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**Midwest**  
**Coalition**  
**for Human**  
**Rights**

June 25, 2013

Tom Vilsack, Secretary of Agriculture  
Michael T. Scuse, Acting Deputy Secretary of Agriculture  
Elisabeth A. Hagen, Undersecretary for Food Safety  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

*Via U.S. Mail*

Dear Messrs Vilsack, Scuse, and Ms. Hagen:

The Midwest Human Rights Coalition, Nebraska Appleseed Center for Law in the Public Interest and the Southern Poverty Law Center (SPLC) enclose a copy of the petition jointly filed today with the Inter-American Commission on Human Rights citing violations of the human rights of meat and poultry processing workers resulting from unreasonable health and safety hazards at slaughtering and processing plants.

The fast speeds at which meat and poultry processing plants are permitted to run under current USDA regulations are central factors contributing to these human rights violations. Line speed continues to cause a staggering number of workers to experience crippling and even life threatening injuries in these industries. As the agency currently regulating line speeds and considering a new rule that would dramatically increase line speeds for workers and for food safety inspectors, we urge the USDA to consider workers' basic human rights to occupational health and safety as it continues to make rules directly impacting workers.

Earlier this year, the SPLC and Alabama Appleseed Center for Law and Justice published the report *Unsafe at These Speeds: Alabama's Poultry Industry and its Disposable Workers*, providing a unique inside look at the operation of poultry plants. The report documents health, safety, and other conditions affecting workers in all positions in the chicken industry, from chicken catchers, live hangers, and rehangers to deboners, skin pullers, and box stackers.

Nearly three-fourths of the 302 workers who were interviewed for the report revealed that they had suffered some type of significant work-related injury or illness, yet 68% felt that they could not ask their supervisors to improve health or safety hazards. The most common injuries suffered involved debilitating pain in workers' hands, gnarled fingers, cuts, and skin and

respiratory problems, and workers in positions most sharply affected by processing line speeds and high rates of repetitive motions reported the highest rates of musculoskeletal injuries. Over three-fourths (78%) of workers said that an increase in the line speed makes them feel less safe, makes their work more painful, and causes more injuries. Eighty-six percent of wing cutters and 80 percent of deboners reported hand and wrist pain such as swelling, numbness or an inability to close their hands – symptoms of disabling repetitive motion injuries.

The realities workers face demonstrate an ongoing health and safety crisis in the poultry and meat processing industry, principally driven by the punishingly fast speeds at which slaughtering and processing lines currently operate. The extent of the crisis is understated in employer-reported data, known by workers and industry alike to undercount actual injury and illness rates.

In light of these findings, we respectfully urge you to use your agency's authority to withdraw the current proposed rule entitled "Modernization of Poultry Slaughter Inspection," which would increase maximum permitted line speeds to 175 birds per minute and which would replace independent federal food safety inspectors with plant employees already too intimidated to ask for protections for their own health. If that is not possible, we ask you to implement worker safety protections in this rule, including allowing the National Institute for Occupational Safety and Health (NIOSH) to study the health and safety impact on workers of increased line speeds and make occupational safety recommendations before allowing the rule to take full effect.

We respectfully bring this petition to your attention.

Truly,



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