

Submitter: Reuben Davidson
On Behalf Of: Myself
Committee: House Committee On Labor and Workplace Standards
Measure, Appointment or Topic: HB2548

I agree with Representative Shelly Bosshart Davis's opposition she wrote below.

Oregon's agriculture industry is already grappling with the aftermath of the recent agricultural overtime law, HB 4002 (2022). Now, HB 2548 proposes a sweeping, one-size-fits-all mandate that could force many family farms and ranches out of business. HB 2548 disregards the significant protections already in place for farmworkers and threatens to fast-track new, burdensome regulations that could cripple Oregon's agricultural industry.

HB 2548 eliminates the relationship between employers and workers.

The bill undermines the relationship between farm employers and workers by transferring critical decisions about staffing, wages, benefits, and training to an unelected and unaccountable bureaucratic body. Farmers would be stripped of their ability to make management decisions under this punitive concept.

HB 2548 threatens the survival of family farms and ranches and accelerates job loss. HB 2548 targets an industry that largely cannot adjust prices to account for rising labor costs. Oregon's agricultural sector exports 80% of its produce, competing not just with other local farms, but with international growers in Mexico, Guatemala, Turkey, and beyond. By raising operational costs for Oregon farmers, the bill diminishes their competitiveness in both domestic and global markets.

Oregon's farmers are already struggling with labor shortages and rising costs.

Additional mandates from a workplace standards board would only increase these challenges, potentially forcing the closure of multigenerational farms, eliminating farm jobs, or reducing work hours.

HB 2548 duplicates existing worker protections

Oregon already boasts some of the strongest labor laws in the nation, which apply equally to farmworkers. The facts do not support the idea that farm workers need additional protections through HB 2548. Oregon's workplace protections are already so expansive and costly that many small farms can no longer afford to operate. The last USDA ag census showed a loss of approximately 6% of farms in Oregon over the previous five years and over 65% of farms operating at a net cash loss in 2022. HB 2548 risks shutting down family farms and ranches by piling unaffordable costs onto an industry already reeling from labor shortages, climate challenges, and market volatility. This measure could destabilize rural economies, all while duplicating or contradicting existing worker protections.

Oregon law currently allows for at-will employment, meaning both employers and employees can terminate the employment relationship without notice or cause, except in specific cases like public employment or contracts. All industries in Oregon

are considered at-will, including farms and ranches. HB 2548 would dramatically alter this structure, creating significant challenges and litigation risk for agricultural employers.

HB 2548 puts Oregon's farm and ranch families in an untenable position.

Shift in Burden of Proof: HB 2548 would require employers to prove the reasonableness of a termination, shifting the burden to them. Family farms and ranches would be vulnerable to costly litigation, as they would need to defend against employment claims, even in situations involving market conditions, poor yields, or weather events.

Increased Litigation Costs: Family farms already face enormous financial strain. It costs around \$75,000 just to settle a claim before it reaches court. Adding legal risks will only increase financial pressure, especially for small, family-run operations.

Economic Hardships: Many Oregon farms are already struggling with poor yields and low commodity prices. Most will spend the next several years recovering from cash losses incurred in 2023 and 2024. HB 2548 adds another layer of uncertainty that could force family farms into financial ruin.

Impediments to Staffing Flexibility: HB 2548 limits necessary flexibility for staffing and termination decisio