

JANICE WILLIAMS

Unrealistic Downtime Requirements

- Affects sectors like construction, landscaping, agriculture, food service kitchens
- Disrupts productivity and time schedules

Cost of Compliance is High

For a small business with 10 outdoor workers, compliance is estimated to cost around \$16,800 per year. This includes expenses for shaded structures, additional staffing, hydration supplies, training, and documentation.

Administrative Overload

- Requires temperature monitoring, detailed recordkeeping, and written heat illness prevention plans.
- For small businesses without dedicated HR or compliance departments, this adds to an outsized administrative burden.

One-Size-Fits-All Approach Doesn't Work

New Mexico's geography and industries are diverse. Applying the same thresholds and rules across all regions and job types fails to account for local conditions and jobsite realities.

Short Implementation Timeline

Businesses won't have adequate time to adapt operations, budget for new costs

Hiring & Workforce Pressure

- More downtime per worker equates hiring more staff to meet the same output.

Acclimating Challenges for Employers

- Slows Onboarding and Productivity

New hires, especially those in outdoor roles, must undergo a gradual ramp-up in physical activity over 7–14 days. This delays their ability to contribute fully, which is especially difficult during busy seasons.

- Increased Supervisory Demands

Employers are expected to closely monitor new or returning workers for signs of heat illness. This diverts experienced staff or supervisors from other duties, straining already limited resources.

Helping workers adjust to heat makes sense—but the state's mandates go too far, the rule needs to be feasible for all businesses to manage responsibly.

Acclimating employees works best when it's flexible and based on job-specific needs, not imposed timelines and paperwork.

We want safe workplaces, but we also need practical policies that allow us to onboard and train new employees without crippling our operations.