

Clarification of Fall Protection in Scissor Lifts

State Compensation Insurance Fund

Cal/OSHA would like to clarify compliance requirements regarding the use of fall protection in conjunction with scissor lifts. Although fall protection equipment is not required by Section 3642 (a) *Platform Equipment*, of the General Industry Safety Orders (GISO), some manufacturers are recommending that users tie-off while in a scissor lift. So, could an employer be cited for failure to comply with the manufacturer's recommendations, if an employee is using a scissor lift which recommends the use of fall protection equipment but is not tied off while the platform is in an elevated location?

Section 3638 (e) *Equipment Instructions and Marking* of the GISO requires that a scissor lift be 'assembled and erected by a qualified person in accordance with the manufacturer's specifications.' And, GISO Section 3646 describes the operating instruction requirements for scissor lifts, but, unlike the operating instructions for boom-type aerial devices, it does not include a requirement for the use of personal fall protection equipment.

According to Cal/OSHA, an *"elevated bucket,"* as specified in Title 8 of the California Code of Regulation Section 3648 (o) *Operating Instructions (Aerial Devices)*, implies that the lift equipment is a boom-type aerial device and therefore **does require** the use of fall protection equipment regardless of the height of the guardrail or bucket edge. The reason for this is that because booms and buckets of aerial devices are subject to sudden horizontal and/or vertical movements which can eject the operator regardless of the height of the guardrail or bucket edge, the employee must be additionally safeguarded with fall protection.

Cal/OSHA reminds employers that there are two exceptions under which personal fall protection is required.

- If the guardrails are temporarily lowered or removed to allow the scissor lift to fit into a tight space, then Section 3642 (a) applies and requires workers on the scissor lift to use personal fall protection equipment until the guardrails are restored. The scissor lift in this instance must also be designed and manufactured to accommodate fall protection loads and provide a fall protection anchor(s).
- If a scissor lift is used to transfer an employee onto a raised deck or structure - when permitted in the manufacturer's operating instructions - then Section 3646 (e) *Operating Instructions (Elevating Work Platforms)*, applies and prohibits employees from transferring to a deck or structure by climbing over the guardrails. In this case, the employee must wear double lanyards, and be tied off to an approved anchorage on the structure before releasing the lanyard connected to the anchor on the scissor lift. And, such transfer must be by way of a gate in the railing enclosing the scissor lift platform.

If you have further questions, please contact Cal/OSHA Consultation at <http://www.dir.ca.gov/dosh/consultation.html>

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