

Advisory on Fall Protection for Challenge Course Workers

It appears that OSHA Regulation 29 CFR 1910.28 and 29 CFR 1910.140 concerning fall protection are being interpreted to apply to challenge course workers. This will impact BSA challenge course and zip line operations for both paid and volunteer staff members. Staff members working on surfaces where a fall of more than 4' can occur must be protected by one or more of the following methods:

1. **Guardrails.** When guard rails are used, the top rail must be at least 42" above the walking surface and have mid-rails between the top rail and the working surface. Well-designed climbing towers may already have guardrails on working surfaces.
2. **Safety Nets.** Safety nets should be positioned to adequately protect workers from injury if they fall, and allow prompt retrieval of the worker from the net following a fall.
3. **Travel Restraint Systems:** When working on elevated work platforms with unprotected edges, these systems limit the travel of the worker to eliminate the possibility of falling over the edge of the platform. Employing travel restraint systems may allow the use of seat harnesses which are currently in common use by staff and participants at camps.
4. **Personal Fall Protection System:** When it is not feasible to use travel restraint systems, personal fall protection systems may be used. Full body harnesses are required. When the free fall potential is limited to 2' or less, the harness may be connected to the sternum attachment on the harness. This feature is important because it still allows the worker to self-rescue in the event of a fall.
5. **Personal Fall Arrest System:** In rare cases, facility design or operation may not allow free falls to be limited to 2' or less. In these cases, the best course of action is to re-design the facility or operations so that personal fall protection systems or travel restraint systems can be used. When re-design is not feasible, personal fall arrest systems must be used with a dorsal connection to a full body harness. The free fall potential must be limited to 6' or less, the maximum deceleration distance must be limited to 3.5' or less, and the maximum force on the worker must be limited to 1800# or less. The dorsal attachment on the full body harness probably eliminates self-rescue in the event of a fall.