RED MEAT

OSHA's Special Emphasis Program in Ergonomics

by William James Smith

OSHA's Special Emphasis Program

By early 1991, OSHA will have well under way a special emphasis program on ergonomic problems in the meatpacking industry. On August 30, 1990, Secretary of Labor Elizabeth Dole announced the agency's new *Ergonomics Program Management Guidelines for Meatpacking Plants.** The guidelines and the emphasis program constitute a major undertaking in what Assistant Secretary Gerard F. Scannell has called, "the most significant workplace safety and health issue of the 1990s." The guidelines and the program are in response to the ergonomic-related problems OSHA has increasingly found during inspections, rising occupational illness rates for repeated trauma reported by the Bureau of Labor Statistics (BLS), and the mounting concern of the working public.

Although this special emphasis program is a new effort, OSHA is no stranger to the red meat industry or ergonomics. For a number of years, the meatpacking industry (Standard Industrial Classification [SIC] 2011) has been near the top of the list of "high hazard" industries OSHA uses to target safety inspections. Knife cuts and amputations, slips and falls, and back injuries are common.

According to BLS data [1], this industry had an incidence rate of 39.2 injuries and illnesses per 100 full-time workers in 1988 (the most recent year for which complete data are available). This rate is second only to that for the shipbuilding and repair industry (44.9) and over two and a half times that of the construction industry (14.6). In contrast, the incidence rate for all private sector employment was 8.6 in 1988.

Growing attention has been paid to ergonomics within OSHA since the first specialists in this field joined the agency's staff in the late 1970s. In the 1980s, the OSHA Training Institute began offering a course in ergonomic principles, and the agency instituted a national ergonomics program to provide for technical expertise in all OSHA regions. Several hundred inspections focusing on ergonomics were conducted through regional emphasis programs, and general duty clause** citations were issued to employers, often based on the National Institute for Occupational Safety and Health's (NIOSH) 1981 *Work Practices Guide for Manual Lifting* [2].

The Beginnings of the Program

In the late 1980s, the issues of ergonomics and meatpacking became major concerns for OSHA. Late in 1986, OSHA received employee complaints about recordkeeping practices at the Dakota City, NE, plant

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**Refers to Section 5(a) of the Occupational Safety and Health Act of 1970 (Public Law 91-596), which requires each employer to provide a workplace "...free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

of IBP, Inc. (formerly Iowa Beef Packers). In 1987, hearings held by the House Subcommittee on Employment and Housing of the Committee on Government Operations featured graphic testimony by injured workers and focused on serious recordkeeping and ergonomics problems at this facility. That same year, an OSHA inspection of the IBP plant resulted in citations for 620 willful violations associated with cumulative trauma disorders of the upper extremities, such as carpal tunnel syndrome. OSHA proposed initial penalties of $3.1 million for ergonomics violations and $2.59 million for underreporting injuries and illnesses.

In early 1988, the same House committee issued a report entitled, *Here's the Beef...* [3], describing the problems encountered at IBP and criticizing OSHA's lack of earlier action. Shortly thereafter, OSHA responded to an employee complaint regarding recordkeeping and ergonomics problems at the Sioux Falls, SD, plant of the John Morrell Company. As with IBP, OSHA found major deficiencies in the employer's recording of workplace injuries and illnesses, coupled with alarmingly high rates of cumulative trauma disorders. Inspections conducted at other meat and food processing plants, such as Pepperidge Farm, Empire Kosher Foods, and Hillshire Farms, identified similar problems.

Concern for these problems continued to increase in the Congress, among industry and labor groups, and within OSHA. OSHA inspections had demanded weeks of intensive inspection time as well as extensive use of outside expertise from NIOSH or ergonomic consultants. It was apparent to OSHA leadership that a coherent proactive program should be developed to deal with cumulative trauma disorders in the meatpacking industry.

In September 1988, OSHA established a task force for the purpose of making recommendations for enforcement, outreach, and training needs. OSHA national office and field staff, representatives from the Office of the Solicitor of Labor, and technical experts from NIOSH comprised the task force. OSHA state plans also provided technical assistance.

In about 8 months, the task force completed its work and made its recommendations to then Acting Assistant Secretary Alan C. McMillan who reported them to the House subcommittee in June 1989. OSHA then announced that it would do the following:

- undertake a renewed, serious exploration of the issue of the feasibility of an ergonomics standard;
- issue specific hazard alerts and information bulletins for the industries and activities in which ergonomic problems had already been found; and
- put into place a special emphasis program for ergonomics, directed first at the red meat industry, focusing on the importance of an overall ergonomics program in each establishment.

OSHA selected the red meat industry for this ergonomics emphasis program because of the magnitude of the problems it had evidenced, and because management and labor groups within the industry had demonstrated their concern for and willingness to act on cumulative trauma disorders.

Both the American Meat Institute and the United Food and Commercial Workers had published ergonomics guides for their memberships [4,5]. Moreover, IBP resolved the citations issued by OSHA by entering into a corporate settlement agreement that stipulated the implementation of a comprehensive ergonomics program.

To build upon this cooperative foundation, then Acting Assistant Secretary McMillan met with concerned parties in government, industry, and labor to discuss the special emphasis program for the meat industry. There was a consensus of support for the agency to develop and distribute guidelines on the essential elements of a good ergonomics program. OSHA also promised ergonomics efforts in enforcement, training, information, outreach, and research.

The Guidelines

OSHA developed the ergonomics guidelines based on the best available scientific evidence, advice from NIOSH, medical literature, and its experience in enforcement. Labor and industry groups in meatpacking also reviewed and offered comments on the guidelines.

As a result of this effort, OSHA's ergonomics guidelines describe what a good ergonomics program should include specifically for red meat plants. Much of the guidance, however, is broadly applicable to general industry workplaces. It is important to note that the guidelines are not a new standard or regulation. They are designed to assist employers in

meeting their responsibilities under the Occupational Safety and Health Act. OSHA expects meatpacking employers to implement effective ergonomics programs adapted to their particular workplaces and that contain the program elements described in the guidelines.

In developing the guidelines, OSHA used as a framework its recently published voluntary "Safety and Health Program Management Guidelines" [6]. The management guidelines focus on the value of an overall safety and health program that involves the participation of both the employer and the employee.

In other words, a program approach is used to identify and solve ergonomic problems, including management commitment and employee involvement. The four recommended program elements for accomplishing this are as follows:

(1) worksite analysis--using records and job evaluation to find out what actual or potential ergonomic hazards exist;
(2) hazard prevention and control--emphasizing engineering controls, improved job design, and good work practices;
(3) medical management--including early detection and proper treatment for cumulative trauma disorders; and
(4) training and education for all affected personnel.

Using these elements, the ergonomic guidelines for the red meat industry provide information on the steps employers should take to determine if they have ergonomic-related problems in their workplaces, to identify the nature and location of those problems, and to implement measures to reduce or eliminate them.

As in all industries, there is enormous variation in workplace size, products, and operations in the red meat industry. The program elements, therefore, should be adapted to the size and circumstances of the workplace. To help smaller employers do so, the guidelines include a special section on related questions and answers and emphasize the availability of the OSHA consultation service for these employers.

The Special Emphasis Effort

OSHA launched the special emphasis program by mailing copies of the guidelines to every meatpacking employer (those in SIC 2011), along with a letter from Secretary Dole outlining the ergonomic hazards in the industry and asking each employer to adopt an appropriate program to address them. The employers also received a copy of *ErgoFacts**** OSHA's new publication describing the successful means for overcoming specific ergonomic hazards.

Experience has shown that the greatest ergonomic hazards are found in larger facilities, where fast production lines, mechanization, and highly specialized operations present the repetitive, forceful tasks associated with increased risk of cumulative trauma disorders. Accordingly, these large employers (i.e., 500 or more employees) will be targeted first for inspections under the special emphasis program. These inspections are scheduled to begin in January 1991 and will be comprehensive in all respects, covering recordkeeping and safety and health hazards in addition to ergonomics. If violations are found, employers will be cited appropriately, including citations for general duty clause violations, for failing to correct recognized ergonomic hazards.

This target group of employers, however, will also be offered an opportunity to enter voluntarily into an agreement with OSHA to implement an effective ergonomics program containing all of the elements detailed in the guidelines. Such agreements will be comparable in complexity and rigor to the settlement agreements already in place with IBP, the John Morrell Company, and others. If a company enters such an agreement, its workplaces will be subject to monitoring inspections to assess its progress in implementing its program. The company would be deferred from ergonomics-related citations as long as satisfactory progress in abating ergonomics hazards is being made, but it would not be exempt from any other type of OSHA inspection or citation.

States that operate their own workplace safety and health programs under the authority of Section 18 of the Occupational Safety and Health Act will be encouraged to participate fully in Federal OSHA's special emphasis program. They may also develop their alternative programs for addressing ergonomic hazards in the meatpacking industry as long as their programs are at least as effective as those recommended by Federal OSHA.

In addition, OSHA will increase training resources in ergonomics and meatpacking by providing a new course at the Training Institute in Des Plaines, IL.

***Available from the OSHA Office of Information and Consumer Affairs, 200 Constitution Avenue, NW, Room N-3647, Washington, DC 20210.

OSHA compliance officers and consultants will be the first to be trained, but OSHA hopes eventually to include industry and other representatives who are interested.

Another important facet of OSHA's effort is the Model Plant Development Program, through which the agency hopes to promote good safety and health programs in meatpacking plants of varying sizes. From volunteer sites, OSHA will select a limited number of participants who are willing to work toward building an effective overall program, including safety, health, ergonomics, and medical management. Selected "model development sites" would work with OSHA and others to demonstrate state-of-the-art technology and controls, thus providing much useful information for OSHA and the red meat industry.

A major goal is to bring participants up to the entry level of the agency's Voluntary Protection Program (VPP), although participants will not be required to apply for VPP. VPP participants are a select group of facilities recognized as having designed and implemented outstanding health and safety programs to provide better worker protection.

OSHA believes that over the next 2 to 3 years, the ergonomics special emphasis program will provide additional information on how best to deal with ergonomics hazards in the workplace. If this pilot program is successful in getting employers to implement sound ergonomics programs, similar efforts may be extended to other industries such as poultry and fish processing.

Secretary Dole noted that "the Department is committed to taking the most-effective steps necessary to address the problem of ergonomic hazards on an industrywide basis...."

OSHA recommends the guidelines as a good starting point for all employers to begin their efforts to resolve ergonomic hazards and cumulative trauma disorders.

For more information on OSHA's ergonomics program, contact your nearest OSHA office listed elsewhere in this publication.

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NOTE: For other stories on ergonomics, see the articles "Ergonomics: Adapting the Job to Fit the Person" in the Fall 1989 issue of *Job Safety & Health Quarterly* and "Carpal Tunnel Syndrome" in the Winter 1990 issue.

References

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