

Fixed Ladders, Changing Rules: Navigating OSHA's Ladder Fall Protection Requirements

OSHA's revised fixed ladder rule requires fall protection systems for ladders over 24 feet. Here's what safety leaders need to know.

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Fixed ladders have long been a staple in industrial and commercial environments, but they also carry a significant risk of serious injury or fatality when not properly protected. In response to the persistent hazards, OSHA revised its regulations under 29 CFR 1910 Subpart D in 2016, creating a shift that affects how every organization with fixed ladders must approach safety.

If your facility has fixed ladders — especially those where any potential fall exceeds 24 feet — the changes affect your organization. And, if your organization has hundreds of ladders or more, you really can't afford to delay action.

Here's what you need to know, what's changing, and how to plan before the compliance deadline hits in November 2036.

Why It Matters: The Risk Is Real

Falls from ladders remain one of the leading causes of workplace injuries and fatalities. According to the Bureau of Labor Statistics, ladder-related falls accounted for 161 workplace deaths and over 22,000 injuries in a single year (2020). Many of these incidents are preventable with the right systems in place.

The reality is simple: older safety measures, such as cages, are no longer enough. And they will no longer be compliant for falls greater than 24 feet. OSHA now considers cages non-compliant fall protection in those cases, due to their inability to arrest a fall. Worse, they often complicate emergency rescues and can cause additional injuries during a fall.

The OSHA Regulation: What Changed?

Under the revised 29 CFR 1910 Subpart D, OSHA now mandates that any fixed ladder over 24 feet must be equipped with a ladder safety system or personal fall arrest system. This includes ladders where multiple sections combine to exceed 24 feet of continuous fall distance.

Here's a breakdown of the compliance timeline:

- **January 2017:** Official regulation took effect. So, today, when a ladder is replaced, it must meet the updated regulation.
- **On or after November 19, 2018:** All new ladders must meet the updated regulation
- **November 2036:** All existing ladders over 24 feet must be retrofitted with compliant fall protection systems
- **Note:** a copy of the regulation can be found at <https://tinyurl.com/ya28ejxn>.

If your fall protection plan still relies on ladder cages for ladders over 24 feet, it's time to make a change. Removing cages and replacing them with fall arrest systems is more than a checkbox for compliance — it's a fundamental shift toward safer access.

Additional guidance on fixed ladders can be found in American National Standards Institute (ANSI) documents. Specific stan-

dards to reference include:

- ANSI/ALI A14.3-2008 (R2018) - Fixed Ladders
- ANSI/ASSP Z359.16 Standard - Ladder Climbing Fall Arrest Systems

From Assessment to Implementation: A Practical Approach

Addressing fixed ladder fall protection requires more than just installing equipment — it starts with understanding your current systems and evaluating what's feasible. A comprehensive approach typically includes:

- Conducting a full inventory of fixed ladders across the facility or organization
- Assessing each ladder's condition, including geometric compliance, location, and fall exposure
- Reviewing structural integrity to ensure ladders and their mounting surfaces can withstand fall arrest forces
- Selecting appropriate fall protection systems, based on use frequency, ladder type, user transitions, site constraints, and the work required at the elevated location
- Planning phased implementation to manage timelines and budgets, especially for larger sites
- Developing training and rescue procedures that align with selected systems and OSHA expectations

Many organizations benefit from bringing together safety, engineering, and facility management teams early in the process to ensure compliance strategies are practical and cost-effective. Whether upgrading a single ladder or coordinating a sitewide or nationwide retrofit, starting with a methodical, risk-based evaluation can help prevent missteps and delays.

The Hierarchy of Ladder Safety: Not All Solutions Are Equal

When addressing ladder safety, it helps to take a page from the Hierarchy of Controls — a well-established framework for hazard mitigation.

- **Eliminate the hazard:** Replace ladders with stairs, lifts, or other means of access when feasible.
- **Add landings:** Shorten fall distances to below 24 feet by adding intermediate rest platforms.
- **Use overhead SRLs:** For ladders under 100 feet, a single-user self-retracting lifeline (SRL) may be an effective option and provide better access at the top and/or bottom of the ladder.
- **Implement ladder climbing systems:** Chest D-ring systems are better for multiple users and taller ladders, but they often involve more training, more complex transitions and structural reinforcement.

Addressing Transition Hazards

One of the most overlooked elements in ladder safety is the transition point — where users move from ladder to platform or roof. If systems don't support safe transitions (especially on step-through ladders), the risk increases significantly. As with most systems of any type, transition zones often cause greater challenges. Look for:

- Adequate step-through clearance (24–36 inches)
- Sufficient clearance and mobility around the system at the top with fall-protected egress and access
- Devices that support 100% tie-off, even at the top of the ladder

Newer technologies, such as extendable stanchions and remotely operated roof hatches, provide safer ways to transition while remaining connected. But their use may be unfamiliar to users and require additional training with specific attention to installation details.

Why Structural Review Matters

Fall protection isn't just about anchoring a system and calling it compliant. Every ladder and its mounting structure must be reviewed by a qualified engineer. Without this verification, there's no guarantee that the ladder or wall can withstand the forces of a fall arrest event. And these forces are significantly greater than common ladder loads.

In some cases, a new ladder system or support structure may be more cost-effective than retrofitting outdated systems.

Another Part of the Program

Evaluating and controlling fall risk from ladders must be a key component of your organization's fall protection program. Make sure you are addressing all necessary aspects of a comprehensive ladder safety program.

- Provide comprehensive training on safe ladder use
- Confirm completion of required inspections and maintenance of both ladders and active fall protection systems.
- Develop, publish and train on system use and rescue procedures, which are mandatory when active fall protection systems are employed.
- Perform post-incident evaluation of ladders and systems, as components typically need replacement or thorough inspection and recertification after incidents.

Don't Wait for 2036

While OSHA has given employers until November 2036 to retrofit existing ladders, that shouldn't be interpreted as a reason to wait. Large facilities with many ladders may require phased planning, structural evaluations, and budget forecasting to complete the necessary upgrades on time. We recommend organizations:

- Perform a sitewide ladder inventory
- Prioritize high-risk locations
- Budget over multiple years
- Train all personnel on fall protection use, limitations, and rescue plans

Evaluating Your Ladder Inventory: 6 Questions to Ask

Not every ladder needs to be replaced, but every ladder does need to be evaluated. Here are six critical questions that guide the assessment process:

- Is a ladder the right access method? If stairs or catwalks can be used instead, that's often a safer and more productive solution.



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- Does the ladder geometrically comply with OSHA 1910.23 and 1910.28? Design standards, side-rail extensions, and transition zones must be considered and verified after installation.

- Does the ladder extend more than 24 feet above a lower level? If so, it requires a fall arrest system by 2036. Earlier planning is advised for facilities with numerous ladders.

- Can you ensure continuous fall protection? Systems should allow users to stay connected from bottom to top, including while transitioning onto roofs or platforms.

- Is the structure capable of withstanding fall arrest forces? It's essential to get structural documentation confirming this.

- Is the ladder itself designed to support fall arrest systems? Many older ladders were never engineered to support fall protection loads. A structural engineer who is a qualified person should verify their capacity.

Final Thought: This Isn't Just About Compliance

Ladder safety isn't a "check the box" issue. It's about ensuring that everyone who climbs a ladder at your facility goes home at the end of the day.

Now is the time to assess, plan, and implement smarter fall protection for your fixed ladders. Because the longer you wait, the greater the risk and the more pressure on your budget. **OKS**

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