



## Oppose Increased Swine Slaughter Line Speeds

Nationwide, the United Food and Commercial Workers International Union (UFCW) represents more than 30,000 workers in the pork slaughter industry and our members handle 70 percent of all hogs slaughtered in the United States.<sup>1</sup> Our members are highly trained professionals who serve as an extra layer of protection for consumers when it comes to food safety.

Food processing is a high hazard industry and workplace safety is a key concern. Even at current line speeds, pork slaughter and processing workers face many job risks that can lead to severe injury, illness and death.<sup>2</sup>

We deserve safe food, and America's pork workers deserve safe workplaces. The Modernization of Swine Slaughter Inspection rule proposed by United States Department of Agriculture (USDA) calls for an unlimited increase in swine slaughter line speeds, which is dangerous to both workers and consumers.

Jobs inside pork plants are some of the most dangerous and difficult in America, and the risk to food workers and our food supply increase when the line speeds increase. **For the sake of keeping hard-working families and the pork we eat safe — tell the USDA to reconsider their proposal to eliminate line speed limits at pork plants.**

### Increasing Swine Slaughter Line Speeds is Dangerous for Workers and Food Safety

- **The Modernization of Swine Slaughter Inspection rule removes all limitations on line speeds in hog slaughter plants. This will endanger the health and safety of tens of thousands of workers in the hog slaughter industry.**<sup>3</sup>
  - The USDA states that this new swine inspection system is like the poultry inspection system adopted in 2014, but that is inaccurate. When the new poultry inspection system rule was finalized in 2014 it did not allow for an increase in line speeds. Line speed limits remained the same because there were legitimate concerns about how faster speeds would lead to an increase in worker injuries, and there was almost no data on whether plants could maintain process control and food safety with quicker lines.
- **An increase in line speeds will result in an already dangerous industry becoming more dangerous.** The pork industry is already one of the most dangerous for workers. Meatpacking workers in hog slaughter plants work in cold, wet, noisy, and slippery conditions making tens of thousands of forceful repetitive motions

<sup>1</sup> Internal calculation based on kill volume at the plants as published by meat and poultry industry.

<sup>2</sup> <http://www.nelp.org/content/uploads/OSHA-Severe-Injury-Data-2015-2016.pdf>

<sup>3</sup> <http://www.nelp.org/news-releases/usda-proposal-increase-hog-processing-line-speeds-endangers-workers-consumers/>

on each shift. They work with dangerous hooks, knives and large saws to cut and break down the hogs – processing thousands of hogs every hour.

- Meatpacking workers are injured at 2.4 times the rate of other industries. These injuries result in lost time or restrictions at three times the rate of other industries and they face illness rates at 17 times the rate of other industries.<sup>4</sup>
- Research shows that the fast pace in pork plants, coupled with the forceful and repetitive nature of most of the jobs, leads to high rates of musculoskeletal disorders and other serious injuries—such as lacerations.<sup>5</sup>
- OSHA guidelines state that one way to decrease the rates of injury and illness in meatpacking plants is to reduce the total number of repetitions per employee by such means as decreasing production rates.
- **There is no evidence that the increased line speeds can be done in a manner that ensures safe food and safe workers.** The USDA justifies the line speed increase by using a small, poorly assessed pilot project where none of the plants continuously operated at faster line speeds and all had serious safety issues.
  - A 2013 USDA Inspector General Audit found that the USDA did not properly assess the pilot project.<sup>6</sup>
  - A report from Food and Water Watch found that the plants involved in the pilot project had more regulatory violations compared to comparably sized plants not involved in the pilot project.<sup>7</sup>
  - The pilot program revealed serious safety issues:
    - In 2017, a Clemens food plant in Pennsylvania reported injuries severe enough that two workers were hospitalized and one suffered an amputation.<sup>8</sup>
    - In 2016, at a JBS plant in Illinois, the company exposed workers to illness because the company imposed unreasonable restrictions on the use of toilet facilities.<sup>9</sup>
- **The Modernization of Swine Slaughter Inspection rule will privatize the food safety inspections system in hog slaughter plants.** The New Swine Inspection System (NSIS) would reduce the total number of government food safety inspectors in each plant, and turn over that function to the company.

<sup>4</sup> <https://www.bls.gov/iif/>

<sup>5</sup> [https://www.osha.gov/SLTC/meatpacking/hazards\\_solutions.html](https://www.osha.gov/SLTC/meatpacking/hazards_solutions.html); <https://www.cdc.gov/niosh/topics/poultry/pdfs/letterapril72014.pdf>; Kyeremateng-Amoah E, Nowell J, et al. Laceration injuries and infections among workers in poultry processing and pork meatpacking industries. *Am J Ind Med*. 2014. 57:669-682. Lander L, Sorock G. A case-crossover study of laceration injuries in pork processing. *Occup Environ Med*. 2012. 69:410-416.

<sup>6</sup> <https://www.usda.gov/oig/webdocs/24601-0001-41.pdf>

<sup>7</sup> <https://www.foodandwaterwatch.org/insight/translating-new-swine-inspection-system>

<sup>8</sup> [www.osha.gov](https://www.osha.gov)

<sup>9</sup> OSHRC Docket No 16-0510

- **The Modernization of Swine Slaughter Inspection rule provides no requirement or funding to train plant employees on inspection technique.** There is no requirement that plant employees under NSIS be trained in inspection activities that USDA inspectors normally perform.
- **The Modernization of Swine Slaughter Inspection rule will not lead to safer food.** Eliminating line speed limits makes it harder for federal meat inspectors and quality control workers in plants to do their jobs. That means it will be less safe for all of us to eat pork.
  - The proposed new swine slaughter inspection system assumes that having fewer USDA inspectors on the slaughter line and encouraging more offline inspection activities will reduce the incidence of salmonella and campylobacter on carcasses. But that has not proved to be true for poultry plants. 30% of the New Poultry Inspection System (NPIS) chicken plants failed the Food Safety and Inspection Service (FSIS) performance standard compared to only 13% that are still using traditional inspection.<sup>10</sup>

## Background

- In 1993, OSHA published the Ergonomics Program Management Guidelines for the Meatpacking Industry to address the rising rates of carpal tunnel syndrome and other musculoskeletal disorders. Though musculoskeletal disorders or cumulative trauma disorders are present in other industries, the high rates in meatpacking plants prompted OSHA to issue these guidelines. Further, the guidelines made clear that the high rates of injury are due to the high production rates in the pork plants (e.g. high line speeds).<sup>11</sup>
- In 1997, the USDA created a pilot program called the HACCP-Based Inspection Models Project (HIMP) which allowed five hog slaughter plants to test a new food safety program.<sup>12</sup> Under the program, plant employees conduct anatomical and pathological examinations of carcasses, and FSIS inspectors oversee, evaluate, and verify the effectiveness and reliability of the establishments' slaughter process controls. FSIS argued that the HIMP system, in contrast with the traditional inspection system, increased food safety and had other benefits to consumers.<sup>13</sup>
- UFCW represents 4 of the 5 pork slaughter plants involved in the pilot program.
- In 2013, a USDA Inspector General Audit found that the USDA did not properly assess whether the new swine slaughter inspection process had measurable improved food safety at each plant.<sup>14</sup> Worker safety was not evaluated.

<sup>10</sup> <https://www.commondreams.org/newswire/2018/01/30/privatized-inspection-system-produces-more-contaminated-chicken>

<sup>11</sup> <https://www.osha.gov/Publications/OSHA3123/3123.html>

<sup>12</sup> [https://www.washingtonpost.com/politics/usda-pilot-program-fails-to-stop-contaminated-meat/2013/09/08/60f8bb94-0f58-11e3-85b6-d27422650fd5\\_story.html?utm\\_term=.b400623855f8](https://www.washingtonpost.com/politics/usda-pilot-program-fails-to-stop-contaminated-meat/2013/09/08/60f8bb94-0f58-11e3-85b6-d27422650fd5_story.html?utm_term=.b400623855f8)

<sup>13</sup> <https://www.fsis.usda.gov/wps/portal/fsis/topics/regulatory-compliance/haccp/haccp-based-inspection-models-project/history-HIMP>

<sup>14</sup> <https://www.usda.gov/oig/webdocs/24601-0001-41.pdf>



- On February 1, 2018, FSIS proposed new regulations to create a New Swine Inspection System that allows for an unlimited increase in hog slaughter line speeds and will put public health, worker safety and animal welfare at risk.<sup>15</sup> Comments on the rule are due May 2, 2018.

**The Swine Slaughter Inspection Modernization Rule will increase corporate profits by sacrificing the health and safety of our nation's pork workers.**

Forcing pork workers and federal meat inspectors to work significantly faster will only increase the odds they're injured and make pork less safe for every consumer to eat.

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*The UFCW is the largest private sector union in the United States, representing 1.3 million professionals and their families in grocery stores, meatpacking, food processing, retail shops and other industries. Our members help put food on our nation's tables and serve customers in all 50 states, Canada and Puerto Rico. [www.ufcw.org](http://www.ufcw.org)*

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<sup>15</sup> <https://www.federalregister.gov/documents/2018/02/01/2018-01256/modernization-of-swine-slaughter-inspection>