



**Testimony of the National Safety Council
to the
Occupational Safety and Health Administration
at the
Heat Illness and Injury Prevention Standard Informal Hearing
June 16, 2025**

Delivered by: Anthony Abron, Government Affairs Manager

Deputy Assistant Secretary Laihow and staff of the Occupational Safety and Health Administration:

My name is Anthony Abron and I'm here today representing the National Safety Council. The National Safety Council is America's leading nonprofit safety advocate – and has been for over 110 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace and roadway. Our more than 13,000 member companies and federal agency partners represent employees at nearly 41,000 U.S. worksites. Thank you for allowing us to testify today in support of the Occupational Safety and Health Administration's proposed Heat Illness and Injury Prevention Standard.

As stated in our public comments, occupational heat hazards are becoming more prevalent in the United States and throughout the world. According to NSC Injury Facts, exposure to environmental heat resulted in 5,770 Days Away from Work, Job Restriction or Transfer (DART) cases, including 4,910 Days Away from Work (DAFW) cases in 2021 and 2022. Industries that face these hazards at a higher rate include the transportation, construction, and manufacturing industries. It is well within the remit of OSHA to finalize a standard to ensure workers do not get sick or sustain fatal injury due to burdensome heat exposure.

Heat is not slowing down as a topic of environmental and occupational concern. At both the state and federal levels, lawmakers and regulators are putting forth policies to address this risk. This month Congresswoman Yassamin Ansari introduced the Extreme Heat Economic Study Act in the U. S. House of Representatives. Among other things, the bill would require an economic study to look at workers compensation data focused on employee heat-related claims and existing research on labor productivity losses associated with extreme heat. States such as California, Oregon, Colorado, Minnesota, Washington, and Maryland have implemented occupational heat stress standards with other states pursuing legislation to implement their own.

Most employers want to do the right thing and protect their workforce. Workplace injuries and fatalities cost the United States economy over \$173 billion dollars in 2023. There is both a moral and economic imperative to mitigate or eliminate hazards that lead to occupational injuries and fatalities.

Specific to the proposed Heat Illness and Injury Prevention Standard, NSC believes the following items:

1. Workers experiencing temperatures of 80°F or higher should receive shade, rest and water to protect against occupational injury and illness due to heat.
2. A rest break in shade for 15 minutes every two hours with potable water available makes sense for worker protection under a high heat environment.
3. The length and frequency of rest breaks should increase as heat exposure increases over recommended or regulated limits – which is supported by the *Heat Stress Management in Construction and Demolition Operations ANSI consensus standard*.
4. Some acclimatization process for new workers and workers returning to the jobsite after 14 days or more away is important and critical for their safety and health.
5. Supervisors and managers should receive the same training as front-line workers and additional training on emergency procedures, such as taking heat-related measurements, emergency response, and emergency first aid.
6. Employees with personal medical conditions may be adversely affected by exposure to high heat.
7. Nonphysical risk factors, such as physiological stresses from work performed, add to a worker's overall heat load.

As an expert in delivering OSHA-required training and partnering with employers on strengthening their safety health and management system processes, the National Safety Council also believes OSHA has additional work to perform so the proposed standard is workable for businesses. These areas include:

1. OSHA providing examples of what would be considered an acceptable exposure in an environment exceeding the initial heat trigger for 15 minutes or less in any 60-minute period. NSC believes there may be temperatures that are too high where any exposure would invoke an occupational illness or injury.
2. For companies with multiple locations, work outdoors and/or jobsites that change frequently, consistent site-specific monitoring for the heat illness and injury prevention plan may be problematic and ultimately costly to an employer.
3. An employer with multiple worksites might find difficulties in designating a coordinator for each worksite. OSHA should provide alternative compliance-related protocols an employer can use that would still meet the intentions of the coordinator role in the proposed standard.
4. OSHA should outline in the final standard whether employers can make their own acclimatization schedule and the proper guidelines it must follow.
5. The proposed standard should clearly address the use of PPE designed to provide cooling.

NSC hopes that the testimony provided here today is valuable to OSHA as it endeavors to finalize its Heat Illness and Injury Prevention Standard. NSC supports the implementation of this standard as it will save lives in workplaces across the country.