



Testimony in support of HB 3194 (2025)

Chair Bowman, Vice Chairs Drazen 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.

NWJP has been working with Oregon Law Center to pass HB 3194, based on the truly horrendous conditions we have seen over the past two+ years of our work in the Cannabis Worker Resilience Partnership (CWRP). I have submitted a four-page overview of the work of this Partnership, which offers cannabis workers legal, mental health and humanitarian support. While there are many changes to law that we see as necessary to address the illegal cannabis crisis, addressing inhumane housing conditions is our priority this session.

The bill before you today would amend the current "Camp Operator Registration Act" or CORA, ORS 658.750 et seq. This is an outdated bill that is very difficult to use, and the amendments aim to address those shortcomings.

As the Oregon Law Center testified, proponents have worked to respond to the opposition's concerns on the bill. I will briefly outline the changes from the base bill that make up the -6 amendment, which resulted from a half dozen or more meetings with opposition:

- At Representative Kropf's recommendation, we changed who has the "burden of proof" in the bill. The base bill required the landowner to show they had checked the license, registration and indorsement of the camp operator. The -6 amendment requires the worker (the plaintiff) to show the landowner knew or should have known of the unregistered camp operation.
 - An example where a landowner "should have known" is an out of state landowner who receives a call from a neighbor saying they observed a group of workers sleeping on the property or a landowner who lives nearby and sees tents on the property multiple times.
- At Oregon Farm Bureau's request, we added a "rebuttable presumption" for landowners who have a written lease that explicitly prohibits unregistered housing on the property. A worker can rebut this presumption by showing the landowner knew or should have known of the housing.
 - An example of how a worker may be able to rebut the presumption is a landowner who says there is a lease preventing housing but multiple workers testify they

spoke with the owner who was at the property regularly, and saw their sleeping arrangements on the property.

- Also at the Farm Bureau's request, we greatly reduced the potential penalties under the bill. As originally drafted, a worker could have sought penalties based on the number of *distinct* violations of CORA. (These could include failing to register with DCBS, restraining someone from leaving the camp, evicting someone for making a claim against them, among others.) BOLI has the ability to seek penalties "*for each violation*" of any provision of CORA, with a \$2,000 civil penalty *per violation* of CORA, yet they have not had the capacity to enforce this law for many years. (They likely still won't after they hopefully receive more funding this session.) The base bill was seeking a similar penalty framework to what BOLI can do, based on the number of *distinct* violations of the law, but we have reluctantly agreed to a \$2,000 *total* penalty. That means that someone who provides excellent housing but fails to register it would pay the same penalty as someone who fails to register, locks workers in and then evicts them when they make a claim for their unpaid wages.
 - The \$500 total penalty in CORA as written would be worth about \$1,290 today, so the increase to \$2,000 is an improvement but may not serve as a significant deterrent.

Workers are living in extremely dire, inhumane settings, as you have seen and heard about. We ask for your support of HB 3194 so we can give these workers a way to bring some accountability to the landowners who are currently profiting from the cannabis crisis.

Thank you sincerely.