

OSHA Instruction STD 1-1.12  
June 20, 1983  
Office of Compliance Programming

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SUBJECT: Application of 29 CFR 1910.27, Fixed Ladders, to Fixed Ladders Used in Emergency Situations

- A. Purpose. This instruction clarifies the meaning of 29 CFR 1910.27 as it applies to the protection of employees exposed to falling from fixed ladders used only as a means of escape from fire and other emergency situations.
- B. Scope. This instruction applies OSHA-wide.
- C. Reference. OSHA Instruction STD 1-1.3, October 30, 1978, originally dated January 18, 1977.
- D. Action. Regional Administrators and Area Directors shall ensure that the interpretative guidelines given in this instruction are addressed when inspecting sites with fixed ladders used only during fire and other emergency situations.
- E. Federal Program Change. This instruction describes a Federal program change which affects State programs. Each Regional Administrator shall:
1. Ensure that this change is forwarded to each State designee.
  2. Explain the technical content of the change to the State designee as requested.
  3. Ensure that State designees are asked to acknowledge receipt of this Federal program change in writing, within 30 days of notification, to the Regional Administrator. This acknowledgment should include a description either of the State's plan to implement the change or of the reasons why the change should not apply to that State.
  4. Review policies, instructions and guidelines issued by the State to determine that this change has been communicated to State program personnel. Routine monitoring activities (accompanied inspections and case file reviews) shall also be used to determine if this change has been implemented in actual performance.
- F. Background. OSHA has historically established that the requirements of 29 CFR 1910.27 for cages, platforms, or similar fall prevention protection devices are not appropriate for fixed ladders on structures where the fixed ladders are used only as a means of access by fire fighters, other emergency personnel, or escape for employees in fire and other emergency situations. Sometimes these ladders are not provided with employee protection as presently required in 29 CFR 1910.27, when they are intended to be used only in an emergency. In these circumstances, it is sometimes more hazardous to install a cage, well, landing platform or ladder safety device pursuant to the standard than it is not to comply. A cage or well, etc., may interfere with fire fighting or other rescue equipment, or employee escape from fire or other emergency situations.

G. Guidelines. This instruction provides performance criteria for fixed ladders used only as a means of access for fire fighters and other emergency personnel, or escape for employees in fire and other emergency situations.

1. Employers must establish and implement adequate administrative controls such as barricades and signs to prevent nonemergency use of fixed ladders which are meant for fire fighter use and emergency escape only.
2. In the event the employer does not provide adequate administrative controls such as barricades or signs and employees use an emergency ladder for other than its intended purpose, the employer may be appropriately cited under 29 CFR 1910.27.
3. Fixed ladders not equipped with cages, landing platforms, ladder safety devices, or other forms of employee protection, in some situations may be allowed as a means of access for fire fighters and other emergency personnel, or escape for employees in fire and other emergency situations. These guidelines are provided because it may be more hazardous to comply with 29 CFR 1910.27 than not to comply.

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