



*Testimony in opposition to HB 2692 (2025)*

Chair Bowman, Vice Chairs Drazan and Pham, and members of the Committee,

My name is Kate Suisman. I am an attorney at the Northwest Workers' Justice Project (NWJP). Thank you for the opportunity to provide testimony on this important bill. We represent workers in low-wage jobs when bad things happen to them at work: when they are not paid, or are discriminated against for being in a protected class or are retaliated against for speaking up. Finally, we engage in policy advocacy and try to bring the important perspectives of workers in low-wage jobs and immigrant workers to these policy discussions.

I write in opposition to HB 2692, which would significantly change the way agencies make rules in Oregon.

As a worker advocate, I have participated in many rulemakings over the past eight years in my current role. I do not find the process perfect, and have been frustrated at the results in quite a few instances, notably during Oregon OSHA rulemakings on the pesticide application exclusion zone and recently on agricultural labor housing. Farmworkers did not get important protections they fought for. However, the process was generally fair and transparent.

Business advocates usually outnumber worker advocates at least two to one, and sometimes three to one, in the rulemakings I have participated in. Despite that, I believe the agencies I have observed in rulemaking have done their best to give fair time to worker advocate comments.

HB 2692 raises some interesting and important issues, but its solution is too broad. I appreciate the intent to include more public awareness and involvement, and to make the process less bureaucratic. However some of the changes, specifically the added step of a report to Ways and Means, will prolong the already lengthy rulemaking process and unduly involve the Legislature in agency business.

Thank you.