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House Committee on Business and Labor Oregon State Legislature 900 Court Street NE Salem,  
OR 97301

RE: OPPOSITION TO HOUSE BILL 2548

Dear Chair and Members of the Committee:

I am writing to express my strong opposition to House Bill 2548 as the owner of a small, family-run orchard business in Oregon. This bill would create an insurmountable administrative burden for operations like ours and threatens the very existence of small family farms across our state.

Our family orchard, like many small agricultural businesses, operates with minimal administrative staff—often just family members wearing multiple hats. We personally handle everything from planting and harvesting to payroll, and regulatory compliance. The administrative requirements in HB 2548 would dramatically increase this burden in several critical ways:

1. The creation of a new regulatory board with authority to establish and continually revise "minimum working standards" would require us to constantly monitor, interpret, and implement new regulations—a task that large agricultural corporations can assign to dedicated compliance departments but that would fall entirely on our already-stretched family members.
2. The mandatory training requirements for all workers and employees would take precious time away from essential operational activities during our critical growing and harvest seasons when every hour counts.
3. The "for cause" termination restriction would require us to create and maintain extensive documentation systems that we simply don't have the administrative capacity to manage. Unlike large operations with HR departments, we would need to divert significant time from actual farming operations to create, implement, and maintain these systems.
4. The biennial review process will likely create a constantly shifting regulatory landscape that would require regular legal consultation—an expense that our thin profit margins cannot sustain.

We are already struggling to manage the administrative requirements of providing worker housing and complying with overtime regulations. These existing burdens have significantly increased our labor costs and administrative workload. The additional layers of regulation proposed in HB 2548 could make it financially impossible for us to continue operating.

While I understand the intention to protect agricultural workers, this bill fails to recognize the fundamental differences between large corporate business and small family operations. The unintended consequence will be the acceleration of farm consolidation, as family operations like ours are forced out.

I respectfully urge you to reject HB 2548. The rich tradition of family farming in Oregon is at stake.

Thank you for your consideration of these concerns.

Sincerely,

Dani Annala  
Annala Orchards, Inc.  
Secretary