



TENNESSEE FARM BUREAU FEDERATION

August 28, 2025

Kimberly Vitelli
Administrator, Office of Workforce Investment
Employment and Training Administration
Department of Labor
Room C-4526, 200 Constitution Avenue NW
Washington, DC 20210

Brian Pasternak
Administrator, Office of Foreign Labor Certification
Employment and Training Administration
Department of Labor
Room N-5311, 200 Constitution Avenue NW
Washington, DC 20210

Daniel Navarette
Director, Division of Regulations, Legislation, and Interpretation
Wage and Hour Division
Department of Labor
Room S-3018, 200 Constitution Avenue NW
Washington, DC 20210

Re: Docket No. ETA-2025-0007; Recission of Final Rule: Improving Protections for Workers in Temporary Agricultural Employment in the United States

The Tennessee Farm Bureau Federation (TFBF) represents a diverse of commodity producers across the state and, with over 690,000 members, is the largest general farm organization in Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues, including temporary or seasonal agricultural employment. On behalf of our member producers, we support the recission of the final rule titled *Improving Protections for Workers in Temporary Agricultural Employment in the United States*. TFBF submitted comments on November 14, 2023, when this rule was originally proposed, citing concerns with the overburdensome nature of the provisions of the rule and their negative impacts on agricultural employers. We applaud the Department of Labor (DOL) for recognizing these impacts and rescinding these provisions.

The Tennessee agricultural industry faces significant labor challenges along with the rest of the country. Farmers struggle to find a willing, sufficient labor force to perform the duties of their varied farm operations. With a diminishing domestic workforce, more farming operations rely on the H-2A program as a crucial source of valued and trusted foreign guest workers to meet their labor needs. These workers play a fundamental role in keeping farms operating across the country. Without them, the United States could not sustain its strong and reliable food supply. TFBF believes a legal foreign agricultural workforce benefitting producers, farm workers, and the American consumer is a key component of national immigration policy. We support a workable system allowing temporary or seasonal workers to enter the United States for work and return home.

Farmers appreciate the men and women who choose to work on their farms, and the responsibility to take care of them is not taken lightly. Bad actors should be penalized consistent with the law and mistreatment of workers should be properly addressed, but not in a way which makes it difficult for farm employers to comply with rules and regulations that protect worker's rights. We thank DOL for rescinding this rule and look forward to working with the Department to find solutions which properly protect farm workers and encourage success for farm employers.

Sincerely,

A handwritten signature in black ink that reads "Eric Mayberry". The signature is written in a cursive, flowing style.

Eric Mayberry

President

Tennessee Farm Bureau Federation