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The Effects of the Climate Crisis on Worker Safety and Health - and the Need for Regulation

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July 2024

The climate crisis is the defining event of the 21st century, and its drastic consequences are already being felt in the Israeli labor market. Global economic uncertainty is expected to have far-reaching effects on the economy's resilience. Despite this, the State Comptroller's latest report reveals that the State of Israel still lacks a national economic preparation plan for the crisis's impacts. He further found that demands for a transition to green industries and a green economy, to reduce emissions and to internalize external environmental costs—may lead to increased prices for public services provided by corporations and that these demands are not accompanied by a government action plan, causing employment uncertainty.[2] Even worse, until recently, the different government ministries have not addressed the climate crisis's effects on worker safety and health[3], and there is currently no legislation directly dealing with protecting workers exposed to the elements.

The climate crisis also has a diverse and dramatic effect on workers' safety and health. This includes, among other things, exposure to physical risk factors such as heat stress and hazardous radiation. According to the International Labor Organization, **approximately 38,000 workers worldwide die annually due to heat stress or ultraviolet radiation, and the health of roughly 2.09 million workers worldwide is permanently damaged.**[4] These consequences are already being felt in Israel, where dozens of workers collapse from heat stress during their work each year. Additionally, about 1,000 new patients are diagnosed annually with skin cancer due to occupational reasons.[5]

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[2] The State Comptroller, *The Actions and Preparation of the Israeli Government for the Climate Crisis - Extended Follow-up Audit 2024*, special report: a collection of reports on environmental protection.

[3] On July 10, 2024, the Ministry of Labor published a landing page and *Practical Guide for Working in Extreme Heat*. On July 17, 2024, an inter-ministerial conference was held on the effect of heat stress on employment in Israel and the public sector's preparation.

[4] ILO, Ensuring safety and health at work in a changing climate (report at a glance), April 2024.

[5] As presented to the Health Committee as part of an urgent discussion on the subject: "The National Insurance Institute's Severe Damage to Skin Cancer Patients due to Occupational Exposure to the Sun" held on April 1, 2024, between 8% to 10% of diagnosed cases are of occupational origin, and there are approximately 12,000 new skin cancer patients in Israel annually.

There is no denying that the climate crisis is an existential threat to all of us, and we are well into "Injury Time." Therefore, in this position paper, we will examine the current Israeli safety and health regulations for protecting workers who work outdoors from the elements, with an emphasis on these risk factors (i.e., heat stress and ultraviolet radiation) and the measures taken by countries around the world to reduce workers' exposure to these factors.

The purpose of this document is to contribute to the formulation of relevant recommendations for Israel to ensure the protection of workers whose health and safety are at increased risk due to the effects of the climate crisis and to demand that decision-makers immediately formulate legislation to prevent further harm to the most vulnerable workers.

Effects of the Climate Crisis on Occupational Safety and Health:

According to estimates by the International Labor Organization, the climate crisis is already affecting workers' safety and health and is expected to have significant consequences in several areas. Here are some of the key areas:

1. **UV Radiation**—Working outdoors exposes workers to solar radiation, specifically ultraviolet radiation, a significant risk factor to workers' health. This radiation may lead to blindness, sunburn, skin cancer, and even death.
2. **Heat Stress**—Overheating is another risk factor to which outdoor workers are exposed. Working in high temperatures and humidity is a significant risk factor that will increase due to the climate crisis and global warming, especially in Israel. When a worker is employed outdoors in extreme heat, there is concern that he will reach a state of physiological heat stress, defined as a condition in which the body's internal temperature rises above 38 degrees Celsius. Possible symptoms include dehydration, loss of concentration, skin irritations, and rashes. A worker who reaches this state and continues to work may suffer heatstroke and, in particularly severe cases, even death. Heat stress also decreases cognitive function and increases the risk of workplace accidents.
3. **Extreme Weather Events**—Another example of the expected impact of the climate crisis is working at height on cranes during strong winds or heavy rain. Crane operators often report unsafe conditions in the cabin, which do not allow them to lift loads or safely use the crane's functions, understanding that any wrong movement could lead to disaster—either due to objects falling from a height, damage to scaffolding, destruction of infrastructure, or even damage to the crane. Additionally, many cranes require the operator to climb an external ladder to access the cabin, which puts them in danger every time they ascend or

descend. According to meteorological service estimations, the amount of rain in Israel is expected to decrease in the coming years, but the intensity of the rain will increase, posing a severe risk factor for workers whose work is already affected by extreme weather.[6]

4. Furthermore, the International Labor Organization also foresees the **worsening of air pollution**, which causes respiratory diseases, heart diseases, and lung cancer. There is also an expected **increase in diseases** spread by biological agents such as fungi and pests like mosquitoes and ticks, as well as **increased workplace exposure to chemicals** due to a decrease in the effectiveness of pesticides in light of the climate crisis.[7]

Affected populations:

Worker's Hotline (Kav LaOved) has been working for over 30 years to protect the most vulnerable workers in the Israeli labor market by demanding fair employment conditions and protecting workers in individual cases and in a group and collective manner. From our many years of experience, we have observed that most workers in the secondary labor market are more exposed to climate effects. It is no coincidence that these workers come from the socio-economic periphery and are particularly vulnerable to the impact of the climate crisis.

For example, **Agricultural workers** include Israelis, migrant workers mainly from Thailand (and, since October 7th, also from other countries), and Palestinian workers; **Construction and infrastructure workers** include migrant workers primarily from China, Turkey, Romania, India, and Palestinian workers who work in core physical construction trades (scaffolders, bricklayers, etc.). Additionally, there are crane operators, most of whom are Israeli citizens who often come from low socio-economic strata and work under difficult conditions; **Agency workers** (including Israelis and asylum seekers) who work in municipal services such as gardening, pruning, sanitation, and cleaning. They are frequently employed in abusive working conditions (such as physical outdoor work, insufficient pay, understaffing and task overload, high burnout rates, long working hours, etc.).

Due to its geographical location, the State of Israel is particularly vulnerable to the climate crisis, and the entire labor market is already being affected by it. This situation requires immediate preparation. In light of this, the Israeli Society of Ecology and

[6] Nir Hasson, *You Are Not Mistaken: The Number of Extreme Heat Days in Israel has Sharply Increased*, Haaretz, July 2024

[7] For further reading, see the *summary of the International Labor Organization report: Ensuring Health and Safety at Work in Climate Change*, by Dr. Laliv Egozi, **Israel Institute for Occupational Safety and Hygiene**, June 2024.

Environmental Sciences and the Ministry of Environmental Protection published a comprehensive report in April 2024 that maps, for the first time, the index of various populations' vulnerability to the effects of the climate crisis. One of the indicators examines, through several sub-indices, the socio-economic sensitivity of each individual, household, local authority, and the Israeli market as a whole. According to the report, socioeconomic sensitivity stems from several factors, including the rate of immigrants, access to information and services, belonging to minority groups, education levels, and more.[8]

In addition to the abusive working conditions and wages, workers from the socio-economic periphery are also the first in the chain of exposure to climate conditions. These workers perform manual labor, work long hours on construction sites, in fields and greenhouses, in a Sisyphean manner, until the task is completed. For these workers, the challenge is twofold: employers often require them to work in extreme climate conditions - such as strong winds, storms, or extreme heat stress - without really being able to refuse due to concern for their livelihood. The second challenge is staying informed about worker rights, particularly their legal right to refuse work that endangers their health or safety and that their refusal will not result in their dismissal. They also need to know who to contact if an employer forces them to work and puts them in such danger.

Alongside them are other workers—such as those in operation, inspections, and enforcement within local and national authorities; national infrastructure workers, such as those from the Israel Electric Corporation; communications workers and municipal corporation workers, such as the water corporations; and others who are exposed to the elements and spend most of their workday outdoors. These workers are also expected to be significantly affected by the climate crisis, the increasing heat loads and extreme temperatures, and the rising solar radiation.

In October 2023, the Arlozorov Forum published a comprehensive study reviewing the expected consequences of the climate crisis on the labor market in Israel. The study notes that *"Extreme climate conditions are one of the consequences of the climate crisis that we are already feeling, and they are going to intensify in the coming years. This situation will challenge the work practices in various industries due to the risk that the workers in these industries will face, whether a one-off risk or cumulative health damage."*[9]

Therefore, according to the socio-economic vulnerability index, there is a high risk for workers from disadvantaged groups, especially those employed in sectors such as

[8] Dr. Ben Black, *Development of a Climate Vulnerability Index: Summary of Insights from a Committee of Experts*, April 2024.
[9] Ran Raviv, *Ensuring Employment, Livelihood and Workers' Rights in Dealing with the Climate Crisis*, October 2023.

agriculture, construction, sanitation, cleaning, etc. These workers are expected to be particularly affected by the risks created by the climate crisis. However, despite the high exposure of these workers and industries to the effects of the climate crisis, the Israeli legislation remains silent on this matter and does not require employers to prepare accordingly, as we will see in the next section.

Safety Laws in Israel:

Below, we will briefly review the current safety and hygiene legislation that applies to workers in Israel, specifically regarding outdoor work conditions. As we will see, the current legal framework lacks relevant references to climate-related damages and their effect on workers' safety and health. In contrast, other organizations, such as the Ministry of Education and the IDF, have developed specific regulations for prolonged outdoor stays and activities, as well as specific and tailored instructions to protect against climate damage.

The Work Safety Ordinance (New Version), 1970, and its regulations apply only to the industries and professions listed in Section 3 of the ordinance, including various industrial plants, the construction industry, agriculture, laundries, laboratories, slaughterhouses, and more. That is to say that **the ordinance does not apply to sectors such as gardening, pruning, sanitation, cleaning**, etc.

The Work Safety Regulations (Work at Heights), 2007, specify in section 12.d, *"Conditions for performing work at height - work at height, between sunset and sunrise, in poor visibility conditions, during strong winds, torrential rain, snow or hail, will be carried out only according to express written safety instructions given by the contractor undertaking the job, including regarding the manner of performing the work and all the required equipment, which the contractor will determine in general or for a particular job;"* (the same sentence also appears later in the regulations, under the sections on Rope Access Services and Mast Climbing Work). **However, the regulations do not establish standards or define what constitutes strong winds, leaving the determination of specific safety guidelines to the person undertaking the job.**

Heat stress or solar radiation is included as a hazardous physical factor in the definition of "hazardous factor" in the Work Safety Regulations (Environmental Monitoring and Biological Monitoring of Workers for Hazardous Factors, 2011). However, these factors are not on the list of those that, according to the regulations, require periodic testing of workers exposed to harmful factors, and **the regulations do not specify permitted exposure levels.**

Additionally, the Work Regulations (Personal Protective Equipment), 1997, address exposure to solar radiation. They state that a worker who is exposed to sunlight must

wear clothing and a hat that cover their body and head to prevent radiation damage and must also wear glasses that filter UV radiation. Accordingly, an employer must not employ a worker exposed to solar radiation unless they are protected by the measures specified in the regulation. While these provisions regulate the protective equipment provided to workers, they, too, do not establish criteria for safe work under the sun.

The Israel Meteorological Service (IMS) is the government's forecasting body, operating under the Ministry of Transportation. The IMS's 80 measuring stations conduct measurements and forecasts of indicators such as temperature, wind, pressure, and humidity. It publishes hourly forecasts by municipality, segmented by factors like heat stress, radiation, wind speed, rainfall, and more. Additionally, the IMS issues daily warnings based on the forecasts to alert against heat stress or extreme climate events, allowing workplaces to prepare accordingly.

The common standard in Israel for assessing heat stress is the HSI index (Heat-Stress-Index), which averages dry and humid temperatures. Although this index does not account for solar radiation, wind, or the effect on the individual, the IMS notes that the index was developed by the Medical Corps for soldiers and is oriented towards physical work under heat stress. Therefore, the IMS uses this index to publish alerts.

The IDF has an independent forecasting unit, but it primarily serves the Air Force. According to the IDF's publications, this unit is crucial for executing missions and accompanies all operational activities since *"weather is an essential element in planning the IDF's operational activity. Every operation, flight, ground activity, training, or long-term planning is* conducted *only after the advice and direction of the meteorologists."*[10] Additionally, we have been informed that the IMS is currently developing an application to address climate risks for soldiers to facilitate appropriate preparation.

Similarly, the Ministry of Education utilizes IMS data to develop specific guidelines for outdoor activities aimed at protecting students during such activities. For example, the education system sets restrictions on outdoor activities during heat stress and in the open air, considering the health risks for students and staff members.[11] The Ministry of Health also uses the IMS data, issuing guidelines regarding protection against solar radiation for individuals staying outside, with a particular focus on children and teenagers, as approximately 80% of sun damage occurs before the age of 18.[12]

Despite this, the Ministry of Labor does not require employers to use these tools to check daily forecasts in relation to workers' tasks. In the Practical Guide published by

[10] Information about positions: Meteorologist (Assistant Forecaster) in the Forecasting Unit, the IDF website.
[11] For example see: https://meyda.education.gov.il/files/Bitachon/omeshom2016.pdf; information card for trips: https://meyda.education.gov.il/files/PortalBaaluyot/POB/Safety/heat-activity.pdf; information card for outdoor activities: https://meyda.education.gov.il/files/Bitachon/cartismeydahom.pdf.
[12] Ministry of Health guidelines for summer safety, here.

the Ministry of Labor in July 2024, several organizational measures were recommended to employers to reduce workers' exposure to heat stress, including rotation, breaks, worker training, and encouraging hydration. However, using these measures is only a recommendation and is not mandatory. Currently, there is no regulatory obligation in the labor market to review alerts or adhere to safety and health regulations tailored to heat stress, radiation levels, wind strength, air pollution, and other factors relevant to the workplace.

Comparative Overview - General:

While Israeli legislators are still silent on the climate crisis and its impact on workplaces and workers, and do not utilize the IMS index or other accepted indices for measuring heat stress and guiding the labor market, other countries are addressing the issue. For this position paper, we conducted a short comparative review to examine the existing legislation in various countries and how they prepared for climate change.[13]

In this context, a review published by the Ministry of Labor in December 2023 examined the effects of heat stress on workers in the construction industry. The review found that most countries globally focus on increasing general awareness of heat risks.[14] This is in light of their *"significant economic impact on the construction industry, which serves as an "economic engine" in many countries."* For example, the Ministry of Labor noted that, to the best of its knowledge, *"currently, the European Union and the United States primarily engage in comprehensive outreach activities to address heat risks. These include instructing workers and employers about the risks to the human body, the importance of pre-planning work and providing proactive breaks set by the employer, and more."* However, it is important to note that the heat stress and temperatures measured during summer months in the European Union and the USA should not be compared to the situation in the Middle East.

In its review, the Ministry of Labor found that two countries formulated a different regulation that outlines binding guidelines to help employers and workers reduce the risks associated with working in heat stress in the construction industry: **Hong Kong** and **Oman**: *"For example, Hong Kong introduced a binding professional code for the construction industry in 2017, that defines clear guidelines for employers, including the requirement to implement work-break cycles to manage heat stress. Similarly, Oman has enacted strict regulations that prohibit employing construction workers between 12:30 and 15:30 from June to August."*

[13] This review is not exhaustive and requires further deepening in light of the differences in climate conditions and labor legislation between the surveyed countries.
[14] Ran Cohen, Yitzhak Yosef, "Heat Stress and its Possible Effect on Work Accidents in the Construction Industry in Israel - a Review and Possible Courses of Action", December 2023.

Our comparative review found that **all the Gulf countries prohibit work in the middle of the day in the summer. As a result, night work is preferred in the Persian Gulf countries due to the intense heat, and employers are also restricted from continuing outdoor work during specified times and months.** Qatari legislation for 2021 goes further, at least in theory, as it prohibits all outdoor work when the temperature exceeds 32.1 degrees Celsius.[15] However, Qatar's labor market and its protective labor laws are not a model to follow, as there are serious allegations of human trafficking and modern slavery in the country.[16]

The UK does not specify minimum or maximum temperatures, but employers must ensure that working temperatures are "reasonable" for their workers.[17]

In **Austria**, regulations mandate maintaining a climate within workplaces and specify allowable temperatures based on the level of effort and the season.[18]

Germany has defined a maximum temperature of 26 degrees Celsius for workplaces under normal conditions. However, this is not anchored in legislation but as a recommendation. Employers are responsible for ensuring safety beyond this temperature, providing water and refreshment breaks. If the workplace temperature exceeds 35 degrees Celsius, it is considered unfit for work unless additional measures are taken, such as cooling the environment or transitioning to a flexible schedule to allow work at later hours.[19]

France's Labor Code does not define a maximum temperature, but it does require employers to ensure their workers work in safe conditions, including protection from heat stress. For example, employers in the construction industry must provide at least 3 liters of water per day and may halt if they believe an immediate danger to workers' health arises.[20]

In **Spain**, the maximum allowable temperatures are defined by the institution equivalent to the Israeli Institute for Occupational Safety and Hygiene: between 17 and 27 degrees Celsius for office work and between 14 and 25 degrees Celsius for light-

[15] Translation from Arabic: Human Rights Watch, "Gulf Countries: Migrant Workers are at Extreme Risk due to the Extreme Heat" : https://www.hrw.org/ar/news/2023/06/01/gulf-states-migrant-workers-serious-risk-dangerous-heat

[16] See in this regard the reports on over 6,500 migrant workers who were killed during their work in the construction industry in Qatar in preparation for the 2022 World Cup: https://www.theguardian.com/global-development/2021/feb/23/revealed-migrant-worker-deaths-qatar-fifa-world-cup-2022

[17] For more information, see: https://www.gov.uk/workplace-temperatures; https://www.acas.org.uk/extreme-temperatures-in-the-workplace.

[18] https://www.ris.bka.gv.at/NormDokument.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10009098&Paragraf=28.

[19] https://www.euronews.com/next/2023/07/18/too-hot-to-work-what-labour-laws-in-european-countries-say-about-working-in-a-heatwave.

[20] There.

effort jobs. Workers may report employers who fail to adhere to these recommendations to the enforcement bodies or the workers' organization.[21]

Worldwide Use of Various Indices for Assessing Heat Stress:

Scientists have developed several indicators over the years to orient citizens and workers. One such indicator is the above-detailed HSI, which calculates the average between dry and humid temperatures. Another indicator is the Wet-Bulb Globe Temperature (WBGT)[22], which combines physiological measures to assess the impact on humans. Unlike simple temperature measurements, WBGT examines all four major environmental heat factors: air temperature, humidity, radiant heat (from sunlight or sources such as furnaces), and air movement (wind or ventilation)[23]. A newer index, the Universal Thermal Comfort Index (UTCI), was developed by the International Biometeorology Community. It is estimated to be more accurate than the previous indices. Among other things, it includes a measure for examining "body cooling", which evaluates the depth of heat stress effects on the human body and the ability to recover from exposure to harmful heat stress.[24]

The indices are used differently in different countries:

A. In the **Gulf countries**, the WBGT index is the recommended standard for imposing work restrictions during extreme heat periods and implementing occupational safety and health measures to protect workers.[25]

B. In the **European Union** (EU), several mandatory provisions address the effects of the climate crisis on occupational safety and health (OSH) and the employer's role in managing the changes. These provisions include references to both the WBGT and the newer, more accurate UTCI. The main recommendation focuses on raising awareness, conducting research, and mapping the effects across different EU regions and vulnerable populations.[26]

C. **Belgium** has established a Well-Being at Work code that entitles workers to various protective measures against heat exposure based on the WBGT index. It includes using a special thermometer that measures both temperature and humidity, tailored to the workload and effort involved.[27]

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[21] There.
[22] https://en.wikipedia.org/wiki/Wet-bulb_globe_temperature
[23] See for example the Oklahoma Meteorological Service USA: https://www.weather.gov/tsa/wbgt
[24] https://www.utci.org/
[25] See: https://www.hrw.org/ar/news/2023/06/01/gulf-states-migrant-workers-serious-risk-dangerous-heat
[26] https://oshwiki.osha.europa.eu/en/themes/climate-change-and-occupational-safety-and-health.
[27] https://werk.belgie.be/nl/themas/welzijn-op-het-werk/omgevingsfactoren-en-fysische-agentia/thermische-omgevingsfactoren-0.

As noted, the accepted index in Israel for measuring heat stress is the HSI index (the average between dry and humid temperatures), which is used by different government ministries. While the HSI is not the most recommended index by global experts for assessing heat stress effects in the workplace, it is important to recognize that these measurements serve only as recommendations and guidance. In any case, it is crucial to monitor workers for symptoms in real-time and take appropriate action to inform and guide them. [28]

Summary and Recommendations:

As mentioned earlier, while the State of Israel lags far behind OECD countries in reducing emissions and preparing its economy for the climate crisis and its consequences[29], it also remains silent regarding the impact of the crisis on workplace safety and health. The government ministries' recent awakening on this issue still does not adequately address the need to protect workers' health and safety, including through the implementation of protective legislation.

In light of the above, our position at Kav LaOved is that clear rules must be defined based on objective indicators to ensure workers' safety and health. These rules should be defined in advance and in writing and align with professional knowledge and infrastructure regarding the dangers to which the workers are exposed. They should clearly specify which hours are unsuitable for work, how much rest is required during strenuous activity, how the work should be carried out in extreme climate conditions, and when it should be prohibited entirely. These decisions should not be left to the sole discretion of the foreperson in the field, whose interests often conflict with those of the workers.

To this end, the following is proposed:

- Employers in industries more vulnerable to climate hazards should be required to consult with an occupational hygienist at any workplace where a safety supervisor must be appointed according to the Labor Inspection (Organization) Law, 1954. Both supervisors should advise the workplace owner regarding working in extreme climates. In a workplace without an appointed safety supervisor, the workplace owner should follow the chief labor inspector's instructions and consult with a safety supervisor and occupational hygienist twice a year to address climate hazards. Additionally, sanctions should be imposed on violators;

[28] Ross Di Corleto, https://www.thethermalenvironment.com/what-is-a-heat-stress-index/
[29] The State Comptroller, *The Actions and Preparation of the Israeli Government for the Climate Crisis - Extended Follow-up Audit 2024*; Yael Ga'aton, *'Silman was Absent at the last Moment from the First Discussion of the New Climate Law in the Knesset: "She Ran Away"'*, Transparent, June 5, 2024.

- A prohibition on working at height during heavy rain, strong winds, and storms should be promoted, as well as a prohibition against working on uncovered construction sites or agricultural areas while exposed to the sun, or in conditions of rain and heat stress, where the IMS had issued warnings to the public. This should follow criteria formulated by the Ministry of Health, in addition to imposing sanctions on the violators. This regulation is necessary because, despite the partial prohibition currently in place regarding work at height, safety inspectors sent to construction sites do not enforce this directive. Enforcement in the agricultural sector is minimal and almost non-existent when it comes to climate conditions[30]. Additionally, many workers are not informed about their right to refuse work assigned by the employer, which endangers their health or safety.

  For example, it can be determined that: "Outdoor work in moderate heat stress will be permitted only if it is not strenuous. Outdoor work in heavy heat stress will be permitted only when following specific limitations, and in extreme heat stress it will be prohibited"; "Working on a type X crane in winds over Y km/h is prohibited"; "Working in a sandstorm is prohibited." Additionally, work regulations might state, "Working in heat stress will only be carried out until 11 am, and starting at 4 pm while providing sufficient rest";

- Establishing a Climate Calculations Center, as recommended in the State Comptroller's report[31]. This center will serve as a crucial knowledge hub for decision-makers to plan appropriate policies in response to climate risks. The center will utilize every available tool, including the national climate risk map published by the Ministry of Environmental Protection, and integrate data and forecasts from the IMS. Additionally, the Climate Calculations Center will collaborate with the Institute for Occupational Safety and Hygiene, whose goal is to promote occupational safety and health. The center will advise the Ministries of Environmental Protection, Labor, and Health on matters related to the climate crisis and its implications on occupational safety and health.

- Allocating resources to implement the changes, including worker training and information. Additionally, dedicated resources should be allocated for supervision and enforcement.

A just transition is directly related to changes in work and behavior patterns, so it must also take place with consideration for the safety and health of the workers who are in this process and are already affected by the consequences of the climate crisis.

[30] Israel hasn't ratified the ILO Governance convention No.129 Labour Inspection (Agriculture) Convention, 1969.
[31] The State Comptroller, *The Actions and Preparation of the Israeli Government for the Climate Crisis - Extended Follow-up Audit 2024*.

Formulating workplace safety and health regulations that address work in extreme climate conditions is another part of the shift in consciousness needed to foster a better occupational safety and health culture in Israel.

Therefore, as presented in this document, regulation and clear rules will, first and foremost, improve the protection of workers' health from the weakest strata in the State of Israel and enhance Israel's preparedness for the climate crisis. **The State of Israel must pay more attention to preventing damage in advance rather than dealing with it retrospectively. Therefore, the various government ministries must act to implement these changes immediately.**