

Discussion Tool

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SOURCE OF FEDERAL OSHA STANDARD(S): 29 CFR

SCOPE: Applicable throughout state unless otherwise noted.

FEDERAL: §	STATE: General Industry Safety Orders	GOALS	Current Provisions
<p><u>1926.501. Duty to have fall protection.</u></p> <p><i>(a) General.</i> (1) This section sets forth requirements for employers to provide fall protection systems. All fall protection required by this section shall conform to the criteria set forth in § 1926.502 of this subpart. (2) The employer shall determine if the walking/working surfaces on which its employees are to work have the strength and structural integrity to support employees safely. Employees shall be allowed to work on those surfaces only when the surfaces have the requisite strength and structural integrity. (b)(1) <i>Unprotected sides and edges.</i> Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems. (b)(2) <i>Leading Edges.</i> (i) Each employee who is constructing a</p>	<p>Subchapter 4. Construction Safety Orders Article 24. Fall Protection</p> <p>Amend Section 1669 to read:</p> <p>§1669. General.</p> <p>(a) When work is performed from thrustouts or similar locations, such as trusses, beams, purlins, or plates of 4-inch nominal width, or greater, at elevations exceeding 15-6 feet above ground, water surface, or floor level below and where temporary guardrail protection is infeasible-impracticable, employees shall be required to use approved personal fall protection system in accordance with Section 1670.</p> <p>(b) When requirements in subsection (a) are infeasible-impracticable, approved safety nets shall be used in accordance with Section 1671.</p> <p>(c) When <u>it can be shown by the employer that the use of conventional fall protection is infeasible or creates a greater hazard, the employer shall develop and implement a fall protection plan which meets the requirements of Sections 1671.1 and 1671.2</u> the work is of short duration</p>	<p>To be commensurate with the federal standard.</p> <p>To be commensurate with the federal standard.</p> <p>The state proposes to delete work of short duration because it is not commensurate with federal standards. An informational note is proposed to clarify to the employer that conventional fall protection methods must be used, unless they can demonstrate that their use is infeasible.</p>	

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<p>leading edge 6 feet (1.8 m) or more above lower levels shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems.</p> <p>Exception: When the employer can demonstrate that it is infeasible or creates a greater hazard to use these systems, the employer shall develop and implement a fall protection plan which meets the requirements of paragraph (k) of § 1926.502.</p> <p>Note: There is a presumption that it is feasible and will not create a greater hazard to implement at least one of the above-listed fall protection systems. Accordingly, the employer has the burden of establishing that it is appropriate to implement a fall protection plan which complies with 1926.502(k) for a particular workplace situation, in lieu of implementing any of those systems.</p> <p>(ii) Each employee on a walking/working surface 6 feet (1.8 m) or more above a lower level where leading edges are under construction, but who is not engaged in the leading edge work, shall be protected from falling by a guardrail system, safety net system, or personal fall</p>	<p>(i.e., non-repetitive) and limited exposure and the hazards involved in rigging and installing the safety devices required by this Article equals or exceeds the hazards involved in the actual construction, these provisions may be temporarily suspended, provided adequate risk control is recognized and maintained under immediate, competent supervision.</p> <p><u>Note: There is a presumption that conventional fall protection is feasible and will not create a greater hazard. Accordingly, the employer has the burden of establishing that conventional fall protection is infeasible or creates a greater hazard.</u></p>	<p>Fed OSHA does not have short duration and limited exposure, so will this be the best way to fix this?</p>	

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<p>arrest system. If a guardrail system is chosen to provide the fall protection, and a controlled access zone has already been established for leading edge work, the control line may be used in lieu of a guardrail along the edge that parallels the leading edge.</p>			
<p><u>1926.501. Duty to have fall protection.</u></p> <p><i>(b) General.</i></p> <p>(1) This section sets forth requirements for employers to provide fall protection systems. All fall protection required by this section shall conform to the criteria set forth in § 1926.502 of this subpart.</p> <p>(2) The employer shall determine if the walking/working surfaces on which its employees are to work have the strength and structural integrity to support employees safely. Employees shall be allowed to work on those surfaces only when the surfaces have the requisite strength and structural integrity.</p> <p><i>(b)(1) Unprotected sides and edges.</i> Each employee on a walking/working surface</p>	<p>Subchapter 4. Construction Safety Orders</p> <p>Article 24. Fall Protection</p> <p>Amend Section 1670 to read:</p> <p>§1670. Personal Fall Arrest Systems, Personal Fall Restraint Systems and Positioning Devices.</p> <p>(a) Approved personal fall arrest, personal fall restraint or positioning systems shall be worn by those employees whose work exposes them to falling in excess of 7½<u>6</u> feet from the perimeter of a structure, unprotected sides and edges, leading edges, through shaftways and openings, sloped roof surfaces steeper than 7:12, or other sloped surfaces steeper than 40 degrees not otherwise adequately protected under the provisions of these Orders.</p>		

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<p>(horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.</p> <p>(b)(2) Leading Edges. (i) Each employee who is constructing a leading edge 6 feet (1.8 m) or more above lower levels shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems. Exception: When the employer can demonstrate that it is infeasible or creates a greater hazard to use these systems, the employer shall develop and implement a fall protection plan</p>			
<p><u>1926.502(e)</u></p> <p>Positioning device systems. Positioning device systems and their use shall conform to the following provisions:</p>	<p>(g) If an employee's duties require horizontal movement, rigging shall be provided so that the attached lanyard will slide along with the employee. Such rigging shall be provided for all suspended staging, outdoor advertising sign platforms, floats, and all other catwalks, or walkways 7½<u>6</u> feet or more above the ground or level beneath.</p>	<p>The state proposes to amend 1670 (g) to be commensurate with the federal standard</p>	

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<p>1926.105 Safety Nets</p> <p>1926.105(a)</p> <p>Safety nets shall be provided when workplaces are more than 25 feet above the ground or water surface, or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines, or safety belts is impractical.</p> <p>1926.105(b)</p> <p>Where safety net protection is required by this part, operations shall not be undertaken until the net is in place and has been tested.</p>	<p>Note: For additional fall protection requirements during steel erection operations, see Article 29.</p> <p>Subchapter 4. Construction Safety Orders Article 24. Fall Protection</p> <p>§1671. Safety Nets.</p> <p>(a) Where the elevation is 25 feet or more above the ground, water surface, or continuous floor level below, and when the use of personal fall arrest systems, personal fall restraint systems, positioning device systems or more conventional types of protection are clearly impractical, the exterior and/or interior perimeter of the structure shall be provided with an approved safety net extending at least 8 feet horizontally from such perimeter and being positioned at a distance not to exceed 10 feet vertically below where such hazards exist, or equivalent protection provided safety nets shall extend outward from the</p>	<p>CA standards are more stringent than Federal</p>	

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1926.105(c) 1926.105(c)(1) Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below such work surface. Nets shall be hung with sufficient clearance to prevent user's contact with the surfaces or structures below. Such clearances shall be determined by impact load testing.	<div>outermost projection of the work surface as follows:</div> <table><tr><td>Vertical distance from working level to horizontal plane of net.</td><td>Minimum required horizontal distance of outer edge of net from the edge of working surface.</td></tr><tr><td>Up to 5 feet</td><td>8 feet</td></tr><tr><td>More than 5 feet up to 10 feet.</td><td>10 feet</td></tr><tr><td>More than 10 feet but not to exceed 30-25 feet</td><td>13 feet</td></tr></table> <div>Nets shall be hung with sufficient clearance to prevent user's contact with the surfaces or structures below. Such clearances shall be determined by impact load testing.</div> <div>*****</div>	Vertical distance from working level to horizontal plane of net.	Minimum required horizontal distance of outer edge of net from the edge of working surface.	Up to 5 feet	8 feet	More than 5 feet up to 10 feet.	10 feet	More than 10 feet but not to exceed 30-25 feet	13 feet	Amend 30ft to 25ft to meet federal requirements	
Vertical distance from working level to horizontal plane of net.	Minimum required horizontal distance of outer edge of net from the edge of working surface.										
Up to 5 feet	8 feet										
More than 5 feet up to 10 feet.	10 feet										
More than 10 feet but not to exceed 30-25 feet	13 feet										

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<p>1926.501(b)(6) Ramps, runways, and other walkways. Each employee on ramps, runways, and other walkways shall be protected from falling 6 feet (1.8 m) or more to lower levels by guardrail systems</p>	<p>§1724. Roofing--General. (a) Roof Jack Systems (Includes Jacks, Planks and Appurtenances.)</p> <p>(f) Personal Fall Protection.</p> <p>(1) Where used to prevent workers from falling off roofs, personal fall arrest systems, personal fall restraint systems and positioning devices shall be installed and used in accordance with the provisions of Article 24, Fall Protection.</p> <p>(2) Safety lines shall be attached in a secure manner to substantial anchorages on the roof.</p> <p>****</p> <p>(h) Ramps and Runways.</p> <p>(1) Ramps or runways erected and used exclusively for the purpose of loading or unloading roofing materials at elevations above ground, or other level below, not exceeding 20<u>6</u> feet in height shall be at least 40 inches in width. At those elevations exceeding 20<u>6</u> feet in height, standard guardrails shall be installed and maintained on both sides of the ramp or runway.</p>	<p>The state proposes to amend 1724 (h)(1) to be commensurate with the federal standard.</p>	

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<p><u>1926.501(b)(10)</u></p> <p>"Roofing work on Low-slope roofs." Except as otherwise provided in paragraph (b) of this section, each employee engaged in roofing activities on low-slope roofs, with unprotected sides and edges 6 feet (1.8 m) or more above lower levels shall be protected from falling by guardrail systems, safety net systems, personal fall arrest systems, or a combination of warning line system and guardrail system, warning line system and safety net system, or warning line system and personal fall arrest system, or warning line system and safety monitoring system. Or, on roofs 50-feet (15.25 m) or less in width (see Appendix A to subpart M of this part), the use of a safety monitoring system alone [i.e. without the warning line system] is permitted.</p>	<p>Note: Plain text language is the section 1730 version that is effective July 1, 2025</p> <p>§1730. Roof Hazards.</p> <p>. (a) During roofing operations the employer shall comply with the provisions of Section 1509 and employees shall be trained and instructed in accordance with the provisions of Section 1510 of these orders. This section does not <u>Section 1731 applies</u> to residential-type roofing activities as defined in Section 1731.</p> <p>(b) Slopes 0:12 to 4:12--Single-Unit (Monolithic) Roof Coverings.</p> <p>(1) Employees shall be protected from falls from roofs of a height of more than 20-6 feet by use of one or a combination of the methods in this section. Whenever felt laying machines or other equipment that is pulled by an operator who walks backwards is being used, this provision shall apply regardless of the height.</p> <p style="text-align: center;">****</p>	<p>This regulation will be updated on July 1, 2025</p> <p>Fed OSHA requested clarification in 7.12.24 letter</p> <p>The state proposed to clarify that Section 1730, which applies to commercial roofing, does not apply to residential roofing operations, which are addressed by Section 1731.</p>	

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	<p>(c) Slopes Greater Than 4:12--Single-Unit (Monolithic) Roof Coverings. Employees shall be protected from falls from roofs of a height of more than 20<u>6</u> feet by use of one or a combination of the following methods:</p> <p>****</p> <p>(e) Slopes 0:12 Through 5:12--Multiple-Unit Roof Coverings. Employees shall be protected from falls from roofs that are of a height of more than 20<u>6</u> feet by the use of a roof jack system as provided in Section 1724(a), a minimum of 24-inch high parapet, or other method affording equivalent protection.</p> <p>(f) Slopes Greater Than 5:12--Multiple-Unit Roof Coverings. Employees shall be protected from falls from roofs that are of a height of more than 20<u>6</u> feet by one or a combination of the following methods:</p> <p>****</p> <p>(g) For purposes of Section 1730, the height measurement shall be determined by measuring the vertical distance from the employee's walking/working surface to the ground or level below. The height of parapets</p>	<p>Discuss concerns with the term WWS</p>	

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	<p>shall not be included in the roof height measurements.</p> <p>Notes: Section 1731 is the current (May 2025) version with language effective July 1, 2025, shown as markups</p> <p>§1731. Roof Hazards New Production Type Residential Construction <u>Residential-type Roofing Activities</u></p> <p>(b) Definitions.</p> <p><u>Residential-type roofing activities. Roofing work consists of roofing and re-roofing work, including roof removal performed on single-family homes, townhouses, duplexes and other structures covered by Section 1716.2. Roofing work also includes loading and installation of roofing materials, including related insulation, sheet metal that is integral to the roofing system, and vapor barrier work, but does not include the construction of the roof deck.</u></p> <p>*****</p> <p><u>(e) For the purposes of this section, the employee's fall height measurement shall be determined by measuring the vertical distance from</u></p>	<p>Identify concerns with definition</p> <p>Verify fall height calculation / measurement</p>	

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	<p><u>the employee's walking/working surface to the ground or level below. The height of parapets shall not be included in the roof height measurement.</u></p>		
<p><u>1926.501(b)(13)</u></p> <p>"Residential construction." Each employee engaged in residential construction activities 6 feet (1.8 m) or more above lower levels shall be protected by guardrail systems, safety net system, or personal fall arrest system unless another provision in paragraph (b) of this section provides for an alternative fall protection measure.</p>	<p>Note: Plain text language is the section 1716.2 version that is effective July 1, 2025</p> <p>§1716.2. Wood and Light Gage Steel Frame Construction, Residential/Light Commercial.</p> <p>(e) Work on Top Plate, Joists and Roof Structure Framing.</p> <p>(1) When employees are walking/working on top plates, joists, rafters, trusses, beams or other similar structural members 6 feet or more above the surrounding grade or floor level below, fall protection shall be provided by one or more of the following methods: scaffolding, guardrails, safety nets, personal fall protection systems, or, provided the employer demonstrates that the use of conventional fall protection methods are infeasible, a fall protection plan with safety monitors and controlled</p>	<p>This regulation will be updated on July 1, 2025</p>	

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	<p>access zones as described in Sections 1671.1 and 1671.2.</p> <p>(2) When walking/working on top plates, joists, rafters, trusses, beams or other similar structural members for interior framing activities between 6 and 15 feet above the surrounding grade or floor level below and all requirements in paragraphs (A) through (C) are met, the employer may<u>shall</u> use a fall protection plan with safety monitors and controlled access zones as described in Sections 1671.1 and 1671.2 <u>unless fall protection is determined to be infeasible, instead of the conventional fall protection methods specified in subsection (e)(1):</u></p> <p>(A) For structural members, they shall either be securely braced or during installation, are laid on their sides on the top plate; and,</p> <p>(B) either the center spacing between structural members shall not exceed 24 inches or plywood sheathing shall be laid down to cover the spacing between structural members; and</p> <p>(C) Employees are more than 6 feet from an unprotected side or edge.</p>	<p>The state amended Exception B to be commensurate with the federal standard This regulation will be updated on July 1, 2025</p> <p>April 2024 letter from Feds states that employers must evaluate each job site to determine if fall protection is infeasible.</p>	

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<p><u>1926.501(b)(15)</u></p> <p><i>Walking/working surfaces not otherwise addressed.</i> Except as provided in § 1926.500(a)(2) or in § 1926.501 (b)(1) through (b)(14), each employee on a walking/working surface 6 feet (1.8 m) or more above lower levels shall be protected from falling by a guardrail system, safety net system, or personal fall arrest system.</p>	<p>****</p> <p>(f) Work on Floors and Other Walking/Working Surfaces. When working on floors and other walking/working surfaces that are 6 feet or more above the surrounding grade or floor level below and will later be enclosed by framed exterior walls, employees directly involved with the layout and construction of framed stud walls shall be protected from falling by one or more of the following methods: personal fall protection systems, scaffolding, safety nets, standard guardrails as specified in Section 1620 around all unprotected sides or edges, or, provided the employer demonstrates that the use of conventional fall protection methods are infeasible, a fall protection plan with safety monitors and controlled access zones as described in Sections 1671.1 and 1671.2</p>		