## Jennifer Oppenheim

The New Mexico Environment Department (NMED) has published a strong draft heat protection rule that I strongly support. But I believe there are five key ways that the standard could be improved even more.

- 1) The standard should require employers to include references to existing New Mexico non-retaliation laws as part of employer HIIPP plans and worker training.
- 2) The standard needs more clarity on emergency procedures. In cases of heat stroke and other severe heat-related illnesses every second counts.
- 3) The standard has only a few reasonable exemptions for specific workplaces, but it needs to clarify that buildings and vehicles with mechanical cooling controls are exempt only when those systems are functioning.
- 4) The NMED should strengthen the HIIPP provisions by urging employers to seek input and involvement of non-managerial staff in drafting the plans.
- 5) The standard should specify that training must be given in person with the opportunity to ask questions.

Thank you for your consideration.