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Line Speeds, Worker Injuries, and Food Safety

The United Food and Commercial Workers International Union represents 1.3 million workers in North America, primarily in the grocery, retail, and meatpacking industries.

There is evidence of a correlation between the increase in line speeds in the poultry and meatpacking industries over time and the increase in worker injuries, most especially Musculoskeletal Disorders (MSDs) and food-borne illnesses. A well-researched article by University of Iowa Law Professor Marc Linder published in 1995, documented the increase in the 1980s and 1990s of line-speed-related occupational injuries in poultry to changes in inspection regulations heavily influenced by the industry.

Occupational Safety and Health Administration (OSHA) inspections were conducted in large poultry and meatpacking companies in the 1980s and 1990s, because there was an epidemic of MSDs. These led to multi-million dollar citations and settlement agreements. One of OSHA's stipulations in these agreements was that companies assess line speed and the number of repetitions performed by workers on "the line," and find ways to reduce them. University-based researchers including Michael Riley, from the University of Nebraska, documented that the push for faster line speeds was the source of workplace injuries in one of America's largest slaughter plants. In 1995, the Government Accountability Office (GAO) and Human Rights Watch looked at the meatpacking and poultry industries and found dangerous line speeds and life-ending injuries. They issued reports calling for immediate action from employers and federal and state governments to rectify these conditions.

According to UFCW research, line or chain speeds in one beef plant increased from around 270 head per hour in 1994, to 360 head per hour in 2008. Across the red meat industry, chain speeds have increased 20 percent over the 20-year period from 1988 to 2008. The injury rate in the meatpacking industry continues to be among the highest reported. In 2007, it was two times the level of manufacturing.

Several studies suggest a link between line speeds and food contamination. A 2001 GAO report to the Senate Committee on Agriculture, Nutrition and Forestry on weaknesses in the Hazard Analysis and Critical Control Point Program (HACCP) suggests a relationship between line speed and microbiological contamination, documented in part by interviews with Food Safety Inspection Service (FSIS) inspectors.

Under a proposed U.S. Department of Agriculture (USDA) Public Health-Based Slaughter Inspection System (PHBSIS) that was in the planning stages this year, slaughterhouses and processing plants will be allowed to set their own line speeds, without analysis of the impact of fast moving production lines on worker health and consumer safety.

The first implementation of PHBSIS allows for increased line speeds and self-regulation by industry. A proposed rule for poultry slaughter would allow companies to increase their line speeds so long as they submitted a process control plan to FSIS and kept the incidence of *Salmonella* under a baseline level. Another rule, finalized recently, allows companies to dramatically increase turkey slaughter line speeds. The rulemaking document included ConAgra's estimation that "…this increase will result in $600,000 to $3,000,000 more in revenue annually per establishment." The risk based poultry slaughter rule includes FSIS' opinion that "…[c]ost savings would likely result because of increased line speeds, increased productivity, and increased flexibility to industry." While FSIS rulemaking process explicitly considers impacts on industry profitability, the agency has taken no account of the impact on worker safety from the increased line speeds that PHBSIS will allow.

FSIS has not intensively studied the impact that increased line speeds will have on food safety. Consumer groups fear that faster lines will inevitably lead to poorer oversight, more careless slaughter technique, and thus more contamination on carcasses. A recent inspectors' union survey stated that 80 percent of inspectors feel that line speeds are already too fast to allow proper inspection of carcasses, and a scientific advisory committee to FSIS said that PHBSIS should not go forward without a study of the impact of line speeds on food safety.

The UFCW therefore makes the following recommendations:

1. A panel of experts should be convened, possibly under the umbrella of the National Academies of Science, to determine the evidence and set a course for research into these important public health issues.

2. The National Institute for Occupational Safety and Health (NIOSH) should conduct research into line speeds and workplace injuries in the poultry and meatpacking industries. There will have to be conditions under which companies will be compelled to comply with requests from NIOSH for access. Up to this point, the industries have refused.

3. Before any variance or new inspection system is implemented in the poultry industry or specific poultry plant, there must be a study to examine the effects of line speed as it relates to injuries and food safety.

4. The Administration should initiate a Department of Labor – Department of Agriculture Task Force to address line speed as it affects both worker protection and food safety. The Task Force should include representation from the Food Safety and Inspection Service (FSIS), the Occupational Health and Safety Administration (OSHA), the Wage and Hour Division, and the National Institute for Occupational Safety and Health (NIOSH).

5. Advisory committees such as the National Advisory Committee on Meat and Poultry Inspection (NACMPI) already include explicit positions for consumers and industry. They should also include explicit positions for worker representatives.