



November 5, 2025

Ms. Kristina Rosett
Interim Director, Division of Labor Standards and Statistics
Colorado Department of Labor and Employment
707 17th Street, Suite 150
Denver, CO 80202

Dear Interim Director Rosett,

On behalf of the below signed agricultural organizations, we write in response to proposed changes to the Agricultural Labor Conditions Rules

We support the proposed changes to Rule 4, Access to Key Service Providers, as those changes are in line with the statutory changes and legislative intent in Senate Bill 25-128, which our organizations supported.

We oppose the proposed changes to Rule 3, Heat Illness and Injury Protection, and ask the Division to not adopt these proposed changes since the Department has not engaged with the agriculture industry in any stakeholder process to date to discuss these proposed changes. Further, the Division, without engaging in any stakeholder process, has not provided any basis or rationale for the need for these proposed changes. Without an

understanding of the Division's desire for these changes, it is hard to fully understand the proposed changes' impact on agricultural employers and their operations in implementing the changes, should they be included in the final rule.

Without the Division providing justification for the need for the proposed changes in Rule 3, we request the Division not adopt these proposed changes in the final rule. At a minimum, the Division should engage with industry representatives in a meaningful stakeholder process to discuss changes to the rules that aren't directed by changes in statute.

Thank you for your consideration of this request.

Sincerely,

Colorado Cattlemen's Association
Colorado Wool Growers Association
Colorado Association of Wheat Growers
Colorado Corn Growers Association
Colorado Dairy Farmers
Colorado Farm Bureau