platform, an additional fall protection device would be required.

Presuming your guardrail system meets the requirements of §1926.451(g)(4), the employer in the situation you describe has the choice of using either a fall arrest system or a guardrail system to protect employees from fall hazards associated with working from a scaffold more than 10 feet above a lower level.<sup>1</sup>

If you need additional information, please contact us by fax at: U.S. Department of Labor, OSHA, Directorate of Construction, Office of Construction Standards and Guidance, fax #202-693-1689. You can also contact us by mail at the above office, Room N3468, 200 Constitution Avenue, N.W., Washington, D.C. 20210, although there will be a delay in our receiving correspondence by mail.

Sincerely,

Russell B. Swanson, Director  
Directorate of Construction

<sup>1</sup>We note that, in your inquiry, you referred to the fact that the platform extends beyond the wheelbase of the lift. The fall protection requirements do not vary based on whether the platform ends at or beyond the wheelbase. However, use of such a platform is permitted only if the scissor lift, in that configuration, meets the requirements in Part 1926 Subpart L. [[back to text](#)]

# UNITED STATES DEPARTMENT OF LABOR

(<https://www.dol.gov>)

Occupational Safety & Health Administration  
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Washington, DC 20210  
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