



April 20, 2026

Justin Ransom, Ph.D.
Administrator
Food Safety and Inspection Service
United States Department of Agriculture
Room 331-E Whitten Building
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Washington, DC 20250-0251

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Re – *Maximum Line Speed Under the New Swine Slaughter Inspection System (NSIS)* – Proposed Rule [Docket No. FSIS-2025-0009]; 91 Fed. Reg. 7905; (February 19, 2026).

Dear Dr. Ransom:

The Meat Institute is the nation's oldest and largest trade association representing packers and processors of the majority of U.S. beef, pork, lamb, veal, turkey, chicken, and processed meat products. The Meat Institute provides regulatory, scientific, legislative, public relations, and educational services to the meat and poultry packing and processing industry.

The Meat Institute strongly supports the Food Safety and Inspection Service's (FSIS or the Agency) proposed rule to eliminate the maximum line speed limit for establishments operating under the New Swine Slaughter Inspection System (NSIS), allowing establishments to set line speeds based on their demonstrated ability to maintain process control (proposed rule or proposal). The Meat Institute commends the agency for replacing a patchwork of temporary measures with a clear, durable regulatory framework, providing long-term certainty while maintaining full inspection authority. The Meat Institutes also welcomes the decision to remove the annual worker-safety attestation requirement for NSIS establishments and clarify FSIS authority at NSIS establishments. The proposal reflects years of experience and sound data, modernizing outdated regulatory constraints, and appropriately focusing FSIS oversight on its statutory mission: ensuring that meat products are safe, wholesome, and unadulterated through

effective federal inspection. The proposed rule is a great example of a deregulatory action to remove unnecessary regulatory burden on the industry and agency.

The proposal is grounded in years of data and experience.

Predictable, data-driven line-speed policy is essential to maintaining adequate processing capacity and ensuring stability throughout the pork supply chain. The Meat Institute supports FSIS's proposal because it replaces uncertainty created by temporary waivers and prescriptive limits with a clear, performance-based framework grounded in demonstrated process control and effective inspection.

In drafting the proposal, FSIS wisely relied on years of NSIS experience, pilot programs, waivers, and formal evaluations in developing this proposed rule. The proposed rule reflects years of sound data, operational experience, and scientific study, and it advances a modern, outcomes-based inspection system that protects public health while supporting efficient operations. Removing prescriptive line-speed limits while maintaining FSIS's authority to ensure effective inspection provides the right balance of flexibility and oversight. This approach reflects a data-driven, outcomes-based inspection system that better aligns regulatory oversight with modern swine slaughter operations.

Allowing NSIS establishments to operate at speeds based on their individual capabilities provides flexibility to respond to herd conditions, labor availability, and equipment performance without compromising food safety or inspection effectiveness. This regulatory certainty supports efficient plant operations and long-term planning decisions, which in turn contribute to a more resilient and reliable food system.

FSIS is right to center the rule on process control and inspection effectiveness rather than fixed speed limits.

The Meat Institute commends FSIS for advancing a regulatory framework that ties operating speed to an establishment's ability to maintain process control and the agency's ability to conduct effective online carcass-by-carcass inspection, rather than a prescriptive maximum line speed. This approach is consistent with modernization principles and reflects the operational realities of today's slaughter establishments, which vary significantly in design, equipment, staffing, and process capability. Today's swine herd is also substantially healthier than when line-speed limits were originally established, reflecting decades of innovation in animal care, biosecurity, and genetics.

FSIS requested comment on whether it should establish a maximum line speed of 1,450 head per hour for NSIS establishments. The Meat Institute does not support the establishment of a new, fixed regulatory ceiling and instead strongly supports the framework proposed by FSIS that relies on process control and effective

inspection. A uniform cap would be arbitrary and reintroduce a prescriptive constraint that does not account for differences in establishment design, technology, staffing, and operational controls. As the agency has recognized, the ability to maintain process control and conduct effective carcass-by-carcass inspection is not determined by a specific numeric speed, but by how the process performs in practice and provides a more effective and scientifically sound safeguard than an arbitrary maximum speed.

Process control is demonstrated through measurable RTC and ZT outcomes under establishment programs.

To promote consistent implementation, the Meat Institute recommends that FSIS clarify in the final rule that “process control” in this context¹ refers to an establishment’s ability to meet ready-to-cook (RTC) and zero-tolerance (ZT)² standards, as measured and documented through establishment programs and required by 9 CFR 310.26(d)(1). Inspection verification and direction to change line speed should focus on whether an establishment’s documented program is effective in achieving RTC outcomes at designated points in the process, rather than relying on isolated observations or discretionary determinations at intermediate steps. Isolated, transient conditions that are effectively managed within the establishment’s control system should not be treated as evidence of a loss of process control.

The Meat Institute supports FSIS’s reaffirmation of IIC authority and recommends that the final rule clearly tie IIC-directed speed reductions to objective circumstances: (1) the inability to perform effective carcass-by-carcass inspection due to the manner in which animals are presented or herd health conditions, or (2) a **demonstrated** loss of process control. This clarity will help ensure uniform application across establishments while preserving FSIS’s critical inspection role. The Meat Institute recommends 9 CFR 310.26(c) be amended as follows:

(c) *Line speed limits.* The line speed limits in § 310.1 do not apply to the establishment, provided it is able to maintain effective process control and prevent contamination of carcasses and parts by enteric pathogens and visible fecal material, ingesta, and milk. Establishments operating under the NSIS must slow operations as directed by the Inspector-in-Charge (IIC). IICs are authorized to require establishments to reduce the rate of establishment operations at any point in the slaughter process when, ~~in their judgment,~~ there is a demonstrated loss of process control or when carcass-by-carcass inspection cannot be adequately performed due to the manner of presentation or the condition of the animals.

¹ 9 CFR 310.26(c)

² *Id.* “prevent contamination of carcasses and parts by enteric pathogens and visible fecal material, ingesta, and milk.”

Process control verification sampling required under 9 CFR 310.25 and other microbiological sampling is not an appropriate metric for establishing or directing line speed. Microbiological results are typically unavailable for 24 to 48 hours or longer after slaughter and therefore cannot be used to support real-time operational decisions. Reliance on inherently retrospective, delayed microbiological data to inform immediate line-speed determinations would be inconsistent with both scientific principles and practical slaughter operations. Microbiological sampling plays an important role in validating process control over time, but it cannot serve as an instantaneous measure of control on the slaughter floor. RTC and ZT standards, by contrast, are assessed in real time and directly measure whether products meet defined outcomes under the establishment's process-control program, making RTC and ZT the appropriate benchmark for evaluating process control as it relates to line speed.

The Meat Institute recommends that FSIS clarify expectations regarding "process control" in this context through Directives or guidance, rather than by codifying a definition in regulation. Given the establishment-specific and evolving nature of process control, regulatory definitions risk being overly rigid or quickly outdated. Guidance-based clarification would allow FSIS to promote consistent inspection nationwide while preserving the flexibility necessary for effective process control programs.

Worker safety is outside FSIS's statutory scope and remains an industry priority.

The Meat Institute supports FSIS's proposal to remove the NSIS requirement for establishments to submit annual worker-safety attestations. Oversight of worker health and safety resides with the Occupational Safety and Health Administration (OSHA) and state authorities, not FSIS. Eliminating this requirement appropriately aligns FSIS regulations with the agency's statutory authority and removes redundant paperwork that does not advance FSIS's food-safety mission.

The Meat Institute and its members maintain worker health and safety as one of the highest priorities in swine slaughter establishments. The industry's commitment to worker safety is demonstrated through comprehensive ergonomic programs, engineering controls, staffing adjustments, training, and continuous improvement efforts. Importantly, the extensive study commissioned by FSIS and conducted across six swine slaughter establishments found that line speed was not the leading factor in worker musculoskeletal disorder (MSD) risk.³ These findings reinforce that line speed alone is not a reliable proxy for worker safety and support

³ U.S. Department of Agriculture, Food Safety and Inspection Service. (2025, January 9). Swine processing line speed evaluation study (PULSE).

FSIS's decision to remove worker-safety attestations from the NSIS regulatory framework.

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The Meat Institute appreciates FSIS's leadership in proposing a balanced, data-driven framework that modernizes oversight while maintaining robust federal inspection. The Meat Institute commends the agency's efforts to remove unnecessary regulations and allow a more efficient inspection process that continues to protect public health. The Meat Institute supports the proposal and strongly encourages FSIS to move swiftly toward publication of the final rule, allowing the anticipated benefits to take effect without unnecessary delay. Please contact us if you have questions about these comments or anything else regarding this matter. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Casey Lynn Gallimore', with several loops and flourishes.

Casey Lynn Gallimore
Senior Director, Regulatory Policy

Cc: Julie Anna Potts
Nicole Johnson-Hoffman