

## FSIS RegulationsComments

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**From:** SouthernVet@aol.com  
**Sent:** Friday, November 11, 2005 1:30 PM  
**To:** FSIS RegulationsComments  
**Subject:** FSIS Docket 05-031N;Natl. Advisory Committee on Meat/Poultry Inspection

Dear Committee Members:

I would like to suggest a future agenda item for your committee. This particular topic concerns FSIS' Directive 6550.1, Line Speeds for Heavy Young Chickens. The directive states that "the IICs must adjust line speeds as necessary to allow for proper inspection of heavy young chickens...Responsibilities of IIC: Adjust line speeds according to the weight of the birds. If the average weight of the 10 young chickens exceeds 6 pounds, the lot is defined as heavy young chickens." The lack of enforcement of this directive causes injuries to the workforce. On the other hand its enforcement would have a negative impact on the Poultry Industry.

This directive is not permitted to be enforced in the field. In 1995 as the IIC of a poultry plant I directed the FSIS inspectors to randomly weigh 10 carcasses. The average weight was greater than 6 pounds. I then directed the establishment's plant manager to decrease the line speed as per the directive. It was a SIS-2 plant so the line speed was decreased to 55 birds per minute (bpm). Shortly thereafter the FSIS area manager of Jackson Mississippi contacted me, mandating that I return the line speed to 70bpm. During this time period both myself and a FSIS food inspector were suffering from wrist tendinitis. During the ensuing 10 years I ascertained that this directive was not enforceable in our area. Early in 2004 my team collected average daily weights (ADW) on the carcasses for the two large carcass lines within the poultry plant. These weights were collected as per the directive. We found that the ADWs were greater than 6 pounds every day that we collected the data. The data was collected for approximately 30 days. As a new District Manager had recently come to our District, I approached him concerning the enforcement of this directive. He informed me that the line speed could not be slowed based solely on the weight of the carcasses. He stated that there were other considerations that must be taken into account, such as presentation flaws and/or disease incidence, before the line speed could be decreased.

The inspection of carcasses at line speeds of 91bpm (NELS) and 70 bpm (SIS) is a highly repetitious task, requiring each inspector to perform 1818 (NELS) or 2100(SIS)hand motions per hour. As the carcass increases in weight so does the weight of the fat pad, thus there is an increase in force required for the inspector to elevate this fat pad. In general this fat pad is not 'broken and reflected"by the plant arranger before reaching the food inspector. According to FSIS' 1990 revision of their Employment Development Guide, page 15, the post-mortem inspection technique required on a two-point suspension with viscera suspended to the inspector's right, is to use the left thumb to elevate the fat pad so as to be able to view the body cavity. This particular task is accomplished by moving the wrist through approximately a 30-45 degree angle. Over time, this highly repetitious, forceful task performed in a relatively static position results in musculoskeletal disorders (MSDs) such as tendinitis, tendinosis, tenosynovitis, medial epicondylitis, trigger finger, and carpal tunnel syndrome etc.

If this fat pad is not elevated then it is not possible to adequately observe the inside of the carcass. Many who perform this task can attest to the fact that if the fat pad is not elevated and reflected then it obstructs the inspector's view of the body cavity. And in my experience, evidence of air sacculitis can be overlooked as in many cases the exudate from this disease process can be observed under the left fat pad. Thus the fat pad in these large carcasses can obstruct the inspection process if it is not elevated and reflected.

What scientific basis was used when Directive 6550.1 was issued in 1993? Were there any studies conducted as to the safety of this task? Were any risk assessments performed? Fast-paced, forceful tasks performed in static positions have been shown to cause MSDs, and yet there appears to have been few studies performed to ascertain the effects of this task on the workforce within the evisceration/slaughter environment. In addition FSIS does nothing to inform its workforce of this safety hazard.

The enforcement of this directive would also have a huge financial impact on the poultry establishment. In a NELS establishment, a reduction of line speed from 91 bpm to 73 bpm would result in a 20 percent decrease in the hourly slaughter rate per evisceration line.[ $\frac{5460-4380}{5460} \times 100$ ]. As the Industry works on a small profit margin, volume is important for Industry to survive financially.

Thus this is a safety issue for the workforce as well as a financial issue for the Poultry Industry. In addition it is a food safety

issue. As such, I am presenting this problem to the committee. The problem has been ignored for too long and it must be solved.

Respectfully submitted,

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