

Fixed Ladders and the 2036 Deadline

About 8 minutes to deliver

Cages were never fall protection, OSHA has said so since 2018, and every fixed ladder over 24 feet has a date on it.

A cage on a fixed ladder looks like fall protection. It is not, and it never was — it keeps a falling person roughly in line with the ladder while they fall the whole way down. OSHA said so in the 2016 walking-working surfaces rule and put dates on fixing it.

THE NUMBERS

1910.28(b)(9)(i) applies to fixed ladders extending more than 24 feet above a lower level:

- Ladders installed before 19 November 2018 may have a personal fall arrest system, a ladder safety system, a cage, or a well.
- Ladders installed on or after 19 November 2018 must have a personal fall arrest system or a ladder safety system. A cage no longer counts on a new ladder.
- When a ladder, cage or well is replaced, in whole or in part, a personal fall arrest system or ladder safety system goes into at least that section.
- On and after 18 November 2036, every fixed ladder over 24 feet must have a personal fall arrest system or a ladder safety system. No exceptions, no grandfathering.

If your building has a caged ladder to a roof, a tank, a silo or a mezzanine, that is a dated obligation, and 2036 arrives one replacement at a time.

WHAT A LADDER SAFETY SYSTEM IS

A carrier — a rail or a cable running the length of the ladder — with a sleeve or trolley that travels with you and locks when it moves fast. You wear a harness and connect to the sleeve at the bottom, climb, and disconnect at the top. It stops a fall in inches.

That is a different thing from a cage, and it is what the deadline is about.

CLIMBING ONE

- Three points of contact, face the ladder, and nothing in your hands.
- Connect before you leave the ground and disconnect only when you are on the landing, past the rail.
- Check the sleeve travels and locks before you commit to the climb.
- Look at the ladder. Corroded rungs, loose brackets, missing bolts, a rung worn thin at the middle. A fixed ladder outdoors rusts from the inside of the bracket where you cannot see it — report anything that moves.
- Landings and extensions. The rails have to extend 42 inches above the landing, or there has to be a grab bar. Getting off the top is where people fall.

THE EVERYDAY ONE

Nobody climbs a fixed ladder carrying anything. Hoist it, wear a bag, or make two trips — on a 30-foot ladder there is nowhere to put it down and nothing to catch you.

ASK THE CREW

- Do we have fixed ladders over 24 feet, and what is on them — a cage or a system?
- Has anyone climbed one carrying something this week?
- Which of our ladders is due for replacement, and does anyone know the rule applies then?

29 CFR 1910.23 · 29 CFR 1910.28

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ATTENDANCE RECORD

Fixed Ladders and the 2036 Deadline

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Date

Job / site

Delivered by

Company

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I delivered this talk and determined it was suitable for this crew and this work.

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