

June 19, 2017

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Secretary of Labor

Sonny Perdue
Secretary of Agriculture

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Deputy Under Secretary for Food Safety
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Assistant Administrator
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Dorothy Dougherty
Acting Assistant Secretary
Occupational Safety & Health Administration

Julie Wise
Office of Information & Regulatory Affairs

Elizabeth Ashley
Office of Information & Regulatory Affairs

Dear Administration Officials:

We are writing concerning the plan by the USDA's Food Safety and Inspection Service (FSIS) to expand the Hazard Analysis and Critical Control Point-based Inspection Models Project (HIMP) pilot program throughout the hog-processing industry. We note that on June 10, 2017, FSIS submitted the proposed rule "Modernization of Swine Slaughter Inspection" (RIN: 0583-AD62) to the Office of Information and Regulatory Affairs (OIRA) for review.

As we indicated in earlier correspondence to your agencies dated February 18, 2016, we have deep concerns about USDA's plans to move forward with a rule to expand HIMP. We believe the HIMP model creates serious and multiple public health dangers that must be avoided, including painful and permanently crippling musculoskeletal injuries, lacerations, amputations, and other safety and health hazards to workers who are employed in pork-processing facilities. We urge OIRA to ensure that both the Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) are included immediately in the required inter-agency review process. OSHA and NIOSH have the technical and scientific expertise to evaluate the proposal for its potential consequences on the health and safety of pork-processing workers.

In 2011, OSHA and NIOSH were initially excluded from the inter-agency review of the FSIS's New Poultry Inspection Slaughter proposed rule. Mr. Almanza subsequently said that FSIS learned from the mistake of omitted these key agencies. We urge OIRA to rely on OSHA and NIOSH for their expertise and ensure they are included in this important step in the rulemaking process.

Pork-processing workers are gravely concerned that USDA will propose a rule to “modernize” the slaughter inspection system by allowing an increase in line speeds. Pork-processing workers make tens of thousands of forceful repetitive motions on each and every shift. They already experience a relentless pace of work and suffer injuries as a result. We provide the following testimony to illustrate the point:

"My name is Teresa. I worked at a meatpacking plant in Nebraska for four-and-a-half years. I packed hams for eight hours a day, 40-50 hams every minute. The processing line moves tremendously fast and doesn't stop. After just three years I had to have surgery. Now two years later, I still wake up from intense pain. What I wanted when I worked at the plant was to be treated like a human being and not like some replaceable machine."

As representatives and advocates for poultry and meatpacking workers, we urge OIRA and USDA to engage with the experts at OSHA and NIOSH in a formal interagency review of the proposed rule “Modernization of Swine Slaughter Inspection” (RIN: 0583-AD62). The Trump Administration must ensure that USDA’s plans for HIMP are not in conflict with the missions and responsibilities of OSHA and NIOSH.

Sincerely,

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