

Exhibit I

Declaration of Mark Lauritsen

I, Mark Lauritsen, declare as follows:

1. I am the International Vice President for Meatpacking, and the Director of the Food Processing, Packing, and Manufacturing Division at the United Food and Commercial Workers International Union (“UFCW”).

2. I am submitting this declaration to explain that it is feasible for meatpacking plants to increase the space between workers on the processing lines to at least 6 feet. Based on my decades of experience in meatpacking plants, there are numerous ways for a plant to increase physical distancing on the lines. And based on my experience visiting numerous plants in the last few months, many employers are in fact spacing out workers in order to protect them from the coronavirus.

3. I have done work related to meatpacking for 35 years. I started my career as a worker at a hog slaughter plant in Cherokee, Iowa. For the last 15 years, I have directed UFCW’s meatpacking division.

4. The UFCW represents over 250,000 workers in meatpacking and food processing plants across the country. As meatpacking director, I regularly visit plants where UFCW represents the workers. Throughout my 35-year career, I have been inside dozens of meatpacking plants, either as a worker or to inspect their operations.

5. Meatpacking plants vary in layout, but virtually all of them share several features. The part of a plant where live animals are stunned, bled, de-haired, and eviscerated is called the “kill floor” or the “harvest” area. Carcasses pass through the kill floor on continuously moving, mechanized lines with hooks that hang the carcasses from the ceiling. As a carcass moves

through the kill floor, workers separate the head, remove hair and toenails, and separate the internal organs.

6. Once the work of the kill floor is done, carcasses are usually kept in a cooler. Afterward, they are sent to a “fabrication” area where they are divided into sections and cut into smaller pieces. This typically happens along multiple conveyor-belt lines, with workers standing either on one side or on both sides of the line. At each work station, workers take pieces of meat off of the line, perform their cutting task, and return the meat back to the line.

7. Finally, the meat is sent to a “packaging” area, where it is packed and labeled for sale. Workers stand around packing tables, where they sort the meat into packages, place labels, and then put the packaged meat into a freezer to prepare for shipment.

8. In all three areas, workers traditionally stand very close together—one to two feet, with their elbows and shoulders often touching as they work. This crowding made meatpacking workers extremely vulnerable to the coronavirus, which has spread rapidly in hundreds of meatpacking plants starting in April. Large outbreaks at plants have continued in the months since the initial outbreaks.

9. Throughout the pandemic, I have continued to visit meatpacking plants across the country to inspect their coronavirus protections. Based on these visits, and my broader experience in meatpacking operations, I am confident that it is feasible for plants to implement basic protections like social distancing, testing, and sick leave.

10. Of the plants I have inspected in recent months, a number have implemented social distancing of 6 feet in the processing areas for most jobs. There are numerous ways plants can do this and have done this.

11. One of the most common ways to space out workers is to add shifts to the workday. For instance, if a plant that normally processes all of its meat during one 8-hour shift per day adds a second shift, there can be many fewer workers present at any one time. There can also be fewer workers present if a plant expands the hours per shift and slows then slows down the processing line with fewer workers present. Having fewer workers present on the line allows people to space out significantly.

12. Once a plant reduces the number of workers in the plant at any given time, it can space out work stations to 6 feet or more in most cases, or it can leave every other work station empty. Where workers are facing each other across the line, the plant can move work stations so they are staggered, with no worker directly facing a co-worker across the line.

13. Reducing the number of workers present at a given time can be done without reducing the number of workers a plant employs. For instance, adding a shift to reduce crowding often means hiring *more* workers. And many plants have hired additional staff during the pandemic to ensure proper sanitation and distancing. The plants where I have seen distancing successfully implemented have not had to lay anyone off.

14. If there is any excess space along a fabrication line or on the kill floor, a plant can spread out the workers to fill all of the available space. This can be done without reducing the number of workers present.

15. Another crowded place in most meatpacking plants is the cafeteria. Plants have spaced out workers in the cafeteria in a number of ways. One common way is to schedule multiple lunch “shifts,” so that only a fraction of the workers eats lunch at a time, instead of having everyone eat in the cafeteria all at once. Another common practice is to set up temporary lunch and break areas inside and outside the plant.

16. Some plants have invested in expanding their cafeterias to provide more space in which workers can distance themselves while eating.

17. In multiple plants I have visited, the practices described above have been used to successfully increase spacing between workers to 6 feet or more.

18. There are several other basic coronavirus protections that I have seen multiple plants implement during the pandemic to protect workers and their families. All of the following protections are feasible in the meatpacking context.

19. All of the plants I have seen are providing masks and ensuring that workers wear masks at all times except when eating. This requires giving out masks when workers enter the plant, and then replacing masks as soon as they become too soiled to wear. Replacing masks is especially important in a meatpacking plant, because large amounts of sweat, blood, and fat quickly soil workers' clothing and masks.

20. Many plants are going beyond masks and giving workers face shields as well, to ensure that their eyes are protected.

21. Many plants also are installing Plexiglas dividers.

22. All of the plants I have visited since June are providing paid sick leave to workers who have symptoms of the coronavirus, and they are requiring sick workers to stay home. In order to make sure that sick people do not keep working, plants are communicating these sick leave policies to workers in a number of ways, including by giving out flyers, posting notices, and announcing the policies orally.


23. Some plants are going beyond paid sick leave and are paying particularly vulnerable workers to stay home. This includes older workers and workers with pre-existing conditions that make them likely to get especially sick if they become infected.

24. Some plants have invested in reworking their ventilation systems to protect against the coronavirus. They have done things like add new air filters and increase the speed with which the air inside the plant is replaced with fresh air from the outside.

25. Finally, many plants have implemented onsite testing programs. Some plants have hired outside testing companies to administer tests at the plant. Other plants have assigned their own on-staff nurses and other medical personnel to administer the tests. Tests are given to workers with symptoms, workers who have had close contact with sick co-workers, and workers without symptoms to identify spikes.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: 12-2-2020



Mark Lauritsen