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Docket Clerk, U.S. Department of Agriculture (USDA) FSIS  
Patriots Plaza 3, 355 E. Street SW., Room 8-163A, Mailstop 3782  
Washington, DC 20250-3700

*The opinions expressed herein are our own and do not necessarily reflect the views of  
The Johns Hopkins University.*

**RE: Public Comment on the *Modernization of Poultry Slaughter Inspection*  
(Docket No. FSIS-2011-0012)**

To whom it may concern,

We are researchers from the Johns Hopkins Center for a Livable Future (CLF), based at the Bloomberg School of Public Health. CLF engages in research, policy analysis, education, advocacy, and other activities guided by an ecologic perspective that diet, food production, the environment, and public health are interwoven elements of a single complex system. CLF recognizes the fundamental importance of food animal slaughter and processing in these issues as they relate to the U.S. food system.

As part of the proposed *Modernization of Poultry Slaughter Inspection* rule, the USDA Food Safety Inspection Service (FSIS) aims to raise the maximum rate at which chickens could be slaughtered and processed from 140 to 175 birds per minute, cut the number of FSIS inspectors per line to one, reduce the number of viscera inspections and to place sole responsibility for preliminary on-line screening of adulterated birds on plant employees. The proposed rule addresses a system already faced with challenges presented by its speed, scale and lack of testing and oversight, and proposes to make it faster, bigger, and to drastically alter the manner in which carcasses and poultry meat products are inspected. We have a range of concerns and requests for more information regarding the new rule, and we thank you for this opportunity to share our views. These concerns include increased opportunities for cross-contamination, occupational and community health risks and changes in inspection that have not been adequately evaluated.

## **Increased opportunities for cross-contamination**

Increases in line speed are meant to facilitate greater efficiency and capacity at large processing facilities. The gains in efficiency from faster line speeds may come, however, at a cost to the public's health. Between routine cleanings of equipment, pathogens introduced by infected and colonized birds can spread throughout a processing facility, contaminating surfaces, equipment and workers' personal protective equipment. These infectious agents have been shown to survive in the environment of the processing plant, where they may cross-contaminate other carcasses during processing.<sup>1</sup> Studies have shown that *Salmonella* species, along with other human pathogens, may survive the various process controls and decontamination methods used in U.S. processing facilities.<sup>2-4</sup> With more carcasses processed in each facility per shift, the likelihood of introducing human pathogens to the processing environment becomes greater. In addition, the increase in line speed means that a greater number of carcasses could become cross-contaminated following the introduction of an infected or colonized bird. As a greater number of contaminated poultry products enter our food supply, consumers could be put at greater risk for exposure to foodborne pathogens.

## **Occupational and community health risks**

Faster line speeds, coupled with the associated increase in production volume, may contribute to several occupational and community health risks.

On the assumption that faster speeds increase the risk of injury among plant workers, the Occupational Safety and Health Administration has recommended a reduction in line speeds.<sup>5,6</sup> Plant officials have also acknowledged the importance of line speed on worker safety and health.<sup>5</sup> Injuries and illnesses among meat and poultry plant workers are already among the highest in any U.S. industry;<sup>5</sup> between 2003-2007, the U.S. Bureau of Labor Statistics reported that workers in poultry slaughter and animal processing were 64 percent more likely to sustain a work-related injury than the national average.<sup>7</sup> While further research is needed to assess the full impact of line speed on worker safety, this remains an important consideration regarding unintended effects of the proposed rule.

Many plants have reduced the need for human labor with automation, but this does not preclude the risk of occupational health harms. Plant workers are in constant contact with potentially contaminated carcasses and machinery. Workers at such

facilities are at a higher risk of sustaining an infection with dangerous microbial pathogens, including Methicillin-resistant *Staphylococcus Aureus* and other drug-resistant bacteria,<sup>8</sup> particularly if they incur cuts, burns, scrapes or abrasions on the job. Afflicted workers can suffer debilitating illnesses resulting in lost time and productivity at work, costly healthcare, and even death from these infections. As stated above, with a greater volume of carcasses processed in each facility per shift, the likelihood of introducing human pathogens to the processing environment becomes greater.

The health risks of increased line speeds are not limited to workers at processing facilities. Infected or colonized workers may spread these pathogens into their homes and communities, particularly if they go to the clinic or hospital to seek treatment for work-related infections or illnesses.<sup>9</sup> Healthcare settings (among other environments) represent a reservoir into which these pathogens may migrate and persist, and it is in these environments where vulnerable populations may be subsequently exposed. While none of this is new in the current understanding of how food animal processing may impact occupational and public health, all of these problems could be amplified by the proposed increase in line speed at poultry processing plants.

## **Changes in inspection**

The new rule proposes to shift responsibility for initial line screening of adulterated carcasses from FSIS inspectors to line workers at the processing facility. In the current system, though FSIS line inspectors only perform brief organoleptic inspections, they serve the critical function of keeping many of the unhealthiest carcasses from contaminating the processing facility and the food supply chain. FSIS inspection at the evisceration, sorting, trimming and washing stages is critical, not only because this is the stage where whole birds with obvious signs of contamination may be most easily screened, but, more importantly, this is the stage where equipment and infrastructure may become contaminated. As described above, contamination of machinery and equipment can rapidly spread low levels of harmful pathogens to thousands of carcasses before the equipment is cleaned or the contamination is eliminated. These contamination events may be sporadic enough to evade detection by infrequent random microbial sampling, and will be undetectable to gross examination by either inspectors or employees at any stage. Widespread contamination of carcasses and poultry with microbial agents that are undetectable by visual inspection is the outcome of primary concern with regard to

food safety and the protection of public health. These outcomes may be profoundly impacted by the proposed changes.

The proposed rule has been justified, in part, by the results of an evaluation that measured levels of microbial contamination in pilot plants. The microbial sampling and analysis performed as part of this evaluation, however, were not performed with adequate frequency or power to detect the sporadic low-level contamination of carcasses that occur via contamination of plant equipment. *Salmonella* species were the only bacterial pathogens for which samples were tested to assess microbial contamination, and during the evaluation, pilot plants were sampled at an average rate of 40 times per plant per year.<sup>10</sup> **The testing for microbiological contamination used to perform the risk assessments that justify these changes in inspection policy is inadequate. More frequent sampling for a broader range of potential contaminants is necessary to assess the impact of these changes in inspection and process control.**

The proposed changes are meant to enable FSIS inspectors to focus on other duties, such as microbial sampling, verifying Hazard Analysis & Critical Control Points plans, and overseeing sanitation procedures. These changes may go to some lengths toward enhancing food safety, and we support placing a greater emphasis on these aspects of FSIS inspection. It is a potentially dangerous move, however to place responsibility for line inspection on slaughter plant workers, who must judge and screen each bird while engaged in other critical tasks.

FSIS line inspectors are highly trained public servants mandated to ensure food safety and to protect public health. We recognize that many inspectors are overworked and the FSIS program is chronically short of necessary resources. This is exactly why more inspectors (and more resources for FSIS) are needed in poultry processing plants, not fewer. The data supporting the idea that line workers at a poultry plant can adequately perform initial screening for adulterated carcasses is inadequate and incomplete. **The proposal to allow workers at a facility to perform preliminary carcass screening in lieu of FSIS inspection must be evaluated more thoroughly before implementation of such sweeping changes to inspection policy.**

## **Conclusion**

For the reasons detailed above, we urge USDA-FSIS not to implement the proposed increase in allowable line speeds. We also urge the agency not to implement the changes in inspection policy before the potential impacts on food safety, occupational health and public health can be properly evaluated and reviewed. The proposed changes in line inspection policy alter the paradigm of food safety inspection considerably. We believe that the expertise of FSIS line inspectors is an indispensable aspect of ensuring food safety at U.S. poultry processing facilities. We urge the USDA to retain current levels of line inspections performed at the evisceration, cutting, trimming and sorting stages of poultry plants by qualified FSIS staff, at least until more thorough evaluations of the potential risks and impacts of the proposed changes can be completed and an adequate evidentiary basis for reforming inspection policy can be established.

Sincerely,

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