

New Mexico Farm and Livestock Bureau

NM Environment Improvement Board
c/o NM Environment Department
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

Dear Environment Improvement Board,

New Mexico Farm and Livestock Bureau (NMF&LB) appreciates the opportunity to provide comment on the Proposed Heat Illness and Injury Prevention Rule. New Mexico Farm and Livestock Bureau is New Mexico's largest and oldest agriculture organization, representing members involved in all aspects of agriculture from dairy and livestock to fruits and vegetables. Our mission is to promote and protect agriculture in the great State of New Mexico. We are charged with the important task of representing our members interest when it comes to impending regulation.

The culture of New Mexico agriculture keeps many producers actively involved in day-to-day operations, with many starting in the early hours of the morning, working into the late hours of the evening, providing shade, water, and breaks as needed. Current federal rule OSHA Standard for Agriculture (1928.110b), employers are required to provide drinking water to their employees.

We appreciate the efforts that the department has taken to draft a plan, recognizing that the climate in which we live can have impacts on the health and well-being of labor workers. New Mexico Farm and Livestock Bureau is concerned with the one-size-fits-all approach to implementing such a rule. The proposed standard fails to account for the diverse industries in New Mexico, implementing identical standards are unreasonable and cause concern for increased inefficiencies and unnecessary costs to producers.

New Mexico Farm and Livestock Bureau is opposed to the implementation of rules and regulations on agriculture within full disclosure of the impacts that will be incurred by producers. As an organization we are opposed to any rule or regulation that may restrict or limit the growing and/or processing of agricultural producers.

As producers in New Mexico, we understand that protection of workers from heat-related illness is essential to their well-being and the success of agricultural operations. New Mexico producers are aware of the conditions in which their employees are working, understanding that dynamic environments require flexible, site and industry specific, employer led risk assessments to effectively and efficiently complete agricultural operation tasks.

New Mexico Farm and Livestock Bureau encourages the development and implementation of funding for training producers and employees on recognizing heat related illness and injury in alternative to imposing regulations. Concerns on the economic feasibility of operations and inefficient work scheduled to produce the food that feeds the American population, would be unsustainable under the proposed rule. We ask that you consider the impacts such a regulation will have on current and future agricultural operations, taking into consideration the efforts that

producers currently take to provide employees with shade, water, breaks, and adjusting hours to benefit the work conditions of those employees.

Once again, New Mexico Farm and Livestock Bureau appreciates the opportunity to provide comment on the Proposed Heat Injury and Illness Prevention Rule. We look forward to further engaging in this process and appreciate your consideration of our members viewpoints.



NEW MEXICO FARM & LIVESTOCK BUREAU

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May 16, 2025

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