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FSIS Docket Clerk
Docket No. 98-027R
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Cotton Annex
300 12th Street SW
Washington DC 20250-3700

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Mark Thomas

Re: Proposed rule making for Advanced Meat Recovery

The referenced rule is without comprehensible foundation and is adventurous. The proposed rule reflects the Agencies insensitivity to labor.

It is imperative that FSIS permit industry to implement technologies to mitigate the crippling effects of Musculoskeletal Disorders (MSD'S). Packinghouse workers experience a disproportionate share of MSD'S.

The most susceptible workers are those employed on deboning lines, where they make a single motion (cut) repeatedly through out each working day with hand held knives in a cold environment. The introduction of mechanical vibratory knives compounded the problem.

These jobs were typically filled by men with limited language skills and minimal education. Today, it includes large numbers of women who are more susceptible than males. This population is least able to understand these crippling traumas and/or find other employment. This population will most likely require government assistance to combat the latter stages of MSD'S.

When the USDA finally approved Advanced Meat Recovery Systems in 1994, they were unaware of the potential worker benefits.

However, the meat industry quickly realized the benefits and began implementation of Advanced Meat Recovery Systems to protect their workers from these debilitating diseases. The meat industry, where ever an Advanced Meat Recovery System was installed, began transferring these valuable employees (deboners) to jobs where they would be less susceptible to MSD'S. These jobs were positions normally vacant, this being a labor short industry.

The meat industry in their own mindful way, based a major portion of their cost justification on this transference. They also recognized the potential for increasing animal unit yield. Yield, due to the difficulty of meat removal by hand, otherwise lost to low value rendering.

Considering OSHA'S recently published proposed ergonomics rule; the President's Executive Order concerning food gleaning and Secretary Glickman's food gleaning initiative – Advanced Meat Recovery meets all the criteria i.e., eliminating food waste.

In conclusion, it is a scientific fact that meat produced by Advanced Meat Recovery Systems is of great public benefit, it is nutritious, safe and provides an improved supply of lean meat to America.

Therefore, I would request the USDA to withdraw their proposed rule and defend their original rule.


Mark Thomas