

November 18, 2013

Docket Clerk
U.S. Department of Agriculture (USDA)
Food Safety and Inspection Service (FSIS)
Room 2534, South Building
1400 Independence Avenue, SW
Washington, DC 20250

**Re: FSIS Petition #13-05
Work Speed on Production Lines in Meatpacking and Poultry Industries**

Dear Secretary Vilsack:

The National Council of La Raza (NCLR), the largest national Hispanic civil rights and advocacy organization in the United States, writes to support the rulemaking petition submitted by the Southern Poverty Law Center and 14 other organizations to issue a mandatory occupational safety and health standard regulating work speeds on production lines in meatpacking and poultry industries and to ensure that worker safety is protected in any rulemaking related to line and work speeds in these industries.

As stated in our comments to FSIS regarding the proposed rule titled “Modernization of Poultry Slaughter Inspection” (Docket No. RIN 0583–AD32), production line speed contributes to unacceptably high levels of worker injuries in the poultry processing industry. The proposed rule would exacerbate these conditions by increasing line speed. Given their overrepresentation in the poultry and meatpacking workforce, Latinos suffer disproportionately from occupational injuries resulting from repetitive motion, especially musculoskeletal disorders. The public health literature documenting high levels of injury and illness among poultry and meatpacking workers, the known linkages between injuries and production line speed, and the egregious shortcomings of the current structures in place to protect workers’ health and safety amount to an urgent case for USDA to invite 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 this goal and to provide a date for expected completion.

Sincerely,



Eric Rodriguez
Vice President, Office of Research, Advocacy, and Legislation
National Council of La Raza

cc:

Thomas E. Perez, Secretary of the U.S. Department of Labor
Cecilia Muñoz, Director of the White House Domestic Policy Council
Howard Shelanski, Director, Office of Information and Regulatory Affairs
David Michaels, Assistant Secretary of Labor, OSHA
Alfred V. Almanza, Administrator, Food Safety and Inspection Service, USDA
Kirsten Gillibrand, Agriculture, U.S. Senate
George Miller, Education and Labor Committee, U.S. House of Representatives
Rosa L. DeLauro, Appropriations Committee, U.S. House of Representatives