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

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Submitter Information

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General Comment

See attached file(s)

Attachments

Submitted Farm Labor Survey Letter May 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:

I am a third-generation family farmer from Virginia and our family has been farming since 1915. I am grateful for the opportunity to provide input on the National Agricultural Statistics Service's Agricultural Labor Survey.

I am a longtime member of the Virginia Farm Bureau. I proudly serve on the American Farm Bureau's Labor Issue Advisory Committee, where I, along with my counterparts around the United States, advise the organization on labor-related matters affecting the agriculture sector.

We are a family-owned and diversified nursery and orchard operation in central VA. We have about 100 acres of perennials, annuals and landscape shrubs in containers and also have about 100 acres of field production which is primarily boxwood. We also grow about 200 acres of apples, peaches, nectarines, and Asian Pears. We have a Farm Market onsite where we market our products directly to the consumer. With the type of agriculture that we are involved in, it is labor intensive. Each year, we recruit and are required to hire any able and willing domestic workers. However, we have not yet been successful in keeping these employees for any period of time. Because we have not been able to find sufficient staffing using domestic workers, we participate in the federal H2A guest worker program, which has met our increasing labor needs since 1998. At peak season we employ over 100 H2A workers and about 100 more domestic employees in all facets of our business.

We have been getting workers through the H2A program since 1998. To my knowledge during that time we have not received a copy of the Agricultural Labor Survey. The H2A A.E.W.R.(Adverse Effect Wage Rate) has gone up 33.12% in Va since 2019. It has gone up 3.63% per year since we joined the program in 1998. This continued increase in labor costs is unsustainable in today's agriculture. I am concerned that if us H2A users are being surveyed that the spiraling increase in the AEWR is a result of using the past year's AEWR to ratchet up the AEWR for the next year. In other words, as more farmers get their labor through the H2A program they will be paying the AEWR which will also increase wages in that area for other farmers not using H2A to remain competitive in keeping labor. So, as we raise the AEWR each year that becomes the minimum wage rate for that area; then, the AEWR has to be raised for the subsequent year so that US workers are not adversely affected. It ratchets on itself and spirals out of control.

In our business as the AEWL continues to spiral up, we have to increase wages to all employees at the farm. So as the AEWL goes up, all wages at the farm go up. We can't raise wages on certain employees without raising them for all employees. Therefore, there is a ripple effect from this AEWL increase each year. This means that from our entry level corresponding workers to administrative staff to accounting to truck drivers to growers to the General Manager, they all get raises. It is simply not sustainable.

I have 4 other sons who I hope will join me one day in our family business. (We have one son working here now.) I would be very proud to pass our business to the 4th generation. However, we will not be able to farm in the future with the continued increases in labor costs caused by the increased AEWL. Labor-intensive agriculture can't absorb these increased labor and program costs. US Agriculture will be priced out of the market and our food will be imported from other countries that will have cheaper labor and perhaps less oversight of food safety. I do not want this for the future of our country. I want to be food independent. As one of our good farmer friends said, a nation that cannot feed itself is neither secure, nor free.

I am concerned that the Agricultural Labor Survey does not accurately capture market wages within agriculture, 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 Farm Bureau moving forward as you consider these concerns.

Sincerely,
JWS