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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

John Nethercut  
Executive Director

Dear Secretary Tom Vilsack:

Debra Gardner  
Legal Director

The Public Justice Center is a non-profit legal organization public interest law office, founded in Maryland in 1985, that seeks to enforce and expand the rights of people who are denied justice because of their economic status or discrimination. Our Workplace Justice Project partners with low-wage workers and fellow advocates to promote justice in the workplace. We work to improve workplace health and safety by advocating for policies that recognize the human dignity of each worker.

Monisha Cherayil  
Sally Dworak-Fisher  
Ilana Gelfman  
C. Matthew Hill  
John Pollock  
Russell R. Reno, Jr.  
Camilla Roberson  
Alexandra Rosenblatt  
Zafar S. Shah  
Andrea Vaughn

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. In short, the grueling speeds are unsustainable, and threaten the health and safety of vulnerable low-wage workers. This is an issue that directly implicates OSHA's expertise and accordingly, we support the modest call to invite OSHA to assist in the development of humane and safe standards.

Levern Blackmon  
Certified Paralegal

Jennifer Pelton, CFRE  
Development Director

As scientists and other experts have pointed out, workers in these plants suffer disabling work-related musculoskeletal injuries. The following are just two examples of the grueling pace of their work:

Erin Brock  
Development Associate

Brenda Midkiff  
Office Manager

Rachel Boss  
Legal Assistant

Rebecca Reynolds  
Legal Assistant

Erika Johnson  
Legal Advocate

1. 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.)

Jiyoon Kim  
Administrative/Development  
Assistant

2. 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.

The proposed rule to “modernize” poultry slaughter inspections will only exacerbate these hazards and increase injuries to these workers.

Accordingly, we urge USDA to make a public commitment to accept this request and provide a date for completing it.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally" followed by a stylized, cursive flourish.

Sally Dworak-Fisher