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OSHA Updates Animal Slaughtering and Processing Worker Safety Enforcement Inspection Guidance

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On October 15, 2024, OSHA issued [Inspection Guidance for Animal Slaughtering and Processing Establishments](#) that updates enforcement protocols for the agency's field staff and compliance guidance for employers in NAICS Code 3116 (Animal Slaughtering and Processing), which includes NAICS Codes 311611 (Animal (except Poultry) Slaughtering), 311612 (Meat processed from carcasses), 311613 (Rendering and meat byproduct processing), and 311615 (Poultry processing). The guidance takes the form of a memorandum from the Director of OSHA's Directorate of Enforcement Programs out to all of OSHA's Regional Offices. 

OSHA justified the need for the updated enforcement guidance by noting that animal slaughtering and processing workers suffer serious injuries at a rate that is more than double that of all industries combined.

The updated OSHA guidance supersedes and replaces OSHA's October 28, 2015 "[Inspection Guidance for Poultry Slaughtering and Poultry Processing Establishments](#)."

The memorandum encourages each OSHA Region to determine whether a special enforcement emphasis program — either a Regional or Local Emphasis Program — is justified after reviewing relevant data in their regions. There are currently active emphasis programs in [Region 4](#) (Regional Emphasis Program for Poultry Processing Facilities covering Georgia, Florida, North Carolina and South Carolina), [Region 5](#) (Regional Emphasis Program for Food Manufacturing Industry covering Illinois, Ohio, Wisconsin, Michigan, Indiana, and Minnesota), [Region 6](#) (Regional Emphasis Program for Poultry Processing Facilities covering Texas, Oklahoma, Arkansas, Louisiana, and New Mexico), and [Region 7](#) (Nebraska Local Emphasis Program for Meat Processing Industries). Because OSHA believes these hazards are pervasive nationwide, State OSH Plans, especially those with significant meat and poultry processing industries, are encouraged by OSHA in this enforcement memorandum to follow this guidance document.

Pursuant to OSHA's updated memorandum, all programmed and unprogrammed inspections in NAICS 3116 will scrutinize the following work activities and hazards common to the meat processing industries:

- Sanitation and Cleanup Operations
- Ergonomics/Musculoskeletal Disorders
- Personal Protection Equipment (PPE)/Payment for PPE

- Hazardous Energy (Lockout/Tagout)
- Machine Guarding
- Slips, Trips, and Falls
- Process Safety Management – Ammonia
- Chemical hazards – Ammonia, Chlorine, Hydrogen Peroxide, Peracetic Acid, Carbon Dioxide, Nitrogen (gas & liquid)
- Occupational Noise
- Egress and Blocked Exits
- Injury and Illness Recordkeeping

The memorandum specifically calls out the following hazards associated with work tasks in meat processing plants:

- Water splashing on walkways and stairs
- Fatty skin creating slippery surfaces
- Exposure to infectious diseases
- Struck-by hazards
- Carpal tunnel syndrome
- Tendinitis
- Epicondylitis
- Trigger finger

OSHA is particularly focused on ergonomics hazards in the meat and poultry industries. In this enforcement memorandum, OSHA expressed particular concern about carpal tunnel syndrome (CTS), tendonitis, epicondylitis, and “trigger finger,” pointing to recent BLS incidence rate of CTS in animal slaughtering and processing that were more than seven times the national average. OSHA explained:

“Animal slaughtering and processing industry employers [are] over six times more likely to identify repetitive motion as the exposure resulting in a serious injury, compared to employers in all industries”

In the memorandum, OSHA lays out several inspection strategies for its field staff, including:

- Conducting inspections during off-shift times to ensure late shift operations (e.g., sanitation services) are evaluated.
- Including contractors and temporary workers in inspections in these industries.
- Reviewing training efforts, focused on training effectiveness and worker understanding of the training they receive (i.e., whether training is provided in a language and literacy level all employees understand).
- Evaluating injury and illness recordkeeping compliance.
- Identifying and including employee representatives in the inspection process, including possibly third party inspection representatives pursuant to [OSHA's new Worker Walkaround Representative Designation Process Rule](#).

Lastly, OSHA expressed that meat and poultry workers are not only vulnerable to hazardous working conditions, but also are uniquely vulnerable to unfair labor practices and employment barriers. Accordingly, consistent with

OSHA's latest the [Memorandum of Understanding between the Department of Labor's Wage and Hour Division and OSHA](#), OSHA is now requiring its Area Directors to make referrals to the WHD, or to the USDA's Food Safety Inspection Service, and other whistleblower staff, whenever appropriate.

What Should Employers Do Now?

There is no better time than now for employers in NAICS Code 3116 to review their safety programs, hazard assessments (especially those specifically identified by OSHA in the memorandum), policies, and procedures. An employers internal audit can be invaluable during an inspection or subsequent appeal of a citation.

Likewise, in anticipation of more OSHA inspection activity in these industries, covered employers should take steps now to prepare for an OSHA inspection. That includes designating and training an OSHA Inspection Team to manage OSHA inspections at your workplaces. Ensure every team member knows who to contact and what to do from the moment OSHA arrives on site. The inspection team should be trained on each facet of an OSHA inspection, paying particular attention to the importance and objectives of the opening conference. Retain experienced OSHA counsel in advance so you are not scrambling when OSHA arrives. **To ensure your team is ready for an OSHA inspection, sign-up for [Conn Maciel Carey's OSHA Inspection Masterclass](#). Learn more about this training program [here](#).**