October 28, 2021

Martin J. Walsh
Secretary
U.S. Department of Labor

AIHA Comments on the U.S. Department of Labor’s Climate Action Plan
Docket No. CEQ–2021–0003

Dear Secretary Walsh:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety (OEHS), representing approximately 8,500 members, appreciates the opportunity to provide feedback on the U.S. Department of Labor’s (DOL) proposed Climate Action Plan. Few issues are more important than climate adaptation and resilience, and we hope you find our comments useful.

1) Policy for Climate Change and Adaptation
AIHA supports the DOL’s new Climate Action Plan to protect our planet and its people. We are ready to work with DOL, our members, and the broader OEHS community to ensure that our nation has a sustainable, healthy, and safe future for workers, employers, and the communities they serve.

AIHA recommends that DOL and the Occupational Safety and Health Administration (OSHA), as the lead agency, partner with AIHA and with other prominent OEHS organizations; these include but are not limited to the National Environmental Health Association, American Society of Safety Professionals, ASHRAE, International System Safety Society, International Safety Equipment Association, and the American Public Health Association, to implement and provide guidance on DOL’s Climate Action Plan.

2) Ensuring Worker Safety and Health
AIHA agrees that due to climate change, workers face increasing risks of injury, illness, and death while working in extreme weather conditions or while exposed to health and safety risks during response and recovery from extreme weather events. In particular, AIHA supports the following statement from DOL’s Climate Action Plan: “Due to increased adverse outcomes from climate change events, employers must consider preparedness and mitigation for tolerances previously considered safe in construction, industrial and chemical
engineering, transportation, and other critical infrastructure industries.”

3) Current and Upcoming OSHA Regulations for Emergency Response and Remediation

Section 1910.120(q) of the Hazardous Waste Operations and Emergency Response ("HAZWOPER") standard “covers employers whose employees are engaged in emergency response no matter where it occurs and requires employers to develop and implement an emergency response plan “to handle anticipated emergencies prior to the commencement of emergency response operations.”

AIHA supports OSHA’s plans to develop a new standard protecting indoor and outdoor workers from hazardous heat, and will submit comments to the agency containing our recommended improvements for safeguarding the health of more workers. AIHA is currently working with both Maryland and Virginia as they develop similar occupational heat illness and injury prevention standards. One of our members serves on Virginia’s Regulatory Advisory Panel, and we recently submitted comments to Virginia as it prepares its standard.

4) Recommendations

AIHA recommends the following components be included in DOL's Climate Action Plan:

- Reference to established and recognized alert/exposure limits
- Provisions for personal protective equipment, rest, water, and shade
- References to surveillance and medical testing
- References to vector-borne diseases
- References to protection against mold and other microbial contamination
- References to wildfires and air quality
- Mental health effects
- Administrative controls such as training and the posting of heat stress warning notices
- Explicit provisions for whistleblower protections

5) Assistance

AIHA is able to assist DOL in many ways as it implements its Climate Action Plan, including:

- Raising awareness, developing educational materials, and providing employers, workers, and other stakeholders with strategies and practical tools to prevent workplace injuries, illnesses, and deaths from hazardous heat and other climate-related workplace hazards.

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• Tracking and analyzing climate change-related hazard trends to address possible public policy gaps.

**Conclusion**

AIHA thanks you for the opportunity to provide our thoughts on how DOL can improve its Climate Action Plan to better protect more workers and their communities. If you have any questions about our comments or would additional information, please contact Mark Ames at mames@aiha.org or (703) 846-0730.

Sincerely,

Lawrence Sloan, MBA, FASAE, CAE
Chief Executive Officer
AIHA

**About AIHA**

AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA’s nearly 8,500 members are Certified Industrial Hygienists and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.