



**OREGON
DEPARTMENT OF
AGRICULTURE**

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March 20, 2025

The Honorable Tina Kotek
Governor of Oregon
900 Court Street NE
Salem, OR 97301

From the Desk of
Representative
Shelly Boshart Davis

Dear Governor Kotek,

On behalf of the voting members of the State Board of Agriculture, we write today to share our deep concerns regarding House Bill 2548. Following public comments at our March meeting and direct input from our agricultural communities, we feel it is our obligation to provide our insights directly to your office. While the Board primarily advises the Oregon Department of Agriculture, certain policy matters of significant impact, like this, compel us to engage at this level.

Oregon's agricultural sector is a cornerstone of the state's economy, navigating a complex landscape of environmental variability, market fluctuations, and increasing regulatory requirements. Farmers and ranchers already contend with rising production costs, natural disasters, and global competition—all within a sector that operates under inherent uncertainty.

Oregon has long upheld strong labor protections for farmworkers, including some of the nation's most rigorous workplace health and safety standards, as enforced by Oregon OSHA. Existing laws ensure fair compensation, anti-discrimination protections, pay equity, and protected and provided leave; all developed through public processes and elected representation.

House Bill 2548 proposes the establishment of an independent Agricultural Workforce Labor Standards Board. This measure singles out agriculture by introducing a new regulatory body that duplicates existing labor standard authorities and complicates an already robust framework. The bill fails to acknowledge the current comprehensive protections and the careful balance required to sustain Oregon's family farms and ranches.

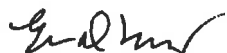
The agricultural sector requires operational flexibility due to its unique economic and environmental challenges. Introducing a state-level body with broad regulatory authority, particularly over employment conditions such as "for cause" termination, imposes additional burdens that place Oregon producers at a competitive disadvantage. While the bill allows layoffs in some cases, the burden of proof and the additional constraints

on standard employment termination creates unworkable challenges for farms that rely on seasonal and fluctuating labor demands. Many of our farms operate as price takers in volatile markets, where sudden regulatory shifts can have detrimental consequences for employers and workers.

Furthermore, while HB 2548 does not remove the Legislature's oversight entirely, it does shift key policy decisions away from elected representatives to an appointed board. The legislative process remains the most appropriate for evaluating and enacting policy changes of this magnitude. Through a deliberative and transparent structure, the Legislature ensures public accountability, thorough analysis, and the necessary resource alignment for effective implementation.

At a time when both farmers and farmworkers face mounting challenges, we urge a careful and measured approach to avoid unintended disruptions within the agriculture community. We appreciate your thoughtful consideration of these concerns and welcome the opportunity to discuss this matter further.

Sincerely,



Elin Miller, Chair
State Board of Agriculture

C: Lisa Charpilloz Hanson, Director, Oregon Department of Agriculture
Geoff Huntington, Senior Natural Resources Advisor, Office of Governor Tina Kotek
Bob Livingston, Legislative Director, Office of Governor Tina Kotek