Recently, a client asked us if fall protection railings are required on a loading dock that is more than four feet high. Our answer may surprise you.

Our Recommendation

After a comprehensive review of several documents, including proposed OSHA rules and publications, we advised our client to install railings on loading docks that are six feet or higher.

While we still recommend railings on loading docks that are shorter than six feet, the railing must be installed in such a way as not to impede workflow. Personnel working on a loading dock must have adequate fall prevention training—and no one should be on the loading dock unless necessary. It is not an appropriate place for work breaks.

OSHA Regulations

General Duty Clause. Employers will furnish “a place of employment … free from recognized hazards that are causing or are likely to cause death or serious physical harm.” This is the duty of care required of all employers and is relied upon when an OSHA regulation lacks clarity or detail. It is also the reason we recommend that our clients consider installing chains or railings on any active loading dock.

OSHA 1910.178(m)(6) Powered Industrial Trucks. This regulation requires that “a safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock.” However, it does not define that safe distance.

OSHA 1917.112 (b)(1), Marine Terminals, Guarding of Edges. “Guardrails shall be provided at locations ... which present a hazard of falling more than 4 feet or into the water.” However, it goes on to say, “Guardrails are not required at loading platforms and docks.”

OSHA 1926.500 Safety and Health Regulations for Construction, Fall Protection. This regulation applies to construction sites only.

Other Guidelines

OSHA Publication 3220-10N, 2004 Pocket Guide Worker Safety Series Warehousing. This publication comes closest to addressing the question directly: “[A]reas that employees could fall 4 feet or more or walk off should be chained off, roped off or otherwise blocked.” However, the use of the term “should” indicates that this is a guideline, not a requirement.

OSHA Proposed Rulemaking on Walking and Working Surfaces: April 1990. Published but never fully adopted, this proposal was referenced in a December 1997 Standards Interpretation letter and states: “employers would not be required to install guardrail systems on the working side of platforms, such as loading docks, where the employer can demonstrate that the presence of guardrails would prevent the performance of work.”

OSHA Standards Interpretation (2005). Although specific to construction, this standards interpretation directly addresses the question at hand and should thus be considered. It calls for guardrails to be installed for fall heights of six feet, unless work is conducted six to ten feet from the edge.

OSHA Proposed Standard for Walking-Working Surfaces (May 2010). The proposed standard indicates that guarding is needed on loading docks for heights of 4 feet or more, unless people work an undefined distance away from the edge. But there is an exception. If guardrails are infeasible, work may be done without guardrails if the work is in process, only authorized employees have access, and authorized employees are trained.

CAL-OSHA Subchapter 7, General Industry Safety Group 1, Standard Specifications §3210: Guardrails at Elevated Locations. California often leads the pack and has more detailed regulations. It states that guardrails are not needed at “loading or storage platforms which are used primarily for loading or unloading railroad cars or trucks.”

ANSI Standard A12.1264.1 Safety Requirements for Workplace Floor, Wall Openings, Stairs + Railings. The American National Standards Institute states that loading docks are an exception for required fall protection. Height limitations are not specified.