



The International Brotherhood of Teamsters

Comment on the Proposed Rule:
Maximum Line Speed Under the New Swine Slaughter Inspection System (NSIS)

Docket ID:FSIS-2025-0009

April 20, 2026

The International Brotherhood of Teamsters (IBT) submits these comments in response to the USDA FSIS proposal to amend its federal meat inspection regulation to allow establishments operating under the New Swine Slaughter Inspection System (NSIS) to determine their line speeds based on meeting process control requirements. The IBT opposes the proposed “Maximum Line Speed Under the New Swine Slaughter Inspection System (NSIS)” rule¹. The proposed rule raises significant public health, worker safety, and animal welfare concerns. We oppose the elimination of the attestation rule and any increase in maximum allowable line speeds in swine processing facilities above the currently allowed 1,106 head per hour (hph) and urge the USDA to withdraw this proposed rule.

The IBT represents 1.3 million working men and women in virtually every occupation throughout the United States and Canada. The IBT estimates that approximately 8,000 workers in the animal slaughtering and processing industry are represented by about 48 Teamster local unions combined. We work with local, state, and national partners to promote policies and programs that create good, safe jobs for all. The safety and health of workers is a top priority for the organization.

Slaughter Facility Injury Rates Among the Highest in our Economy

For decades, the swine processing industry has faced hazardous working conditions—cold, wet, and crowded environments. Some of the most frequently cited workplace hazards are slips,

¹ Docket ID No. FSIS 2025-0009 (RIN 0583-AE02).

trips, and falls, which are prevalent in swine processing facilities. The Bureau of Labor Statistics (BLS) Nonfatal Occupational Injuries and Illnesses Report for 2023–2024 shows that slips, trips, and falls were the third leading cause of workplace injuries, accounting for 26 percent of injuries (a total of 479,480 cases, with an injury rate of 22.6 per 10,000 full-time workers)². The agricultural sector is one of the leading industries for these types of injuries.

Swine Processing increases risk for ergonomical injuries. The BLS 2023–2024 nonfatal report categorizes overexertion, repetitive motion, and bodily conditions (the most serious types of injuries in this category) as the second leading cause of occupational injuries involving days away from work, with an injury rate of 23.2 per 10,000 full-time workers. Workers who experienced these injuries spent an average of 14 days away from work, resulting in lost time for employers and accounting for 27 percent of all reported nonfatal injuries.

The hazards in swine processing facilities are extensive. In 2018, the IBT submitted comments condemning the Modernization of the Swine Slaughter Inspection rule, citing a Government Accountability Office (GAO) report that confirmed the dangerous working conditions in the swine processing industry. Since 2018, these conditions have not improved. GAO’s 2023 report further emphasized the hazardous working conditions in swine processing establishments, which were exacerbated by the COVID-19 pandemic and have not yet recovered.

Slaughter facilities already experience a higher-than-average injury risk rate and removing line speeds will only make things worse. Swine workers handle hog parts daily, exposing them to cuts and lacerations, known as contact incidents. The BLS 2023–2024 nonfatal report confirmed that contact incidents are the leading cause of workplace injuries, with an injury rate of 23.6 per 10,000 full-time workers. The three leading causes of workplace injuries—contact incidents; overexertion, repetitive motion, and bodily conditions; and slips, trips, and falls—accounted for 80 percent of all workplace injuries nationwide. Swine workers are exposed to all of these hazards daily. OSHA’s 2024 annual report documented 9,882 incidents in animal slaughtering and processing establishments. Of these incidents, 83 percent were recorded as injuries, and 88 percent occurred in larger establishments with 250 or more workers. Any increase in line speeds in swine processing facilities will further jeopardize worker safety in an already dangerous industry.

Piece Rate – the number of hog parts handled per minute by workers – has been found by the government through their annual PULSE study to have a direct correlation to musculoskeletal disorder (MSD). Roughly 46 percent of swine and 81 percent of poultry workers are found to be at risk of MSDs and that is at the current line speed rate. FSIS considers this regulation to have a substantial impact if it affects more than 30 percent small businesses in their analysis. MSD injury rates in swine and poultry processing facilities are 16 and 51 percent higher than this threshold. A

² Bureau of Labor Statistics (BLS). <https://www.bls.gov/web/osh/table-1-industry-rates-national.htm>
National Safety Council (NSC). <https://injuryfacts.nsc.org/work/work-overview/top-work-related-injury-causes/>

well-documented worker safety issue, supported by decades of research is being ignored instead to focus on operational output and increasing productivity and profit.

FSIS Review of Line Speed Waivers is Inconclusive

The 2021 Time Limited Trail (TLT) waiver program has, according to the government itself produced mixed results and therefore should not be used to justify the removal of line speed quotas. The first waiver program data set was determined to be “not robust enough” and so the waiver program was modified in 2024. On January 9th 2025, FSIS published the findings on their worker safety study, and the results were inadequate at best. Of the six establishments studied for MSD risk, one showed increased risk, one showed decreased risk and four showed no statistically significant association. The one establishment that experienced lower MSD risk after increasing the line speed also had the lowest average piece rates in most of its processing areas. Researchers showed significant association with MSD risk when high piece rates coincide with high line speeds.

The agency cannot ignore the role of piece rate in MSD risk when proposing line speed increases. Each swine processing establishment is different, and piece rates can vary considerably. Consequently, the MSD effects of line speed increases will vary widely, making the proposed rule particularly dangerous for worker safety. Researchers final analysis showed that workers are at high risks for MSDs regardless of whether the company operates at the time limited trail speed or not. Immediate efforts to mitigate the high risk for these workers (are) needed.³

FSIS is ignoring the researchers’ recommendations by proceeding with this proposed rule. A null association does not indicate the absence of an effect; rather, it means the researchers lacked sufficient evidence to conclude that an effect exists. In two establishments, statistically significant results were found, allowing researchers to conclude that an association existed—one increase and one decrease in MSD risks. MSDs can result from either a single traumatic incident or cumulative trauma conditions such as carpal tunnel syndrome or tendinitis, which develop over time with repeated stress.

Costs Associated with this Rule are Bad for Workers But Good for Employers.

Falling victim to higher injury rates means higher costs for workers and companies. Liberty Mutual Insurance’s annual Workplace Safety Index categorized falls (i.e. on the same level that slaughterhouse workers experience) as the second leading cause of workers’ compensation claims, resulting in \$1.27 billion in workers’ comp costs⁴. Ergonomic risk factors also play a factor. According to the BLS 2023-2024 nonfatal report, overexertion was the leading cause of workers’ compensation costs, resulting in \$13.7 billion in costs to employers. Repetitive motions account for \$.58 billion. Overexertion and repetitive motions together contribute to over 31

³ Swine Processing Line Speed Evaluation Study (PULSE) – Page 77:
https://www.fsis.usda.gov/sites/default/files/media_file/documents/PULSE_SwineStudy_250109_Final.pdf

⁴ Liberty Mutual Insurance Safety Index Report (2025). <https://business.libertymutual.com/workplace-safety-index/>

percent of all workers' comp costs in 2025. These findings demonstrate that ergonomics play a substantial roll in worker safety and if line speeds quotas are eliminated workers will be forced to work faster and safety will suffer.

The rule suggests that industry will save money under this proposal, but these findings are undermined by the indirect costs associated with safety risk factors. The safety cost analysis is incomplete because it focuses solely on future estimates of industry and agency cost savings. It also assumes lower consumer prices, despite a reduction in the agency workforce that will affect the availability of inspectors to verify that employers are meeting process control requirements. Good public health and safe working conditions can only be achieved by prioritizing workers over company profits.

The cost savings estimate assumes a uniform adoption pattern that would allow the proposed rule to succeed over a ten-year period. However, the PULSE swine study shows the impact of eliminating line speed on MSD risk, varied by establishment. Although FSIS states that inspection personnel could slow line speeds if process control or carcass-by-carcass inspection performance is compromised, this reactive approach fails to align with the hierarchy of controls, which prioritizes hazard elimination over employee safety risk. Additionally, the elimination of approximately 45 inspection positions through NSIS conversion reduces FSIS's ability to adequately assess compliance. Increasing line speeds will therefore increase the burden on already limited inspection staff. Worker and consumer safety should be proactive priorities, not afterthoughts.

Removing Attestation Resource Will Hurt Workers

While court rulings such as *Seven County v. Eagle County* confirm that FSIS lacks statutory authority to regulate worker safety, the agency retains a moral obligation to emphasize safety compliance at regulated establishments and to report safety concerns to OSHA. Other federal agencies, such as the EPA, routinely forward worker safety findings to OSHA when identified during inspections.

Maintaining the worker safety attestation requirement in some form demonstrates FSIS's commitment to safety and supports OSHA's statutory authority by providing valuable information to protect workers. It does not create confusion regarding FSIS's jurisdiction; instead, it reinforces interagency cooperation. The worker safety attestation serves as an accountability mechanism for establishments while strengthening and standardizing worker safety reporting in meat and poultry establishments.

The worker safety attestation requirement has been part of the regulation for years. Claims of confusion regarding statutory authority or administrative burden do not justify its removal. Employers should instead receive training on the distinct roles of FSIS and OSHA to support effective food safety and worker safety programs. Safe working conditions are fundamental to safe food production. Retaining 9 CFR 310.27 also preserves the severability clause in 9 CFR 310.28,

ensuring the food safety framework remains enforceable. The IBT strongly opposes the removal of the worker safety attestation requirement, as its elimination would also negate the severability clause and undermine 9 CFR Parts 309 and 310.

The claim that this proposal constitutes an “economically significant” regulatory action is fundamentally flawed. Increased line speeds will result in continued worker injuries—including amputations, severe falls, and chronic upper-extremity pain, which affected 43% of swine workers and 40% of poultry workers in the PULSE studies—along with financial hardship for workers and rising workers’ compensation costs for employers. Researchers emphasized the importance of lowering piece rates, continuously evaluating ergonomic risks, reducing job-specific line speeds, and increasing job-specific staffing levels, not the elimination of line speed quota to help boost corporate profits. The long-term human and economic costs of line speed increases far outweigh the short-term financial gains anticipated by corporations.

The evidence is clear and is no better illustrated than by the 2023 GAO report (GAO-23-1-5104)⁵ on meat and poultry worker safety, which confirms that line speed increases endanger workers. The IBT opposes any rule that violates sound public health principles and prioritizes corporate profit over worker safety. We strongly oppose this proposal and urge the USDA FSIS to withdraw the Maximum Line Speed Under the New Swine Slaughter Inspection System (NSIS) rule.

⁵ Government Accountability Office (GAO-23-1-5104). <https://www.gao.gov/assets/gao-23-105104.pdf>