



November 9, 2021

The Honorable Douglas Parker  
Assistant Secretary for Occupational Safety and Health  
US Department of Labor  
200 Constitution Ave, NW  
Washington, DC 20210

RE: Extension Request for the Comment Period on RIN: 1218-AD39, Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings

Dear Assistant Secretary Parker:

The Coalition for Workplace Safety (“CWS”) respectfully requests an extension to the comment period on the Occupational Safety and Health Administration’s (“OSHA”) Advanced Notice of Proposed Rulemaking (“ANPRM”), Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings, which was published in the Federal Register on October 27, 2021. CWS and many of its member associations intend to comment on the ANPRM. OSHA’s current 60-day comment period, however, poses challenges for stakeholders seeking to provide thoughtful, accurate responses to the numerous questions posed in the ANPRM. CWS, therefore, urges the agency to consider doubling the comment period to 120 days, extending it through February 2022.

CWS is a coalition of trade associations and companies focused on establishing reasonable and responsible workplace safety standards across the country. We base our efforts on five key principles – cooperation among all parties, assistance from OSHA to educate the employer community on workplace safety, transparency from OSHA on the data, science, and studies used to develop its safety regulations, clarity within safety regulations to best ensure compliance, and accountability among all stakeholders for their roles in protecting the workforce.

As it currently stands, OSHA has provided only 60 days for the public to provide input on its proposal, which includes over 100 questions that will require resource-intensive research and data collection. To provide OSHA with comprehensive, accurate, and meaningful input, stakeholders need ample time to analyze the ANPRM, collect the relevant information and data, and compile thoughtful comments for the agency to consider. For this reason, CWS strongly urges OSHA to provide an additional 60 days to the comment period.

Thank you for your consideration of this matter.

Sincerely,

American Bakers Association  
American Coke and Coal Chemicals Institute



American Composites Manufacturers Association  
AmericanHort  
American Frozen Food Institute  
American Foundry Society  
American Mold Builders Association  
American Pipeline Contractors Association  
American Pyrotechnics Association  
American Road & Transportation Builders Association  
American Trucking Associations  
Associated Builders and Contractors  
Associated General Contractors of America  
Distribution Contractors Association  
HARDI - Heating Air-conditioning & Refrigeration Distributors International  
Independent Electrical Contractors  
Industrial Fasteners Institute  
Industrial Minerals Association – North America  
Institute of Makers of Explosives  
International Dairy Foods Association  
International Foodservice Distributors Association  
International Warehouse Logistics Association  
Manufactured Housing Institute  
Mechanical Contractors Association of America  
National Automobile Dealers Association  
National Association of Chemical Distributors  
National Association of Home Builders  
National Association of Wholesaler-Distributors  
National Christmas Tree Association  
National Club Association  
National Cotton Ginners Association  
National Demolition Association  
National Grain and Feed Association  
National Lumber and Building Material Dealers Association  
National Propane Gas Association  
National Ready Mixed Concrete Association  
National Restaurant Association  
National Retail Federation  
National Tooling and Machining Association  
National Utility Contractors Association  
Non-Ferrous Founders' Society  
North American Die Casting Association  
North American Meat Institute  
Power and Communication Contractors Association  
Precision Machined Products Association



Precision Metalforming Association  
Reusable Industrial Packaging Association  
Tree Care Industry Association  
US Chamber of Commerce