

## Compatibility of Fall Protection Components

OSHA 29 CFR 1926.502 Subpart M Appendix C Section II states:

https://www.osha.gov/pls/oshaweb/owadisp.show\_document?p\_table=standards&p\_id=10925

(c) "Component compatibility considerations." Ideally, a personal fall arrest system is designed, tested, and supplied as a complete system. However, it is common practice for lanyards, connectors, lifelines, deceleration devices, body belts and body harnesses to be interchanged since some components wear out before others. The employer and employee should realize that not all components are interchangeable. For instance, a lanyard should not be connected between a body belt (or harness) and a deceleration device of the self-retracting type since this can result in additional free fall for which the system was not designed. Any substitution or change to a personal fall arrest system should be fully evaluated or tested by a competent person to determine that it meets the standard, before the modified system is put in use.

OSHA 29 CFR 1910.140 Subpart I Appendix C – Personal Fall Protection Systems Non-Mandatory Guidelines states:

https://www.osha.gov/pls/oshaweb/owadisp.show\_document?p\_table=STANDARDS&p\_id=1294

(d) Component compatibility considerations.

Ideally, a personal fall protection system is designed, tested, and supplied as a complete system. However, it is common practice for lanyards, connectors, lifelines, deceleration devices, body belts, and body harnesses to be interchanged since some components wear out before others. Employers and employees should realize that not all components are interchangeable. For instance, a lanyard should not be connected between a body harness and a deceleration device of the self-retracting type (unless specifically allowed by the manufacturer) since this can result in additional free fall for which the system was not designed. In addition, positioning components, such as pole straps, ladder hooks and rebar hooks, should not be used in personal fall arrest systems unless they meet the appropriate strength and performance requirements of part 1910 (e.g., §§ 1910.140, 1910.268 and 1910.269). Any substitution or change to a personal fall protection system should be fully evaluated or tested by a competent person to determine that it meets applicable OSHA standards before the modified system is put in use. Also, OSHA suggests that rope be used according to manufacturers' recommendations, especially if polypropylene rope is used.

The mixing of manufacturer's equipment is also outlined in ANSI Z359.6-2016 section 4 paragraph 4.2.2:

"Compatibility. All directly connected components of an active fall protection system shall be compatible, such that they perform as intended and cannot unintentionally disengage on their own during the use of the system or during a fall event. Equipment and hardware for all components of an active fall protection system shall be specified to provide compatible connections. Combining equipment from different manufacturers is permitted as long as the components are compatible."

Since ANSI Z359.6-2016 is a national consensus standard, and compliance is not required by law, users have the responsibility to determine if the standard is applicable to their workplace. They may also wish to consult their insurance carrier or their legal counsel regarding their liability and their company's liability if they choose to use safety equipment in a manner inconsistent from what is advised by the manufacturer.

## 3M Personal Safety Division

There are no statements by OSHA prohibiting the mixing of manufactures fall arrest products such as full body harnesses, energy absorbing lanyards and self-retracting devices. However, a good practice is to ensure that all sub components of a PFAS (personal fall arrest system) are compliant with equivalent standards.

Regarding "Engineered Fall Protection Systems" such as horizontal lifelines, where calculated safe working clearances have been provided for the system, or vertical lifeline systems where a fall arrester and rope lifeline are tested and certified as a compatible system, 3M, as well as other manufacturers, may impose restrictions regarding substituting or mixing components from different manufacturers within those systems.

3M legacy fall protection products and Capital Safety fall protection products (manufactured under DBI and Protecta brand names) meet applicable industry performance standards and regulatory requirements including OSHA and ANSI. As a result, 3M approves the combination of 3M legacy fall protection products and Capital Safety fall protection products, subject to a "Competent Person" review by the employer or user to verify component compatibility and to approve compliance of the assembled system with applicable standards and requirements for such systems.



## (i) IMPORTANT NOTE

Refer to the 3M User Instructions provided with your product for additional information.

3M.com/FallProtection