



## Consumer Federation of America

October 21, 2013

FSIS Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Room 2534, South Building  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

RE: USDA/FSIS Petition # 13-05

Dear Secretary Tom Vilsack:

The Consumer Federation of America (CFA) is writing to support the rulemaking petition (USDA/FSIS Petition # 13-05) submitted by the Southern Poverty Law Center and 14 other organizations on the need for USDA to address excessive line speeds in poultry and meatpacking plants.

CFA is an association of nearly 300 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and food safety organizations.

Production line speed already contributes to unacceptably high levels of injuries in the meat and poultry industry. Workers in these plants suffer disabling work-related musculoskeletal injuries. A recent study by neurologists and other medical staff at Wake Forest University found that 59% of workers in poultry plants had definite or possible carpal tunnel syndrome. USDA's proposed rule to modernize poultry slaughter inspections will exacerbate these hazards and increase the risk of injuries to these workers.

The petition makes a modest request of the USDA: Inviting OSHA to assist in crafting protection standards to incorporate into USDA's proposed rule on poultry slaughter inspection. We urge USDA to make a public commitment to accept this request and provide a date for completing it.

Sincerely,

Chris Waldrop  
Director, Food Policy Institute