



January 11, 2022

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 comment period, however, poses challenges for stakeholders seeking to provide thoughtful, accurate responses to the numerous questions posed in the ANPRM. Consequently, while CWS appreciates OSHA’s extension to January 26th, we ask that you consider extending the comment period by an additional 30 days, through February 2022, to give stakeholders time to provide thoughtful responses to the ANPRM.

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 90 days, much of which fell over the holidays, 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 30 days to the comment period.

Thank you for your consideration of this matter.

Sincerely,
American Bakers Association
American Coke and Coal Chemicals Institute

American Mold Builders Association
American Pipeline Contractors Association
American Trucking Associations
Associated Builders and Contractors
Distribution Contractors Association
Flexible Packaging Association
IAAPA, The Global Association for the Attractions Industry
Independent Electrical Contractors
Industrial Fasteners Institute
Industrial Minerals Association – North America
International Dairy Foods Association
International Warehouse Logistics Association
Manufactured Housing Institute
National Association of Home Builders
National Automobile Dealers Association
National Club Association
National Cotton Council
National Cotton Ginners Association
National Demolition Association
National Ready Mixed Concrete Association
National Retail Federation
National Stone, Sand & Gravel Association
National Tooling and Machining Association
National Utility Contractors Association
Non-Ferrous Founders' Society
North American Die Casting Association
North American Meat Institute
Plastics Pipe Institute
Portland Cement Association
Power and Communication Contractors Association
Precision Machined Products Association
Precision Metalforming Association
Reusable Industrial Packaging Association
TRSA, The Line, Uniform and Facility Services Association
U.S. Chamber of Commerce