

Comments Submitted by John MacNeill

National Safety Director, Utility Workers Union of America (UWUA)

Re: Support for New Mexico OSHA Proposed Heat Illness Prevention Rule

On behalf of the Utility Workers Union of America (UWUA), I am writing to express strong support for the New Mexico Occupational Health and Safety Bureau's proposed heat illness prevention rule. As the National Safety Director for UWUA, I represent thousands of utility workers across the United States, including those who work in some of the most extreme and hazardous environments, often in high temperatures with direct exposure to the sun and radiant heat sources.

The proposed rule is both necessary and urgent. As climate change continues to drive longer, more intense heat waves across the Southwest, frontline workers are increasingly at risk of heat-related illnesses, injuries, and fatalities. For utility workers—particularly those involved in electric, water, and gas infrastructure—outdoor exposure is unavoidable. They must respond to emergencies, conduct repairs, and maintain vital services regardless of weather conditions. This proposed rule provides critical protections that will save lives and improve the working conditions for thousands of essential workers in New Mexico.

We commend the state for recognizing the need for employer accountability through written heat illness prevention plans, acclimatization protocols, access to cool drinking water and shade, and employee training. These measures align with the best practices recommended by occupational health experts and reinforce the foundational principle that no job is worth a life.

The inclusion of specific provisions for emergency response workers is especially important to UWUA members, who are often deployed during natural disasters and extreme weather events—precisely the conditions where heat illness risks are most elevated. Codifying mandatory breaks, hydration intervals, and access to cooling is a vital step in protecting those who keep our infrastructure running under extreme stress.

We also support the emphasis on worker participation, including the right to report symptoms without retaliation. Too often, workers are discouraged from speaking up due to production pressure or fear of reprisal. A strong standard must empower workers and ensure that health and safety concerns are addressed proactively.

In closing, UWUA urges New Mexico OSHA to move forward with finalizing and implementing this rule without delay. We stand ready to work in partnership with employers, state officials, and fellow labor organizations to ensure effective implementation. This proposed rule represents a model for the rest of the country and sets a clear standard: protecting workers from the dangers of extreme heat is not optional, it is a matter of justice and human dignity.

Sincerely,

John MacNeill

National Safety Director

Utility Workers Union of America (UWUA)