

From: Carol Parker <carolamesparker@gmail.com>

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Subject: Support for Heat Illness Prevention Regulation 16 VAC 25-210

To: <jay.withrow@doli.virginia.gov>

Dear Jay Withrow,

I am an occupational health specialist retired from the Federal EPA in the Office Pesticide Programs with over 30 years of experience in regulations and programs developed to protect pesticide handlers and farmworkers. I urge you to implement a Health Illness Prevention Regulation, 16 VAC 25-210.

There is no shortage of support for regulations to insure workers are protected from heat related illness, injury and death. ***Despite large communication and education programs by OSHA and related to preventing health stress dating back to the 90s by both EPA and OSHA, there still have been 69,374 workers seriously injured and 783 workers who have died from heat stress during that period. This is not enough.*** Agricultural workers who often do long hours of strenuous work in the heat and humidity are particularly susceptible. These are the people who feed our nation and should be protected.

As you have outlined in your comprehensive and thoughtful regulatory proposal, a heat illness prevention program should include the basics of water, shade breaks and training on what to do in an emergency. ***Training should be for labor contractors and farm managers, as well as for workers,*** so the correct measures are done to both prevent and treat heat related illness. CA, WA and MN already have these standards.

EPA already requires agricultural workers and pesticide handlers to be trained by their employers on preventing pesticide related illnesses and what to do in case of an emergency. ***Heat stress reduction training could be piggybacked on these pesticide safety training requirements.*** The EPA Agricultural Worker Protection Standard does not exempt small farms (like the OSHA exemption). Training programs are already being done successfully by several farmworker education programs partnering with employers to provide the training (like the Association of Farmworker Opportunity Programs).

On final thought, I think there should be additional research into the impact of piece work and the lack of incentive to stop work to drink water or take rest breaks. Making rest/shade/water breaks mandatory under certain heat conditions should be investigated.

Thank you for taking on this serious issue. I urge that you move forward to protect workers from heat related illness.