



# MIOSHA Fact Sheet

## Construction Safety & Health Division

### Scissor Lift Attachments

#### Background:

In the past, the MIOSHA Construction Safety and Health Division had granted variances from [Part 32](#) Aerial Work Platforms that allowed employers alternative methods to gain additional height in a self-propelled elevating work platform (scissor lifts only) for use in areas where the aerial lift could not reach due to overhead obstructions, provided several stipulations were adhered to. The two specific rules pertaining to the variance were:

**Rule 3216 (3)** states: “The guardrail system of the platform shall not be used to support any of the following:

- (a) Materials.
- (b) Other work platforms.
- (c) Employees.”

**Rule 3216 (4)** states: “Employees shall maintain firm footing on the platform while working on the platform. The use of railings, planks, ladders, or any other devices on the platform for achieving additional height is prohibited.”

#### New Policy:

Over the past several years the aerial work platform manufacturers have designed many new attachments and made significant changes to equipment that are now available to employers for accessing those “hard to reach” areas. In light of these new products, variances from Rules 3216 (3) and 3216 (4) are no longer needed when using manufacturer-approved attachments and equipment, in addition to following the manufacturer’s restrictions, instructions and warnings. ***If a manufacturer does not allow planking to gain additional height when working from one of their scissor lifts, employers should seek an alternative option for reaching the work.*** Different size and types of aerial work platforms can be rented and/or purchased from many manufacturers. Scaffolding and one-person aerial work platforms can alternatively be used for unique situations. See Rule 3216 (1) below.

**Rule 3216 (1)** states: “The aerial work platform shall be used only in accordance with the manufacturers or owners operating instructions and safety rules.”

Employers should contact the manufacturer first to determine whether or not a scissor lift can withstand the vertical and lateral loads imposed in the event a fall occurs. Most of the scissor lifts on the market today are equipped with designated anchor points having a safety factor of 5000 pounds. However, even though an anchor point may be rated for a personal fall arrest system, the scissor lift itself may not. Not all manufacturers or owners allow fall restraint and/or a personal fall arrest system to be secured to these attachment points or other parts of the lift. Many scissor lifts are only rated for fall/travel restraint systems which may be capable of supporting only 1,000 pounds...this is significantly less than the 5,000 pound requirement for attaching a personal fall arrest system! See Rules 3214 (1) and 3214(2) for requirements on fall arrest systems and restraint devices.

**Rule 3214 (1)** states: “The employer shall provide a safety harness that has a lanyard which is in compliance with construction safety standard Part 45 "Fall Protection," R 408.44501 to R 408.44502 and which is affixed to attachment points provided and approved by the manufacturer. Any occupant of an aerial work platform described in the provisions

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(Revised • August 3, 2015)

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of R 408.43202(a) and (c) and figures 1 and 3 shall use the harness. *A fall arrest system shall only be used where the aerial lift is designed to withstand the vertical and lateral loads caused by an arrested fall.*”

**Rule 3214 (2)** states: “An employee may use a body belt with a restraint device with the lanyard and the anchor arranged so that the employee is not exposed to any fall distance. *An employee shall use a restraint device where the aerial lift cannot withstand the vertical and lateral loads imposed by an arrested fall.*”

**Conclusion:**

Ultimately the employer is responsible for determining the appropriate aerial lift to use, which type of fall protection systems are allowed by the manufacturer, and then provide their employees with the appropriate training and equipment based on the configuration of the manufacturer’s/owner’s specifications for the specific piece of equipment.

**The previous MIOSHA Fact Sheet: “Scissor Lifts – Alternatives for Compliance” has been rescinded.**

For additional assistance, please contact the Construction Safety and Health Division at 517-284-7680 or the Consultation Education and Training Division at 517-284-7720. Construction Safety Standards and other information can be viewed on the MIOSHA website at [www.michigan.gov/miosha](http://www.michigan.gov/miosha).

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(Revised 08/24/2015)

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