

Severe Injuries in the Food Processing Industry

This alert is directed to employers, contractors, staffing agencies and employees in the food processing industry, including cleaning and maintenance shifts, to increase awareness and help ensure the industry is taking action to reduce the alarming number of serious preventable injuries, including deaths, in poultry, meat and other food processing establishments.

Background

The food processing industry has a range of hazards that workers face during all stages of food processing operations including normal production operations; machinery inspection; servicing and maintenance; machinery adjustments; clearing jams; cleaning; sanitizing, environmental testing, and/or food safety inspection tasks. Because of the presence of these hazards, as described in the “Prohibited Child Labor” section below, most work in the food processing industry is prohibited for young employees under the age of 18.

Employers are required to report when an employee suffers a work-related amputation, in-patient hospitalization, or loss of an eye. OSHA collects severe injury reports (SIRs) to identify and focus efforts on hazardous industries. From 2015 to 2022, food and beverage processing machinery and butchering machinery were the primary contributors to SIR injuries in the food processing industry (see Figure 1).

Machinery in the Food Processing Industry Contributing to SIRs

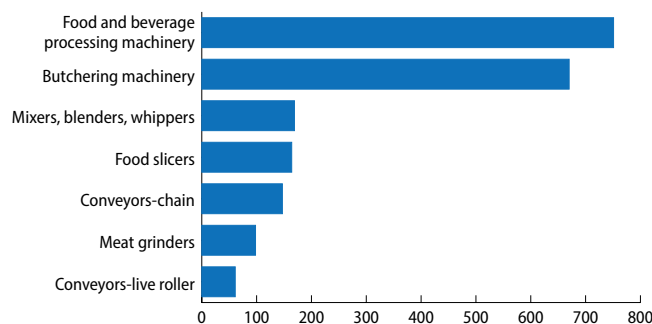


Figure 1: SIRs by machine type over the past 7 years (federal jurisdiction only)

Employers should be committed to the safety and well-being of both experienced, new, and temporary workers as well as subcontractors who operate machinery. OSHA investigations completed in 2022-2023 have revealed a rise in fatalities and amputations among

young individuals who have recently joined the workforce. Failure to provide sufficient training resulting in a lack of understanding of the hazards are frequently the root cause. Employers should focus appropriate attention to ensuring younger and inexperienced workers receive sufficient instruction and oversight.

An increase in sanitation subcontracting amongst food processors has increased the number of temporary and contract workers at these facilities, particularly on third shift. Communication of lockout tagout programs and employer responsibilities are very important to understand. Resources for [Protecting Temporary Workers](#) and navigating OSHA's [Multi-Employer Citation Policy](#) can be accessed using the provided links.

Prohibited Child Labor

Federal child labor regulations prohibit workers under the age of 18 from most jobs in meat and poultry slaughtering, processing, rendering, and packing establishments and from using, cleaning, oiling, setting-up, adjusting, or repairing certain machines in the food processing industry, including power-driven meat slicers, saws, and choppers. See [29 CFR 570.61](#).

The Department of Labor's (DOL) Wage and Hour Division (WHD) provides a [comprehensive list](#) of jobs that are off-limits to workers under 18 years of age, as well as [additional resources](#) to prevent illegal child labor. These resources include a [fact sheet](#) and an [employer self-assessment tool](#) to help employers comply with the child labor provisions of the Fair Labor Standards Act (FLSA).

Recognizing Hazards

To prevent worker fatalities and amputations in the food processing industry, employers and workers must be able to recognize the contributing factors, such as the hazardous energy associated with machinery.

Conducting job hazard assessments to understand the mechanical components of machinery, the hazardous motion that occurs at or near the moving components, and employee activities performed in conjunction with machinery operation, will help avoid injury. See [29 CFR 1910 Subparts D, I, J, O, P, R, and Z](#) for some standards that apply to operations in the food processing industry.

Refer to OSHA's [Safeguarding Equipment and Protecting Employees from Amputations](#) (OSHA 3170) publication for specific details to help identify and manage common amputation hazards associated with the operation and care of machines.

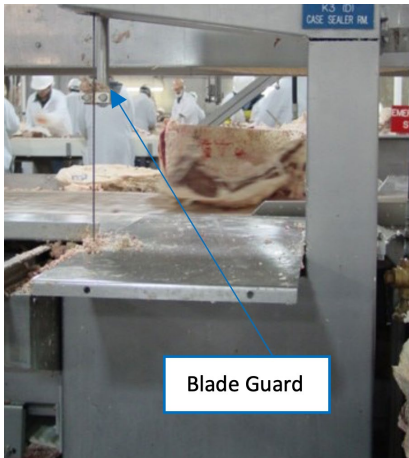


Figure 2: A band saw blade guard set at proper height, no more than one-quarter of an inch above the top of the highest part of the piece being cut.

Workers can be seriously or fatally injured if machinery they service, maintain, clean, or sanitize, unexpectedly energizes, starts up, or releases stored energy. These hazards may also be present during food safety inspection tasks or during environmental testing for microbial growth. OSHA's standard on the Control of Hazardous Energy (Lockout/Tagout), found in [29 CFR Part 1910.147](#), provides guidance on actions employers must take associated with the unexpected release of hazardous energy while performing servicing or maintenance activities.

The standard addresses practices and procedures necessary to shutdown machinery and control hazardous energy while maintenance or servicing activities, including cleaning, are performed. Cleaning and sanitizing activities can be hazardous because they may require the worker to energize or move machine parts to be cleaned or sanitized. In these cases, a machine specific procedure must be written, implemented, and communicated to all employees in accordance with [29 CFR 1910.147](#).

It is the employer's responsibility to communicate all hazards to subcontractors hired to conduct cleaning and sanitizing operations and who may be unfamiliar with the facility. Hazards include machine, physical, chemical and lockout/tagout (LOTO) hazards. Refer to OSHA's [Control of Hazardous Energy Lockout/Tagout](#) (OSHA 3120) publication for additional guidance on general requirements for controlling hazardous energy.

Corrective Measures

To effectively communicate workplace hazards and controls, workers and subcontractors require notification and training in a language they understand. Comprehensive training programs must provide an understanding of proper LOTO procedures and machine guarding protocols. Supervisors and managers must ensure compliance with these safety measures and regularly evaluate employees' and subcontractors' understanding.

The best way to prevent fatalities and amputations caused by machinery while in operation is with machine safeguarding:

- Guards provide physical barriers to hazardous areas. They should be secure, strong, and workers should not bypass, remove, or tamper with them. Guards should not obstruct the operator's view and must be replaced and secured when removed for maintenance or repair activities.
- Safeguarding devices, including presence sensing devices, prevent contact with points of operation and may replace guards if fully effective or supplement guards.
- Safeguarding devices, presence sensing devices, and trip devices, can interrupt the normal cycle of the machine prior to the operator's hands reaching a hazardous point of operation in the danger zone.

Other corrective measures employers may need to implement include:

- Develop, document, and communicate procedures to control hazardous energy. The procedures must explain what employees need to know and do to control hazardous energy effectively when they service, maintain, sanitize, or clean machinery. This must be conducted so that it is understandable to all employees.
- Develop and document machine-specific energy-control procedures if their machinery has variable conditions such as multiple energy sources, different power connections, or different control sequences that workers must follow to shut down and isolate various pieces of machinery.

- Conduct periodic safety inspections and regular maintenance of machinery which is crucial to identify any potential issues or deficiencies in the LOTO and guarding systems before servicing or maintenance activities are performed.
- Provide robust machine guarding that meets OSHA and industry standards and conduct routine checks to ensure they are properly installed and functioning effectively (see Figure 2).
- Implement safety practices as a core value and have open communication, where workers feel empowered to report any safety concerns or hazards promptly.

Conclusions

By recognizing hazards associated with machinery and applying these corrective measures, employers can significantly reduce the risk of fatalities, amputations, other workplace incidents, and foster a safer work environment for all.

DOL WHD Worker Protections

If you are concerned or have questions about illegal child labor in the food processing industry, please contact the Wage and Hour Division. WHD enforces the FLSA. The FLSA establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in federal, state, and local governments. The FLSA also [prohibits retaliation](#) against any employee who files a complaint or cooperates in an investigation. For more information, you can contact WHD at 1-888-4US-WAGE (1-888-487-9243) or visit the WHD website at www.dol.gov/agencies/whd.

How OSHA Can Help

OSHA has compliance assistance specialists throughout the nation who can provide information to employers and workers about OSHA standards, short educational programs on specific hazards or OSHA rights and responsibilities, and information on additional compliance assistance resources. Contact your local OSHA office for more information.

OSHA's On-Site Consultation Program offers no-cost and confidential services to help small and medium-sized businesses find and fix workplace hazards.

On-Site consultation services are separate from enforcement and do not result in penalties or citations.

To locate the nearest OSHA Consultation office, visit: www.osha.gov/consultation or call 1-800-321-OSHA (6742).

Workers' Rights

Workers have the right to:

- Working conditions that do not pose a risk of serious harm.
- Receive information and training (in a language and vocabulary the worker understands) about workplace hazards, methods to prevent them, and the OSHA standards that apply to their workplace.
- Review records of work-related injuries and illnesses.
- File a complaint asking OSHA to inspect their workplace if they believe there is a serious hazard or that their employer is not following OSHA's rules. OSHA will keep all identities confidential.
- Exercise their rights under the law without [retaliation](#), including reporting an injury or raising health and safety concerns with their employer or OSHA. If a worker has been retaliated against for exercising their rights, they must file a complaint with OSHA as soon as possible, but no later than 30 days.

For more information, see [OSHA's Workers page](#).

How to Contact OSHA

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to help ensure these conditions for America's workers by setting and enforcing standards, and providing training, education, and assistance. For more information, visit www.osha.gov or call OSHA at 1-800-321-OSHA (6742), TTY 1-877-889-5627.

There are 29 [OSHA-approved State Plans](#) operating state-wide occupational safety and health programs covering private and/or state/local government workplaces. State Plans are required to have standards and enforcement programs that are at least as effective as OSHA's and may have different or more stringent requirements.

This Hazard Alert is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards [and other regulatory requirements]. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm. The mention of any non-governmental organization or link to its website in this Hazard Alert does not constitute an endorsement by OSHA or NIOSH of that organization or its products, services, or website.

