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RE: Comment in Opposition to Proposed Rule FSIS-2016-0017 “Modernization of Swine Slaughter Inspection”

Dear Ms. Rotenberg:

We submit this comment in opposition on behalf of our members who are affected by the issue because they are consumers across the state of Indiana. We strongly believe that if this rule is approved, it will pose a significant public health threat to consumers and workers, as well as increasing inhumane treatment of animals across the industry.

Food Safety

If this rule is approved, food safety will suffer. The probability of human error or accidental contamination increases when slaughtering and meat processing are subjected to relentless pressures to increase productivity. It is difficult to keep pace with the speed while attempting to identify and remove contaminated meat, some of which could be carrying E. coli or other dangerous bacterial agents. To claim that food safety will improve from the elimination of line speed limits, as the agency does here, contravenes reality, common sense, and existing policy. U.S. Department of Agriculture inspection records indicate that when fecal contamination is discovered near the end of the line at meatpacking plants, the built-in response is to slow the speed of the line.¹ This is clear acknowledgment of cause and effect. The proposed rule turns too much of the inspection and food safety testing over to the companies. It is crucial that regulators set a threshold that companies cannot surpass. In a profit driven market, many companies will choose to increase line speeds despite an increase in incidents of worker injury, inhumane

¹ Don Walton, *Why line speed is 'non-negotiable'*, Lincoln Journal Star, http://journalstar.com/why-line-speed-is-non-negotiable/article_4af83d30-b2bc-11de-9b21-001cc4c03286.html.

handling, or food contamination. Simply put, it is financially worth the risk. Therefore, this aspect must be regulated by an independent source.

Worker Health & Safety

There is a direct connection between line speeds and worker injury. Federal statistics show that animal slaughtering and processing facilities are the 6th most dangerous workplaces for severe injuries.² There is also a huge issue with underreporting in this industry. According to a Government Accountability Office report, most musculoskeletal injuries caused by repetitive movement, such as carpal tunnel syndrome, are not reported by workers.³ Interviewed employees explain that they do not report their injuries or file complaints because they are afraid of being fired.⁴ This makes sense. A financially vulnerable employee cannot afford to jeopardize their occupation to receive help; especially when they have families or loved ones who rely upon them. This is another reason why it is so important that regulators step in and keep companies from sacrificing safety for speed.

Conclusion

Line speed is the alpha and the omega in processing facilities. It determines workloads, affects injury rates, and is directly connected to food safety. Why would the Food Safety and Inspection Service (FSIS) not regulate such a critical component of the industry? FSIS has repeatedly rejected proposals that eliminate line speed limits for poultry facilities. Why should hog facilities be any different? Higher line speeds increase emotional and physical stress for both workers and animals, creating issues that reverberate throughout the entire process. Line speed limits are vital to protect workers, preserve quality control, reduce inhumane handling, and ensure food safety. We urge the FSIS to remain consistent in their decision-making and reject this proposed rule.

² Severe Injury Reports, Occupational Safety and Health Administration, <https://www.osha.gov/severeinjury/index.html>.

³ *Id.*

⁴ Nicole Erwin, *Too Fast For Safety? Poultry Industry Wants To Speed Up the Slaughter Line*, National Public Radio, <https://www.npr.org/sections/thesalt/2017/10/27/559572147/too-fast-for-safety-poultry-industry-wants-to-speed-up-the-slaughter-line>.

Signed,

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