

May 2, 2018

Mr. Paul Kiecker
Acting Administrator
Food Safety and Inspection Service
U.S. Department of Agriculture
Docket Clerk
Patriots Plaza 3
1400 Independence Avenue, SW
Mailstop 3782, Room 9-163 A
Washington DC 20250

Dear Acting Administrator Kiecker:

The United Food and Commercial Workers International Union (UFCW) submits these comments in response to the U.S. Department of Agriculture (USDA) Food Safety Inspection Service's (FSIS) proposal to radically change the food safety inspection system in hog slaughter plants, which will endanger public health, worker safety and animal welfare. The UFCW strongly opposes the proposed Modernization of Swine Slaughter Inspection rule: FSIS-2016-0017 (RIN 0583-AD62), issued by the USDA. This proposed rule calls for an unlimited increase in hog slaughter line speeds which is dangerous to both workers and consumers.

As the organization most familiar with effects of line speeds on worker safety, the UFCW can unequivocally state that we are strongly opposed to any increase in maximum allowable line speeds in hog slaughter facilities above the current allowed 1,106 head per hour (hph), and urge the USDA to withdraw this proposed rule. The American public deserves safe food, and America's hog slaughter and processing workers deserve safe workplaces and this proposed rule potentially undermines both of these.

Nationwide, the UFCW International Union represents nearly 40,000 workers in the hog slaughter and processing industry, which is 60% of the industry's workers. Our members are highly trained professionals who serve as an extra layer of protection for consumers when it comes to food safety. However, the meat packing industry is a high hazard industry and workplace safety is a key concern. Even at current line speeds, hog slaughter and processing workers face many job risks that can lead to severe injury, illness and death.¹

¹ <http://www.nelp.org/content/uploads/OSHA-Severe-Injury-Data-2015-2016.pdf>

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Jobs inside hog plants are some of the most dangerous and difficult in America. Hog slaughter plants are designed to disassemble hogs that are hung by the hind legs on shackles after the hogs are slaughtered and blood is drained from the animals. The hogs are dehaired and often singed after an initial scalding to remove hair. The hogs move on chains past workers wielding knives, hooks and saws to disassemble the hogs. Workers often work in close proximity to each other. Typically, the following tasks are involved in breaking down the hog: removing the head, removing the tongue from the head, removing the feet, removing the digestive track and other internal organs, and inspection of organs and carcasses. Manual labor is required at different stages of production. Workers make a series of cuts to separate fat, muscle and bone. These cuts involve using knives, hooks and saws. Some tasks involve using one hand to pull skin and fat, and the other hand, wielding a knife, making the cuts. All tasks are performed on hogs that are constantly moving, hanging from the chain. Therefore, all of these tasks described will be impacted by an increase in line speed.

There are over three decades of studies that point to fast line speeds in meatpacking plants as the root cause for the high numbers of serious injuries and illnesses. Refer to https://www.osha.gov/SLTC/meatpacking/hazards_solutions.html for studies. UFCW believes that it is imprudent of the Food Safety Inspection Service to ignore these studies and propose a system that will increase line speeds and sacrifice worker safety and health. As FSIS did in the modernization of the poultry industry inspection system, it must reject any increase in line speeds in hog slaughter plants.

Hog slaughter workers already endure harsh working conditions to provide cheap pork to American consumers. Speeding up the lines will only exacerbate these conditions. These workers work with knives, hooks, and small and large saws, making tens of thousands of forceful repetitive motions on each and every shift. They sometimes work in extreme heat and humidity on the slaughter side in plants that do not have cooling systems in the slaughter department, and in cold conditions on the fabrication side. Water, fat, blood and grease are abundant and make the walking-working surfaces slippery and dangerous. Meatpacking plants are very noisy. Hearing loss in hog slaughter plants is not uncommon. In addition, there are moving belts, conveyors, chains and equipment throughout the plant. According to the Bureau of Labor Statistics, the meatpacking industry reports that workers are injured at rates 2.4 times higher than the national average for all industries. The rate is nearly 3 times as high for those injuries that are so serious they require time off from work or restrict a worker's ability to do his or her regular job.² Meatpacking workers also experience an illness rate—which includes disorders like carpal tunnel syndrome—that is almost a staggering 17 times as high as

² Bureau of Labor Statistics. Survey of Occupational Injuries and Illnesses. "Highest rates for cases with days away from work, restricted work activity, or job transfer (DART) - Injuries and Illnesses," Table No. SNR2 (2016).

the average for all other industries.³ Currently hog and meat plants experience turnover rates as high as 60% annually. This turnover is particularly the case with new workers, many of whom experience the early symptoms of a musculoskeletal disorder or MSD, making it too painful to work.

A work-related injury can cause serious physical suffering and have enormous economic consequences for a worker and his/her family, further exacerbating economic inequality for the nation's working families. The financial burden of work related injuries may fall on the worker if the worker cannot continue to work, putting injured workers and their families at risk of falling into poverty.

The proposed Modernization of Swine Slaughter Inspection rule removes all limitations on line speeds in hog slaughter plants which will endanger the health and safety of tens of thousands of workers in the hog slaughter industry. The USDA states that this new swine inspection system is like the poultry inspection system adopted in 2014; except that is not true. When the new poultry inspection system rule was finalized, it did not allow for an increase in line speeds. This was because there were legitimate concerns about increasing worker injuries, and there was almost no data on whether plants could maintain process control and food safety at greater line speeds.

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 using a small, poorly assessed pilot project where none of the plants continuously operated at faster line speeds and all had serious safety issues. In fact, a 2013 USDA Inspector General Audit⁴ found that the USDA did not properly assess the pilot project. A report from Food and Water Watch⁵ found that the plants involved in the pilot project had more regulatory violations compared to comparably sized plants not involved in the pilot project.

However, the UFCW represents workers in hog slaughter plants, and regularly reviews OSHA 300 logs to monitor injuries, illnesses and fatalities, to understand the nature of the injuries and illnesses workers suffer, as well as to understand how they can be prevented. The UFCW communicates with and educates its members on their rights to a safe and healthy workplace, and learns about the underlying issues they face in these plants that lead to injury and illness. The UFCW, through its representation of

³ Bureau of Labor Statistics, Injuries, and Illnesses. "Highest incidence rates of total nonfatal occupational illness cases." Table SNR12 (2015)
<https://www.bls.gov/iif/oshwc/osh/os/ostb4747.pdf>

⁴ United States Department, Office of Inspector General. "Food Safety and Inspection Service—Inspection and Enforcement Activities at Swine Slaughter Plants Audit Report," 24601-0001-41. (<https://www.usda.gov/oig/webdocs/24601-0001-41.pdf>)

⁵ Food and Water Watch. "Translating the New Swine Inspection System." February 15, 2018.
<https://www.foodandwaterwatch.org/insight/translating-new-swine-inspection-system>.

workers in the hog slaughter and processing plants, understands the impact of hog production work on the safety and health of workers in these plants.

In the proposed rule, FSIS says that it “compared in-establishment injury rates between HIMP and traditional establishments from 2002 to 2010.” FSIS go on further to say that “preliminary analysis shows that HIMP establishments had lower mean injury rates than non-HIMP establishments.” The data that FSIS relied on are the industry reported injury and illness through the OSHA Data Initiative, or ODI.

There are a number of problems with FSIS statements in this regard, and the analysis FSIS says it completed. First, there have been requests to FSIS to identify the non-HIMP plants that were used for comparison to HIMP plants in order to understand this analysis as well as requests for the raw data. FSIS has refused to provide this information. It is impossible for UFCW and others to understand the analysis without this information. Second, underreporting of injuries and illnesses occurs in meatpacking plants, both beef and hog, therefore suggesting that the employer-reported data that FSIS relied on for its preliminary determination that HIMP establishments had lower mean injury rates than non-HIMP establishments is flawed.

In addition, UFCW, in reviewing OSHA 300 logs for HIMP plants that are represented by the UFCW (four out of the five plants are represented by the UFCW), from years 2014 to 2017, have discovered numerous serious and traumatic injuries and illnesses suffered by workers in these plants, some of which may be a direct result of the speed of the line. Examples of some of these injuries are listed as follows, with the descriptions taken directly from the OSHA 300 logs:

- Complete tear of right rotator cuff from repetitive use of Whizard Knife, resulting in 94 days of job transfer or restriction.
- Upper extremity pain from opening hogs with a knife.
- Strain to right shoulder from pulling heads from jawbreaker/kill floor, resulting in 26 days of job transfer or restriction.
- Infection to right index finger from striking a pig's tooth.
- Carpal Tunnel Syndrome from repetitively holding “fom” (not explained on log, but job was on the kill floor), resulting in 58 days of job transfer or restriction.
- Lost consciousness when worker slipped and fell pulling gondola hitting her head on floor in Hog Pressing, 136 days with restriction/transfer.
- 2nd degree burn on right hand/forearm from 180 degree water. 26 days of restriction/transfer.

These are only an extremely small sample of serious and traumatic injuries and illnesses occurring in HIMP plants, plants that USDA represents as “safer” than traditional slaughter establishments.

In addition, the JBS, Swift Pork Plant in Beardstown, IL, a HIMP plant, was cited by OSHA in 2016, for exposing workers to illness by imposing unreasonable restrictions on the use of the toilet.

Non-HIMP/Traditional plants; dangerous at current line speeds.

The UFCW analyzed OSHA 300 logs collected from UFCW represented hog slaughter plants, for years 2014 to 2017. Analysis of these logs reveals high rates of strains and sprains, some of which are the result of repetitive and forceful movements. Serious and traumatic injuries, including amputations, are not uncommon, resulting in significant trauma to the injured worker, as well as extended periods of days away from work or on restricted work, due to the injury. Burns, slips, and falls, are common occurrences. Finally, lacerations and cuts, from the knives and other sharp tools, are daily occurrences. Some of these cuts and lacerations lead to infections. Many may be treated as "first-aid" and thus not logged onto the OSHA 300 logs. These injuries become data that are not collected and thus unknown, unless a union, for example, talks to workers and discovers these injuries. Many workers report being cut by "neighbors" or the workers next to them on the line, thus named "neighbor cuts." Neighbor cuts result, in many cases, from workers working too close to one another, as there is not enough room on the line, and they are working very fast.

Listed below are examples of these traumatic injuries and, of course, just a tiny fraction of the thousands of terrible injuries that occur in hog slaughter and processing plants. The descriptions come directly from the OSHA 300 logs:

- Amputation at first knuckle, right ring and long finger. Second kill, 2 kill, 94 days away.
- 2nd degree burn on right hand/forearm from 180 degree water, 26 days of restriction/transfer.
- 2nd degree burn on back of right foot from a pipe. Kill floor, 19 days of restriction/transfer.
- Amputation of right index finger from the Chain, in Coolers, 5 days away from work.
- 2nd degree burn on right hand from 180 degree water. Kill Floor, 7 days away from work.
- Amputation of left little finger by grinder. 109 days away from work.
- 2nd degree burn on right foot from 180 degrees. Loin Boning, 21 days away.

Illnesses in hog slaughter plants, with musculoskeletal injuries related to repetitive motion and other ergonomic hazards classified as illnesses, are significantly higher when compared to other industries.

In 2015, animal slaughtering, excluding poultry, including hog and beef, had the highest incidence rates of non-fatal occupational illness cases per 10,000 full-time workers of all industries. Illnesses included musculoskeletal injuries related to repetitive motion and other ergonomic hazards.⁶

UFCW conducted a study (unpublished) starting in 2004 of OSHA 300 logs collected from all meat and poultry plants. The study was conducted from 2004 to 2011, identifying injury and illness rates, and identifying the most common injuries/illnesses. For meatpacking, the highest occurring injuries/illnesses were musculoskeletal disorders, 41% of all injuries/illnesses recorded on the logs, followed by lacerations at 14%.

There is strong evidence, with studies going back to the 1990's,⁷ linking exposure to a combination of ergonomic risk factors, (force, repetition and posture) to carpal tunnel syndrome, epicondylitis and other musculoskeletal disorders. UFCW members who work in hog slaughter plants, both on the kill or harvest floors, and on the fabrication side of the plants, are exposed to these risk factors. UFCW hog workers report using great force to do many of the jobs requiring the use of a knife. Where knives are dull, and not properly maintained by the company, greater force is required to do the job. Lack of training, or lack of a long enough break-in time to learn the knife cuts, contributes to the problems of potential injury, including musculoskeletal disorders and lacerations/cuts/amputations. In non-knife jobs, use of the hand to push, pull, tug, grip, carry or lift (i.e. guts), requires a lot of force. The positions of the hands often are flexed, extended, and rotated. The arms are often in awkward positions above the head or shoulder, sometimes twisted away or toward the body. Twisting and turning of the hands, arms and body to perform these jobs are common. The repetitions of the movements required to do the jobs, for example, repetitively making the same knife cut, are the result of hogs hanging on moving chains in front of the worker, or hog parts moving in front of the worker on a moving belt. These chains and belts do not stop, except for breaks, and break downs. If the chain speed increases, the increased speed will increase the number of repetitions by those workers on the line, and thus increase the risk of exposure to hazards and increase the risk of injury. These reasons include: the company does not add more workers to do the work; there is not room on the line to add more workers; the company adds more workers but there is not enough room, and workers work too close together, creating more ergonomic hazards and increased risk of cuts and lacerations from "neighbors"; the company moves workers around, and does not properly train the

⁶ Bureau of Labor Statistics, Injuries, and Illnesses. "Highest incidence rates of total nonfatal occupational illness cases." Table SNR12 (2015)
<https://www.bls.gov/iif/oshwc/osh/os/ostb4747.pdf>

⁷ Bernard BP (ed.) Musculoskeletal disorders and workplace factors: Critical review of epidemiological evidence for work-related musculoskeletal disorders of the neck, upper extremity, and low back. Cincinnati, OH: U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health, 1997.

workers who are added to the line, requiring those regularly on the line to do more work to make up for the untrained workers who may not be able to keep up.

OSHA has acknowledged the role line speed has played in the development of musculoskeletal disorders among workers in hog slaughter plants going back as far as 1988.⁸ OSHA cited John Morell, a hog slaughter and processing plant, for workplace hazards injuring hundreds of workers at the plant, causing them to develop cumulative trauma disorders (the term used at the time for musculoskeletal disorders), including tendinitis, lower back pain and injured hands, found at the time to be the result of repetitive motions. OSHA at the time also stated that some of the possible solutions were a redesign of knives and work stations, slower production-line speeds, and the restructuring of jobs so workers would do a variety of tasks and more rest and training.

In 1993, the UFCW provided significant input into the “Ergonomics Program Management Guidelines for Meatpacking Plants.”⁹ At the time, OSHA noted “there has been a significant increase in the reporting of cumulative trauma disorders (CTDs) and other work-related disorders due to ergonomic hazards. CTDs account for an increasingly large percentage of workers' compensation costs each year, and they represent nearly half of the occupational illnesses reported in the annual Bureau of Labor Statistics (BLS) survey. Much of the increase in CTDs is due to changes in process and technology that expose workers to increased repetitive motion and other ergonomic risk factors.” These guidelines specifically identify line speed as a workplace condition that creates biomechanical stress on a worker, and outlines risk factors that are related to line speed, such as repetition rate and work/rest regimens.

There is no reason to believe that in 2018, line speed and the ergonomic risk factors that are associated with line speed, including repetition, and work/rest breaks, are any less significant in the development of musculoskeletal disorders, than they were in 1993.

The FSIS asks: should companies be allowed to run line at speeds greater than the current regulatory limit of 1,106 hph? Workers in hog slaughter plants are concerned about this proposal and say no for a number of reasons.

With respect to the practicality of implementing the proposed inspection system in all hog slaughter plants, the UFCW has serious concerns about maintaining worker safety and food safety. To prepare these remarks, the UFCW conducted

⁸ Swoboda, Frank. The Washington Post. October 29, 1988. “OSHA Fines Meatpacking \$4.3 Million.” https://www.washingtonpost.com/archive/politics/1988/10/29/osha-fines-meatpacker-43-million/3cf5fa53-6395-4bce-aab4-b13d2a5715d2/?utm_term=.edbb3187f1cf

⁹ Occupational Safety and Health Administration (1993). “Ergonomics Program Management Guidelines For Meatpacking Plants.” <https://www.osha.gov/Publications/OSHA3123/3123.html>

confidential interviews of workers employed at hog slaughter plants. There are significant concerns among workers in these plants, most of which are running at line speeds of 1,106 hph or less. The following comments reflect findings solicited directly from workers as well as recommendations that should be put into the final rule, with enforcement, if worker safety and food safety has any hope or chance of being maintained in hog slaughter plants.

Our interviews revealed key interventions or protective programs that must be integrated into any regulatory changes in pork inspection. However, we reiterate that UFCW is opposed to any increase in line speed. In the absence of the programs which we suggest below, more workers will be injured and crippled by their jobs. It would be irresponsible and unconscionable for the USDA to lift line speed restrictions without ensuring that these key issues are addressed.

The following quotes are directly from workers we have interviewed:

1. **Staffing/Workspace**

"You're more likely to get cut by a co-worker than to cut yourself."

Any increase in line speeds or the speeds at current limits must be accompanied by a required increase in staffing that would not increase worker/production ratios. USDA however, in the proposed rule assumes that the pork industry will not increase staff and instead will be able to maintain existing labor costs and just increase profits. But even the seemingly logical solution of increasing staffing at increased line speeds is stymied by the space limitations that are common throughout the industry. Since many hog slaughter facilities already operate with very limited space, the addition of workers adds to existing overcrowding problems. The additional safety hazards—such as "neighbor cuts"—associated with overcrowding in the meatpacking industry have been well-documented by OSHA since 1988.

"Space equals time when you're on the line."

In addition to introducing hazards, overcrowding creates a condition of diminishing returns with respect to line speed. Since the chain is in constant motion, the amount of time a worker has to complete the assigned tasks is determined both by line speed and their work area. Even if there is sufficient staffing for a specific task to be completed in six seconds, overcrowding can result in the workspace only being within a given worker's workspace for less than the six seconds, for example, it may only be four seconds. Under these conditions, staffing cannot make up for the increase in line speed.

"This place is a revolving door. Most new hires can't take the work."

The difficult and demanding conditions in the meatpacking industry have resulted in turnover, particularly among new workers and presents understaffing problems. Industry plans to increase hiring are unconvincing in light of their current inability to fill vacancies. In plants that operate at a staffing deficit and with high turnover rates, workers are being asked to make up for deficient staffing ratios. The experienced workers are carrying the production burden as new-hires struggle to get up to speed.

2. Knife Program

A range of musculoskeletal disorders result from tasks that combine excessive force with excessive repetition. Knife work in the meatpacking industry is a well-known example of these combined risk factors. Hog industry workers identify dull knives as a key contributor to pain and injury. If increased line speeds result in increased repetitions in the hog industry, injuries and illnesses will go up if the issues of dull knives and proper training are not addressed. Even at current line speeds, the industry must develop ways to control and reduce excessive force. Knife sharpening programs must be part of ergonomic controls.

3. Training and time to sharpen knives.

"Sometimes the new hires dull their blades when they try to sharpen them. Then they are really hurting by the end of the day."

Knife sharpening and maintenance is a skill that must be learned and practiced. Training for new hires, skill assessment, and refresher training are all necessary elements of an effective knife program.

"We do not even have time to steel our knives."

Workers in hog plants have traditionally maintained the sharpness of their knives by using a metal or ceramic steel. Increasing line speeds will drastically reduce the time available for workers to do even this basic task. Any time allotment for knife tasks must provide sufficient time for workers to do basic knife maintenance such as steeling knives and cleaning and/or deglazing steels.

4. Objective Sharpness Testing

Many hog slaughter facilities use a knife sharpening system whereby workers are provided with knives that have been sharpened in a central location. Lack of training and time pressures result in uneven quality of knife sharpness. Techniques for objective evaluation of knife sharpness are available and being implemented in some hog plants. They must be integrated into all hog facility programs.

5. Medical Management and Record Keeping

"Everyone here is broken. The medical department doesn't even bother to write it down if you report an injury."

There are significant differences among hog facilities in the effectiveness of the Medical Management Programs and accuracy of reporting systems. There are some facilities that record worker injuries and follow-up with appropriate medical treatment; but there are also facilities where injured workers are shamed, ridiculed and intimidated.

Facilities must agree to observe the OSHA Medical Management guidelines for the Meatpacking Industry.

6. Training/Communication

"I can train a worker on the motions of their job through sign language, but I cannot teach them how to stay safe or how to watch for food safety issues unless I can explain to them in words."

Language barriers exist in hog slaughter plants. There are workers from many different countries, who may not speak or understand English, working in hog slaughter plants. As FSIS inspectors are moved off-line, line workers will be required to take on more responsibility for detecting abscesses, fecal contamination, and other food safety problems. This information must be transmitted in a language workers can understand. Very few hog plants have language programs beyond using untrained shop floor workers to do the complex and nuanced tasks of interpreting.

If the hog industry continues to benefit from an immigrant and refugee workforce, they must develop ways to communicate worker safety and food safety information thoroughly and effectively with their workforce.

"I was given a 3-ring binder with a bunch of poor quality black and white photos. There was no way I could do an adequate food safety inspection with the training I received."

Training of workers to conduct the on-line food safety inspections must include interpreters, who interpret the training into the language spoken by workers, as well as evaluation of the training to determine the effectiveness of the training.

7. Access to drinking water and bathrooms.

"If you step away to get a drink of water or go to the bathroom it just makes more work for your co-workers."

At its most basic level, fast line speeds coupled with understaffing creates problems with respect to two key elements of worker safety: access to drinking water and access to bathrooms. There are facilities that have bathroom relief policies in place that are not operable due to chronic understaffing. The JBS plant in Beardstown, IL, was cited by OSHA for bathroom policies that restricted workers' access to the bathroom.

In addition, workers are reluctant to leave the line because this places an even greater burden on co-workers to cover additional work while they are gone. Workers on the slaughter side of the plant, where heat and humidity can combine to create heat stress hazards, may avoid drinking water necessary to stay hydrated because they do not want to have to make extra trips to the bathroom.

8. Risk Assessment

"No one can keep up with the pace they want us to work at."

Work tasks must be evaluated for risk of injury, including potential musculoskeletal disorders. Appropriate analysis tools such as Hand Activity Level must be applied by trained evaluators, and the results must be documented and made available to workers and their representatives.

FSIS requests comments regarding National Institute for Occupational Safety and Health (NIOSH) evaluation of hog establishments.

The UFCW also wishes to comment on FSIS's request for comments on the concept of hog establishments working with NIOSH to evaluate the effects of waivers of line speed restrictions on worker health. The UFCW opposes the granting of any line speed waivers to hog establishments; however, we do agree that it is useful to have hog establishments work with NIOSH to evaluate the impact of line speed on workers' safety and health at current line speeds. In order to ensure the effectiveness of such an effort, FSIS should require all hog plants to request an evaluation from the National Institute for Occupational Safety and Health (NIOSH) to determine the adequacy of the employer's occupational injury and illness prevention program; to evaluate effects of line speeds on workers' safety and health; and to require establishments to commit to implementing the recommendations from NIOSH on ways for the employer to eliminate or reduce the hazards causing work-related injuries or illnesses that come out of such an evaluation.

One practical recommendation to FSIS is to establish a memorandum of understanding (MOU) between FSIS and NIOSH to fulfill the requirements described above. The MOU must also include a funding mechanism to reimburse NIOSH for the cost of each evaluation and follow-up monitoring. We include this recommendation due to the fact that NIOSH's annual appropriation is \$335 million, which has declined substantially since its establishment when accounting for inflation. Moreover, future

appropriations for NIOSH may be greatly limited. The President's fiscal year 2018 and 2019 budgets call for a 40 percent cut to NIOSH funding.

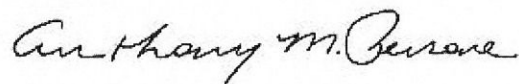
Economic impact on workers in hog slaughter plants.

Any increase in line speeds will also have a negative economic impact among workers and their communities. In addition to the dangers of the proposed line speed increase to workers and consumers, there is a calculated cost in lost wages to the workers in these plants, and by extension to their communities. The speed up would require fewer hours for slaughtering before these plants reach maximum capacity in their coolers. Fewer production hours would regularly leave hundreds of workers idle.

The UFCW attempted to calculate the potential lost wages and lost dollars impacting workers, and that otherwise would be available for workers to spend in their communities as opposed to the corporations pocketing these dollars in the productivity gains. For large, established hog plants in Marshalltown, IA; Worthington, MN; Logansport, IL; and Ottumwa, IA, the idle time resulting from proposed line speed changes ranges from 1.25 to 1.8 hours, as it takes less time to fill the coolers to capacity. For each production cycle to fill the coolers to capacity there are between \$3,000 and \$5,000 in unpaid wages as those workers sit idle. Easily, there are hundreds of thousands of dollars in a year that would have been take home pay for those workers that would go into the corporation's top line earnings and flow wherever the company chooses. Taking that amount out of workers hands and communities will be felt immediately and have lasting impact.

In conclusion, the UFCW strongly opposes the proposed Modernization of Swine Slaughter Inspection rule: FSIS-2016-0017 (RIN 0583-AD62), issued by the United States Department of Agriculture (USDA). This proposed rule calls for an unlimited increase in hog slaughter line speeds which is dangerous to both workers and consumers.

Sincerely,

A handwritten signature in cursive script, reading "Anthony M. Perrone".

International President