

VIRGINIANS SUPPORT HEAT PROTECTIONS FOR WORKERS

Hundreds of Virginia workers visit the emergency room or miss at least one day of work each year because of heat-related illness.¹ Since 2015, construction and manufacturing workers have made up the greatest share of heat-related hospitalizations and deaths reported by Virginia employers.² However, anyone who is regularly exposed to extreme heat on the job runs the risk of health problems, ranging from mild cramps to death.³

Commonsense safeguards could help protect the health of these workers and improve their productivity on the job.⁴ However, neither the commonwealth nor the federal government has a workplace heat standard that explicitly requires essential protections such as written heat illness prevention plans, heat training for workers and supervisors, or scheduled and paid preventative cooldown breaks.⁵ The lack of a specific

heat standard puts workers in danger of preventable harm every time the temperature soars, which is happening more frequently as Virginia's climate heats up.⁶ In June 2025, a severe heat wave set a new record for reported heat-related health illnesses across the state, with 828 people visiting emergency rooms and urgent care clinics over just four days.⁷



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VIRGINIA POLICYMAKERS SHOULD PROTECT WORKERS BY ADVANCING A STRONG, ENFORCEABLE WORKPLACE HEAT STANDARD FOR THE COMMONWEALTH

Virginians agree. In August 2024, the federal Occupational Safety and Health Administration (OSHA) proposed the first-ever national standard to protect workers from heat.⁸ People around the country then had five months to submit a public comment on the proposal. More than 540 service workers, health professionals, elected officials, and other residents of the commonwealth weighed in, with more than 8 in 10 broadly in favor of the proposal (see methods, below).

Here's just some of what they had to say.

“The heat in a truck can get above 120 degrees. The sun coming in the windshield and the heat from the engine compound with the outside temperature to make driving unbearable ... The sweat that runs down a [driver's] face and burns their eyes creates a hazard for anyone traveling the same highway. Companies are not compliant with making sure the [air conditioning] is working in their trucks and they expect their drivers to be on the road, not parked under a tree.”

CYNTHIA D., TRUCK DRIVER, NEWPORT NEWS

“Several years ago, I took care of a young man in his late 20s a week after he was discharged from the hospital after nearly losing his life to extreme heat. It was during the hot humid days of summer [and] his colleagues brought him to the emergency room in a panic when he passed out at work. He was found to be extremely dehydrated, suffering from acute kidney injury, and experiencing mental status changes manifested with confusion and ultimately loss of consciousness. Fortunately, the emergency care provided to him reversed these serious medical problems and he recovered.”

KRUPAL S., INTERNAL MEDICINE PHYSICIAN, FAIRFAX

“I'm sick tonight ... after pulling heavy materials without [acclimatization]. I don't feel well enough to work tomorrow, but I can't afford to take a day off. I did inform my supervisor that I felt overheated, but he asked me to continue with the work causing my dizziness, nausea, head and muscle aches.”

SUSAN B., INDOOR WORKER, SUFFOLK



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“I respect OSHA regulations [because] I was a Safety Manager for a supermarket that had to make numerous changes because of their own dangerous working conditions. Without those regulations, my job would have been much harder. But at least I was in a position to have water and breaks when I needed them.”

DOUGLAS W., FORMER SAFETY MANAGER, FAIRFAX

“I am tired of literally drinking a gallon of water per shift. Feeling like I am dying from temperature.”

TROY C., RESTAURANT WORKER, VIRGINIA BEACH

“I have learned from my own experience working as a farm hand that heat exhaustion is no laughing matter. Workers suffering from heat exhaustion often are too incoherent to realize how quickly their health deteriorates. Businesses taking away the benefit of humane working conditions means that workers will bear the full cost of their injury, while their employer benefits from not providing anything more than they are legally required to.”

JAMES B., FORMER FARMWORKER, WINCHESTER

“I have worked in multiple restaurants and have experienced coworkers vomiting, sweating profusely, and losing their balance from overheating and a lack of proper air circulation and cooling.”

MAX C., RESTAURANT WORKER, RICHMOND

“Having worked for five years as a self-employed house painter in the 1980s, I experienced first-hand the effects of heat. Though I was able to control my work hours and breaks, I still twice suffered heat stroke during my years in this work (both outdoors and indoors). Many of my fellow painters who worked for companies did not enjoy the same controls I did over their work conditions, and they suffered even more than I did. Such suffering is wholly preventable and is good business: An injured worker cannot work.”

ARTHUR K., FORMER HOUSE PAINTER, WILLIAMSBURG

“Both my partner and my father are two hardworking men that spend 10+ hours a day outside for their jobs, and I constantly worry about their safety and the negative impacts that the heat can have on their health.”

CRISTINA G., CONCERNED VIRGINIA RESIDENT

The future of OSHA’s proposed heat standard is currently unclear, particularly given the current U.S. Department of Labor’s priority of repealing existing labor standards and worker protections.⁹ But regardless, it takes OSHA an average of seven years to move a rule from introduction to implementation, and workers can’t wait for federal policymakers to finish the job they started.¹⁰

Given the lack of urgent action at the federal level, Virginia’s leaders should show workers they’re ready to protect them from preventable harm by moving immediately to develop a statewide heat standard.

Methods: We downloaded all publicly available comments for Document OSHA-2021-0009-4761 using the bulk download tool on Regulations.gov.¹¹ OSHA restricted access to thousands of comments due to the inclusion of personal information, including more than 13,000 comments from NRDC members and supporters.¹² We combined the unpublished NRDC data with the 20,674 public records, and then removed duplicate commenters from the combined database. Finally, we reviewed the unique comments from Virginia and coded each one as “in support,” “in opposition,” or “mixed/unclear.” For more methodological detail or a copy of the underlying dataset, please contact NRDC at workers&heat@nrdc.org.

Thank you to Jeremy Hoffman for his review of this text.

ENDNOTES

- 1 Virginia Department of Health, “Heat-Related Illness Surveillance,” accessed September 11, 2025, <https://www.vdh.virginia.gov/surveillance-and-investigation/syndromic-surveillance/hri-surveillance/>; Bureau of Labor Statistics, “Biennial Nonfatal Case and Demographic Numbers and Rates: Virginia, DAFW Cases, All Ownerships, All Industry, Exposure to Environmental Heat, 2021–2022,” accessed September 11, 2025, <https://data.bls.gov/multi-screen?survey=cb>; Peter Braun et al., “A Heat Emergency: Urban Heat Exposure and Access to Refuge in Richmond, VA,” *GeoHealth* 8, no. 6 (2024): e2023GH000985, <https://doi.org/10.1029/2023GH000985>.
- 2 NRDC calculations from Occupational Safety and Health Administration (hereafter OSHA), “Severe Injury Reports: Virginia, 2015–2025,” accessed September 11, 2025, <https://www.osha.gov/severe-injury-reports>; OSHA, “Investigation Summaries: Virginia Offices, 2015–2025,” accessed September 11, 2025, <https://www.osha.gov/ords/imis/accidentsearch.html>. We did not include postal workers or other heat-exposed federal workers because they would not be protected by state-level heat standards.
- 3 Juanita Constible et al., *On the Frontlines: Climate Change Threatens the Health of America’s Workers*, NRDC, June 2020, <https://www.nrdc.org/resources/frontlines-climate-change-threatens-health-americas-workers>.
- 4 BlueGreen Alliance and NRDC, “Economic Benefits of Workplace Heat Standards,” March 2025, <https://www.bluegreenalliance.org/wp-content/uploads/2025/03/Economic-Benefits-of-Workplace-Heat-Safeguards.pdf>.
- 5 BlueGreen Alliance, “Checklist for a Model Heat Illness Prevention Rule,” April 2025, <https://www.bluegreenalliance.org/wp-content/uploads/2025/04/BGA-Checklist-for-a-Model-Heat-Illness-Prevention-Rule.pdf>.
- 6 Jeremy S. Hoffman et al., “Ch. 22. Southeast,” in *Fifth National Climate Assessment*, Allison R. Crimmins et al., eds., U.S. Global Change Research Program, 2023, Washington, DC, https://www.southernclimate.org/wp-content/uploads/NCA5_Ch22_Southeast.pdf.
- 7 NRDC calculation from Virginia Department of Health, “Heat-Related Illness Surveillance: Daily Heat-Related Illness, June 23–June 26, 2025,” accessed September 11, 2025, <https://www.vdh.virginia.gov/surveillance-and-investigation/syndromic-surveillance/hri-surveillance/>.
- 8 OSHA, “Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings Rulemaking,” accessed August 11, 2025, <https://www.osha.gov/heat-exposure/rulemaking>.
- 9 Frida Garza, “A Long-Awaited Rule to Protect Workers From Heat Stress Moves Forward, Even Under Trump,” *Grist*, July 28, 2025, <https://grist.org/labor/federal-workplace-heat-protections-osha-temperature-regulation-trump-farmworkers/>.
- 10 U.S. Government Accountability Office, “Workplace Safety and Health: Multiple Challenges Lengthen OSHA’s Standard Setting,” April 2, 2012, GAO-12-330, <https://www.gao.gov/products/gao-12-330>.
- 11 OSHA, “Proposed Rule: Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings,” August 30, 2024, <https://www.regulations.gov/document/OSHA-2021-0009-4761>; Regulations.gov, “Bulk Data Download,” accessed July 21, 2025, <https://www.regulations.gov/bulkdownload>.
- 12 Margaret Tran Ramadhar, Natural Resources Defense Council (NRDC), “Public Comment: Document OSHA-2021-009-4761, (13,421 Individual Comments),” OSHA, posted January 16, 2025, <https://www.regulations.gov/comment/OSHA-2021-0009-22508>.