

# Josh Anonymous

Any focus on employee health is always welcomed and a necessity.

Some of requirements I believe are beneficial under the "Proposed Heat Illness and Injury Prevention Rule (PHIIPR)" are the following:

- "Suitably Cool Drinking Water" must be provided to employees.
- Employers having a mandatory "Heat Illness and Prevention Plan."
- Acclimatization for employees who have not been working in a high heat environment for duration of time. \*\*Note I have read that our bodies do acclimatize naturally, and I believe the timetables as currently written could be modified.

However, I do have strong concerns that as this "PHIIPR" is written it will have devastating economic consequences. Which will also include a secondary consequence of greater health issues for employees.

## Economic Consequences:

Based on the work/rest schedule to produce the same output in production, a company would need to increase its workforce by a minimum of 2 times to 4 times. Depending on the Heat Index. That is cost increase no less than double to quadruple the amount of what it would be currently. With employers from all types of industries having issues hiring new employees this increase in employment demand could not be met. Which would create another issue. Time.

If the employers are not able to hire more employees, then it would take 2 to 4 times longer to deliver a project or a product to the end user.

Imagine construction costs going up 2 to 4 times more than they are currently. The state would not have enough funding to provide money for new schools, road work, water treatment plants, etc.

New homes would be even more out of reach for new families to purchase.

A family who needs their AC unit fixed would be forced to choose between feeding their families or keeping them cool enough to have proper sleep.

Private companies would no longer invest in our State.

Gas and agriculture prices would increase.

Families would lose their jobs and no longer be able to afford their rent or house payments.

I could go on, but everything would go up in price and jobs would be lost!

My other concern with how PHIIPR is currently written is the secondary consequence of health impacts.

Due to economic impacts employees would lose their jobs. No longer being able to provide for themselves or their families with proper shelter, nutrition, clothing, and medical care.

If an employer decides to move operations to the late evening or morning shifts to prevent all activities during the "Work Rest Schedule" that would also create a health concern. Based on US Department of Labor report (<https://www.osha.gov/worker-fatigue/hazards>) working evening shifts has an 18% increase in work related injuries and 30% increase working nights. Here are some of the more serious health effects that a study found:

- Heart Disease
- Musculoskeletal disorders
- Depression

- Breast and Prostate Cancer

You could also logically include an increase in car traffic accidents.

How would a single parent have time to spend with their children?

Or who would watch them?

While it is always important to strive to safeguard all employees and prevent any injuries. However, as the PHIIPR currently written, it would create an economic and therefore health disaster for our citizens.

Lastly the mind is the most powerful tool. Let's be more stringent in educating our work force about Heat Illness.