

November 15, 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: Docket # 13-05

Dear Secretary Tom Vilsack:

We are members of the public health, workers' safety and labor rights community. We are writing to support the rulemaking petition 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.

Workers in these plants suffer disabling work-related musculoskeletal injuries. The following are just two examples of the grueling pace of their work:

Wing-folding workers are typically asked to grab, twist, fold, and tie two chicken wings every three seconds. This requires a worker to perform a quick series of four or more motions simultaneously with both hands. Workers perform this task twenty times per minute with each hand, or forty times total in a minute. Over the course of an eight-hour shift, wing folding workers may perform this series of motions more than 18,000 times (more than 9,000 times with each hand.)

Workers packing hams described packing 40 hams per minute with 5 motions per ham, including: reaching back with the right shoulder, grabbing the ham and moving it forward, dropping it in a bag opened with the left hand, and then pushing the ham along with the right hand. During an 8-hour shift, this worker makes approximately 96,000 movements.

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. The following organizations and individuals urge USDA to make a public commitment to accept this request and provide a date for completing it.

Sincerely,

Organizational Signatories

CATA - Farmworker Support Committee
Centro de los Derechos del Migrante, Inc
Food and Water Watch
Food Chain Workers Alliance
International Chemical Workers Union (representative of poultry and meatpacking workers)
Migrant Clinicians Network
National Consumers League
United Food and Commercial Workers International Union
United Steelworkers International Union
WorkSafe
WyCOSH (A project of the Equality State Policy Center Casper, Wyoming)

Individual Signatories

[Affiliations for Identification Only]

James Albers, MPH, CIH
Cincinnati, Ohio

Fran Ansley
Distinguished Professor of Law Emeritus
University of Tennessee College of Law
Knoxville, TN

Leslie I. Boden, PhD
Department of Environmental Health
Boston University School of Public Health

Liz Borkowski, MPH
Research Associate
Department of Environmental & Occupational Health
George Washington University School of Public Health & Health Services

Diane Brown
AFSCME

Rich Campbell
Editorial Board
New Solutions

[Affiliations for Identification Only]

Nelson Carrasquillo
General Coordinator
CATA - The Farmworker Support Committee

Jennifer Cavallari, ScD, CIH
University of Connecticut Health Center

HK Chun, ScD

Linda Delp, PhD, MPH
Director
UCLA Labor Occupational Safety & Health Program

Peter Doob

Peter Dooley
LaborSafe

Earl Dotter
Photojournalist

Peter Draper MD MPH
Chicago, Illinois

Rick Engler
Director
New Jersey Work Environment Council

Alice Freund
Industrial Hygienist

Megan Gaydos

Judy Gearhart
Executive Director
International Labor Rights Forum

Drew Gitchoff
President
SILCOSH

David Harrington, MPH

[Affiliations for Identification Only]

Robert Harrison, MD, MPH
Occupational Medicine Specialist
University of California San Francisco Medical Center

Richard Henighan, APRN, FNP, BC
Jobs with Justice of East Tennessee

Darrell Hornback
Director
ICWUC Health and Safety Department

K. Dean Hubbard, Jr.
Director
Sierra Club Labor Program

Katherine Hunting, PhD, MPH
Professor of Environmental & Occupational Health
School of Public Health & Health Services
The George Washington University

Brent Kim, MHS
Program Officer
Johns Hopkins Center for a Livable Future

Katherine H. Kirkland, DrPH, MPH
Lorton, VA

Gary Kloepfer
Legislative/Political Director
American Postal Workers Union, AFL-CIO

Paul Landsbergis, PhD, MPH
Associate Professor
State University of New York-Downstate
School of Public Health

Robert S. Lawrence, MD
Center for a Livable Future Professor
Professor of Environmental Health Sciences, Health Policy, and International Health
Johns Hopkins Bloomberg School of Public Health

[Affiliations for Identification Only]

David LeGrande
Occupational Safety and Health Director
Communications Workers of America

Charles Levenstein, PhD, MS
Professor Emeritus of Work Environment
UMass Lowell

Joan Lichterman
UPTE-CWA 9119, AFL-CIO

Amy K. Liebman, MPA, MA
Director of Environmental and Occupational Health
Migrant Clinicians Network

Hester J. Lipscomb, PhD
Professor
Division of Occupational and Environmental Medicine
Duke University Medical School

Elizabeth H. Maples, PhD
Deputy Director, Deep South Center for Occupational Health & Safety
Assistant Professor, Environmental Health Sciences
University of Alabama School of Public Health

Bob Martin, Director, Food System Policy
Center for a Livable Future
Johns Hopkins Bloomberg School of Public Health

Barbara Materna, PhD, CIH
Occupational Health Branch
California Department of Public Health

Mary E. Miller, RN, MN
Occupational Health Nurse Affiliate Instructor
School of Nursing
University of Washington

Tammy Miser
United Support & Memorial for Workplace Fatalities

[Affiliations for Identification Only]

Celeste Monforton, DrPH, MPH
Professorial Lecturer
Department of Environmental & Occupational Health
School of Public Health & Health Services
George Washington University

Steve Mooser
Director of Health and Safety
Retail, Wholesale & Dept. Store Union/UFCW

Karen B. Mulloy, DO, MSCH
Visiting Associate Professor
Case Western Reserve University

Andrea Mulvenon, MS
Graduate Research Assistant
University of Nebraska Medical Center
College of Public Health
Department of Environmental, Agricultural & Occupational Health

Roni Neff, PhD MS
Program Director
Food System Sustainability and Public Health
Center for a Livable Future
Assistant Scientist, Environmental Health Sciences and Health Policy & Management
Johns Hopkins Bloomberg School of Public Health

Richard A. Negri
Health and Safety Director
SEIU Local Union 121RN

John Newquist, MS, CSP

Elise Pechter MPH, CIH
Industrial Hygienist
Boston, MA

De Ann Pendry, PhD
Senior Lecturer
Department of Anthropology
University of Tennessee-Knoxville
Member, United Campus Workers-Communications Workers of America

[Affiliations for Identification Only]

Barbara Rahke
Director, Philaposh
Philadelphia Area Project on Occupational Safety and Health

Kimberly Rauscher, ScD, MA
Assistant Professor
Interim Vice Chair
Occupational and Environmental Health
West Virginia University School of Public Health

Bonnie S. Richter, MPH, PhD

Beth Rosenberg, ScD, MPH
Tufts University School of Medicine

Steve Schrag
ConnectiCOSH

Jeanne Sears, PhD, RN
Senior Research Scientist
Department of Health Services
University of Washington

Michael Silverstein, MD, MPH

Nancy Simcox, MS

Craig Slatin, ScD, MPH
Professor, Department of Community Health and Sustainability
University of Massachusetts Lowell

Jeanette Smith for
South Florida Interfaith Worker Justice

Rosemary Sokas, MD, MOH, MSc
Professor and Chair
Department of Human Science
School of Nursing and Health Studies
Georgetown University

[Affiliations for Identification Only]

Geraldine Stella
Health & Safety Specialist
NYS Public Employees Federation
USW Local 9265

John G. Stewart, PhD
Knoxville, Tennessee

Laura S Welch, MD
Medical Director
Center for Construction Research & Training

Silver Spring, MD 20910
Tom Winters

Patrice Woepfel, EdD

Michael J. Wright
Director of Health, Safety and Environment
United Steelworkers

Keith Wrightson
Worker Safety & Health Advocate
Public Citizen

Sherry Wyckoff, MPH
Research Coordinator
NYCAMH/NEC