**Federal OSHA Heat Forum Public Stakeholder Meeting**

**PRR Public Comment: May 3, 2022**

Hello and thank you for the opportunity to speak today. My name is Helen Cleary and I’m the Director of The Phylmar Regulatory Roundtable, PRR. We are an Occupational Safety and Health Forum with members from various industries, including aerospace, apparel, biopharma, energy, manufacturing, telecommunications, technology, and utilities. Individual members are EHS professionals.

Today we offer three points for OSHA to consider regarding the Heat Illness Prevention rulemaking.

**First, Scope -**

While we generally **support a federal standard** that addresses heat illness prevention, our experience is that it is *essential* that a well-crafted federal standard, **focus on the industries, work tasks and regions that create the greatest risk.**

OSHA has already identified high-risk industries and is following this approach in the recently launched NEP.

We also believe that there is not sufficient research to **support a broad federal standard applicable to all workers, workplaces, and geographies**.

We strongly encourage OSHA to collect and analyze data currently available from other agencies and groups to *fill those gaps* in information related to heat stress in *occupational settings.*

**Second, this should be a Performance-based Standard**

**Current heat illness detection methods have limited effectiveness***.* Individual monitoring is more effective in detecting and preventing heat stress than currently available environmental and ambient condition monitoring techniques.

The Heat index does not consider individual workers or workplaces and the tools *currently available*, are limited, complex and resource intensive. Work environments are dynamic and heat stress is influenced by a multitude of contributing factors, as identified by OSHA in the ANPRM.

Due to these challenges and based on PRR member experience, we believe a federal standard should be performance-based and focused on prevention through water, rest, shade, and employee education – like OSHA’s heat campaign.

We acknowledge these are simple solutions for a hazard that is extremely complex. However, with the data, tools, and understanding of heat stress to the industrial worker that is available *today*, it is the most effective approach for a federal standard for all workers.

Also, all included elements should be determined based on research and data that demonstrates a direct correlation of the control, to actual reductions in heat stress and improvement to the health of each worker impacted.

**Finally,** a federal standard should allow and encourage employers and employees the *option* to use technologies, such as wearables, that measure and mitigate heat stress.

We acknowledge there are several barriers to resolve before these solutions become practical and feasible for every employer.

However, **technologies that monitor individual health and performance will continue to develop and become more accessible**.

The **application of new technologies in occupational settings *will* positively impact worker health.** It is already happening and it’s very exciting.

It is imperative that OSHA has a forward-thinking approach and considers integration of *future innovations* that may be utilized by the worker and employer.

Thank you for your time today. We recognize this is a complex area and appreciate OSHA’s thoughtful approach to involve stakeholders.

We look forward to more opportunities to engage as OSHA proceeds with its rulemaking.