Submitter:	D Torres
On Behalf Of:	
Committee:	House Committee On Rules
Measure, Appointment or Topic:	HB2548
Chair & Committee Members,	

I want to express my STRONG OPPOSITION to the proposed bill establishing the Agricultural Workforce Labor Standards Board, which would be tasked with setting minimum working standards for agricultural workers and enforcing compliance through new legal remedies.

This bill raises significant concerns regarding regulatory overreach, redundancy, potential economic harm to family farms and rural communities, and lack of stakeholder balance in the policy process.

### This is Duplicative and Unnecessary Bureaucracy

Oregon already has labor standards in place that protect agricultural workers, enforced by agencies such as the Bureau of Labor and Industries (BOLI) and the Occupational Safety and Health Administration (OSHA). Creating an entirely new board with overlapping duties adds an unnecessary layer of government bureaucracy that could lead to confusion, inconsistency in enforcement, and administrative bloat without clear evidence that existing protections are failing.

This is an Economic Risk to Small and Family-Owned Farms

Unlike large agribusinesses, many small and family-owned farms operate on thin margins. Mandating a new board with the authority to unilaterally establish labor standards could introduce rigid, one-size-fits-all mandates that don't reflect the realities of seasonal agriculture, market volatility, or region-specific conditions. This may force small farms to scale back, automate, or close—hurting not only employers but also the very workers this bill claims to protect.

#### Lack of Balanced Representation

The proposed structure and mission of the board raise concerns about equitable stakeholder input. If the board is dominated by appointees who lack direct agricultural experience or heavily favors one side of the labor-management relationship, the resulting standards could be imbalanced and unrealistic. True reform must come from inclusive dialogue—not top-down mandates disconnected from on-the-ground realities.

#### Potential for Increased Litigation

By creating new remedies and enforcement mechanisms, the bill opens the door to increased legal disputes that may further strain farm owners already working to

comply with a complex web of labor laws. Rather than fostering collaboration or proactive compliance, this framework could encourage adversarial approaches and unintended consequences, such as job losses or the contracting out of labor.

## Alternative Approaches Are Preferable

If the legislature wishes to improve working conditions for agricultural laborers, there are more constructive and collaborative paths forward. Strengthening the resources available to existing agencies, supporting worker education and outreach, and incentivizing compliance through voluntary certification or grant programs would deliver progress without destabilizing the industry.

# Conclusion

Protecting the rights and dignity of agricultural workers is a goal we all share. However, this bill takes an overly aggressive, top-down approach that ignores existing protections, threatens the viability of family farms, and risks unintended harm to the rural economy. I respectfully urge the committee to reject this proposal and pursue more balanced, collaborative solutions.

Please DO NOT pass this bill.