



Risk Insights

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Understanding Fall Protection Equipment Warranty Requirements

Employers that are using fall protection equipment (e.g., personal fall arrest systems, connection components or anchors) should understand the manufacturers' warranty requirements and instructions. Following these warranty requirements is often necessary if the business would like the manufacturer to cover the product when it is damaged or if there is a functional issue. Examples of functional issues are when the fall protection fails to protect the employee when they fall or if a component of the fall protection (e.g. webbing, harness straps or buckles) needs repair.

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' own requirements that express the particular and proper use of the 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 connector. This equipment is 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 that are meant to keep the equipment in the best shape possible during use. This is why the 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. Certain 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, it is important for employees 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 used to have 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 competent-person inspection requirements as outlined in the guidelines.

Environmental Risks

Every year businesses are faced with stricter environmental guidelines, meaning more environmental liabilities exist. Some types of environmental liabilities the acquired company could face in the future are pollution, mold and hazardous materials in air, in water or on land. It's important to pinpoint early any exposures for the company being acquired. Here are some ways to manage environmental risks:

- Environmental impairment liability insurance covers any vulnerabilities due to the void in general liability policies for pollution coverage.
- Risk remediation cost containment insurance can cover any cost overruns that weren't expected during pollution cleanup.
- Premises pollution liability insurance covers the costs of both off-site and on-site cleanup and remediation, as well as third-party lawsuits brought on because of hazardous material exposure.

Using Other 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 [safety and health bulletin](#) 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 since it is not their product and they are not required to test the compatibility of any other brands with their own.





Therefore, it is best practice and in the best interest of the employer 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 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 and tears
- Fraying and abrasions
- Missing straps
- Mildew
- Brittleness
- Broken fibers
- Hard or shiny spots indicating heat damage
- Uneven webbing thickness indicating it was possibly worn during a fall
- Issues with the stitching

Additionally, 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 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, OSHA regulations require 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.

Making 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 prior to having repairs made by a third party.

It is important for employers to have fall protection 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.





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