WORKMEN'S COMPENSATION WHERE INJURY RESULTS FROM EXPOSURE TO THE NATURAL ELEMENTS

It is the purpose of modern workmen's compensation statutes to give the employee protection from risks connected with his employment.\(^1\) The employer is charged with certain injuries to his workmen without regard to negligence.\(^2\) Workmen's compensation is thus a form of strict liability—a liability limited, however, by the statutes which provide almost uniformly that an award shall be made only when there has been an injury which arises out of and in the course of the employment.\(^3\) As a further limitation, except in states allowing compensation for occupational diseases, it is generally required by statute, either expressly or as construed, that the injury to be compensable must be accidental.\(^4\)

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\(^1\) SCHNEIDER, WORKMEN'S COMPENSATION (3d ed. 1941) §3.

\(^2\) HOROWITZ, WORKMEN'S COMPENSATION (1944) 7.

\(^3\) BROWN, Arising Out of and in the Course of the Employment in Workmen's Compensation Acts (1931) 7 WIS. L. REV. 15, 67; Note (1931) 15 MINN. L. REV. 742.

\(^4\) For a collection of cases, see (1935) 71 C. J. 562.