

CSA Revalidation Schedule for SRDs

Overview

This bulletin seeks to clarify the revalidation schedule for Self-Retracting Devices (SRDs) relating to changes in the CSA Z259.2.2 standard from 1998 to 2017.

Background

In 1998, CSA Z259.2.2-98 was published with the following revalidation schedule for SRDs:

7.1.5 Type 1 Devices

Type 1 (SRL) Devices shall bear the following warning or similar wording:

WARNING: This device shall be removed from service when subjected to a fall.

7.1.6 Type 2 and 3 Devices

Type 2 and 3 devices shall bear a warning indicating the following:

WARNING: This device shall be removed from service when the visual load applicator is deployed.

All Type 2 and 3 devices shall be returned to the manufacturer or manufacturer-approved service agent no more than 2 years after the date of the manufacture for inspection and maintenance, and annually thereafter. The manufacturer shall record the findings of this service and label the product with the next annual service date.

Type 1 SRDs (3 meters length or shorter) were to be labeled with a warning that they should be removed from service if subjected to a fall. Type 1 SRDs were not required to have a fall indicator, and no revalidation was required because the SRD could be used indefinitely provided it passed inspections. Type 1 SRDs were not typically repairable and would be scrapped if no longer passing inspection or subject to a fall. Type 2 and 3 SRDs (greater than 3 meters in length and typically attached to an anchor instead of user) were required to be inspected and revalidated by the manufacturer within two years of manufacture and then annually inspected and maintained by the manufacturer.

In 2017, CSA published the updated version of the standard, CSA Z259.2.2-17, where there was a different revalidation requirement system. SRDs were to be inspected and serviced by the manufacturer according to the following inspection table, Table 2, from the standard:

Table 1: 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.

Type of use	Application examples	Example conditions of use	Worker inspection frequency	Competent person inspection frequency	Product revalidation frequency
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.

Thus, the standard changed to put the onus of determining the revalidation schedule on the end user. In addition, the revalidation schedule was to be determined based on the conditions of use.

Guidance

The change in the standard has led to some confusion as to how often SRDs should be revalidated by the manufacturer. The intent of this bulletin is to provide some clarity on how end users should make this decision for their 3M manufactured SRDs.

- For those SRDs that were manufactured prior to 2017 and certified to the 1998 standard, the revalidation schedule from CSA Z259.2.2-98 should be followed.
- For SRDs that were manufactured after 2017 and certified to the 2017 standard, the revalidation schedule from CSA Z259.2.2-17 should be followed.
- Some SRDs that were manufactured prior to 2017 and certified to the 1998 standard have since been sent in for repair and
 revalidation to a 3M Authorized Service Centre (ASC). Those SRDs may have been repaired in such a way, with new
 components, that they meet the requirements of CSA Z259.2.2-17. These SRDs would have been labelled with a 2017 label
 before being sent back to the end user. In this case, since the SRD now conforms to the 2017 requirements, the revalidation
 schedule from CSA Z259.2.2-17 should be followed.



For these products, CSA has not published any documentation commenting on the process of taking an SRD that was manufactured to the 1998 standard and upgrading it with components to meet the 2017 standard. 3M is documenting what components were replaced and is validating that the products being sent back to the end user meet the 2017 standard.



Please also note that 3M does not provide SRL service and repair parts for products with 5 years of discontinuation or longer.



Personal Safety Division

3M Center, Building 235-2W-70 St. Paul, MN 55144-1000 3M PSD products are

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3M Canada P.O. Box 5757 London, Ontario N6A 4T1 In United States of America

Technical Service: 1-800-243-4630 Customer Service: 1-800-328-1667

3M.com/workersafety

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