

PUBLIC SUBMISSION

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Submitter Information

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General Comment

Please find my comment letter attached.

Attachments

FLS Comments

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:

As a farmer from the state of North Carolina , 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 North Carolina 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.

My family farm began in 1939, we grow apples, corn, hay and cattle. Apples are labor intensive, specifically hand labor. On my farm we harvest about 6.7 million pounds of apples each year. We are dependent on H2A labor to harvest our apple crop. We attempt every year to hire more domestic employees and are unsuccessful. Harvest is time sensitive and a legal, reliable workforce is a necessity.

My farm utilizes both H2A and domestic employees (H2A for 8 years). I know that my employees are the most important part of my farm. I can do everything right to grow great apples, but without someone to harvest them, they would never make it into someone's grocery cart. Since we began using H2A the wage rate for North Carolina has increased over 40%, the highest increase that we have received on our apple sales in any year is 20%. That imbalance is not sustainable. It is essential that farmers are surveyed in an undistorted way to ensure that results are accurate and reflect all farmers. Many farms, like mine, have never received a survey and many that have, found them difficult to complete, causing them to complete them incorrectly or not at all. The cost of housing and transportation should be considered in the survey, both are a significant added expense that increase the value of compensation that H2A workers are receiving. The wage rate is calculated per state, housing costs vary drastically within states. In the farming town where our farm is located H2A workers begin arriving in the early spring and continue through the fall- the positive economic impact on our town is significant and as fewer farmers can afford to participate in the H2A program the town will feel that impact.

In closing, 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,

Linda Pryor