

Submitter: Matt Snyder

On Behalf Of:

Committee: House Committee On Labor and Workplace Standards

Measure, Appointment or Topic: HB2548

To whom it may concern,

I farm Christmas trees in Clackamas county and am very concerned about some of the goals in HB 2548. I am in opposition of the bill for the reasons found below. Thank you for your time in reading this and your consideration in voting NO on this bill HB 2548.

- HB 2548 threatens my ability to keep farming. Oregon already has some of the highest labor costs in the country, and after several tough years, I can't afford more regulations and wage increases.
- HB 2548 would give unelected officials the power to set wages and safety rules that go far beyond current protections. This would add more regulatory burden to small farms like mine. Farmers know how devastating this regulatory model is. Oregon's state agencies have adopted very harmful regulations in the last five years with little to no accountability for their actions. This board would be no different; its members aren't even elected.
- HB 2548 unfairly targets agriculture by taking away at-will employment. This means I wouldn't be able to make necessary staffing decisions without the risk of costly lawsuits. One claim can cost tens of thousands of dollars or more.
- Farms should not be forced keep employees who may not meet performance expectations or adapt to the demands of the job. All other sectors in Oregon would be at-will, but farms—whose employment needs are impacted by weather, yields, trade, market conditions, pests, diseases, etc.—would not. Not only is that unfair, but it would likely result in job loss, not job security.
- HB 2548 doesn't help workers or consumers; it just makes farming harder and more expensive. I have already had to reduce hours for workers to comply with agricultural overtime, and this bill would have even more severe consequences.
- HB 2548 shifts the burden of proof. The proposal 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.
- HB 2548 would increase 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. This proposal adds another layer of uncertainty that could force family farms into financial ruin.
- HB 2548 would take away staffing flexibility: The proposals limit necessary flexibility for staffing and termination decisions, making it harder for employers to

navigate the unpredictability of farming. These restrictions could lead to difficulty in hiring and maintaining a workforce.

- HB 2548 would threaten the livelihood of family farms and ranches by imposing unnecessary legal burdens. It increases costs and limits the flexibility needed to manage agricultural businesses. At a time when family farms are struggling to stay afloat, the Legislature should reject this punitive concept.

Thank you again for your time.

Matt Snyder

Clackamas County Christmas tree grower