



December 19, 2017

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, NW
Washington, D.C. 20250

RE: NAACP STRONG OPPOSITION TO ANY PETITION TO INCREASE POULTRY LINE SPEEDS.

Dear Secretary Purdue,

On behalf of the NAACP, our nation's oldest, largest and most widely-recognized grassroots-based civil rights organization, I strongly urge you to reject the National Chicken Council (NCC) petition to increase poultry line speeds. An unlimited increase in poultry line speeds would endanger both workers and consumers. People everywhere deserve safe food, and America's poultry workers deserve safe workplaces.

The food processing industry is a notoriously high hazard industry and workplace safety is a key concern. Currently, the majority of poultry workers are women and people of color and concentrated in plants in the Southeast (Alabama, Georgia and Mississippi).

Even at current line speeds, poultry slaughter and processing workers face many job risks that can lead to severe injury, illness and death.¹ Every day over 250,000 poultry processing workers stand shoulder to shoulder on both sides of long conveyor belts and use scissors and knives to make thousands of forceful cuts as the chickens move down the line. They work in cold, damp, extremely loud conditions and are often sprayed with the same acidic chemicals that are sprayed over the meat. Available industry statistics show poultry workers are currently 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.² 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.³

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.

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

² <https://www.bls.gov/iif/oshwc/osh/os/ostb4358.pdf>

³ Government Accountability Office. (April 2016). WORKPLACE SAFETY AND HEALTH Additional Data Needed to Address Continued Hazards in the Meat and Poultry Industry. Available at <http://www.gao.gov/assets/680/676796.pdf>

The NCC petition requests that U.S. Department of Agriculture (USDA) create a new rule with no public notice and comment. The USDA's Food Safety and Inspection Service (FSIS) can grant waivers to poultry plants only if they are testing new processes or experiencing emergencies. Faster line speeds are not a new process, nor is there an emergency. In 2014, USDA acknowledged the danger to workers of increased line speeds and also said that more study and review was needed before any change in line speed would be made. There has been no such study or review done since this acknowledgement. ⁴

The USDA must not bend the rules at the expense of the wellbeing and safety of workers and consumers. Thus, the NAACP, on behalf of poultry workers and poultry consumers everywhere urges to you to reject the NCC petition for an unlimited increase in poultry line speeds as well as any waivers that are requested during the time you are reviewing the petition. Thank you in advance for your attention to the position of the NAACP. Should you have any questions or comments, please do not hesitate to contact me at my office at (202) 463-2940.

Sincerely,



Hilary O. Shelton
Director, NAACP Washington Bureau &
Senior Vice President for Policy and Advocacy

cc: Carmen Rottenberg
Acting Deputy Under Secretary for Food Safety
Food Safety and Inspection Service
U.S. Department of Agriculture

⁴ Government Accountability Office. (August 2013). FOOD SAFETY More Disclosure and Data Needed to Clarify Impact of Changes to Poultry and Hog Inspections. Available at: <http://www.gao.gov/assets/660/657144.pdf>

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