



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

September 17, 2018

U.S. Department of Labor
Occupational Safety and Health Administration
Attn: Ms. Loren Sweatt, (Room S-2315)
Deputy Assistant Secretary of Labor for Occupational Safety and Health
200 Constitution Ave NW
Washington, DC 20210

REQUEST FOR ASSISTANCE **FALL PROTECTION MANAGEMENT**

Dear Deputy Assistant Sweatt:

The American Society of Safety Professionals (ASSP) is asking for your agency's assistance in raising awareness in business and industry of the need to implement, manage and enhance an organizational fall protection management program. The feedback we have received from our membership and OSH professionals overall is that having such a program is a sound initiative backed by good science and sound technology.

OSHA is now attending ANSI/ASSP Z359 meetings, and the agency's insight has been invaluable in creating national consensus standards and technical reports designed to protect workers at height from falls. In addition, OSHA has done an outstanding job with its Fall Protection Stand-Down, and ASSP is pleased to participate in that initiative via engagement of our members and the ANSI/ASSP Z359 Fall Protection Committee. The Stand-Down has gone a long way in raising awareness of important fall protection issues such as acceptable weight ranges, certified/non-certified anchorages, and the overall need to wear and utilize proper equipment.

However, we believe additional and stronger support is required to emphasize the need for organizations to develop and implement an overall comprehensive fall protection management program. Organizations with multiple sites, or



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

whose workers encounter diverse fall protection/restraint hazards and exposures have asked ASSP for more guidance in managing an overall fall protection management program. Such a program should also be part of an overall OSH management system, which we know is an effective approach to reducing workplace risks, protecting workers and improving business outcomes worldwide

Recently, we created an ASSP Managed Fall Protection Certificate Program and the response has been very positive. Fall protection/restraint is specifically noted in both the ANSI/ASSP Z10 Occupational Health and Safety Management Systems Standard and in the newly approved American adoption of the ISO 45001 (OHSMS) Standard. While the standards note the importance of fall protection, much more guidance is needed on the importance of managing such a program.

Current data supports our position that more needs to be done on the issue of fall protection management. Data from the Bureau of Labor Statistics (BLS) indicate that fall fatalities rose from 800 in 2015 to 849 in 2016. And, it is important to note that this number is 30% higher than it was in 1995, the year after CFR 1926 Subpart M was published. As another comparison, the United Kingdom had only twenty-five fall-related fatalities, according to the Health and Safety Executive (HSE) in its last annual report. This is disturbing when we consider the fact that the United Kingdom population is approximately 20% of the population in the United States. While OSHA regulations and the ANSI/ASSP standards ensure that hundreds, if not thousands, of workers return home safely, falls are not tracking with the decrease in overall workplace fatalities since 1995.

ASSP and the Z359 committee are well positioned within business and industry and around the world to incorporate lessons and best practices to prevent fall related incidents.

We are specifically requesting enhancement from OSHA to:

- Include more information and focus on the concept of comprehensive fall protection program management in the next Stand-Down. Perhaps we



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

could conduct a joint complimentary webinar as a way to generate awareness of this issue.

- Provide a response from OSHA stating that it agrees with ASSP's position that investment in fall protection program management is a worthy investment for organizations.
- Publish an OSHA guidance statement recognizing the importance of fall protection program management and its benefits to organizational performance.
- Include fall protection program management on the [OSHA Quick Card for Fall Protection](#) in General Industry.
- Consider specifically referencing ANSI/ASSP Z359.2, "Minimum Requirements for a Comprehensive Managed Fall Protection Program," in OSHA 1929 and 1910. This would be similar to OSHA's 1910.6 (l) reference to the Construction Management Association of America, (CMAA).
- Include the Z359 and A10 standards on OSHA's fall protection safety and health topics page, in the section titled "Additional Resources". While we understand that OSHA does not want to create a never-ending list of ANSI standards, these standards are particularly relevant due to their specific and significant impact on fall protection, fall restraint and the overall concept of fall protection program management.

Conclusion

In addition, we suggest that OSHA consider participating in our Z359 Fall Protection Forum during the June 2019 Professional Development Conference in New Orleans. We historically have solid attendance at this event and OSHA participation would be beneficial.



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

We would be pleased to meet with you or members of your staff to discuss these requests and explain why they will advance fall protection and fall restraint on a national basis. Such a meeting could be held either at OSHA in Washington, DC, in conjunction with our Z359 meeting in Chicago during the week of November 4th, or via a webinar coordinated by ASSP.

Thank you for your attention to this matter. If you have any questions or concerns, please feel free to contact the Society per the additional enclosed contact information.

Respectfully Submitted,

Rixio Medina, CSP, CPP
President, ASSP

Copy To: ASSP Board of Directors
ASSP Governmental Affairs Committee
ASSP Standards Development Committee
ANSI/ASSP Z359 Committee