As a safety professional in the industrial manufacturing sector, I am committed to ensuring the well-being of our workforce. However, I have significant concerns regarding the proposed New Mexico Environment Department (NMED) Heat Illness and Injury Prevention Rule. While the intention to protect workers from heat-related illnesses is commendable, the proposed regulations will introduce challenges that will impact both safety and operational efficiency.

**1. Lack of Flexibility for Diverse Work Environments**

The proposed rule mandates uniform requirements, such as specific rest breaks and acclimatization schedules, triggered at a heat index of 80°F. This one-size-fits-all approach does not account for the varied conditions present in different industrial settings. For instance, indoor manufacturing facilities often have controlled environments, and imposing the same standards as outdoor worksites may not be appropriate. Flexibility is crucial to tailor heat illness prevention measures effectively to specific workplace conditions.

**2. Operational and Economic Impact on Manufacturers**

Implementing the proposed measures, such as providing shaded rest areas and conducting regular heat exposure assessments, will impose substantial costs on manufacturers. OSHA estimates that compliance with similar federal standards could cost companies $7.8 billion nationwide. For small to medium-sized manufacturers, these costs could be particularly burdensome, ultimately affecting their competitiveness and sustainability.

**3. Redundancy with Existing Safety Protocols**

Many manufacturing facilities already have comprehensive heat illness prevention programs tailored to their specific operations. The proposed rule will duplicate existing efforts, leading to unnecessary administrative burdens without significantly enhancing worker safety. Moreover, the requirement to maintain detailed records for five years could divert resources from proactive safety initiatives.

**4. Potential for Reduced Compliance Due to Overregulation**

Overly prescriptive regulations may lead to reduced compliance, as employers struggle to meet stringent requirements that may not align with their operational realities. A more flexible, performance-based approach could encourage broader adoption of effective heat illness prevention strategies, fostering a culture of safety without imposing undue constraints.

**Recommendation**

I strongly exhort the NMED to reconsider the proposed rule and engage with industry stakeholders to develop a more adaptable framework. By focusing on performance-based outcomes and allowing employers to implement context-specific measures, we can achieve the shared goal of protecting workers from heat-related illnesses while maintaining operational efficiency.