



November 8, 2024

The Honorable Douglas Parker
Assistant Secretary of Labor
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

RE: Extension Request Related to Comment Period on Notice of Proposed Rulemaking for Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings (RIN 1218-AD39)

Dear Mr. Parker:

The Coalition for Workplace Safety (CWS) requests that the Occupational Safety and Health Administration (OSHA) extend the deadline for comments on its Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule until March 31, 2025, in order to provide the regulated community with adequate time to analyze the proposal and prepare comments that will help the agency in its development of a final rule.

The CWS is comprised of associations and employers who believe in improving workplace safety through cooperation, assistance, transparency, clarity, and accountability. The CWS believes that workplace safety is everyone's concern. Improving safety can only happen when all parties – employers, employees, and OSHA – have a strong working relationship.

OSHA's proposed rule is lengthy and complicated and, if implemented, would be the most sweeping regulation ever issued by OSHA. It would require significant changes to many workplaces across the economy and the nation. Many members of the CWS are still working with their companies to assess what impact the proposed standard would have, which means, despite a longer than usual comment period, additional time is needed to develop a full understanding of it. Moreover, the current comment period deadline falls during the holiday season when many workers are taking time off, which will make finalizing comments more difficult.

In light of these circumstances, CWS urges OSHA to extend the comment period to March 31, 2025. Thank you for your consideration of this request.

Sincerely,

Coalition for Workplace Safety