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October 28, 2015

MEMORANDUM FOR: REGIONAL ADMINISTRATORS
STATE DESIGNEES

THROUGH: DOROTHY DOUGHERTY
Deputy Assistant Secretary

FROM: THOMAS GALASSI, Director Directorate of Enforcement Programs

SUBJECT: Inspection Guidance for Poultry Slaughtering and Poultry Processing Establishments

This memorandum establishes guidance for inspections conducted in poultry slaughtering and processing establishments, North American Industry Classification System (NAICS) 311615, Poultry Processing. All such inspections, programmed and unprogrammed, shall cover the hazards listed below:

- Ergonomics/Musculoskeletal Disorders
- Personal Protection Equipment (PPE)/Payment for PPE
- Lockout/Tagout – Electrical
- Machine Guarding
- Slips, Trips, and Falls
- Process Safety Management – Ammonia
- Chemical hazards – Ammonia, Chlorine, Hydrogen Peroxide, Peracetic Acid, Carbon Dioxide
- Occupational Noise
- Egress and blocked exits
- Sanitation and cleanup operations

These focus hazards shall be addressed in addition to other hazards that may be the subject of the inspection or brought to the attention of the compliance officer during the inspection. The goal of this policy is to significantly reduce injuries and illnesses resulting from these hazards through a combination of enforcement, compliance assistance, and outreach.

Scope: This guidance applies to all Federal OSHA inspections, programmed and unprogrammed, conducted in NAICS 311615, Poultry Processing.

Regions may determine that a Regional or Local Emphasis Program is justified after reviewing relevant data (e.g., review of the number of sites in the region) and as consideration of other resources demands. The guidance in this memorandum should be included in any Regional or Local Emphasis Programs developed to inspect facilities in the aforementioned NAICS.

Background: Workers employed in the poultry industry face many serious hazards, including high noise levels, dangerous equipment, musculoskeletal disorders, and hazardous chemicals such as ammonia, used as a refrigerant, and peracetic acid used to kill bacteria. Poultry processing is highly mechanized, so walkways are often adjacent to conveyors. Processing the meat uses a large amount of water that splashes on walkways and stairs. The addition of scraps of fatty skin from the poultry carcass creates very slippery surfaces. Overall, poultry workers suffer serious injury rates – injuries that require a day or more away from work or restricted activity to recuperate – at a rate that is almost double private industry. The DART rate for private industry in 2013 was 1.7 and for NAICS 311615 the DART was 3.0. The incidence rate of occupational illness cases reported in the poultry industry is more than six times the average for all U.S. industries. Total illness rate for private industry in 2013 was 16.6 per 10,000 FTE and for NAICS 311615 the rate was 104.2. The number of injured workers may be higher than the reported cases at some sites due to high worker turnover and inadequate medical management.

Musculoskeletal disorders are of particular concern and continue to be common among workers in the poultry processing industry (GAO 2005, Cartwright 2012). Musculoskeletal disorders are injuries to the nerves, tendons and muscles that result from processing operations and are not the result of an accident. There are many such disorders, including carpal tunnel syndrome (CTS), tendonitis, epicondylitis and “trigger finger”. The incidence rate of CTS in the poultry processing was more than seven times the national average in 2013. The rate for CTS in private industry in 2013 was 0.7 per 10,000 FTE and for NAICS 311615 the rate was 5.4. Poultry industry employers in 2013 were also more than 4.5 times more likely to identify repetitive motion as the exposure resulting in a serious injury, compared to employers in all industries in 2013. The rate for repetitive motion involving micro tasks in private industry in 2013 was 2.7 per 10,000 FTE and for NAICS 311615 the rate was 12.2.

The BLS data on carpal tunnel syndrome (CTS) in the poultry industry is also confirmed in the scientific literature, as well as in two recent NIOSH health hazard evaluations (Musolin et al. 2014, Ramsey et al. 2015). The NIOSH health hazard evaluations (HHEs) at two different poultry processing plants found very high prevalence rates, 42% and 34% respectively, of CTS among workers (Musolin 2014, Ramsey 2015). In addition, literature suggests the likelihood of substantial under-reporting of worker injuries and illnesses by poultry industry employers. Ramsey (2015) noted that, although 64 workers met the NIOSH case definition

suggests that many conditions that trigger "first aid" actually represent real, easily definable musculoskeletal injuries that should have been identified and recorded.

State Plan Impact: Because these hazards have been identified nationwide, State Plans are expected to follow the guidance provided in this memorandum. State Plans may have an existing State Emphasis Program, or, similar to OSHA's Regions, determine that an emphasis program is warranted after reviewing relevant state data. State Plans must code inspections conducted in accordance with this guidance as noted below ("OSHA Information System").

Other Hazards: In addition to the hazards listed on the first page, and hazards that may be the subject of the programmed or unprogrammed inspection, other hazards that may be encountered in poultry slaughtering and processing establishments include, but are not limited to: the adequacy of toilet and sanitary facilities, and worker access to them; exposures to hazards that are associated with handling live chickens and contact with poultry feces; contaminated surfaces; dirt and dust. Exposures to biological hazards may cause *Camphylobacter*, avian influenza, or psittacosis infections. Lockout/tagout hazards associated with clean-up operations are also often encountered by workers contracted for sanitation activities.

As detailed in the FOM (OSHA Instruction CPL 02-00-159, effective date 10/1/2015, or latest version), when such additional hazards come to the attention of the compliance officer, the scope of the inspection may be expanded to include those hazards.

Inspection Procedures: Inspections shall follow the guidance in the FOM, directives, or State Plan equivalent policies relevant to the focus hazards and other hazards encountered. A Sample Alleged Violation Description (AVD) for MSDs may be found in Attachment 1.

Recordkeeping issues must be handled in accordance with OSHA Instruction, CPL 02-00-135, *Recordkeeping Policies and Procedures Manual*, other relevant field guidance, or State Plan equivalent policies. In all inspections, a partial walkthrough shall be conducted and workers shall be interviewed in order to verify injury and illness records.

Compliance safety and health officers (CSHOs) are encouraged to contact the Directorate of Technical Support and Emergency Management's Office of Occupational Medicine and Nursing (OOMN) to obtain a Medical Access Order, if necessary, early in the inspection process. OSHA Directive CPL 02-02-072, *Rules of Agency Practice and Procedure Concerning OSHA Access to Employee Medical Records*, provides guidance when there is a need to gain access to personally identifiable employee medical information. Additionally, CSHOs are encouraged to contact OOMN to discuss medical management practices early in the investigation to solicit assistance if interviews indicate the OSHA injury and illness recordkeeping logs are incomplete, or if employees are not referred to a physician or licensed healthcare provider (PLHCP) after several visits to the company healthcare provider.

CSHOs should identify if the poultry processing plant has adopted the United States Department of Agriculture (USDA) New Poultry Inspection System (NPIS). Plants that adopted NPIS will submit on an annual basis an attestation to the management member of the local Food Safety Inspection Service (FSIS) circuit safety committee stating that it maintains a program to monitor and document any work-related conditions of establishment workers. The elements of this program include:

- 1) Policies to encourage early reporting of symptoms of work-related injuries and illnesses, and assurance that the establishment has no policies or programs intended to discourage the reporting of injuries and illnesses.
- 2) Notification to employees of the nature and early symptoms of occupational illnesses and injuries, in a manner and language that workers can understand, including by posting in a conspicuous place or places where notices to employees are customarily posted, a copy of the FSIS / OSHA poster encouraging reporting and describing reportable signs and symptoms.
- 3) Monitoring on a regular and routine basis of injury and illness logs, as well as nurse or medical office logs, workers' compensation data, and any other injury or illness information available.
- 4) A commitment to issuing FSIS notice, "Procedures for Notifying the Occupational Safety and Health Administration (OSHA)." The notice establishes a procedure for FSIS inspection personnel to notify OSHA directly of serious workplace hazards that may affect non-federal establishment personnel in meat and poultry products establishments and in egg product plants.

Outreach, Compliance Assistance, and Training: The National Office has developed additional information, such as compliance assistance tools to support outreach, and training materials for CSHOs and compliance assistance specialists (CAS). The information addresses technical issues related to the focused hazards, including ergonomics and evaluation of MSD recordkeeping procedures. In 2014, OSHA partnered with USDA FSIS to send a joint letter to employers in the poultry processing industry. Enclosed with the letter was a copy of OSHA's guidelines, updated in 2013, titled, *Prevention of Musculoskeletal Injuries in Poultry Processing* (<https://www.osha.gov/Publications/OSHA3213.pdf>)*. In addition, the USDA and OSHA also published a joint **Poultry: Workers' Rights Poster** (<https://www.osha.gov/Publications/OSHA3769.pdf>)*.

OSHA has webpages, such as a Safety and Health Topics webpage for Poultry Processing (<https://www.osha.gov/SLTC/poultryprocessing/>) and a Poultry Processing Industry eTool (<https://www.osha.gov/SLTC/etools/poultry/>). The Agency also published two safety and health information bulletins (SHIBs), **Avian Influenza Protecting Poultry Workers at Risk** (<https://www.osha.gov/dts/shib/shib121304.html>) and **Contracting Occupationally Related Psittacosis** (https://www.osha.gov/dts/hib/hib_data/hib19940808.html). These and additional references may be found in Attachment 2.

OSHA Information System: For all inspections meeting the definitions of this guidance (for NAICS Code 311615), code in OIS "N-02-Poultry". Add any additional codes for related Regional or local emphasis programs in poultry for either Federal or State Plan enforcement activity. Coding for ergonomic enforcement activity must also be consistent with existing field guidance for OIS coding.

This policy is effective as of the date of this memorandum. If you have questions, please contact the Office of Health Enforcement at (202) 693-2190.

Attachments

cc: Directorate of Cooperative and State Programs

Attachment 1

Sample AVD

Alleged Violation Description

causing or likely to cause death or serious physical harm to employees, in that employees were required to perform tasks [identify tasks] involving ergonomic risk factors including, but not limited to excessive force or exertion, repetitive motions, improper lifting, awkward postures, improper tools and inadequate recovery time, resulting in working conditions that had caused, were causing, or were likely to cause musculoskeletal disorders (MSDs) such as but not limited to tendonitis, carpal tunnel syndrome, trigger thumb and shoulder sprain.

a)Debone area (or appropriated location): On or about [date] and at times prior; the employer exposed employees to the hazard of developing musculoskeletal disorders (MSDs) while performing prolonged, repetitive, forceful tasks [identify tasks] in awkward postures for extended periods and inadequate recovery time at the debone area. Job tasks include, but are not limited to, load cone, cut shoulder, cut wing, saw wings, pull skin, pull breast, tender pulling, final breast and bone scan.

Recommended Abatement Action:

Among other methods, feasible and acceptable methods of abatement includes, but are not limited to: Engage in a process that includes analysis of the worksite; medical management; training and education of employees in both recognition of injury and avoidance of injury; and hazard prevention and control to determine the most effective methods of addressing the ergonomic risk factors.

Some examples of methods that may apply to this workplace include: increase the recovery through task rotation during the work shift (rotation to tasks without continuous use of a knife, scissors or forceful grip); increase recovery time through implementation of mini-breaks (with sufficient time pre/post lunch for a bathroom break), increase of cycle time for each task, establish a rotation on a daily basis between departments to increase recovery (such as rotation between Debone and Marination); provide knives with handles designed for repetitive tasks (e.g., handle diameters close to one and a half inches, handle length of four inches, textured handles to reduce grip force, larger quillons (guard) before the blade to prevent hand from sliding down the knife allowing reduced grip force and handle design oriented to reduce the need for wrist deviation in the ulnar or radial direction during cuts); install mechanical skin removal equipment or provide textured gloves to reduce hand force when pulling skin; provide air-assist powered scissors for wing cut; position the chicken to minimize wrist deviation during cuts; position the knife sharpener to minimize non-neutral wrist postures; evaluate each employee at each station to determine the appropriate work platform height to reduce non-neutral postures and to position work the platforms at the proper height. Employees need time to adjust their platform prior to each rotation cycle.

Additional methods of reducing the ergonomic hazards:

1. Provide an ergonomic assessment, by a Certified Professional Ergonomist (CPE), Industrial Engineer (IE), or other qualified professional, of the deboning tasks and jobs that are included in rotation of deboning employees. The Ergonomist, or other qualified professional, shall provide a job hazard analysis and recommendations for reducing or eliminating ergonomic risk factors from the work of the employees performing repetitive hand activity. The ergonomics assessment should be repeated whenever conditions of order selection change (i.e., new layout, new product, new equipment or hand tools, or reported MSD injury or illness). Design or redesign job tasks so that they are below the American Conference of Governmental Industrial Hygienists' threshold limit value for hand activity and force or the Job Strain Index.
2. Develop a participatory, multi-disciplinary, competent ergonomics team to implement and sustain an effective ergonomics program. The composition of the team should include: hourly-employees, union representation, plant management, engineering, maintenance, medical, and safety. The team should receive training to achieve a basic competence in ergonomic hazard identification, principles, and risk reduction approaches, with ongoing training and education. The team will facilitate problem identification and abatement through employee suggestions, audits, reported injuries and complaints, with follow-up to resolution.
3. Secure the services of a CPE or other qualified person to assist the ergonomic team to review concerns, perform independent or joint audits and evaluations, and provide the ergonomic training applicable to the work conducted for management and hourly employees.
4. Enhance medical management screening and medical assessment onsite to improve early intervention of musculoskeletal disorders and traumatic injuries. An outside expert should review the medical management protocols for treating musculoskeletal injuries and education for employees on early recognition and reporting of signs and symptoms. The review of the protocol must include recommendations for alternate duty, (e.g., time on the training lines) for employees who report hand pain. The expert should conduct initial plant nurse training and follow-up training. The expert should provide an annual review of trends in the nurses' log and recommend changes in the protocol based on the trends.

Engineering Controls

5. Incorporate a lean stand and anti-fatigue mats into the adjustable height platform as a rest from prolonged standing.
6. Ensure that employees are using sharp knives for cutting by implementing knife replacement policy (knife replaced with a sharp knife at each break). Inspect knives to ensure consistent sharpness.
7. Provide sharp scissors with an ergonomic handle and powered assist.

Administrative Controls

8. Educate and train all employees in basic ergonomic principles and risk reduction approaches with emphasis in proper techniques, work stand adjustment, tool selection and use. While on the training line, new hires should be trained on work station adjustment and should also include ergonomic coaching relative to achieving and working with neutral postures. Managers and supervisors should be trained as ergonomic coaches and should be encouraged to observe work practices and provide guidance to employees on improving techniques and making specific adjustments to the work station. Maintenance personnel can also benefit from this type of training since they often have the best mechanical skills at the work site and can be an invaluable source of ideas about development of new tools or equipment modifications that can reduce the hazard to the employees.
9. Until jobs can be redesigned, use a job rotation schedule where employees rotate to jobs that are below the American Conference of Governmental Industrial Hygienists' threshold limit value.
10. In areas with temperatures below 60 degrees F employees should be provided with localized heating or frequent breaks to warm their hands.
11. Employees who work in debone should not work overtime in the deboning department or departments with similar repetitive hand motions.

Attachment 2

References

Rule, September 18, 2014.

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6. OSHA and USDA **Poultry: Workers' Rights Poster**: <https://www.osha.gov/Publications/OSHA3769.pdf>.*
7. OSHA Instruction CPL 02-00-144, *Ergonomic Hazard Alert Letter Follow-up Policy*, April 11, 2007.
8. OSHA Instruction CPL 02-00-159, effective date 10/1/2015,(or latest version)Field Operations Manual (FOM)
9. OSHA's *Prevention of Musculoskeletal Injuries in Poultry Processing guidelines* <https://www.osha.gov/Publications/OSHA3213.pdf>.*
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11. OSHA's Poultry Processing Safety and Health Topics webpage: <https://www.osha.gov/SLTC/poultryprocessing/>.
12. OSHA SHIB **Avian Influenza Protecting Poultry Workers at Risk** <https://www.osha.gov/dts/shib/shib121304.html>.
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