

April 20, 2026

Docket Clerk
U.S. Department of Agriculture, Food Safety and Inspection Service
1400 Independence Avenue SW, Mailstop 3758
Washington, DC 20250-3700

RE: 9 CFR Part 381
Docket No. FSIS-2025-0012
RIN 0583-AE01
Submitted at <https://www.regulations.gov>

Disclaimer: The opinions expressed herein are my own and do not necessarily reflect the views of the Johns Hopkins University.

I am a researcher at the Johns Hopkins Center for a Livable Future (CLF), an interdisciplinary academic center at the Johns Hopkins Bloomberg School of Public Health dedicated to advancing equitable, resilient, and sustainable food systems through science and systems-based approaches. CLF has been researching the public health implications of food production since our founding in 1996.

I am writing to strongly oppose the USDA’s Food Safety and Inspection Service’s Proposed Rule “Maximum Line Speed Rates for Young Chicken and Turkey Establishments Operating under the New Poultry Inspection System.” This proposed rule would cause significant harm to the health and safety of poultry workers and endanger consumers.

The poultry industry is very dangerous for workers. In hundreds of plants across the country, poultry industry workers face harsh and dangerous conditions to turn live chickens and turkeys into the products consumers buy in the supermarkets or eat at restaurants. There is little automation, and workers make the same forceful cuts or movements thousands of times a day—as they hang, slaughter, rehang, skin, disassemble, debone, and pack poultry into the products consumers buy in the supermarket.

The hazards facing poultry workers include acute injuries from slips, trips, falls, lacerations and amputations, chemical exposures from refrigerants and disinfectants, infectious agent exposures, loud noise that can cause hearing loss, extreme temperatures, lack of access to bathrooms causing urinary and bladder infections, and exposure to physical stressors such as repetitive motion, forceful motions, awkward postures and vibration. Meat processing workers experience high rates of repetitive stress injuries, carpal tunnel syndrome, and nerve issues in the hand and arm, and these repetitive movement injuries are the most common injuries for line workers, as discussed in a [2016 GAO report](#).

Poultry workers face injury and illness rates far above the national average for all industries. [Leading poultry companies were](#) found to have among the highest number of severe injuries reported to the Occupational Safety and Health Administration (OSHA)—which include amputations and other injuries serious enough to require an overnight stay in the hospital. Data from OSHA show that on average, [27 U.S. line workers experience an amputation, loss of an eye, or other injury requiring hospitalization each day](#). A [2017 study](#) published in the Journal of Occupational and Environmental Medicine, found that the poultry industry had the highest number of finger amputations of any industry.

Studies have shown that poultry workers also suffer high numbers and rates of musculoskeletal disorders of the hand, wrist and shoulder. The National Institute for Occupational Safety and Health (NIOSH)

studied the rate of carpal tunnel syndrome in two poultry plants through medical exams and documented an alarmingly high rate of carpal tunnel syndrome (CTS) in the plants. In one plant, [34% of workers had carpal tunnel syndrome](#) and 76 percent had evidence of nerve damage in their hands and wrists. [In another plant, 42% had CTS.](#)

Notably, in one [2014 evaluation](#) of a Maryland poultry plant, National Institute for Occupational Safety and Health researchers found that 81% of the jobs had hand activity levels above the American Conference of Governmental Industrial Hygienists' action limit, which is defined by the level at which there is moderate risk for musculoskeletal disorders. This same report concluded that 76% of participants tested abnormal on a nerve conduction test of one or more hands.

Yet, existing data likely underreport the occupational injuries and harms experienced by line workers. A study conducted by [Leibler and Perry \(2017\)](#) found that line workers reported more than two times as many injuries to them than official estimates show. There are discrepancies in the meatpacking industry's injury data for many reasons, including immigration and language barriers and lack of federal protections.

Increasing line speeds in poultry plants will further endanger workers. In a [policy and practice brief](#) on line speeds and worker health I published with a colleague in 2025, we found strong evidence that line speed is associated with higher worker perceptions of injury risk, lower worker well-being, and higher risk of injuries from repetitive tasks. As line speed increases, repetitive movements for workers increase. A study by [Rosenbaum et al., 2015](#) found distinct levels of risk based on the type of job being performed by the line worker (such as deboning versus cutting), raising considerations of differential risk for varying types of workers.

In a study of processing line workers in Arkansas, [Choi and Constance \(2019\)](#) found that all 198 participants reported increased difficulties at work when the line speed increased, and half reported feeling unsafe doing their job at the current line speed. Every worker who spoke with Human Rights Watch in a [2019 report](#) cited speed of work as a major risk of injury and illness. In multiple studies, lineworkers have reported that supervisors control the line speed in their facilities and the workers feel that supervisors do not care about worker safety or safety procedures, leaving them without proper injury reporting channels.

Increasing the line speed for chickens by a full 25% to 175 birds per minute—would only make a bad situation for workers worse.

Workers report that line speed is not the only threat to their well-being, but it is a major source of stress and worry. A [2021 study](#) found that line workers were aware of behaviors that may reduce their risk of injury, such as sharpening their knives or adjusting their posture, but felt they were unable to engage in these behaviors due to the speed of work.

While this comment focuses on the threats to worker health and safety posed by this proposed rule, it is worth noting that there are also serious food safety implications of the proposed line speed increases—as FSIS inspectors have pointed out over the years as line speed increases have been proposed. Increasing poultry line speeds will undermine an already tenuous system and hamper food safety inspectors' ability to identify compromised products. The ensuing risks to consumers from foodborne illnesses and spread of antibiotic-resistant pathogens are unacceptable.

Further, FSIS has not considered the environmental impacts associated with the 1.4 billion pounds of ad-

ditional poultry products per year it estimates will result from the proposed line speed increases. Yet, that additional quantity of poultry production is significant in terms of water, greenhouse gas emissions, and land use. The freshwater footprint to produce the additional 1.4 billion pounds of poultry is equivalent to 30 million gallons or 45,400 Olympic sized swimming pools. The greenhouse gas emissions (2 million metric tons of CO₂ equivalent) are comparable to 466,511 gasoline powered cars driven for one year. The estimated land use is more than 1.3 million acres, larger than the size of Grand Canyon National Park. More details on these calculations and the source material is available upon request.

I urge the USDA FSIS to withdraw this proposed rule. The evidence is clear that increasing line speeds in poultry plants will harm workers and pose risks to consumers.

Sincerely,

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