



**Christine L. Owens**  
Executive Director

July 25, 2018

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Paul Kiecker  
Deputy Administrator  
Food Safety and Inspection Service  
United States Department of Agriculture  
Room 331-E Jamie L. Whitten Building  
12<sup>th</sup> Street and Jefferson Drive, SW  
Washington, DC 20250  
Email: [Paul.Kiecker@fsis.usda.gov](mailto:Paul.Kiecker@fsis.usda.gov)

Re: Worker Health Risks to Peracetic Acid in Poultry and Meat Plants

Dear Deputy Administrator Kiecker:

We are writing to follow up on our May 22 meeting where we, and the poultry workers we accompanied, raised serious health concerns about worker exposure to the antimicrobial Peracetic Acid (PAA). As you acknowledged, this toxic chemical is widely used in poultry plants. At the meeting, you indicated that the Food and Drug Administration (FDA), the agency that provides initial approval for the use of PAA on meat and poultry, reviewed plant worker safety exposure and safety information before approving the chemical for use on poultry or swine. This letter is to clarify for you that no such review takes place at any point – neither by FDA nor by your own agency –and request that FSIS take immediate action to control health risks to workers.

The fact is that FDA, when [approving](#) an anti-microbial for use on meat and poultry, does not ask for worker safety information, nor do they [require](#) that any studies or information on worker exposure or safety be submitted. They do not review any plant worker safety information at all. Further, especially with PAA, FDA officials are often unaware that these chemicals are used in non-enclosed systems and sprayed on carcasses and meat as it moves on open conveyors through the plant—thereby endangering workers in the plant. To assure that you understand the process and get the facts, we encourage you to reach out to the following officials at FDA (all of which I have copied on the email transmitting this letter to you): Paul Honigfort, Thomas Zebovitz, and Michael A. Adams.

PAA is a highly corrosive toxic chemical. It is irritating to the eyes and skin, causing severe rashes, burns and destruction of the eye tissue to exposed workers. The [Safety Data Sheets](#) confirm worker accounts that breathing in the mist and vapors can irritate the respiratory system leading to coughing and difficulty breathing. As you heard in the meeting, workers were suffering from asthma and other health effects from exposure to PAA. A recent investigation by the [Intercept](#) details similar health effects from the Food Safety and Inspection Service's (FSIS) own employees to this chemical as well. Over the years, the industry has increased the volume and number of instances in the plant where this chemical

is applied to the carcass and meat. Of key concern for workers, the Occupational Safety and Health Administration has not established a safe exposure limit to this highly toxic chemical.

It is therefore incumbent on the FSIS, the agency with the final authority to permit the ever increasing use of this chemical in all poultry and swine plants, to request a complete and thorough study of the health effects to meat and poultry plant workers from exposure to PAA. USDA should request this review from the government's worker safety and health experts, the National Institute for Occupational Safety and Health, and additionally request that NIOSH develop recommendations for preventing and controlling plant worker health risks and exposures to PAA.

We look forward to your response.

Sincerely,

Deborah Berkowitz, Program Director, Worker Safety and Health  
National Employment Law Project

Julian Medrano, Director of Public Policy  
Interfaith Worker Justice Coalition

CC. Carmen Rottenberg, Administrator