

## Public Comment on OSHA's Proposed Heat Standard

To OSHA and Concerned Stakeholders,

As health professionals working in Texas, we collectively support the Occupational Safety and Health Administration's (OSHA) proposed rule titled *Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings*. Given the escalating temperatures and the increasing frequency of extreme heat events tied to climate change, it is crucial to implement proactive measures to safeguard the health and safety of our workforce, especially those in outdoor and high-heat environments.

Extreme heat poses serious health risks, including heat exhaustion, heat stroke, and other heat-related illnesses, which can lead to severe complications and, in some cases, fatalities. Workers in agriculture, construction, and manufacturing are among the most vulnerable, with these risks disproportionately impacting low-income and minority communities who often work in the most exposed and high-risk roles.

In Texas, heat-related health emergencies are a growing concern. Each year, thousands of cases of heat-related illnesses are reported among Texas workers, with construction and agricultural workers disproportionately affected. Recent reports highlight instances where young workers, exposed to relentless heat without adequate rest or cooling measures, have collapsed or even died. These tragic incidents underscore the urgent need for stronger protections.

In rural Texas, particularly in areas such as the Rio Grande Valley, agricultural workers face some of the highest heat risks. Many of these workers, often from Hispanic communities, work extended hours in extreme temperatures with limited access to shaded rest areas or cooling. The indoor sector is also affected, as warehouse and factory workers in poorly ventilated, high-temperature environments suffer from elevated rates of heat exhaustion and heat stress.

To ensure comprehensive protection for workers, we recommend that OSHA consider including the following provisions, which align with best practices advocated by national health organizations, including Physicians for Social Responsibility:

**Heat Illness Monitoring:** Begin monitoring for heat-related symptoms at a heat index of 80°F.

**Buddy System:** Implement a buddy system during acclimatization periods to support vulnerable workers.

**Rest Breaks:** Increase the frequency and duration of rest breaks as heat conditions rise.

**Medical Screening and Confidentiality:** Screen workers for heat stress risk factors with confidentiality provisions like OSHA's Silica and Beryllium Standards.

**Written Heat Illness Plans and Small Employer Support:** Require all employers to develop written plans available in multiple languages and provide templates for small employers to ensure compliance.

**Co-Exposure Preparation:** Address combined risks from heat and other stressors, such as smoke, which can worsen heat stress when protective equipment is required.

These measures, in addition to those outlined in OSHA's proposed standard, represent essential steps to prevent heat-related illnesses, protect productivity, and promote economic stability by ensuring workers remain healthy and able to work safely.

We urge OSHA to finalize and enforce the proposed heat standard with robust, clear, and enforceable guidelines. The standard should include provisions for comprehensive training and education on heat risks and safety measures, clear criteria for implementing protective actions, and strong mechanisms to hold employers accountable.

As health professionals who live and work in Texas, we witness the toll that extreme heat takes on our communities, our patients, and our colleagues. We are committed to advocating for policies that protect the health and safety of our state's workforce. We commend OSHA for taking this important step and look forward to the implementation of a strong and effective heat protection standard for workers across the nation.

Signed,

[Insert List of Health Professionals]