



Swift & Company

POSITION PAPERS

March 2, 2004

ERGONOMICS

1. Swift & Company strongly supports and actively practices the use of ergonomics. Ergonomics is used most effectively as a proactive, prevention-oriented process for safety and productivity improvement. Thus, we believe that sound ergonomic practices can aid in reducing work-related musculoskeletal disorders (MSDs).
2. Ergonomics plays a key role within our company's daily operations. Swift & Company has been using OSHA's "Ergonomics Program Management Guidelines for Meatpacking Plants" for more than 12 years. During that time, we have made substantial progress, and have implemented numerous ergonomics improvements within our facilities.
3. Our comprehensive ergonomics program is based on science and is tailored to our business. Our management team is committed to providing adequate resources to sustain the ergonomic process that includes program elements such as worksite analysis, hazard prevention and control, employee involvement and training.
4. Swift & Company is opposed to a "one size fits all" standard. Ergonomics must be based on science, and current technology. Therefore, Swift & Company urges OSHA to develop guidelines to aid employers, as they did with their "Ergonomics Program Management Guidelines for Meatpacking Plants." Incomprehensible regulations that deal with medical management and override state worker's compensation laws are not the appropriate way to help employers reduce work related MSDs.
5. Swift & Company's experience with the implementation of OSHA's voluntary guidelines has proven to be an effective and successful method in the reduction of work-related MSDs. We believe that a more narrowly regulated program will result in a reactive, after-the-fact program, which ultimately would be less effective than our existing ergonomics programs.
6. Swift & Company is committed to providing the highest level of workplace safety to all of its employees, regardless of whether they are native-born or have limited English language proficiency. Beyond an extensive safety training program for new employees, we offer English as a Second Language (ESL) and Spanish as a Second Language (SSL) classes to ensure that training and communication are as effective as possible. Both the ongoing training and communication programs have contributed to Swift & Company plants consistently having safety rates that far exceed the industry average.

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