

VIA E-MAIL

October 10, 2017

Ms. Carmen Rottenberg
Acting Deputy Under Secretary
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington DC 20250-3700

Dear Madam Acting Deputy Under Secretary for Food Safety:

With the health and safety of over 250,000 hard-working poultry workers, 70,000 of whom are members of our union family, we write to urge you to reject a petition submitted by the National Chicken Council (NCC) to run food processing lines with no speed limits.

This petition, submitted to you in early September, would allow select poultry plants to run their lines with no speed limits, endangering both workers and consumers. Even more troubling is that this petition essentially requests that USDA create this new “no speed limit” rule behind closed doors with no opportunity for notice and comment by the public as the regulatory process requires.

As you must know, poultry workers hold some of the most dangerous and difficult jobs in America. The implications of this rule change are striking, for example:

- Industry statistics show poultry workers are almost at twice the risk of being injured on the job compared to other workers and suffer illnesses at a rate that is seven times as high.
- A [2016 report](#) from the Government Accountability Office showed that forcing lines to move faster will expose poultry workers to higher rates of injuries and illnesses.
- Increased line speeds will also make it harder for both federal inspectors and quality control workers to properly check birds for contamination that could make consumers sick.

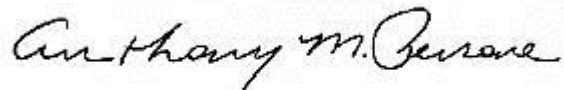
Given the facts noted above, the petition from the NCC clearly poses a dangerous risk to American families.

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When the USDA chose not to raise line speed limits for poultry plants in 2014, there was large public interest in the open and transparent process (which we participated in) that ensured all perspectives on this proposed modification were heard – including those of the NCC. A wide array of people and interests, from workers on poultry lines to experts across the country, agreed then as they do now that faster line speeds will make this industry dramatically less safe, both for workers and consumers.

For the sake of keeping hard-working families safe – whether they are preparing, buying, or eating chicken – the USDA must reject this petition.

Sincerely,

A handwritten signature in cursive script that reads "Anthony M. Berone".

International President