



State of Oklahoma
Department of Agriculture, Food, and Forestry

Mary Fallin
Governor

Jim Reese
Secretary of Agriculture

November 30, 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 in regards to the proposed Child Labor Regulations published at 76 Fed. Reg. 54836, September 2, 2011 from your Department relating to labor laws for young people in agriculture. In an era of sedentary lifestyles, i.e.; computers, video games, all access TV and poor eating habits in the United States, this policy to restrain and/or limit on-farm employment of young people is very misguided. The youth of America would benefit greatly from working on the farm, in the open air, learning about animals, crops, and wildlife. Hauling hay, riding horses, sorting cattle and driving tractors have been a learning foundation for many of our nation's most successful citizens. Any policy that would hinder the opportunities of young Americans to experience life in our agricultural communities is misguided indeed. Our parents, grandparents, aunts and uncles are much more able to determine and teach farm safety to our youth than government officials in Washington DC. Farm safety classes are available in communities all across our state.

The youth of America are facing many challenges today. We believe working outside, in agriculture, on a farm could be the best remedy for this generation. Safety is imperative to every Oklahoma farmer and their families. Agricultural youth are required to complete all of their farming responsibilities and chores while still competing in school activities and achieving academic excellence. One of the very reasons for working on the farm is to learn the life skills of competition, commitment, dedication, and achievement. We respectfully ask that you reconsider these proposed rules. We also urge you, when there is an opportunity to hire additional staff; to hire a farm raised, common sense, young person and see just how dedicated and competitive they are.

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, farms are also a great tool and educator for many urban youth or "town kids" that work summers on a friend's farm. Many family farms have a corporate structure or become a Limited Liability Corporation to adhere to best business practices; yet they are entirely family inclusive. There are just too many exceptions needed to make this rule.

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We need more young farmers in Oklahoma, not less. We need more young people to know where their food comes from, not less. We need more young people outside, exercising, working, and earning rather than discouraging this practice. The federal government should not construct further employment barriers at a time when there are fewer job opportunities available for young people.

There are already necessary and proper laws in place to ensure agricultural youth workers are protected. We have many avenues that we currently use to promote youth safety including Cooperative Extension and Vocational Agricultural Education. Agricultural experiences are not identical from state to state. These avenues would allow each state to address the risks and conditions in their state. Our recommendation for these rules is to immediately withdraw and abandon this proposal.

Sincerely,



Mary Fallin
Governor of Oklahoma



Jim Reese
Oklahoma Secretary of Agriculture

cc: Senator James Inhofe
Senator Tom Coburn
Congressman John Sullivan
Congressman Dan Boren
Congressman Frank Lucas
Congressman Tom Cole
Congressman James Lankford
The Honorable Tom Vilsack