

HEAT STRESS

**A review of the legal regimes and
why compliance is the floor NOT the ceiling**

A brief for businesses operating across Arab States



Heat Stress: From Occupational Safety Issue to Human Rights Concern

Across much of the Arab States, extreme heat is not an occasional event, it is a defining feature of the working environment. From construction sites and agricultural fields to ports, logistics hubs, sanitation services and oil and gas operations, millions of workers perform physically demanding tasks in temperatures that can regularly exceed 45°C during the summer months. As climate change accelerates, heatwaves are becoming more frequent, more intense and longer-lasting, placing growing pressure on workers, employers and regulators alike.

Heat stress occurs when the human body can no longer effectively cool itself and maintain a safe internal temperature. The consequences extend far beyond discomfort. **Exposure to excessive heat can lead to dehydration, heat exhaustion, heat stroke, kidney disease, cardiovascular complications, workplace accidents and, in severe cases, death. Heat also affects concentration, decision-making and physical performance, increasing the likelihood of occupational injuries while reducing productivity and operational efficiency.**

The challenge is particularly acute across the Gulf and other parts of the Arab region, where high temperatures are often combined with intense humidity and demanding working conditions. Workers in outdoor occupations and poorly ventilated environments face heightened risks, especially where access to shade, drinking water, rest breaks, cooling facilities or medical assistance is limited. Migrant workers, subcontracted workers and low-income workers may face additional vulnerabilities where economic pressures, recruitment-related debts, insecure employment or restrictions on mobility limit their ability to stop work or report unsafe conditions.

Heat stress is therefore not only an occupational health and safety issue, but also recognised human rights concern. Excessive heat can affect the **rights to life, health, safe and healthy working conditions, just and favourable conditions of work, and an adequate standard of living.** As temperatures continue to rise across the region, businesses are facing growing expectations from governments, investors, international organisations and civil society to move beyond minimum legal compliance and adopt more effective measures to prevent heat-related harm.

Insights from the ground:

Why legislation is not enough and businesses need to go beyond compliance?

Legal protections on heat stress, including midday work bans and occupational safety requirements, are an important baseline. However, experience from the ground shows that legislation alone does not always translate into effective protection for workers. In practice, risks often persist because of loopholes in the law, inconsistent implementation, limited enforcement, and operational pressures that encourage companies and contractors to treat compliance as a box-ticking exercise rather than a genuine prevention strategy.

Key risks observed in practice include:

- **Displacement of risk rather than reduction of risk**
Workers may be moved to earlier morning, late afternoon, or evening shifts to comply with midday bans. However, these shifts can become longer, more intensive, or still take place during periods of dangerous heat and humidity.
- **Longer or more compressed working hours**
In some cases, work that cannot be carried out during banned hours is compressed into fewer hours. This can increase physical intensity, reduce rest periods, and heighten the risk of dehydration, exhaustion, and accidents.
- **Loopholes around “shaded” or “indoor” work**
Some work may be classified as shaded or non-outdoor even when workers remain exposed to extreme heat, poor ventilation, radiant heat, or partially covered environments that do not provide meaningful protection.
- **Narrow focus on certain sectors**
Enforcement and company policies often focus on construction, while other exposed workers may be overlooked, including:
 - security guards;
 - delivery drivers;
 - petrol station attendants;
 - cleaners;
 - maintenance workers;
 - transport and logistics workers;
 - subcontracted and outsourced workers.
- **Limited visibility over subcontractors**
Heat-stress controls may be stronger for direct employees than for workers employed by contractors, labour suppliers, or subcontractors. This creates a protection gap for workers who are often among the most exposed.
- **Weak or inconsistent enforcement**
Government inspections may be limited, fines may not always be imposed consistently, and enforcement may focus on visible breaches during fixed banned hours rather than actual heat exposure throughout the day.
- **Pressure to meet deadlines**
Project delays, supply-chain disruption, and crisis-related operational pressure can lead managers and contractors to prioritise delivery timelines over worker safety.
- **Near misses treated as isolated incidents**
Fainting, dizziness, dehydration, confusion, minor accidents, and heat exhaustion are often treated as individual incidents rather than warning signs of systemic failure in heat-risk management.
- **Limited worker voice**
Workers may hesitate to report symptoms, request rest, or stop work because of fear of wage deductions, disciplinary action, retaliation, or being seen as refusing work.

The regulatory landscape

Across the Arab States, dedicated heat stress regulations remain the exception rather than the norm. As of 2026, only the six GCC countries (Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates) have adopted specific heat stress measures, typically through seasonal midday work bans and associated worker protection requirements. Jordan also stands apart from much of the region, having developed a more explicit framework for occupational safety and health protection, although it does not have a dedicated heat stress regime comparable to those found in the GCC.

By contrast, most countries in North Africa and the Levant including Egypt, Algeria, Morocco, Tunisia, Libya, Mauritania, Lebanon, Syria and Palestine do not currently have specific heat stress regulations governing work in high temperatures. Similarly, Iraq, Yemen, Sudan, Somalia, Djibouti and Comoros do not have dedicated heat stress legislation. **Instead, employers in these jurisdictions remain subject to general occupational safety and health obligations requiring them to provide a safe workplace and protect workers from foreseeable risks to health and safety.** While these general duties can reasonably be interpreted as including heat-related risks, they rarely establish detailed requirements regarding heat monitoring, work-rest schedules, hydration, acclimatisation, temperature thresholds, or mandatory suspension of work during extreme heat events.

Current Heat Stress Regulations and Government Measures in the Arab States

Country	Period of enforcement	Hours daily	Summary of regulation/guidelines	Source
 Bahrain	15 June - 31 August	12:00–16:00	Employers must display site schedule, which must be accessible to workers and labour inspectors. and enforce shade/water breaks. Limited exceptions apply for essential and continuous activities, including oil and gas operations, public utilities, emergency maintenance, security and rescue services, and certain government projects subject to approval. Companies must notify Ministry if using exemptions and still mitigate heat risk and sun-related illnesses. The Ministry of Labour has designated the phone number 17873921 for reporting observations or violations during the work-ban period, and reports may also be submitted through WhatsApp on the same number.	Ministry of Labour has announced that Ministerial Decision (5) of 2026. Bahrain's cabinet decision dated 31 March 2026.
 Kuwait	1 June – 31 August	11:00-16:00 NEW: Starting June 1 through Aug 31, 2026, the interior ministry's traffic department has banned delivery motorcycles from	The regulation requires employers to provide cold drinking water, first-aid facilities, shaded rest areas, and appropriate rest breaks adapted to working conditions and climatic circumstances. The resolution allows limited exemptions for essential technical or operational activities that cannot be postponed, such as emergency maintenance, public services, and critical infrastructure works, subject to prior approval from the Labour Inspection Department and full compliance with occupational health and safety requirements. In addition, outdoor work must be suspended whenever weather or environmental conditions pose a risk to workers' health and safety, including dust storms, heavy rainfall, exceptionally high	Kuwait's Public Authority of Manpower (PAM) announced the updated Ministerial Decree No. 3 (2026) to regulate work in open areas and inappropriate climatic conditions. Ban on delivery bikes in peak summer hours. The interior ministry's traffic department has

		operating on all roads nationwide between 11:00 and 16:00 daily.	temperatures or humidity, natural disasters, epidemics, or other emergency situations.	banned delivery motorcycles.
 Oman	1 June – 31 August	12:30-15:30	Oman's Ministry of Health issued the 'Safe Summer' Guidelines (2025) to strengthen worker protection from heat stress. The guidance promotes a risk-based approach, including rescheduling physically demanding work to cooler hours, mandatory rest breaks every 45-60 minutes in shaded or air-conditioned areas, provision of drinking water and hydration support, and measures to improve cooling through air conditioning, fans, and shade. Employers are encouraged to implement heat alert systems based on daily temperature and humidity levels, identify and provide additional protection to high-risk workers, and deliver regular heat stress awareness training through educational materials and worker engagement. These measures complement broader occupational safety and health requirements that require employers to train workers on heat-related risks and preventive measures.	Ministerial Decision No. 286/2008 (as amended by Resolution No. 322/2011), alongside the Occupational Safety and Health Regulations under Oman Labour Law. Oman's Ministry of Health issued the 'Safe Summer' Guidelines (2025)
 Qatar	1 June – 15 September	10:00-15:30	Employers must conduct risk assessments, provide mandatory annual health checks, to diagnose and manage chronic diseases that may contribute to the risk of heat stress train workers and OSH staff, provide cool drinking water, shaded rest areas and PPE, and workers have a right to remove themselves from high heat-stress situations. The responsibility of the principal contractor to coordinate prescribed heat stress mitigation measures when two or more employers undertake activities simultaneously at one work site and their obligation to collaborate.	Ministerial Decision No. 17 of 2021. Ministry of Labour A Guide for employers April 2023 Heat stress Legislation.
 Kingdom of Saudi Arabia	15 June – 15 September	12:00-15:00	The Ministry of Human Resources and Social Development has also issued guidance on preventing work-related heat exposure, including regular hydration, rest breaks, shaded or cooled rest areas, teamwork and buddy systems, and stopping work when symptoms appear. Workers are encouraged to drink fluids every 15–20 minutes, avoid working alone, seek assistance from colleagues, take breaks, and wear light-coloured clothing that reduces heat absorption. Employers are also expected to provide water, adjust work schedules to reduce prolonged heat exposure, monitor temperature and humidity at worksites, designate rest areas, and conduct annual health checks to identify workers more vulnerable to heat-related illness. Exemptions may apply where work cannot be postponed for technical or emergency reasons, provided employers take necessary protective measures to prevent heat stress and protect workers' health.	Ministerial Decree No. 3337 of 15/07/1435 H (14 May 2014), MHRSD. Ministry of Human Resources and Social Development (Ministerial Decision No. 196086, dated 29/10/1442 on occupational safety and health of preventing effects of working in high-temperature. The ministry published on its website the “Occupational Safety and Health Procedural Guide for Preventing the Effects of Sun Exposure

and Heat Stress” and the “Guidance Manual for Preventing the Effects of Working in Hot Environments,” with the aim of informing business owners and enabling them to implement its contents



United Arab
Emirates

15 June – 15
September

12:30-15:00

Employers must provide workers with shaded areas during the break, and ensure the availability of cooling equipment, sufficient drinking water, hydration supplements where approved, and first-aid supplies. For exempted work that cannot be postponed, employers must still provide the necessary protective measures to safeguard workers from heat stress.

UPDATED: The Abu Dhabi ADPHC Safety in the Heat Technical Guideline applies to employers with workers exposed to high-temperature environments, including outdoor work and hot site operations. It requires employers to assess heat stress conditions using the Thermal Work Limit (TWL) approach, which considers air temperature, humidity, radiant heat and wind speed, and to use this assessment to determine controls, work/rest breaks and rehydration needs. Employers are expected to acclimatise and re-acclimatise workers, schedule hot or physically demanding work during cooler periods, reduce physical workload, provide extra or relief workers where needed, ensure access to cool water, rest breaks and cool rest areas, monitor workers at risk, and train workers, supervisors and first aiders on heat illness risks, symptoms, prevention, treatment and PPE. The guideline also recommends practical site systems, including hydration protocols, inspection checklists, emergency response arrangements and a flag system to communicate heat conditions to workers.

[The Ministry of Human Resources and Emiratization in the United Arab Emirates has established the “Midday Break Decree” under the “Decree No. 401 of 2015”](#)

Abu Dhabi Health Center Abu Dhabi
[Occupational Safety and Health System Framework](#)

[\(ADOSH-SF\) ADOSH-SF Technical Guideline](#)

[Safety in the Heat V4 2024](#)



The challenge is no are workers genuinely protected from heat-related harm, or is the company simply complying with the visible minimum required by law?

What does good look like *beyond* compliance

Legal compliance is only a baseline, employers must manage actual heat risks, especially among subcontractors and suppliers where exposure is often less visible and less controlled.

- **Conduct heat-stress risk assessments before work starts**

Employers should assess all hot work, including outdoor work, indoor work in poorly ventilated areas, transport, logistics, maintenance, cleaning, security, delivery, and subcontracted activities. Assessments should consider temperature, humidity, radiant heat, workload, PPE, physical effort, access to water and rest, worker health, accommodation and transport conditions, and emergency preparedness.

- **Use real-time heat monitoring, not only calendar-based rules**

Employers should use appropriate heat-monitoring tools, such as Heat Index or preferably Wet Bulb Globe Temperature (WBGT), to determine when work should be modified, paused, or stopped. This helps ensure that controls respond to actual risk rather than relying only on fixed dates and hours.

- **Adapt working hours and work-rest cycles**

Heavy or strenuous tasks should be scheduled during cooler periods, and structured work-rest cycles should be applied based on heat exposure and workload. Employers should avoid simply shifting work to earlier or later hours if this results in longer shifts, compressed work, reduced rest, or equally hazardous exposure.

- **Provide cool, shaded and ventilated rest areas**

Rest areas should be close to the worksite, accessible to all workers, and genuinely cooler than the work area. Shade should not be treated as a technical loophole that allows unsafe work to continue; it should support actual recovery from heat exposure.

- **Ensure hydration and electrolyte replacement**

Cool drinking water should be available near the work location at all times, with clear encouragement to drink regularly. Where workers are exposed to prolonged sweating or heavy physical work, employers should provide appropriate salt or electrolyte replacement.

- **Introduce acclimatisation for new or returning workers**

Workers who are newly recruited, returning from leave, or assigned to hotter or more physically demanding tasks should be gradually exposed to heat. Workload and exposure should be increased progressively, with closer supervision during the first days or weeks.

What does good look like *beyond* compliance

- **Reduce physical workload where possible**

Employers should use mechanical aids, rotate tasks, split strenuous work, increase staffing, and use buddy systems to reduce heat strain. Work planning should aim to eliminate or reduce exposure first, rather than relying only on individual resilience or PPE.

- **Identify and protect vulnerable workers**

Employers should provide medical screening and health monitoring for workers who may be more vulnerable to heat stress, including those with hypertension, diabetes, kidney disease, heart conditions, or other relevant health risks. High-risk workers should be reassigned or given additional protections where needed.

- **Train workers, supervisors and contractors**

Training should cover the signs of heat exhaustion and heat stroke, hydration, safe work-rest practices, first aid, emergency escalation, and the right to report symptoms. Supervisors should be trained to stop work when warning signs appear and not to treat heat-related illness as a disciplinary or productivity issue.

- **Enable worker voice and non-retaliation**

Workers should be able to report symptoms, request rest, access water, and remove themselves from dangerous heat exposure without wage deductions, punishment, or retaliation. Worker input should be built into risk assessments and daily site monitoring.

- **Extend protections across the supply chain**

Heat-stress controls should apply to contractors, subcontractors, labour suppliers, outsourced workers, security, transport, cleaning, maintenance, delivery, and logistics workers. Contracts should require compliance with heat-stress controls, and companies should monitor implementation in practice.

- **Track incidents, near misses and complaints**

Employers should record heat-related symptoms, near misses, medical cases, worker complaints, rest breaks, hydration access, and heat readings. Fainting, dehydration, confusion, dizziness, and heat exhaustion should be treated as warning signs of systemic risk, not isolated incidents.



About BHRMENA

BHRMENA is ***the only organization solely*** dedicated to advancing business and human rights practices across the Arab States.

Regional legal experience BHRMENA is an independent regional firm with strong legal and regulatory expertise across the Arab States. Its neutral positioning allows it to convene businesses, suppliers, and stakeholders in a trusted setting for open and practical dialogue.

Extensive experience with international standards BHRMENA has extensive experience working with global frameworks such as the UN Guiding Principles, OECD Guidelines, and ILO standards, and is well positioned to translate these expectations into practical approaches suited to the Arab States' regulatory and business environment.

Operational understanding of supply chains BHRMENA's work is grounded in the operational realities companies face in the region, including procurement pressures, subcontracting models, labour supply dynamics, and day-to-day implementation challenges.



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