



April 20, 2015

Honorable Raul Labrador
United States House of Representatives
Washington, DC 20515-1201

Via electronic mail: scott.reber@mail.house.gov

RE: H.R. 1215 – Future Logging Careers Act

Dear Representative Labrador:

On behalf of the American Industrial Hygiene Association (AIHA) I am writing to express our opposition to your legislation, H.R. 1215, the “Future Logging Careers Act”. AIHA is one of the largest international associations serving occupational health and safety professionals who practice industrial hygiene.

AIHA appreciates your efforts to improve the economy in Idaho and attempts to bolster one of Idaho’s most important industries; however, AIHA is concerned that the resulting injuries and fatalities may outweigh any of the positive economic gains. In 2011 a study at UC Davis estimated the national annual cost of occupational injuries and illnesses at \$250 billion.

Though different operationally, logging and tree trimming comprise some of the highest injury and fatality rates nationwide. The Occupational Safety and Health Administration (OSHA) has attempted to reduce occupational injuries and fatalities through a combination of enforcement and outreach activities. These are dangerous jobs even for seasoned workers; employing young and inexperienced workers only exacerbates the risk of serious on-the-job injuries.

AIHA is aware that other sectors, including the agriculture industry, enjoy regulatory exemptions that allow family members between the ages of 16 and 17 to work under the parents’ supervision. Unfortunately, the agriculture industry also suffers from very high occupational injury and fatality rates. According to the National Institute for Occupational Safety and Health (NIOSH), on average, 113 youth less than 20 years of age die annually from farm-related injuries, with 34% of these deaths occurring to youth 16-19 years of age. And, in 2012, an estimated 14,000 youth were injured on farms with 2,700 of these injuries due to farm work. Adding an exemption for the logging industry to employ 16-17 year olds and subsequently increasing the number of minors at risk of serious injury is not the right way to attempt to stimulate economic growth.

In the end, AIHA is concerned that this legislation would have a detrimental impact on the health and safety of young workers in Idaho. While we have no alternative for H.R. 1215 to offer at this time, AIHA must oppose this legislation. The current regulations which ban persons under the

age of 18 from being employed in these positions deemed hazardous by the Secretary of Labor provide the best protection possible for these young workers.

Should you require additional information or if we can be of any further assistance to you, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan H. Anna". The signature is written in a cursive style with a large initial "D".

Daniel H. Anna, PhD, CIH, CSP
AIHA President-elect

cc: Rep. John Kline, Chair, Cmte on Education & the Workforce ed.gilroy@mail.house.gov
Rep. Robert "Bobby" Scott, Senior Democratic Member richard.miller@mail.house.gov