

DEPARTMENT OF CONSUMER & BUSINESS SERVICES
Oregon Occupational Safety & Health Division

MEMORANDUM

Date: April 18, 2003
Revised: June 4, 2007
To: All OR-OSHA Staff

From: Marilyn Schuster, Manager
Standards & Technical Resources

Subject: Warning lines for other than roofing work

QUESTION (1): Can you use warning lines as a fall protection system to protect employees for other than roofing work when the standards do not specifically address their use?

RESPONSE: No. Other trades cannot use warning lines as a fall protection system. This provision is exclusive to roofers as noted in [1926.502\(f\) and 437-003-1502](#).

QUESTION (2): Can warning lines be used as an awareness barrier for other trades?

RESPONSE: Yes, depending on a variety of circumstances.

BACKGROUND: OR-OSHA reviewed memos, interpretations, the preamble to the federal fall protection standard, federal and other state policies, communications issued by OR-OSHA dealing with warning lines, safe work distances and other closely related subjects.

The conclusion was that if there is no exposure to an unprotected side or edge, there is no violation of a standard. Since there is no designated distance that defines a safe working distance, both OR-OSHA staff and employers need to thoroughly evaluate all relevant factors to determine that safe working distance and whether it is safe to use a warning line to eliminate exposure. When there is exposure to a fall the employer must ensure that fall protection systems are provided, installed, and used according to the criteria in 1926.502.

All OR-OSHA field staff are trained and encouraged to use their professional judgment to evaluate the need for and adequacy of fall protection for elevated work locations. In order to exercise this professional judgment the following conditions must be evaluated.

When a safe work distance is designated and used in conjunction with a warning line, control line or barricade, it must be one that eliminates the potential for the worker to stumble and fall over the unprotected edge. There must be a margin of error included in the distance since there is not a positive means of stopping the worker's forward momentum toward the unprotected edge.

Factors that enter into an evaluation of distance and placement of the warning line include weather conditions, lighting, the slope and condition of the walking surface, the kind of work being performed, materials being handled and the training and supervision of the workers.

For both agency staff and stakeholders the guiding principle to follow when evaluating warning lines is that the distance from the unguarded edge of the work surface must be great enough to remove the worker from exposure to a fall hazard and at a minimum 10 feet.

ACTION: Effective the date of this memo the following will apply:

1. If after evaluating all relevant factors, OR-OSHA field staff determine that a fall hazard has been mitigated by eliminating exposure to the fall through the proper use of warning lines, control lines, barricades or by the location of the work activity, then that method will be considered to be in compliance.
2. Warning lines will only be evaluated by the criteria in 437-03-1502 (1) and (2) 1926.502(f) if they are being used in the specific circumstances addressed by the standard.
3. When there is exposure to a fall hazard then conventional fall protection systems, which fulfill the basic obligation of 1926.502, must be used where feasible, or where not feasible, then alternatives, as provided for in the standard, must be used.

Professional judgment on the part of the compliance officer, consultant and employer representatives is very important when evaluating any alternative fall protection system, especially warning line systems used for other than roofing work. In order for a fall protection violation to be alleged, there must be exposure to a fall hazard.