

PUBLIC SUBMISSION

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Agricultural Labor ICR (0535-0109)

Comment On: NASS-2024-0002-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals

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Comment on FR Doc # 2024-04850

Submitter Information

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General Comment

See attached file(s)

Attachments

AFB Labor IAC FLS comments May 2024

May 6, 2024

Mr. Richard Hopper
NASS Clearance Officer
U.S. Department of Agriculture,
1400 Independence Avenue SW,
Room 5336, South Building
Washington, D.C. 20250-2024

RE: NASS-2024-0002-0001, Agricultural Labor Survey

Mr. Hopper:

Our family farms in Oregon's fruit growing region, the Hood River Valley and raise apples, pears and cherries. We would like to comment on the National Agricultural Statistics Service's Agricultural Labor Survey.

I am a longtime member of the Oregon Farm Bureau and serve on the American Farm Bureau's Labor Issue Advisory Committee where we work on policies that affect our industry. The results of the FLS are of extreme importance and concern to our farm and our industry.

Tree fruits, particularly apples, pears and cherries are extremely labor intensive crops. Mechanization of growing and harvesting of these easily damaged fruits is a long way off. Sixty percent or more of our expenses are for hand labor. The Washington-Oregon Region has had the highest Adverse Effect Wage Rates for the last three years making profitability nearly impossible. In our local fruit growing area, **60** long term family farms have quit farming, mainly caused by the difficulty of obtaining labor and the high cost. The region's agriculture is coming unraveled. Prices received by growers from supermarket chains have not increased to catch up to the escalating AEWR.

The process for determining the Prevailing Wage and thus the AEWR is **deeply flawed**. In areas where a substantial number of H2a workers are employed, all workers in the area (H2a or non H2a workers) are paid at or near the AEWR. Supervisory personnel have to be paid more. This higher pay level immediately must be paid by farms not in the H2a program or they lose workers.

What does this mean? This means that a Prevailing wage in the area which is intended to be the mean wage of the area immediately becomes the minimum wage in the area. The mathematical result when the **FLS Mean Wage immediately becomes the minimum** is a leapfrogging wage effect. This results in an artificial process-induced wage acceleration. This rate of increase exceeds inflation and is not representative of any real economic reality. The Oregon-Washington Regional AEWR increases have exceeded regional inflation 7 out of 11 years.

In closing, I am concerned that the establishment of the Prevailing Wage is a flawed artificial process with a mathematical bias introduced thus having a market-distorting effect on H-2A wages and the overall labor market within our industry.

Thank you for your attention and service. I welcome any engagement with American Farm Bureau moving forward as you consider these concerns.

Sincerely,
Mike McCarthy, PhD
McCarthy Family Farm, llc
Parkdale, Oregon 97041
541 806-6476