

## Dairy Producers of New Mexico

**Comments: New Mexico Environment Department  
Proposed Heat Illness and Injury Prevention Rule**

**11.5.7.7**

A. “Acclimatization” means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. *Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.*

**Comment:** what is the research that demonstrates that?

**11.5.7.8**

A. How employers will *conduct a heat assessment to identify control measures.*

**Comment:** the standard needs to specify how to measure and record this

**11.5.7.9**

A. Heat index of the work environment: *Heat index can be calculated by measuring the temperature and relative humidity and applying those numbers to Index Table 2.*

**Comment:** heat index is easily available on various phone apps

C. *Intensity of the work performed (see Index Table 3).*

**Comment:** table 3 is not helpful...does not specify how to constitute light medium heavy intensity of work, is not guidance for workers

**11.5.7.10**

Ab. A work schedule must be no more than 20% of *the usual duration of work* in the heat on day one and a no more than 20% increase on each additional day.

**Comment:** define usual duration of work for ag settings

Ac. *For workers returning from an absence of seven or more days, the work schedule must be no more than 50% of the usual duration of work in the heat on day one, 60% on day two, 80% on day three, and 100% thereafter.*

**Comment:** state needs to provide how an employer is supposed to do this

Bd. *Employers must provide sufficient pauses in continuous work to allow workers to drink fluids.*

**Comment:** policy should be for workers to self-monitor and take breaks as needed

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