

Regulatory Update

Regulation – Questions from the Industry: 3,600 Pound Gate Strength Requirements for Snap Hooks and Carabiners used in 1926 Construction Industry

June, 2017

As a result of a November 17, 2016 publication of OSHA's final rule on General Industry Walking and Working Surfaces, questions and concerns have been circulating the fall protection industry regarding some of the specific regulatory changes and how this may impact the 29 CFR 1926 Construction Industry. One concern in particular is the direction regulated by OSHA General Industry 29 CFR 1910.140 mandating the use of snap hooks and carabiners designed with 3,600 pound gate strengths.

Let's take a look at the historical timeline of the product standards and regulatory requirements addressing the 3,600 pound gate strength requirements.

- November 2007, ANSI/ASSE Z359.1-2007 increased the design and performance requirements for snap hooks and carabiners used in personal fall arrest systems to incorporate 3,600 gate strengths.
- October 13, 2009, OSHA published letter #20070920-8808 directing that it would enforce the 3,600 pound gate strength requirement under the General Duty Clause. This would align with the hardware design requirements established by ANSI/ASSE Z359.1-2007 requiring the load that a gate face must be able to withstand be increased from 220 pounds to 3,600. Similarly, ANSI Z359.1-2007 §4.3.1.1.3 increased the load that the side of the gate must be able to withstand from 350 pounds to 3,600.
- September 30, 2010, OSHA published letter # 20100427-9737 directing that letter 20070920-8808 regarding the 3,600 pound gate compressive strength requirement be rescinded. Complaints were registered with OSHA that the ANSI/ASSE Z359.1-2007 standard was a voluntary consensus standard and was only applicable to General Industry environments and that the ANSI/ASSE A10.32 standard addressed the Construction sector, which does not require the 3,600 pound gate strengths.

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=27512

- Since OSHA rescinded letter 20070920-8808 in 2010, ANSI/ASSE A10.32 (Construction Standard) in affect at the time has been revised from A10.32-2004 revision where it directed 220 pound gate face (section 7.4.3.1) and 350 pound side gates (section 7.4.3.2) to the current ANSI/ASSE A10.32-2012 revision published October, 2012. This new ANSI/ASSE A10.32 standard became effective January 14, 2013 and mandates under section 6.2.1 that connectors shall comply with the requirements established under ANSI/ASSE Z359.
- It is the interpretation of 3M Fall Protection that under the written direction of OSHA, employers must comply with the requirements established within ANSI/ASSE A10.32. This standard with its most recent revision of 2012, requires that all snap hooks and carabiners used in personal fall arrest systems be designed to meet the design and performance requirements of ANSI/ASSE Z359 which requires 3,600 pound gate strengths for snap hooks and carabiners.
- This direction by OSHA indicates that all snap hooks and carabiners require 3,600 pound gate strengths. This directive is applicable to all General Industry 29 CFR 1910 and Construction Industry 29 CFR 1926 environments where personal fall protection equipment and systems are used.

If you have any questions or require any assistance on this subject, please contact 3M Fall Protection Technical Service Department at 800-328-6146.

Additional information on OSHA's rule on walking-working surfaces and personal fall protection systems can be found at www.osha.gov/walking-working-surfaces