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Technical Bulletin

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Self-Retracting Devices — Inspection and Servicing Guidelines Canada

Background

Servicing and the inspection of mechanical fall protection devices, such as Self Retracting Devices (SRDs) often referred to as Self Retracting Lifelines (SRLs) or Self Retracting Lanyards, are important requirements of any effective fall protection safety program. The service frequency and inspection requirements as well as the person responsible for these actions are all critical items on a fall protection safety regimen. All fall protection equipment, including SRDs, must be inspected before each use. If inspection reveals a defective condition, the SRDs must be removed from use and serviced appropriately.

Servicing Frequency

Servicing frequency is dependent on the applicable country or local codes or regulations that are in effect for that specific region where the SRD is in use. The work environment, the type of work being performed, and the frequency of use are some of the factors that will determine how often the SRD shall be serviced. The following frequency information should be viewed as minimum requirements.

United States

There are no mandatory requirements for servicing frequency in OSHA regulations or ANSI standards. The manufacturer's guidelines for servicing must be followed according to ANSI Z359.14-2014. 3M Fall Protection's guidelines indicate that SRDs must be inspected before each use and also have the units inspected by a competent person. The frequency of the competent person inspections is based on the type and conditions of use (see ANSI Z359.14 and manufacturer's instructions regarding details of the competent person inspections). If a unit fails inspection, the SRD must be withdrawn from use and serviced by an authorized service centre or the manufacturer.

Canada

The Canadian Standards Association (CSA) Standard CSA Z259.2.2-17 requires SRDs to be returned to the manufacturer or manufacturer-approved agent for validation based on a schedule published in the Standard. Inspection must be performed before each use and failure to do so will initiate a requirement for inspection by a competent person. Failure of a competent person to carry out an inspection or an inspection failure carried out by a competent person shall initiate product validation or disposal. Validation shall be carried out based on a "Type of Use" schedule provided in the Standard under paragraph 8.2, Table 1. The competent person shall select the Type of Use category each SRD falls within.

Products that are not subject to the validation process include:

1) SRDs that are considered non-repairable.
2) SRDs that are not designed for disassembly where an internal inspection is not possible without rendering the product unserviceable.
3) The manufacturer shall provide a service life and any other inspection criteria in the user instructions.

Table 2
Inspection and revalidation
(See Clause 8.2.)

Inspection requirements for self-retracting devices					
Type of use	**Application examples**	**Example conditions of use**	**Worker inspection frequency**	**Competent person inspection frequency**	**Product revalidation frequency**
Infrequent to light	Rescue and confined space, factory maintenance	Good storage conditions, indoor or infrequent outdoor use, room temperature, clean environments.	Before each use	Annually	At least every 5 years but not more than intervals required by the manufacturer.
Moderate to heavy	Transportation, residential construction, utilities, warehouse	Fair storage conditions, indoor and extended outdoor use, all temperatures, clean or dusty environments.	Before each use	Semi-annually to annually	At least every 2 years but not more than intervals required by the manufacturer.
Severe to continuous	Commercial construction, oil and gas, mining, foundry	Harsh storage conditions, prolonged or continuous outdoor use, all temperatures, dirty environment.	Before each use	Quarterly to semi-annually	At least annually but not more than intervals required by the manufacturer.

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Countries with CE Standard Compliance

CE standards state that fall arrest equipment such as SRDs must be periodically examined at least every 12 months by a competent person other than the user.

3M SRDs with Fall Indicator (or External Absorber Pack)

The competent person performing the visual examination must decide:

- If the SRD passes this inspection, then visual inspection allows the device to continue to be used for another period.
- If the SRD doesn't pass this inspection and if the unit can be opened up (repairable), the SRD must be sent to a 3M technician or authorized service center for repair and service. In the case of a non-repairable unit, the SRD must be removed from use.

3M SRDs Without Fall Indicator (or Without External Absorber Pack)

- The competent person must be a 3M technician or authorized service centre technician, performing a service and visual examination.
- This service and visual examination allows the device to continue to be used for another period.

Australia / New Zealand

Australian / New Zealand requirements AS/NZS 1891.4. Frequency of service as recommended by the manufacturer must be at least once every 5-years and must be conducted by a height safety equipment inspector, or, in the absence of a manufacturer recommendation, the equipment must be serviced at least once every 12 months.

3M recommends the following:

- Inspection by a height safety operator before and after each use.
- Six (6) month inspection by a height safety equipment inspector.
- Inspection and necessary service required by manufacturer after a fall arrest event.
- Necessary service and re-inspection required by manufacturer after failing an inspection.
- Inspection and necessary service required by manufacturer after 5 years.

Inspection Requirements and Summary by Standard/Regulation

The information identified in the regulations or standards listed below address inspections as follows:

OSHA 1910.140

- Remove impacted systems and components.
- Inspect systems prior to use.

OSHA 1926.502

- Remove impacted systems and components.
- Inspect systems prior to use.

ANSI Z359.14-2014

- Comply with manufacturer's instructions.
- Inspect SRD after subjected to fall arrest. Inspected by user prior to use.
- Competent Person inspection at intervals based on type and conditions of use.

CSA Z259.2.2-17

- Follow manufacturer's instructions.
- Inspect before each use. Failure to inspect initiates a validation.
- Validation of product mandatory based on schedule provided in the CSA Standard.

CE EN365:2004

- Inspect prior to use. Periodic examinations by a competent person must be done at least every 12 months, in accordance with the Manufacturer's instructions.

AS/NZS 1891.4

- Inspection by a height safety operator before and after each use. Six (6) month inspection by a height safety equipment inspector.

IMPORTANT NOTE: Competent Person definition (USA): a person who is capable of identifying hazardous or dangerous conditions in the personal fall arrest system or any component thereof, as well as in their application and use with related equipment.

Ref. OSHA 1910.66 App. C.

Height safety equipment inspector definition: A person who is competent in the skills needed to detect faults in height safety equipment and to determine remedial action. AS/NZS1891.4:2009

3M Personal Safety Division
3M Canada
3M Fall Protection Business
260 Export Blvd.
Mississauga, ON L5S 1Y9
Technical Service: 800-387-7484
3M.ca/FallProtection

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