

March 4, 2026

The Honorable John Burke  
Chair, Senate Committee on Labor & Gaming  
Room 212  
State House  
Providence, RI 02903

*Subject: Senate Bill 2320 – RI Construction Trade Associations' Opposition*

Dear Chairman Burke and Honorable Members of the Committee:

On behalf of our construction industry companies, we write to express our strong opposition to Senate Bill 2320, which would impose new, very specific temperature-related requirements on employers in the state, in addition to current federal laws and regulations.

Our companies are regulated by and subject to health and safety oversight by various federal and state agencies such as the National Institute for Occupational Safety and Health (NIOSH), the Occupational Safety and Health Administration (OSHA), the Rhode Island Department of Labor and Training (RIDLT), and the Rhode Island Department of Health (RIDOH). Our companies are required to have rigorous safety programs in place to keep workers safe on construction job sites at all times and during all seasons. Rhode Island's construction industry has long been a leader in developing best-in-class safety procedures, training, and protocols to protect workers from job-site hazards. Certifications, safety inspections, toolbox talks, fall protection, personal protective equipment (hard hats, safety glasses, and gloves), machine safety guards, and trench protection are just some of the ways workers are protected.

Contractors take steps to mitigate risks during cold winter and hot summer months when needed, including scheduling work earlier or later to avoid performing tasks during times of extreme temperatures, setting up cool-down areas, and taking a total wellness approach to educate employees on the importance of managing health, diet, and hydration. Contractors regularly educate tradespeople, who are encouraged to immediately notify their supervisors, an on-site safety officer, or OSHA if they believe unsafe conditions exist or have concerns. Additionally, OSHA's general duty clause requires employers to provide a workplace free of hazardous conditions, particularly if a feasible method exists to abate the hazard.

With rigorous, robust regulations in place for construction, we are concerned that this legislation may complicate current protection processes, potentially making them less effective, not more. The construction environment is inherently dynamic, and we are concerned that this bill fails to account for this and instead imposes ineffective and duplicative requirements on construction industry employers.

The health and safety of those working on a construction job site is a paramount concern for both labor and management. We ask the committee to consider the unique nature of construction and that a one-size-fits-all approach to extreme temperatures will not meaningfully improve the safety of construction workers.

Thank you for your consideration of our position.

Sincerely,



Ernie Carlucci  
Construction Industries of Rhode Island (CIRI)



John Marcantonio  
Rhode Island Builders Association (RIBA)



Kerrie Bennett  
Rhode Island Associated General Contractors (RIAGC)