

Scolari's Warehouse Markets, Inc. and United Food and Commercial Workers Union, Local 711, AFL-CIO, CLC, Petitioner. Case 32-RC-3886

September 29, 1995

DECISION ON REVIEW AND ORDER

BY CHAIRMAN GOULD AND MEMBERS
BROWNING, COHEN, AND TRUESDALE

On August 19, 1994, the Acting Regional Director for Region 32 of the National Labor Relations Board issued a Decision and Direction of Election in the above-captioned proceeding in which he found that the petitioned-for unit of the Employer's meat department employees was inappropriate and that the only appropriate unit was a wall-to-wall unit in the Employer's various stores. The Acting Regional Director found that the presumption of the appropriateness of a separate meat department unit should not be applied because the meat department employees mainly work on boxed or case-ready meats and did not exercise the full range of traditional meatcutting skills. The Acting Regional Director further found that the other factors considered in determining whether a separate meat department is appropriate did not support a separate unit. On September 9, 1994, the Petitioner filed a timely request for review, contending that a separate meat department was presumptively appropriate and that the meat department employees have a distinct community-of-interest warranting a separate unit. On January 9, 1995, the Board granted review. The Employer and the Petitioner submitted briefs on review.¹

We have carefully considered the record, including the briefs of the parties on review and the amicus brief and reply thereto. We agree with the Acting Regional Director that the presumption of a separate appropriate unit is not applicable here; however, we find that the meatcutters and other meat department employees enjoy a sufficiently distinct community-of-interest to warrant a separate unit. We therefore reverse the Acting Regional Director's unit determination and direct an election in the meat department unit.

I. FACTS

The Employer operates 14 retail grocery stores in Nevada under the name "Scolari's Food and Drug Company" and two warehouse-type stores as "Sack N Save." Its corporate headquarters, where purchasing for all stores is centralized, and a warehouse distribution center are located in Sparks, Nevada.

The stores are variously comprised of meat, bakery/deli, produce, floral, seafood, nonfoods, grocery and

pharmacy departments. There is a meat department and fish section in each of the 16 stores. The Petitioner seeks a unit of the Employer's meat department employees in these 16 stores.² The Employer has a manager, comanager, meat department manager, and produce manager for each store. There is a bakery/deli manager in each of the 8 stores with a bakery/deli department and a nonfoods manager in each of 14 stores.³ The meat department managers supervise the seafood department. Seafood "managers" are leadmen. The department managers report to the store managers. In addition to managers, the Employer has supervisors who are responsible for a particular department on a multistore basis. They provide support to store and department managers and act as liaisons between the stores and corporate headquarters. Some stores are open 24 hours per day while others close at 10 p.m. or midnight. The number of employees at each store varies from 20 to over 100.

From June 1, 1983, to May 31, 1986, the Employer's meat department employees were represented by the Petitioner and covered by a separate multiemployer collective-bargaining agreement. Separate agreements covering grocery employees and a combined unit of bakery, drug, and liquor employees were also in effect during that time. In February 1986, the Petitioner disclaimed interest in representing employees covered by all three agreements.

There are approximately 66 employees in the petitioned-for unit: 50 meatcutters, 15 fish clerks (3 in each of five stores), and 1 meat wrapper. Of the 50 meatcutters, 48 were hired as experienced meatcutters, and 2 are apprentices.

The Employer has contracts with several companies to provide meat to its stores. Approximately 50 percent of the Employer's meat department sales are beef, 9 percent pork, 16 percent poultry, one-half percent lamb and veal, and 2 percent seafood; the rest are frozen products, smoked products, and other processed items. The Employer's meat departments sell on average over 200 kinds of meat cuts or products. There are between 500-600 kinds of meat cuts or products available on the market.

The Employer previously received carcass meat but does no longer. All its meat is either boxed or prepackaged (case-ready). The vast majority of the beef the Employer receives is boxed. The absence of carcass meat means that the meatcutters do not need to know how to break down a carcass and that the amount of boning work has been reduced substantially.

²Seafood departments are part of the meat departments; the Petitioner's reference to meat departments encompasses the seafood departments.

³The parties stipulated that the store managers and comanagers, and the meat department, produce, bakery/deli and nonfoods managers are statutory supervisors.

¹The Board granted the United Food and Commercial Workers Union, AFL-CIO, CLC motion to permit the filing of an amicus brief in support of the Petitioner's brief on review. The Employer filed a response to the amicus brief.

Boxed beef can consist of primals, subprimals, or sub subprimals. Primals are loins, ribs, chucks, and rounds. The Employer receives beef chucks and rounds, but they are preboned. The Employer also receives beef loins, but they are not whole loins. The Employer receives several types of subprimals: for example, top round; top sirloin; and shoulder clod.

The meatcutter must process primal and subprimal meat before it can be sold to the Employer's retail customers. The meatcutter needs to know how to cut the meat to make it attractive and salable to customers. The meatcutters use saws, knives, slicers, and mixer-grinders. Meatcutters provide their own knives. The Employer's meatcutters determine what types of cuts they must make from the particular piece of meat in order to get the most profit. The meatcutters square up the meat, seam it to separate different components, make the cuts considering the angle and grain, and trim the meat and bones. If the meat is cut incorrectly, the meatcutter may lose a more expensive cut that could have been processed from the piece.

The boneless rounds weigh 70–90 pounds. Out of a two-piece boneless round, the meatcutter can get rump roast, round steak, top round, London broil, bottom round steaks and roasts, eye of round steaks and roasts, and other cuts. The tip portion of the boneless round can be made into various steaks, roasts, and "grind." Boneless clod or cross rib is about 12–16 pounds. The meatcutter pulls the top blade off and squares up the meat. From the remaining clod, the meatcutter can get barbecue steak, cross rib roast, stew meat, cube steaks, ground meat, and short ribs. The three-piece loin consists of the short loin (18–20 pounds), top sirloin (10–12 pounds), and fillet butt. From the short loin, the meatcutter can cut porterhouse, T-bone, New York and club steak, and grind. Export rib weighs 10–12 pounds. The west coast chuck is 70–80 pounds. From the west coast chuck, the meatcutter can carve chuck steaks and roasts, and sometimes bone-in short ribs. The Employer also receives sub subprimals, which are smaller pieces requiring less processing. For example, the meatcutter might trim a sub subprimal, or slice it into steaks or stew meat. The Employer is working on expanding a case-ready beef program but so far receives only a few cuts as case-ready.

The Employer receives one pork primal—the pork loin. From this the meatcutters can get various chops, roasts, ribs, and other cuts. The Employer also receives subprimal pork, which is also carved into steaks, roasts, ribs, and grind. According to the Employer, most pork is case-ready. A meatcutter put this figure at 30–50 percent.

The Employer's lamb and poultry products generally are case-ready. The Employer sells very little veal; where veal subprimals are received, some cutting is performed by the meatcutters. Fish is received case-ready or in bulk. Most of the bulk fish is filleted and needs little cutting work.

The meat departments operate on day and night shifts. The day-shift meatcutters are more involved than the night-shift meatcutters in cutting meat and less in packing and displaying meat. No meatcutter works exclusively on a night shift; shifts are rotated. On a typical day, the meatcutter reassembles the machinery that has been cleaned the night before. When meat arrives at the store, meat department employees open the boxes and check that the meat (for example, boneless chuck) is correctly labeled. Meatcutters may need to fix meat that is poorly broken or badly cut to make it attractive to customers.⁴ Meatcutters check the display counters to see what types of cuts are needed. The meat manager and/or meatcutters may make a "cut list." Meatcutters prepare the cuts on the list. The display is also checked to ensure that the meat looks attractive. The meatcutter reworks displayed meat when the package is bloody, when the meat approaches a code date, or when the meat otherwise is not selling. The meat department employees exercise their own discretion as to how to rework the meat. The meat department employee can repackage the meat or rework it either by cutting it into smaller pieces, or by grinding it, marinating it, throwing it away, or reducing its price.

Meatcutters also prepare custom order meats.⁵ Meatcutters tray, wrap, and price the meats. About three-fourths of the stores have automatic wrapping and pricing machines. But meat department employees must be able to identify the various cuts of meat and know the codes so that the meat can be properly labeled and priced. Meatcutters take equipment apart to sanitize it during their shift. One witness testified that he spends 50–60 percent of his time at the cutting table cutting meat. Another witness testified that he spends 80–90 percent of his time cutting meat, but this figure included time spent packaging the meat. The Employer estimated that a meatcutter spends 25 percent of his time cutting meat. Meatcutters also provide information to customers on preparation of meat.

⁴The Employer asserted that it can send such meat back for a credit if problems are reported by the meatcutters, but the record does not indicate how often this occurs.

⁵The testimony was inconclusive regarding the amount of time spent on custom cutting.

The Employer's meat supervisor testified that an employee can be trained in 30–45 working days (8 hours a day) to perform the meatcutting work needed in the Employer's stores. One Petitioner witness, a meatcutter at store #19, who has been with the Employer since 1970, asserted that it would take 2 years of training for an employee to be able to perform the work currently handled by journeymen meatcutters.⁶ The record does not reveal how long the current apprentices have been in training and how much of the meatcutting work they can do. The Employer requires meatcutters to perform cutting tests on four to five items a month. As a result, the Employer can determine how much loss occurs each time that a meatcutter is merchandising a given cut.

The journeymen meatcutters (48 out of 50) are the highest paid of the Employer's employees. They make \$15.50 an hour. This rate is higher than that for all department managers, apart from the meat managers. The meatcutter apprentices start at \$8 an hour. The 15 fish clerks make \$12 an hour, the rate paid to produce and grocery clerks, but it is unclear whether this is the starting or a more experienced rate. The Employer bases the pay of its employees in part on local industry rates for those classifications. Since 1990, all meatcutters who have been hired have had prior meatcutting experience. Of the two apprentices hired, one appears to have had some meatcutting experience. The Employer employs six to eight meatcutter "floaters." There are no floaters in any of the other departments. When a meatcutter is absent, the Employer uses its floaters to fill in. The Employer contends that one grocery clerk has covered for the meat department. However, that clerk had been a meatcutter who transferred to the grocery department when there were an insufficient number of meatcutter hours available.

It is the Employer's policy to provide meatcutters with 40 hours a week of work. The Employer does not have this policy for employees outside the meat department. In the few instances where a meatcutter was not able to obtain 40 hours of work doing meatcutting, the Employer has provided the meatcutter with work in other areas of its stores. Meatcutters have also performed outside the meat department (including guard work) when they were on temporary disability and needed light duty. There is limited interaction between the meat department employees and other employees when food is unloaded or products are put in or taken out of storerooms and freezers.

There have been some transfers into and out of the meat departments. Although the Employer generally posts jobs, no meatcutter job (apart from the meat manager's) has been posted since 1990. One employee transferred from the grocery into the meat department.

⁶The parties stipulated that a second meatcutter would have offered the same testimony.

Another, who had been a meatcutter, went from meat cleanup and janitorial to meatcutter. Two meatcutters went to the grocery department because there were not enough hours available in the meat department. When the hours became available, they transferred back to the meat department. A meat manager transferred temporarily to help start up a bakery/deli department.

The meat departments are separately supervised by meat department managers, who are stipulated supervisors. The meat department managers help select applicants to be hired; evaluate probationary and regular employees; schedule the hours that meat department employees work; resolve grievances of meat department employees; issue written warnings to employees; and are involved in the discipline of the meat department employees. The store manager generally relies on the meat manager's recommendations with regard to the discipline of meat department employees.

There is an employee handbook applicable to all the Employer's employees. The Employer's benefit program—sick leave, health and welfare, retirement, holidays, disability, and vacations—is the same for all employees. There are different vacation benefits and shift premiums for meat department employees hired before January 1, 1987 (less than half the meat department). Apart from two meat floaters who requested reduced hours, the meat department employees work 40 hours a week. In other departments there are employees working full time and part-time.

II. ANALYSIS

Historically, the Board found that meat department units were presumptively appropriate because the meatcutters exercised a broad range of traditional meatcutter skills marking them as craftspeople. *R-N Market, Inc.*, 190 NLRB 292 (1971); *Big Y Food*, 238 NLRB 855 (1978). In those circumstances, meatcutters normally started as apprentices and over a period of 2 or more years learned sufficient skills to become journeymen. Meatcutters regularly handled animal carcasses including halves and quarters of beef, pork, veal, and lamb. Using saws and knives, meatcutters broke carcasses down, cut quarters into primals, subprimals, and further-processed states, and worked with bones (cutting bones to produce certain cuts of meat, trimming bones, deboning). Meatcutters also were required to have the skills to handle whole poultry and prepare fish, although some fish was already filleted. After retail cuts were prepared, meatcutters trimmed the pieces, packaged for retail, handwrapped, and priced.

More recently, in a number of cases, the Board has found that retail store meatcutters typically no longer exercised the full panoply of traditional meatcutters' skills. Meatcutters in these cases no longer handled carcass meat, but dealt only with boxed meat (pri-

marily subprimals or smaller pieces) and/or case-ready meat, fish, and poultry. The Board concluded that since these meatcutters no longer needed to perform all the higher skilled tasks associated with their craft status, their skill level did not warrant applying the presumption that a unit limited to meat department workers was appropriate. *Ashcraft's Market*, 246 NLRB 471 (1979); *Great Day, Inc.*, 248 NLRB 527 (1980). The Board also applied a standard community-of-interest analysis in determining whether a separate meat department unit was appropriate, but found such a unit unwarranted. For example, in *Hall's Super Duper*, 281 NLRB 1116, 1117 (1986), not only did the Board find the presumption inapplicable because three-quarters of the meat was prepackaged, there was minimal cut-to-order work, and the meatcutters essentially performed the "comparatively simple tasks" of trimming and cutting boxed beef into smaller portions for sale, but the Board also found insufficient evidence of a separate community-of-interest based on these facts and because the three meat department employees had common benefits and, except for the head meatcutter, comparable wages, and had common facilities and supervision with the nonmeat department employees. The Board concluded that these factors outweighed the lack of interchange and transfers, a separate work area, and evidence that the union represented separate meat department units in other area stores.

Similarly, in *Copps Food Center*, 301 NLRB 398 (1991), the Board found the presumption of appropriateness of a separate meat department unit inapplicable where the six meatcutters (out of 28–29 employees in the department) trimmed and cut boxed meat into smaller portions for retail sale, the amount of cut-to-order work was minimal, and there was an absence of other evidence showing that the meat department employees exercised traditional meatcutting skills. The Board further found that the traditional factors considered in unit determinations did not support a separate unit for the meat department employees where, in addition to not exercising traditional skills, the meat department employees received the same fringe benefits, shared the same facilities, had similar work hours, were subject to the same work rules, employment policies, and job-bidding system, and had frequent work contact with other store employees. The Board noted that the job duties and skills of over half the proposed unit were similar to those required and performed in other departments, and that these meat department employees' wages were comparable to those of the other supermarket employees. The Board concluded that these factors outweighed separate supervision and minimal interchange and dismissed the petition.

In the instant case, as in *Hall's* and *Copps*, the Employer's meatcutters do not handle carcass meat, but

rather boxed meat and case-ready meat. The Employer's meatcutters therefore do not break down carcasses; there has also been a sharp reduction in boning work. Because the Employer's meatcutters do not exercise the skills necessary to handle carcass meat, we agree that they do not exercise the full panoply of traditional meatcutter skills. Accordingly, we will not apply the presumption for the meat department employees. We will, instead, apply a traditional community-of-interest test in determining whether the meat department constitutes a separate appropriate unit.⁷

However, in determining whether a distinct community-of-interest exists, we conclude, under the facts presented here, that the processing of boxed meat requires meatcutters to possess substantial meatcutting skills which are distinct from the skills of other supermarket employees. In the past, the Board often has used the term "boxed meat" as a short hand term indicating that little or no expertise was required in processing the meat, without discussing what the box contained or the work done by meatcutters in preparing the meat for retail sale. The use of boxed meat was not distinguished from the use of case-ready meat, but rather was contrasted with the use of sides of beef requiring the exercise of full journey-level skills. Thus, the Board in *Hall's*, noting that three-quarters of the meat was prepackaged and a quarter was boxed meat, stated that the meatcutters did not exercise traditional butchering skills but merely cut the delivered meats into smaller portions and trimmed the fat prior to the wrapper's weighing and measuring the meat. The Board did not analyze the skills necessary to handle the employer's boxed meat and, as indicated, made no distinction between processing boxed and case-ready meat. Similarly, in *Copps*, the Board failed to detail the meatcutting skills necessary to handle the employer's boxed meat. The Board again presumed that the handling of boxed meat required little traditional meatcutting skill. Nor did the Board consider what percentage of the employer's meatcutting involved boxed meat.⁸

Upon further consideration, we conclude that the Board's approach was overly restrictive. We find that when a significant amount of meat department work involves handling boxed meat, it is incumbent upon

⁷We will, however, continue to apply the presumption of the appropriateness of a separate meat department unit when traditional butchering of carcasses or cut-to-order operations are involved. *R-N Market*, supra.

⁸We note that the Board, in *Copps*, supra, 301 NLRB at 399 fn. 5, attempted to distinguish prior Board and court decisions finding that meat department employees who handle boxed meat exercise traditional meatcutting skills, because of the alleged absence of any explanation in those cases concerning the specific nature of the work performed by the meatcutters. Ironically, the Board in *Hall's* and *Copps* also failed to provide an explanation of the specific nature of the meatcutters' work. We have attempted to rectify that problem here.

the Board to consider the actual work performed by the meatcutters in order to determine whether they continue to exercise substantial, traditional meatcutter skills. See *NLRB v. Super-H Discount*, 744 F.2d 735, 738-739 (10th Cir. 1984), *enfg.* 261 NLRB 995 (1982) (use of "boxed meat" does not alone demonstrate that meatcutters lack specialized skills; evidence showed the meat department employees still spent most of their time cutting, processing, and wrapping the meat, which required special skills).⁹

Here, almost all the Employer's beef (a majority of its meat products) and some of its pork and veal arrive as boxed meat. Yet a substantial portion of the meatcutters' time is spent performing the type of meatcutting work which marks meatcutters as skilled workers. Although the Employer's meatcutters "make smaller pieces from larger pieces," they do not do this solely by, for example, simply cutting a roast in half or trimming off fat from a case-ready steak. Rather, with regard to beef, and to a lesser extent pork, the meatcutters regularly handle large pieces of meat from which many types of cuts can be drawn. For example, shoulder clods are cut across the rib, the meatcutter separates the second piece, the top blade is pulled off, and the cross rib is sliced into either steaks or roasts. The Employer's meatcutters judge what pieces can be carved from a particular chuck, loin, or other piece of meat in order to maximize profit for the Employer. They choose from among alternative types of cuts when carving the meat since not all possible cuts can be made from a piece. They must know what angles to cut, how to seam the meat, and how to edge the meat to start the cuts in the best place to get the most out of the piece. Their cutting is intended to yield an attractive retail cut that is salable to customers. Mistakes in cutting can preclude getting higher priced cuts, requiring that meat be used instead for lower priced cuts such as grind. In order to do their jobs, they use saws and knives, and, as do many skilled craftsman, they provide some of their own tools. Although the Employer's meatcutters also handle case-ready poultry, fish, and lamb, and some case-ready beef and pork,

⁹To the extent that *Copps*, *Hall's*, and related cases differ with this determination, they are hereby overruled.

Member Cohen finds it unnecessary to overrule *Copps* and *Hall's*. In his view, there are three generic kinds of tasks: the butchering of sides of beef; the cutting of boxed meat; and the handling of case-ready meat. The first task clearly involves traditional craft skills, and the meat department unit is presumptively appropriate. The third task clearly does not involve such skills, and a separate unit is ordinarily inappropriate. The second task is a hybrid. If the cutting of the boxed meat does not involve substantial meatcutter skills, and there are other factors showing commonality of interest with other employees in the store, the unit is not appropriate. See *Copps* and *Hall's*. However, where, as here, the cutting of boxed meat does involve such skills, and there are other factors showing separate interests, the unit is appropriate. Thus, in Member Cohen's view, the cases are consistent, and no overruling is necessary.

their higher level meatcutting skills are manifest. Although the case-ready program may be extended in the future with regard to beef, at present, the vast majority of beef received by the Employer requires the application of the meatcutting skills described above. The Employer's claim that meatcutters spend only 25 percent of their time cutting meat was contradicted by the meatcutter witnesses who perform the work.

There is conflicting testimony regarding the amount of training that would be required to become proficient in meatcutting for the Employer's purposes. The Employer argues that it would take 6 to 9 weeks; one Petitioner's witness contends that it would take 2 years of training and the parties stipulated that another witness would testify to the same facts. However, except for the two apprentices hired in the last few years, the Employer has hired only experienced meatcutters; and it appears that one of the apprentices had experience in meatcutting. Even if the Employer's version is accurate, there is no indication that a similar level of training is required of, or is provided to, the Employer's other employees (with the possible exception of pharmacy clerks).¹⁰ Currently, about 75 percent of the meat department consists of experienced meatcutters. Ten or eleven of the Employer's sixteen meat departments are staffed only by meatcutters. This heavy reliance on experienced meatcutters is consistent with our finding that the work performed by the Employer's meatcutters requires the exercise of substantial, traditional meatcutting skills. Moreover, although the record does not indicate how long the current apprentices were trained (or are still being trained), the Employer's use of apprentices supports a finding that the work requires specialized skills learned over a period of time.

The high level of wages paid to the meatcutters also suggests that the Employer views them as more highly skilled than its nonmeat department employees. Thus, journeyman meatcutters (48 of 66 employees in the petitioned-for unit) earn more than \$3 an hour more than the grocery/deli/fish clerks hired before February 1, 1987, and more than \$5 an hour more than grocery/deli/fish clerks hired after that date. Indeed, the meatcutter journeymen's wages are higher than the wages for the managers of all but the meat department. Apprentice meatcutter wages are higher (\$2 or more per hour in most cases) than the entry level wages of all but the pharmacy clerk. Grocery department clerks earn about \$2 per hour less than the journeymen meatcutters. A recent wage increase for meat department

¹⁰The record shows that clerks in the produce department cut and wrap product, employees in the bakery and produce departments decide how to rework product which is nearing its expiration date, and deli employees (part of the bakery department) must adhere to refrigeration practices similar to the meat department. However, there is no indication that these responsibilities entail the type of skills required by the meatcutters. Nor do these functions require the substantial training necessary to perform the meatcutters' duties.

employees was almost double that of grocery department employees (although less than that of the pharmacy). The higher meat department pay is based, in part, on comparable pay in the area.

Other factors also support finding a separate meat department unit appropriate. Each store has a meat department manager who is a stipulated supervisor. The meat manager handles the day-to-day running of the meat department including involvement in hiring, discipline, schedules, and grievances.¹¹

There is little interchange; instead, the Employer maintains a group of floater meatcutters who fill in for absent meatcutters. Less than a handful of meat department employees have worked outside the meat department. In the few instances they have done so, it was generally to enable them to meet the 40-hour-a-week minimum which the Employer tries to obtain for the meat department employees (there is no similar program for nonmeat department employees) or to allow them temporary light duty.

There are very few transfers. The Employer hires experienced meatcutters to fill openings in the meat department. In the two instances in the last 4 years when the Employer has transferred other employees into the meat department, they were considered apprentices and were given on-the-job training in meatcutting. The few employees who transferred out of the meat department primarily did so in order to increase their number of working hours.

In sum, we find that the following factors: (a) the substantial portion of the Employer's meat department

¹¹ That the Employer's meat departments operate as separate profit-and-loss centers from its other departments further supports a finding that the meat departments' operations are distinct. *NLRB v. Super-H Discount*, supra, 744 F.2d at 738.

business involving boxed meat; (b) the continued application of specialized meatcutting skills necessary for the processing of the boxed meat; (c) the higher level of training of meatcutters; (d) the substantial percentage of the unit engaged in skilled meatcutting work; (e) separate supervision; (f) limited interchange and transfers; and (g) higher wages, outweigh the factors of common benefits and limited skills necessary for handling the Employer's case-ready meats, and support a finding that the meat department employees have a distinct community-of-interest apart from that of the Employer's other employees.¹²

Accordingly, we find that a separate unit of the Employer's meat department employees is appropriate.

ORDER

This case is remanded to the Acting Regional Director to direct an election in the following appropriate unit:

All full-time and regular part-time employees employed by the Employer in the meat and fish departments at its stores #1, 2, 3, 5, 8, 11, 12, 15, 16, 17, 18, 19, 20, 22, 23, and 24 in northern Nevada; excluding office clerical employees, professional employees, guards, and supervisors as defined in the Act.

¹² Member Browning agrees with the result reached by her colleagues, but she would find it sufficient that the meatcutters use different skills and perform distinctly different functions than those performed by employees in other departments, in addition to the other community-of-interest factors cited by her colleagues. See the dissenting opinion of Member Cracraft in *Copps Food Center*, 301 NLRB 398, 399 (1991). She thus finds it unnecessary to reach the issue of whether the processing of boxed meat involves "specialized meatcutting skills."