



Terry E. Branstad
GOVERNOR

Kim Reynolds
LT. GOVERNOR

November 3, 2011

The Honorable Hilda L. Solis
Secretary, U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

Dear Secretary Solis:

We are writing regarding the proposed rules from your Department relating to labor laws for young people in agriculture. We believe that these rules are a prime example of Federal overreach. We both appreciate the work ethic and life lessons that we learned working and growing up on our family farm. We know from experience that parents, grandparents, aunts, uncles, and neighbors care deeply about the health and safety of children involved in agriculture. They are best positioned to determine the capabilities and safety of the kids they love. In fact, here in Iowa our rural communities teach farm safety both to farm kids and town kids.

Federal regulations should be focused on the areas of highest impact and should strive to minimize costs and unintended consequences. The proposed regulatory expansion by the Department of Labor goes beyond key high-risk areas and thus dilutes the focus on worker safety.

Safety is at the forefront for Iowa farmers and their families who think daily about pragmatic solutions to accomplish farming activities and chores while ensuring the well-being of those involved. To give Iowa farmers, who just completed the fall harvest, a fair chance to comment on the regulations, we respectfully request an additional 45 day extension for comments, until January 15, 2012.

We believe Iowa farm families and rural communities are better at ensuring the safety of children in agriculture than the federal government. The proposed regulations claim that they will "in no way compromise the statutory child labor parental exemption involving children working on farms owned or operated by their parents." However, many stakeholders have real concerns that the rules, as written, do directly threaten that exemption. Narrowly limiting the statutory parental exemption ignores the reality of many contemporary family farm business structures. Often several generations and multiple family members are involved in a family farm operation, including farming as a Limited Liability Corporation.

Agriculture is currently among the bright spots in the US economy. Iowa's economy is composed of a unique mix of industries, but agriculture remains a core industry within the State. Farm families should not be saddled with burdensome federal regulations.

We need more young farmers in Iowa to carry on our agricultural traditions. We are concerned that the rules will have the unintended consequences of discouraging farmers from engaging young people in agriculture and preventing future farmers from acquiring the critical skills and experience needed for a successful career in agriculture. The regulations claim to safeguard children against actions that are “not detrimental to their education”; however, we are concerned that these regulations will prevent kids from learning through supervised hands-on experience and obtaining life-long values from those that love them most. In addition, these regulations would likely reduce opportunities for young people to earn money for college. Many young Iowans work in fields and on farms during the summer months and save money for their future. The federal government should not construct further employment barriers at a time when there are fewer job opportunities available for young people.

To give Iowa farmers a fair opportunity to review and comment on the proposed rules we hope you will extend the comment period. We ask that you take the comments of Iowa farm families and our rural communities into account as you determine whether this rule is necessary. Thank you for your time and consideration.

Sincerely,



Terry E. Branstad
Governor of Iowa



Bill Northey
Secretary,
Iowa Department of Agriculture and Land Stewardship

cc: Iowa Congressional Delegation
The Honorable Tom Vilsack

