

WASHINGTONIANS SUPPORT HEAT PROTECTIONS FOR WORKERS

Hundreds of Washington State workers visit emergency rooms or miss at least one day of work each year because of heat-related illness.¹ The highest rates of heat-related visits tend to be in agriculture, transportation and warehousing, and administrative and support services.² However, anyone who is regularly exposed to extreme heat on the job runs the risk of health problems, ranging from mild cramps to chronic kidney disease to death.³

Commonsense measures can help protect the health of these workers and improve their productivity on the job.⁴ The state of Washington recognized this when it adopted a standard to protect outdoor workers from heat in 2008 and subsequently strengthened the standard in 2023.⁵ However, neither the state nor the federal government explicitly requires employers to provide indoor workers with essential safeguards such as written heat illness prevention plans, heat training for workers and supervisors, and scheduled and paid

preventive cooldown breaks.⁶ The lack of an indoor heat standard puts workers in danger of preventable harm every time the temperature soars, which is happening more frequently as Washington's climate heats up.⁷ The record-setting "heat dome" that the state experienced in 2021, which would have been "virtually impossible" without climate change, killed approximately 160 people—making it the state's deadliest extreme weather event on record.⁸



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WASHINGTON POLICYMAKERS SHOULD CONTINUE THE STATE'S TRACK RECORD OF PROTECTING WORKERS FROM HEAT BY ADVANCING A STRONG, ENFORCEABLE WORKPLACE STANDARD FOR INDOOR WORKERS.

Washingtonians agree. In August 2024, the federal Occupational Safety and Health Administration (OSHA) proposed the first-ever national standard to protect workers from heat, opening a five-month public comment period on the proposal.⁹ About 1,500 business leaders, restaurant workers, health-care professionals, teachers, and other Washington residents weighed in, with more than 9 in 10 broadly in favor of the proposal (see methods, below).

Here's just some of what they had to say.

"Washington [Labor & Industries] has implemented a heat-related illness rule, that has what I perceive to be gaps in its language. Specifically, that the rule only discusses outdoor heat environments. Recently I've been working with an electrical contractor performing updates to a data center. One of the rooms had the water cooling system fail. That room maintained a temperature over 120 degrees F for more than six months. My client, rightfully, refused to perform the work, but there was contention between them and the data center because the language of the rule and the 'scope' only addressed outdoor work. Language for any heat-related illness rule must also include indoor heat."

RANDALL D., SAFETY CONSULTANT, WASHINGTON STATE

"I work in a bakery that hit[s] 108 degrees inside. Most days during summer it is between 90 and 100. People that station the kettles and ovens deal with even more extreme heat. There [need] to be protections for indoor heat as well. There is no breeze indoors."

JUSTIN S., WASHINGTON STATE

"My school does not have air conditioning. When it reaches above 80 outside our room is hot and stuffy. There is NO learning taking place. They do not cancel school when it gets to 90+ outside, nor are any type of cooling devices provided. My students and I are left to just suffer in heat. Or parents pull their kids out for the day. Something needs to be done."

JAIME M., EDUCATOR, LONGVIEW

"I have worked jobs where I have been forced to stand for six hours with no break. Standing over a hot stove and near a hot oven makes these jobs very unsafe. We need stricter regulation[s] to enforce breaks and access to cold water. Baking cakes or pizza reaching into a hot oven for a full eight-hour shift when it is already hot outside is extremely unsafe."

SARAH C., KITCHEN WORKER, RICHLAND

"In September of this year, I filed a safety grievance for the staff and students at a newer elementary school. The building has been plagued with an HVAC system that has never worked correctly. They replaced the system over the summer, yet it still didn't work. This building has no openable windows or outside access from classrooms. Inside temperatures hit 85, and it was completely unhealthy and unsafe."

JANET C., UNION LEADER, LAKEWOOD

"As a fast food employee . . . I can confidently say that our work conditions would have been significantly improved if we had a proper ventilation system. Earlier this year, we had to work in a restaurant undergoing renovations. Our windows were shut for long periods of time, leading to the smoke from our fryers to cloud our kitchen for hours. We were expected to work like this for weeks while also dealing with construction debris. It was tiring at best and flat out unbearable at worst. However, because of the toxic work environment, nobody was willing to speak up."

BRANDON R., FAST FOOD WORKER, SEATTLE

"For the first four years of my career, I taught in a windowless and un-air-conditioned classroom. I live in central Washington where the temperature often stays above 90 for August and most of September. My classroom was frequently 90 degrees (I had a thermometer) and it was awful to teach in and the students struggled with focus because they were so hot."

MOLLY R., EDUCATOR, LEAVENWORTH

The future of OSHA's proposed heat standard is presently unclear, particularly since the current U.S. Department of Labor appears more focused on repealing existing labor standards and worker protections than creating new ones.¹⁰ In any case, it takes OSHA an average of seven years to move a rule from introduction to implementation, and workers can't wait for federal policymakers to finish the job they started.¹¹

Given the lack of urgent action at the federal level, Washington leaders should show workers they are ready to protect them from preventable harm by moving immediately to develop a statewide heat standard for indoor workers.

Methods: We downloaded all publicly available comments for Document OSHA-2021-0009-4761 using the bulk download tool on Regulations.gov.¹² OSHA restricted access to thousands of comments due to the presence of personal information, including more than 13,000 comments from NRDC members and supporters.¹³ We combined the unpublished NRDC data with the 20,674 public records and then removed duplicate commenters from the combined database. Finally, we reviewed the unique comments from Washington and coded each one as "in support," "in opposition," or "mixed/unclear." For more methodological detail or a copy of the underlying dataset, contact NRDC at workers&heat@nrdc.org.

ENDNOTES

- 1 Sara Wuellner, Kali Turner, and June T. Spector, "Emergency Department Visits for Heat-Related Illness Among Workers: Occupational Health Surveillance Using Washington Syndromic Surveillance Data," *American Journal of Industrial Medicine* 67, no. 11 (2024): 994–1005, <https://doi.org/10.1002/ajim.23650>; Bureau of Labor Statistics, "Biennial Nonfatal Case and Demographic Numbers and Rates: Washington, DAFW Cases, All Ownerships, All Industry, Exposure to Environmental Heat, 2021–2022," accessed November 18, 2025, <https://data.bls.gov/multi-screen?survey=cb>.
- 2 Wuellner, Turner, and Spector, "Emergency Department Visits for Heat-Related Illness Among Workers."
- 3 Juanita Constible et al., *On the Frontlines: Climate Change Threatens the Health of America's Workers*, NRDC, June 2020, <https://www.nrdc.org/resources/frontlines-climate-change-threatens-health-americas-workers>.
- 4 BlueGreen Alliance and NRDC, "Economic Benefits of Workplace Heat Standards," March 2025, <https://www.bluegreenalliance.org/wp-content/uploads/2025/03/Economic-Benefits-of-Workplace-Heat-Safeguards.pdf>.
- 5 Katherine Torres, "Washington State Files Permanent Heat Stress Rule," *EHS Today*, June 4, 2008, <https://www.ehstoday.com/safety/article/21910487/washington-state-files-permanent-heat-stress-rule>; Washington State Department of Labor & Industries, "Permanent Changes to Outdoor Heat Exposure Rules," June 2023, Publication F417-300-000, <https://www.lni.wa.gov/forms-publications/F417-300-000.pdf>.
- 6 BlueGreen Alliance, "Checklist for a Model Heat Illness Prevention Rule," April 2025, <https://www.bluegreenalliance.org/wp-content/uploads/2025/04/BGA-Checklist-for-a-Model-Heat-Illness-Prevention-Rule.pdf>.
- 7 Barrak Alahmad et al., "A Nationwide Analysis of Heat and Workplace Injuries in the United States," *Environmental Health* 24 (2025): 65, <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-025-01231-1>; Washington State Department of Health, "Extreme Heat and Climate Change," accessed November 18, 2025, <https://doh.wa.gov/community-and-environment/climate-and-health/extreme-heat>.
- 8 Joan A. Casey et al., "Excess Injury Mortality in Washington State During the 2021 Heat Wave," *American Journal of Public Health* 113 (2023): 657–60, <https://doi.org/10.2105/AJPH.2023.307269>; World Weather Attribution, "Western North American Extreme Heat Wave Virtually Impossible Without Human-Caused Climate Change," July 7, 2021, <https://www.worldweatherattribution.org/western-north-american-extreme-heat-virtually-impossible-without-human-caused-climate-change/>.
- 9 Occupational Safety and Health Administration (hereinafter OSHA), "Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings Rulemaking," accessed August 11, 2025, <https://www.osha.gov/heat-exposure/rulemaking>.
- 10 OSHA, "Deregulatory Rulemaking," accessed December 15, 2025, <https://www.osha.gov/deregulatory-rulemaking>; David Kopf, "At the Crossroads: OSHA's New Rules and Deregulation," *Occupational Health and Safety*, November 20, 2025, <https://ohsonline.com/articles/2025/11/20/print-pub-kopf.aspx>.
- 11 U.S. Government Accountability Office, "Workplace Safety and Health: Multiple Challenges Lengthen OSHA's Standard Setting," April 2, 2012, GAO-12-330, <https://www.gao.gov/products/gao-12-330>.
- 12 OSHA, "Proposed Rule: Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings," August 30, 2024, <https://www.regulations.gov/document/OSHA-2021-0009-4761>; Regulations.gov, "Bulk Data Download," accessed July 21, 2025, <https://www.regulations.gov/bulkdownload>.
- 13 OSHA, "Comment Tran Ramadhar, Margaret; Natural Resources Defense Council (NRDC) (13.421 Individual Comments)," posted January 16, 2025, <https://www.regulations.gov/comment/OSHA-2021-0009-22508>.