

**OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION  
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**

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**PROGRAM DIRECTIVE**

Program Directive A-142  
Issued August 5, 1983  
Revised May 29, 2018

**SUBJECT:** Ladders: Fixed Ladders Used Only for Emergency Evacuations

**AFFECTED STANDARDS/**

**DIRECTIVES:** [Division 2/D, Walking – Working Surfaces, 1910.28\(b\)\(9\)\(i\)\(A\) – \(D\)](#)  
[Division 3/X, Stairway and Ladders, 1926.1053\(a\)\(18\) and \(19\)](#)

**PURPOSE:** To establish Oregon OSHA’s position on the applicability of fall protection requirements under 1910.28(b)(9)(i)(A) – (D) and 1926.1053(a)(18) & (19) for fixed ladders used only for emergency evacuations.

**BACKGROUND:** The requirements of 1910.28(b)(9)(i)(A) – (D) and 1926.1053(a)(18) & (19) for personal fall arrest systems, ladder safety systems, self-retracting lifelines, cages, or wells could cause employee exposure to hazards associated with situations that require emergency evacuation. The additional time to locate and put on a body harnesses and connect to a personal fall arrest systems or ladder safety system would delay egress and could potentially expose employees to greater hazards. Also, cages and wells can interfere with equipment used by firefighters and other emergency responders. For these reasons, Oregon OSHA will not enforce these rules for fixed ladders used **ONLY** for emergency access or egress.

Offset and landing platform requirements for fixed ladders with cages or wells under 1910.28(b)(9)(iii) and 1926.1053(a)(19)(iii) are not effected by this program directive.

**ACTION:** Employers must have effective controls to ensure that non-compliant fixed ladders are only used during emergency evacuations unless appropriate fall protection systems are effectively used. Barricades or signs are adequate in conjunction with employee training to prevent non-emergency use.

Compliance officers must evaluate fixed ladder compliance and determine employee use:

- If employees are not effectively prohibited from using non-compliant fixed ladders for other than emergency egress without effective fall protection, cite the applicable fixed ladder rule that addresses the violative condition. In such situations, the employer may abate the hazard by developing and implementing effective controls to ensure use of the fixed ladder is strictly limited to emergency egress
- If non-compliant fixed ladders are not used by employees for any reason other than emergency egress, and the employer has not developed and implemented effective controls to ensure use of the fixed ladder is strictly limited to emergency egress, cite 437-01-0760(1)(b)(C) or issue a hazard letter, depending on what other available means of egress are available to employees.

**EFFECTIVE  
DATE:**

This directive is effective immediately and will remain in effect until canceled or superseded.

**History:** Issued 8-5-1983 Revised 7-18-2000, 1-29-2013, and 5-29-2018