



SAFETY DIRECTOR BULLETIN



FALL PROTECTION: UNDERSTANDING WARRANTY REQUIREMENTS

Employers that use fall protection equipment (e.g., personal fall arrest systems and connection components) should understand the manufacturers' warranty requirements and instructions. Following warranty requirements is often necessary if the employer would like the manufacturer to cover the product when it is damaged or if there is an issue with the equipment functioning properly.

Equipment manufacturers' warranty instruction manuals play a vital role in workplace safety because both the Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI) rely on these manuals to develop their standards on the proper use of equipment. The instructions also include the manufacturers' requirements that express the particular and proper use of their equipment.

In general, employers that follow manufacturers' instructions are protected by equipment warranties. Conversely, employers that do not follow manufacturers' instructions face the risk of voiding warranty protections. Without warranty protections, employers have fewer legal options against manufacturers under product liability policies.

WHAT ARE PFAS?

Personal fall arrest systems (PFAS) are made up of a body harness, anchorage, and connectors used to safely stop a worker who is falling. Under OSHA standards, employers are required to train their employees on the requirements of PFAS. Training is also frequently required by the manufacturer to honor the product's warranty. Employees must understand the performance, care, and use criteria for the fall arrest systems they are using. Each manufacturer of PFAS has different requirements for their warranties.

GENERAL WARRANTY REQUIREMENTS

General warranty requirements include instructions meant to keep the equipment in the best shape possible during use. This is why the owner's manual normally provides instructions on how to care for and maintain the fall protection equipment. The manual will also explain how to inspect and clean the equipment if it becomes dirty. Manufacturers have specific ways of cleaning PFAS that the user must follow to prevent voiding the warranty.

If employees are using PFAS that are designated specifically for them and they label their equipment, employees need to check the manufacturing manual to determine whether there are any specific requirements when using markers to label the equipment (e.g., a manufacturer suggests only using Sharpie markers for writing on the webbing of their products).

OSHA and ANSI do not provide shelf-life recommendations for fall protection. The shelf life of fall protection is up to the manufacturer and will be found in the manual that comes with the equipment. Shelf-life warranties have changed over the years. Most fall protection equipment had a product lifetime of five years from the date of first use or when it was purchased. Some manufacturers have eliminated the five-year shelf life and instead, consider the condition of the equipment. Other manufacturers eliminate the five-year shelf life if the equipment passes pre-use and periodic competent-person inspection requirements as outlined in the guidelines.

USING DIFFERENT BRAND ACCESSORIES OR COMPONENTS

Employers need to be aware that, when purchasing a particular brand of fall protection, they may be required to purchase the same brand of fall protection accessories to maintain the warranty. Manufacturers may not allow the use of other brand accessories with their equipment. While OSHA does not have a standard prohibiting the use of

different brands as long as the components are compatible, the agency has published an information bulletin on the subject. The [OSHA Compatibility of Personal Fall Protection System Components](#) includes this advisory information:

- Personal fall protection made by different manufacturers may not be compatible.
- Components by the same manufacturer may not be compatible if the components are not sized properly.

OSHA requires that employers evaluate the compatibility of all fall arrest systems and anchorage devices before the devices are used to protect employees. Employers should carefully read the manufacturer manuals and the warnings to pay close attention to components that are incompatible for use together.

Using different brands of fall protection with different brand accessories could create liability issues for the employer if there is an accident while using the equipment. The manufacturer likely will not allow the warranty to cover any accident liability if the user does not follow the manual instructions. Manufacturers normally do not honor another manufacturer's product, and they are not required to test the compatibility of any other brands with their own. Therefore, it is best practice to use the same brand for all of their fall protection equipment to prevent any mixing and matching of brands.

INSPECTION REQUIREMENTS

Inspecting fall protection equipment is very important for employee use. Employers must ensure that employees are inspecting their equipment when it is required. If an employee finds anything that would negatively affect the integrity of the equipment, it must be removed from service.

Inspections include visual and touch inspections on the webbing of the harness for things such as:

- Cuts, nicks, tears, fraying, abrasions, and broken fibers.
- Missing straps or issues with the stitching.
- Mildew or brittleness.
- Hard or shiny spots indicate heat damage.
- Uneven webbing thickness indicating it was possibly worn during a fall.

Also, the manufacturer's label needs to be present and legible, or the equipment must be removed from service.

Both OSHA and the manufacturer require that certain inspections be completed by a competent person. A competent person is an employee who is capable of identifying existing and potential hazards in any personal fall protection system (or any component of the fall protection) and who has the authorization to take prompt, corrective action to eliminate the identified hazards. Employers must designate who their competent persons are.

IN THE EVENT OF A FALL

Anytime PFAS are subjected to impact loading, PEOSHA requires an employer to remove them from service immediately. PFAS should not be used again for employee protection until a competent person inspects them and determines they are undamaged and suitable for use.

Repairs to fall protection can only be done by the manufacturer unless the manufacturer authorizes others to make the repairs on their behalf. Review the manufacturer's manual before having repairs made by a third party.

Employers need to have fall protection written plans that review OSHA requirements, ANSI standards, and the manufacturer's instructions. By following the requirements of the brands of fall protection being used, employers can prevent voiding their warranties.