



NVFC Call to Action on Proposed OSHA Emergency Response Standard

The National Volunteer Fire Council (NVFC) appreciates the Occupational Safety and Health Administration's (OSHA) efforts in trying to keep our firefighters and emergency responders safe. We commend OSHA for the time they have invested in writing the new proposed Emergency Response Standard, which is intended to replace the 44-year-old Fire Brigade Standard.

While we agree in concept with many of the updates, we strongly oppose the implementation of the rule in its current state. Very few, if any, of the over 24,000 all or mostly volunteer fire departments in the United States, representing over 676,900 volunteer firefighters, would be able to fully comply with the proposed standard as presented in the Federal Registry.

As 65% of the nation's fire service is volunteer, enacting this standard as written would have disastrous consequences on the protection of both life and property in this country. The time donated by volunteer firefighters saves localities in this country over \$46.9 billion dollars per year. If we close the doors of our local volunteer departments, where does the funding come from to replace this? Entire communities would be left with three options: close the doors of many of the firehouses across the country; bankrupt their communities trying to comply with the new rule; or operate outside of a federal standard, leaving themselves wide open to fines, citations, and huge civil liability exposure should an injury or death occur. These options are simply not acceptable. As such, the NVFC argues that this proposed standard is not economically feasible.

The NVFC is issuing an immediate call to action for the fire and emergency service departments across this country to engage with us in the process to oppose this rule and rewrite the document to a condition that is obtainable. Immediate action must be taken as the proposed standard has been filed in the Federal Registry with a public comment period only lasting until June 21, 2024. We cannot overstress the urgency of this request. If we fail to unite and be heard as one collective voice, we stand no chance of having our concerns heard. The results of that would be devastating to our fire and emergency services and the economic condition of this country.

Please take immediate action. Resources to help understand the proposed rule and how to write an effective public comment can be found at www.nvfc.org/osha-standard.

Find the full proposed standard and submit your public comment here:

<https://www.federalregister.gov/documents/2024/02/05/2023-28203/emergency-response-standard>

Join the NVFC's email list to be kept up to date on the status of the proposed OSHA standard and calls to action: <https://bit.ly/nvfc-updates>