



Heat/Smoke Rulemaking Comment

To: Oregon Occupational and Health Safety Administration
From: United Food and Commercial Workers Local 555
Date: February 22nd, 2022

We thank you for the opportunity to testify today on the set of proposed rules. United Food and Commercial Workers Local 555 is the largest private sector labor union in Oregon, representing workers from a number of industries, including grocery, retail, food processing, manufacturing, and healthcare. We are a diverse group of workers who take pride in acting as a strong collective voice for working people. Over the last 2 years, our members have worked through a global respiratory pandemic, hazardous air quality due to wildfire smoke, ice storms, and an unprecedented heat dome causing temperatures to reach more than 116 degrees Fahrenheit.

Exposure to wildfire smoke and excessive heat have serious, lasting health impacts, including increased risk of respiratory and cardiovascular disease, kidney failure, heat stroke, or even death. Oregon workers on the frontlines of the climate crisis—particularly those who work outside or in non-temperature controlled indoor environments—bear the brunt of these impacts. Extreme heat killed at least three workers last year. During that same heat dome, there were over 100 deaths in Oregon due to heat illness, hundreds more emergency room visits, and 254 complaints submitted to Oregon OSHA between June 24 and 28th alone— just for excessive heat exposure.

The disproportionate harm that excessive heat and smoke have on essential Oregon workers is unconscionable, unacceptable— and entirely preventable. We urge you to strengthen protections for Oregon workers from extreme heat and wildfire smoke, and in doing so, specifically urge you to:

1. **FOLLOW THE SCIENCE:** OSHA must adopt rules that are based in sound science and public health expertise. This means adopting science-based temperature thresholds that rely on “heat index” as a measure, and smoke thresholds that follow Air Quality Index health risk levels. Specifically, I urge you to:
 - a. **Maintain** protections from extreme heat that rely on “heat index” as a measure, and are triggered at 80 degrees F, with high heat procedures triggered at 90 degrees F. I also urge you to maintain requirements to provide workers access to shade or alternative cooling measures and an adequate supply of cool drinking water, and additional paid preventative cool-down breaks in the shade.
 - b. **Eliminate** exemptions for certain categories of work: The current draft heat smoke rules exempt “light work” from key protections. This exemption is not based in health/safety research and science. All workers should be provided access to shade and water.

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