



## Certified Crop Adviser Program

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January 26, 2022

Acting Director Andrew Levinson  
Directorate of Standards and Guidance  
Occupational Safety and Health Administration  
Department of Labor

Re: Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings  
Docket Number: OSHA-2021-0009  
Federal Register Publication Date: 10/27/2021

Dear Acting Director Levinson,

Thank you for the opportunity to offer comments to the Occupational Safety and Health Administration (OSHA) request for information on Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings (Docket No. OSHA-2021-0009).

The International Certified Crop Adviser (ICCA) Program is the globally recognized certification held by professional crop advisers establishing their leadership role in the responsible management of agricultural production systems. Across North America, over 13,500 men and women serve farmers, ranchers, and other agricultural entities as Certified Crop Advisers (CCAs) providing information and expertise on crop production, crop protection, and natural resource management. CCAs play a pivotal role in conservation practice and technology adoption throughout the North American agricultural landscape. Due to their extensive agronomy training and in-field experience, they are deeply trusted by their farmer clients and routinely consulted on critical on-farm decisions.

Most CCAs are employed by a farm input supplier or an agriculture retail or sales operation, though many are self-employed, independent consultants. Safety of workers is a top priority for CCAs whether they are self-employed or work for a small, mid-size, or large company. CCAs and their employers work within the existing guidelines for workplace safety to ensure that works are safe and can continue their vital function of providing agronomic advice to farmers. Additional regulations could be financially burdensome and cause a loss in productivity during times of critical need for their clients and customers. If a national heat illness standard is established in addition to current safety regulations, we urge OSHA to consider these concerns.

### **Focus on Education-Based Prevention**

Warm temperatures not only pose threats to human health but can also be detrimental to crop growth and production. CCAs are tasked with helping farmers make crop management decisions, such as irrigation scheduling and pesticide and herbicide applications, during the warmest months of the year.

With these responsibilities, CCAs must be prepared in advance to prevent heat related illness. Education and training materials are important measures that OSHA can implement to prevent heat related illnesses and deaths, ensuring that all workers and employers are aware of risks and prevention measures before they are exposed to inclement conditions. Training and worker engagement may be time intensive up front but are less burdensome overall.

### **Allow for Regional Flexibility**

Those who work in agriculture are intimately in tune with day-to-day weather conditions, and regional climate variability drives all aspects of agricultural production, including crop selection and rotations, pest management, irrigation needs, planting and harvesting dates, conservation practices, and more. The following are examples of regionally specific agricultural decisions that farmers, with the assistance of CCAs, must often make during high temperature conditions.

- In-season nitrogen applications in early summer are determined by a visually identified crop stage.
- Crop scouting requires a visit to the field multiple times during the growing season to develop integrated pest management plans and to evaluate success.
- Disease monitoring requires several visits to the field to diagnose and plan treatment strategies.

### **Key Takeaways**

Current OSHA standards and safety guidelines, when properly implemented, are adequate for preventing heat related injury and illness in indoor and outdoor settings; however, if an independent standard is proposed, we urge OSHA to keep the concerns and recommendations of CCAs in mind. Prevention measures should be focused on education, training and worker engagement, rather than interventions at high temperatures. Additionally, OSHA should allow for regional flexibility when implementing any new standards due to climate variability and varying agricultural demands.

Thank you for the opportunity to provide comments on this ANPRM. An independent standard for heat injury and illness prevention in outdoor and indoor settings would have broad implications for CCAs. Please do not hesitate to contact the ICCA science policy office with further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Luther Smith". The signature is stylized with a large, prominent "L" and "S".

Luther Smith, CAE  
Interim CEO and Director Professional Development