

**In the United States District Court
Western District of Missouri**

RURAL COMMUNITY WORKER’S ALLIANCE
and JANE DOE

Plaintiffs,

v.

SMITHFIELD FOODS, INC. and SMITHFIELD
FRESH MEATS CORP.,

Defendants.

Declaration of Anthony Corbo

I, Anthony Corbo, hereby declare as follows:

1. I am an employee of the non-profit organization Food & Water Watch (“FWW”).
2. My work focuses substantially on food-related legislation and regulation and particularly its impact on slaughterhouse workers. For instance, I have led FWW’s extensive efforts to fight increased line speed, which we believe will result in increased repetitive stress injuries, food contamination, and environmental harm.
3. As a result of that work, I have toured 2 slaughterhouses, including a pork slaughterhouse and processing facility in 2015.
4. I also regularly review reports and articles on slaughterhouse operations, including their layout, positions, and recorded complaints against them by the government and employees. Throughout the years I have likely read more than 1,000 such articles. I have also spoken with scores of plant workers and United States Department of Agriculture (“USDA”) inspectors who work in these plants.

5. Based on my in-person experience, discussions, and review of the literature a slaughterhouse, and particularly a pork slaughterhouse, operates in the manner described below.

6. Plant workers and USDA inspectors work shoulder-to-shoulder on slaughter lines and in processing facilities where carcasses are butchered into various products, such as pork chops, sausage, bacon, ham, etc. In addition, during breaks and shift changes, plant workers and USDA inspectors are packed in small hallways as they leave their work stations. Worker lockers are not separated from one another; they are literally stacked next to one another.

7. Beyond the layout and operation of the slaughterhouse resulting in close contacts between people, the jobs in these slaughterhouses are also extremely strenuous, so that they would typically result in workers expelling spittle and other bodily fluids, such as sweat. It is also not uncommon to hear of instances of plant workers urinating or defecating while working on the lines for fear of being penalized by their supervisors for taking breaks.

8. It is also important to recognize that these workers are extremely vulnerable. It is well documented in the literature that industrial meat companies hire workers who they can intimidate because they are financially at risk. Plant workers are often subject to a “point system” that keeps track of the number of absences they incur. Pay and job retention are tied to the number of “points” the workers incur. Some plants do not even offer paid sick leave. In this manner, plant workers who are legitimately ill are discouraged from staying home and seeking medical assistance to prevent the spread of illness among their fellow workers. Consequently, the workplace becomes an incubator for the spread of communicable disease.

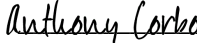
9. Indeed, based on my background and experience neither USDA inspectors nor plant workers are provided proper personal protective equipment to address the contaminants in

the plant before COIVD-19, let alone to address the virus. They are not, as a matter of course, provided facemasks.

10. Nonetheless, based on my tours, discussions and review of the literature, it is possible for the plants to alter their operations to enhance worker safety. For example, both plant workers' and USDA inspectors' job functions could be performed with proper personal protective equipment, particularly masks. The plants can fully function with staggered shifts and meal and rest breaks, which would reduce crowding in the hallways, locker rooms and lunch rooms. Moreover, the speed of the processing line could be reduced, which would allow for additional spacing among workers, and/or clear plastic sheeting could be installed from floor to ceiling between workers on the line. Finally, the industrial agriculture companies are extremely profitable and they could offer paid sick leave with a minimal impact on their bottom line and shareholder returns.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Beltsville, Maryland

DocuSigned by:

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Anthony Corbo

4/22/2020
Dated