

Understanding the Need for Fall Protection on Low Slope Roofs (Non-Construction Activities)*

Historically, there's been confusion about the Occupational Safety and Health Administration (OSHA) fall protection requirements when working on low slope (4:12 pitch or less) roofs. OSHA's 2016 revision to their Walking-Working Surfaces standard detailed here helps to clarify the requirements.

To understand when and what fall protection is necessary, you need to answer these questions:

Step 1: Is the roof a pitch of 4/12 or less?

- a) If no, you must be protected by a guardrail, safety net, travel restraint, or personal fall arrest system.
- b) If yes, continue to Step 2.

Step 2: What is the reason for being on the roof?

- a) If you're on the roof simply to inspect, investigate, or assess the workplace conditions **prior** to the start of or **after** all work has been completed, fall protection isn't required unless systems have already been installed and are available for workers to use for pre-work and post work inspections, investigations, or assessments.
- b) If you're on the roof to perform non-construction work, continue to Step 3.

Step 3: How far from the roof edge is the work you'll be performing?

- a) If less than six feet, you must be protected by a guardrail, safety net, travel restraint, or personal fall arrest system.
- b) If at least six feet but less than 15 feet:
 - a. And work is **both** infrequent and temporary, then a designated area can be used. See *LC1639*: *Requirements for Designated Areas* for more information.
 - i. **Infrequent:** Work performed only on accession, such as equipment breakdown, on an occasional basis, or at sporadic or irregular intervals. Monthly or less frequent maintenance of equipment is infrequent. Work occurring more than once per month is considered frequent.
 - ii. **Temporary:** Duration of task is brief or short. The task takes less time to perform than it would take to set up a fall protection system. Task is completed at one time, rather than requiring multiple trips to the roof or across more than one work shift.
 - b. All other work requires a guardrail, safety net, travel restraint, or personal fall arrest system.
- c) If 15 feet or more:
 - a. Implement and enforce a work rule prohibiting employees going within 15 feet of the roof edge without using fall protection.
 - b. If work **both** infrequent and temporary, no fall protection is required.
 - c. All other work requires a designated area or a guardrail, safety net, travel restraint, or personal fall arrest system.

^{*}Source material taken from www.osha.gov.



