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February 9, 2021

The Honorable Delores G. Kelley
The Honorable Susan Lee
3 East, Miller Senate Office Building
Annapolis, MD 21401

RE: Senate Bill 486 - Labor and Employment - Employment Standards During an Emergency (Maryland Essential Workers' Protection Act) - Unfavorable

Dear Chair Kelley and Members of the Committee,

I am writing on behalf of the Maryland Association of Mutual Insurance Companies (MAMIC) to register their opposition to Senate Bill 486.

MAMIC is comprised of 12 mutual insurance companies that are headquartered in Maryland and neighboring states. Approximately one-half of MAMIC members are domiciled in Maryland and are key contributors and employers in their local communities. Together, MAMIC members offer a wide variety of insurance products and services and provide coverage for thousands of Maryland citizens.

While the list of essential employers beginning on page 4 of the bill may not expressly include the mutual insurers that comprise MAMIC membership, upon closer examination we note that many of the other businesses listed have a direct effect on our members' operations. Accordingly, we have reexamined the requirements of the bill to evaluate its potential effect on our members through its application to related businesses.

The general description of "unsafe work environment" beginning on page 11 at line 5 of the bill imposes very broad requirements on the essential employers who are subject to the bill's new regulatory requirements. Many of these essential employers are small businesses unused to compliance requirements such as those in SB 486. In the event of noncompliance by these businesses, an inevitable result will be disruption to the core business of MAMIC members. It is possible, as well, that MAMIC members themselves may be subject to liability related to noncompliance under the bill by entities with whom they do business.

MAMIC offers no opinion on the nature and scope of these new requirements on essential employers. We have concluded, however, that the impact of these requirements on the essential employers with whom MAMIC members do business may cause significant disruption to their business relationships, and therefore may disrupt their core business as well. MAMIC members are taking all steps required under the current State of Emergency and will continue to do so. We respectfully submit that Senate Bill 486, although well-intentioned, goes too far in extending the reach of our State government into the operations of private business.

For these reasons, MAMIC respectfully requests an unfavorable report on Senate Bill 486.

Very truly yours,



Bryson F. Popham, Esq.