Carlsbad Soil & Water Conservation District

As an organization that deals with workers not only in the agriculture sector, but also the private and industrial sectors, we must write in opposition to this proposed rule. The proposed rules are too general and do not address the individual situations of said sectors. To be clear- no one wants harm to come to their employees. There is absolutely nothing to be gained by that. But the onus that this proposed rule places on all employers without consideration as to the applicability and suitability of those rules will interfere with the day to day operations and have adverse consequences for both employers and employees. We live in the desert. We work in the desert. We play in the desert. If your personal health precludes you from doing so, by all means, do something else. There does not need to be a mandate that forces employers to adapt to a generic rule that should be common sense for anyone who resides in the desert. Most employers, especially in industry in southeast NM and in the ag world already implement healthy procedures for working in the heat that are appropriate for their employees and their work environments.