



May 2, 2018

Carmen Rottenberg  
Acting Deputy Undersecretary for Food Safety  
Food Safety and Inspection Service  
Room 331E, Jamie L. Whitten Building  
12th Street and Jefferson Drive, SW  
U.S. Department of Agriculture  
Washington DC 20250  
Email: [carmen.rottenberg@fsis.usda.gov](mailto:carmen.rottenberg@fsis.usda.gov)

***RE: Docket No. Food Safety and Inspection Service, USDA (FSIS-2016-0017): Modernization of Swine Slaughter Inspection***

Dear Acting Deputy Undersecretary Rottenberg:

On behalf of the members of the Interfaith Center on Corporate Responsibility ([www.iccr.org](http://www.iccr.org)), a faith-based and socially responsible coalition of active investors, we urge the Food Safety and Inspection Service, USDA (FSIS-2016-0017) to reject any proposal to increase line speeds in hog slaughter plants. We oppose this proposal because of the health risks to workers, the food safety risks to consumers, and the harm it may pose to companies and the broader economy.

Integral to the sustainability of our food system is the health and prosperity of its workforce, yet workers in agricultural and food production sectors have experienced a long history of egregious human rights violations. Investors in our coalition are long-term investors and have engaged the world's largest corporations, including companies in the meat sector that would be impacted by this proposal. For over four decades, our members have been encouraging more robust occupational worker health and safety standards, protection of labor rights and accountability throughout the food supply chain.

Given the prevalence of existing worker health and safety risks with the current regulations on line speed, and the reputational, legal, and business risks this poses to employers, this proposal by the USDA to eliminate line speed limits at pork plants is concerning. We also oppose the removal of on-line food safety inspectors and any decrease in government food safety inspectors as they provide critical oversight to ensure worker and food safety in the plant. We believe changing the existing rule will lead to increased health and safety risks for workers.

**1. Jobs inside pork plants are some of the most dangerous and difficult in America.**

Hog slaughter workers already endure exceedingly harsh working conditions to provide inexpensive meat to American consumers: in fact, the pork processing industry is one of the most dangerous for workers. According to the Bureau of Labor Statistics, based on a voluntary survey of pork processing plants, meatpacking workers are injured at rates that are more than 2.4 times higher than the national average for all industries. The rate of injuries that require workers to lose time from work or restrict their duties is nearly 3 times higher.

## **2. This proposal has food safety implications by increasing the risks of food contamination**

Beyond the safety of workers, it is also clear that this proposal may pose dangers to consumers. The proposal would reduce the number of government food safety inspectors in the plants, turning that function over to a reduced number of company employees. Reports by the Office of Inspector General found that the five pilot plants that implemented this proposed new inspection system suggest a higher potential for food safety risks.

Food safety concerns are a risk for companies too since they may face recalls of infected meat that slips by due to reduced inspection. This would cost the company loss of revenue and reputational harm.

## **3. This petition may harm companies**

Any increase in workplace injuries harms workers and risks making pork less safe for every consumer to eat: this will have negative and long-lasting impacts on the reputation of pork companies. Jobs in pork processing plants are already proven to be difficult and dangerous for workers. In focusing on the short-term benefits increased speeds will have on production, companies are ignoring the deleterious and long-term consequences they pose to the industry.

Importantly, companies must consider the financial risks increased line speeds may carry in terms of worker compensation claims, medical and legal expenses, the cost to repair damaged equipment and property and the reduced productivity and revenue loss associated with absenteeism as well as employee replacement training costs. A 2013 study found that injuries and accidents where workers missed more than six days of work “cost U.S. employers nearly \$62 billion.”<sup>1</sup>

## **4. This proposal will roll back progress and jeopardize animal welfare by speeding up slaughter lines**

A faster slaughter line risks the improper stunning of pigs as required by the Humane Methods of Livestock Slaughter Act. Pigs may never lose consciousness, or may regain it during slaughter. Consumers are increasingly considering animal welfare when purchasing products, and a lower bar for animal slaughter unnecessarily opens the door to reputational risk for pork producers.<sup>2</sup>

In summary, increasing line speeds would only exacerbate existing worker health and safety concerns with significant long-term risks to both businesses and their consumers. For that reason, it is imperative that the USDA reject any proposal to modify line speeds until it completes its studies evaluating the safety of existing line speeds. In the interim, any move by the USDA to increase line speeds in pork production completely disregards the safety of the thousands of working men and women who endure exceedingly harsh working conditions to feed their fellow Americans.

America’s workers deserve safe workplaces and consumers deserve safe food. We encourage the USDA to reject this proposal and enforce safe line speed limits and inspections in pork plants.

Sincerely,

Josh Zinner, CEO  
Interfaith Center on Corporate Responsibility

Nadira Narine, Senior Program Director  
Interfaith Center on Corporate Responsibility

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<sup>1</sup> <http://www.ehstoday.com/companies-injuries>

<sup>2</sup> <http://fortune.com/2017/06/23/animal-cruelty-stop-human-society-welfare-businesses-companies/>



And representing the following investors:

Friends Fiduciary Corporation  
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