

The Hamlet Fire:

Public Policy and Workplace Safety

Overview

In this lesson, students learn about the fire at the Imperial Foods chicken processing plant in Hamlet, North Carolina, on September 3, 1991. First, they discuss the idea of workplace safety and its connection to public policy. Then, students analyze primary and secondary sources about the fire, including its causes and effects. Finally, students discuss the sources they examined and what lessons this workplace tragedy of the late 20th century might provide for the United States today.

*This lesson can be used to supplement instruction on the following social studies topics: the Triangle Shirtwaist Fire; Upton Sinclair's *The Jungle*; muckrakers; the Progressive Era; the New Deal (especially as it related to worker protections); 20th century industrialization; labor unions and labor struggles in the United States; government regulation; public policy making at the state and federal levels.*

Objectives

Students will be able to:

- Describe the events, causes, and effects of the Hamlet fire.
- Explain the roles and responsibilities of various state and federal agencies and institutions in maintaining safe workplaces.
- Analyze the role of government regulation and enforcement in the fire at Imperial Foods in 1991 and the implications for current workplace safety.

Materials

- [Slide deck](#)
- **Handout A:** The Hamlet Fire – 1 per student
- **Handout B:** Guiding Questions for Document Exploration – 1 per small group
- **Handout C:** Documents Related to the Hamlet Fire – 1 per student

Preparation

The events of the Imperial Foods plant fire, which resulted in numerous deaths and life-long injuries, can be sensitive for students to analyze. It is thus important that classrooms have a foundation of respect, civil discourse, and empathy prior to engaging with this material. As each classroom is unique, and teachers know their students and community best, it is important educators review the content of this lesson plan carefully to ensure its compatibility with your curriculum and learning goals prior to implementation.

Procedure

I. Focus Discussion

Ask students: *What kinds of obligations do you think employers should have to their employees?* (Accept reasonable answers, which could include protecting employees' safety on the job, providing adequate pay, or maintaining clean workplaces.)

Follow up by asking students: *Who do you think determines what those obligations are, and who makes sure they are met?* (Look for answers that indicate government determines what the obligations are through public policy and has the responsibility to enforce those obligations fairly.)

Briefly introduce the lesson by telling students that today they will be learning about a factory fire that broke out at the Imperial Foods chicken processing plant in Hamlet, North Carolina, in 1991.

Show Slide 2 of the [slide deck](#). Read the definition of public policy on the slide. Check for understanding of the terms in the definition. Explain that students are going to explore issues of workplace safety and public policy related to the fire.

II. Background Reading

Distribute **Handout A: The Hamlet Fire**.

Have students read the handout and annotate the text by jotting down questions in the margins, circling unfamiliar terms, and underlining the main points of the text. If teaching remotely, you can assign the PDF of the reading through whatever LMS you are using, and you can have students make annotations electronically or by taking notes with pen and paper.

Once students have read the text, open discussion for clarifying questions. If students have questions about the event that the background reading does not answer, note them on the board or the screen, so that they can be revisited after the document exploration activity.

III. Document Exploration

Tell students that they are going to examine a range of documents related to the Hamlet fire. From these documents, they are going to reconstruct what happened in the Hamlet fire, and what has happened since the fire.

Divide students into groups of four or five students each. Give each group a copy of **Handout B: Guiding Questions for Document Exploration**. Explain that they will answer these questions together after they read a set of documents with information about the Hamlet fire tragedy.

1. Key terms used in the documents, including *public policy*, and their definitions are listed on Slide 3 of the [slide deck](#). You can display this slide as students read the documents.

Distribute **Handout C: Documents Related to the Hamlet Fire** to each student. Students should read the documents and answer the questions at the bottom of each document, which will help them identify and understand what they are looking at.

1. A larger image of the door in Document 2 is on Slide 4 of the [slide deck](#).
2. For Document 4, you may prefer to have students watch the [video news clip](#) in the source link at the bottom of the page. It is about three minutes long.

Students then work together to answer the questions on Handout B.

1. Each group should choose a spokesperson who is ready to answer any of the questions on Handout B for the rest of the class during the debriefing (below).

IV. Debriefing

Once students have discussed all the documents and answered the questions on Handout B, bring the class back together for a final debriefing and to see what questions students may still have.

Final questions for discussion:

- Which document did you find most helpful in better understanding what happened in the fire at Imperial Foods? Why?
- What information, if any, surprised you in what you read or in what you discussed in your group?
- Did any of the documents provide information from which we can learn lessons about workplace safety today? If so, what are they?
- What could Hamlet's workers have done about safety conditions before the fire had they been members of a labor union?
- What examples of public policy did you read or hear about? Were they examples of public policy working well or not working well? Explain.

V. Assessment/Closure

For a written assessment, ask students to create a written response to the following question from Handout B:

How can something like the Hamlet fire be prevented now and in the future?

VI. Extension Activity & Additional Resources

- A. You may find that your students want to do something to make a difference in their community, whether regarding food production, workplace safety, or any other issue. CRF has a free curriculum that you can use if you want to help them translate that energy and interest into meaningful civic engagement: [Civic Action Project \(CAP\)](#). Having built their understanding of public policy and its impact on our lives through this lesson, your students are primed for CAP, which gives them a chance to independently choose an issue that matters to them and then to take informed civic actions to address

that issue in their community. [Contact the CAP team at CRF](#) if you want to find out more about how to bring it to your classroom!

- B. For an in-depth look at the Hamlet Fire, as well as its connections to current public policy issues, see this [webinar for teachers hosted by Carolina K-12](#) from October 2020. The session, “Exploring the High Cost of ‘Cheap:’ The Hamlet, NC Factory Fire of 1991,” features scholars David Zonderman and Joanna Sierks Smith, as well as playwright, poet, essayist, and arts educator Howard Craft, author of the play *Orange Light*. A link to the webinar can also be found on Slide 5 of the [slide deck](#).

The Hamlet Fire

On September 3, 1991, a fire broke out at Imperial Food Products, a chicken processing plant in the town of Hamlet, North Carolina. The fire started near the plant's 300-gallon deep fryer, used for cooking the chicken nuggets produced at the facility. The fire quickly spread across floors and walls covered with chicken grease.

No emergency sprinklers turned on. Ceiling tiles that were supposed to slow the flames ignited. Workers who tried to get out of the building through the loading dock exit found it blocked by a truck. Its driver was asleep inside. Those who tried to escape through a door in the breakroom found it locked. The plant owners had had other doors locked, preventing escape.

Of the 81 people working that day at Imperial Foods, 25 perished. Eighteen of them were women, many of them single mothers, most of them under the age of 30. Twelve of the victims who died in the fire were Black, like most employees at Imperial. The fire also injured 55 people, many of them in lifelong, debilitating ways.

Why Did the Fire Start?

In 1980, factory owner Emmett Roe moved operations to Hamlet from Pennsylvania to cut costs. In the new location, Roe paid his workers 17 percent less than what he had paid in Pennsylvania. He cut shipping costs by using nearby suppliers of raw chicken.

Just two years before the fire at Imperial, the unemployment rate in Hamlet and nearby Rockingham was extremely high: 18.4 percent. This was almost three times the national unemployment rate of 6.8 percent. Roe paid most of his workers \$5.50 an hour, which was more than the federal minimum wage of \$4.25 an hour, making work at Imperial attractive to the people of Hamlet who were desperate for employment.

Throughout the 1980s, the state legislature did not provide funds to carry out any of the business regulations and laws it passed. That meant that the state's Occupational Safety and Health Administration (OSHA) did not have adequate resources to do inspections of employers like Imperial Foods. In this environment, Roe was able to ignore multiple regulations, including those governing building permits, wastewater management, fire-sprinkler repair, business licenses, and registering with OSHA and the federal Department of Labor.

Roe's move to North Carolina also eliminated the labor union his Pennsylvania workers had belonged to. Had the Hamlet workers started to organize a labor union to try to bargain with Roe for better wages and workplace conditions, Roe would have opposed the effort. The fight to start the union likely would have taken years without any guarantee that the workers' effort would have paid off.

In 1990, North Carolina had fewer safety and health inspectors than it had 10 years earlier. The state passed a law in 1991 requiring that local and county governments appoint a fire inspector to ensure that commercial buildings complied with the state's new fire code. However, the state did not fund the program. There was not a single health and safety inspection in the 11 years that Imperial Foods operated in Hamlet. Investigators eventually discovered 83 health and safety violations — any one of which could have had the business shut down, at least temporarily — but only after the fire.

The only inspectors who did visit the plant regularly were from the U.S. Department of Agriculture (USDA), whose task was to inspect food safety, not worker safety. In 1989, they flagged an issue of flies getting into the plant from doors at the southern end of the building. Roe's management team addressed the fly problem by building a shed around a dumpster and locking an exit door from the outside to prevent flies from getting in — and to prevent workers from opening it.

The USDA inspectors signed off on the solution to the fly issue. The locked door, however, was one of the exits that desperate workers tried to use to get out of the building on the day of the fire.

The Aftermath

In the wake of the fire, Republican Governor James Martin promised to fund about 24 more workplace inspectors. He made other recommendations (such as setting up an anonymous worker safety hotline) intended to address issues that had led to the deadly incident. State lawmakers also passed new workplace-safety laws.

North Carolina's labor department did fine Imperials Foods over \$800,000 for safety-code violations. It was the largest fine ever issued in North Carolina. But labor advocates pointed out that it was tiny compared with federal-level OSHA fines for comparable industrial accidents.

Factory owner Emmett Roe pleaded guilty to criminal charges of manslaughter for his role in locking the doors before the fire. He was sentenced to 20 years in prison but only served four until he was released on parole. The Imperial Foods chicken-processing plant never reopened.

Key Terms

fire code: a safety code that specifically establishes fire-safety regulations; see “regulation” and “safety code” below.

labor union: an organization of employees who negotiate as a group with their employer about issues of wages, hours, and workplace conditions (including safety).

OSHA: a federal agency that sets and enforces workplace safety and health standards. OSHA stands for the Occupational Safety and Health Administration. It was created by a 1970 federal law that gave states the option to oversee OSHA's implementation. In North Carolina, the state runs OSHA.

parole: the release of a prisoner from imprisonment before the full sentence has been served, usually based on the prisoner's good behavior during imprisonment and feelings of remorse. Paroled prisoners must report regularly to law enforcement for a period of time, usually the length of their sentence.

regulation: a rule imposed by government on individuals and companies in business and the private sector, usually with financial penalties for violation. *Deregulation* refers to the practice of governments eliminating such rules.

safety code: a set of laws that establishes regulations for people's safety. Some codes are for workplaces and others are for private homes and rental units.

Guiding Questions for Document Exploration

Directions: You will be working with a small group of your classmates to analyze a set of documents related to the 1991 fire at Imperial Foods.

After you have read the documents carefully, work with your group to answer the following questions:

1. What happened?
2. Why did it happen?
3. How can something like this be prevented now and in the future?
4. What questions do you still have?

Documents Related to the Hamlet Fire

Document 1

When the fire at Imperial Foods happened, it made headlines across the country. The national press continued to follow the story as legal proceedings against the factory's owner, Emmett Roe, moved forward. This excerpt from an article in The New York Times reports on the outcome of the criminal case against Roe.

Meat-Plant Owner Pleads Guilty in a Blaze That Killed 25 People

September 15, 1992

By The Associated Press

The owner of a chicken processing plant where 25 people died in a fire last year pleaded guilty today and was sentenced to nearly 20 years in prison.

In a surprise plea agreement, the owner of Imperial Food Products Inc., Emmett J. Roe, admitted 25 counts of involuntary manslaughter. As part of the agreement, the state dropped charges against two managers at the plant, James N. Hair and Brad M. Roe, the owner's son.

The agreement averted a criminal trial in one of the nation's worst industrial accidents.

Twenty-four workers at the plant, which cooked chicken for fast-food chains, and a delivery man died Sept. 3, 1991, after hydraulic fluid from a conveyor belt under repair sprayed over a gas-fired chicken fryer at the company's plant in Hamlet, N.C. A fireball filled the plant with dense, toxic smoke. Fifty-six workers were injured, and more than 150 others were left without jobs because the plant closed. . . .

State officials have said that the plant, the leading employer in Hamlet, 60 miles southwest of Fayetteville, had no fire alarm or sprinkler system and that its exits were unmarked and doors were locked when the fire occurred. North Carolina's occupational-safety agency said a shortage of inspectors and inadequate resources had prevented the state from inspecting Imperial Food in the 11 years the company has operated. . . .

Emmett Roe, 65 years old, Brad Roe, 29, and Mr. Hair, 56, all were indicted in March on 25 counts of involuntary manslaughter.

The elder Mr. Roe had faced a maximum sentence of 10 years on each of the 25 counts. After receiving his 19-year, 11-month sentence today, he was taken to the Richmond County Jail for eventual transfer to prison. Under parole guidelines, he could be released after serving fewer than three years, said Joe Cheshire, Mr. Roe's lawyer. . . .

Mr. Roe still faces at least 19 lawsuits filed by families of the victims.

Source: <https://www.nytimes.com/1992/09/15/us/meat-plant-owner-pleads-guilty-in-a-blaze-that-killed-25-people.html>

Questions: What is the document? Who created it? When was it created?

Document 2

Imperial Foods Plant Fire Photographs (continued)

Note: This is one of 22 photographs included in the U.S. Fire Service report. Several doors at the Imperial Foods plant were locked, some from the inside and at least one from the outside. Locked and unmarked exits, as well as exits located too far from workstations, were among the 54 “willful” safety violations (the most serious level) for which the company was fined.

The caption below the photo is also from the U.S. Fire Service report. This door was later donated to the Smithsonian Institution.



A close-up view of the north door to the break room. Note the footprints and padlock in-place where the door was kicked; it was eventually opened for the escape of some personnel. (Photo by Jack Yates)

Questions: What is the document? Who created it? When was it created?

Source: <https://www.usfa.fema.gov/downloads/pdf/publications/tr-057.pdf>

Document 3

The fire at Imperial Foods left a lasting mark on the town of Hamlet. The excerpt below is from an article in the local Richmond County Daily Journal. It was published after a memorial service to mark the 25th anniversary of the tragedy. Residents, officials, and survivors recalled the day in 1991 and its impact.

Stories of the Year: Imperial Foods Fire 25 Years Later

January 2, 2017

By Melonie McLaurin

Hamlet Fire Chief Calvin White — who was a captain with the department and had just begun his shift on the day of the fire — said it didn't take long for things to go downhill.

"We came in that morning, me and the guy I was working with on that shift," White said. "We got in about 8 a.m. and it was like other days. . . . It was about 8:35 a.m. when the call came in."

White said it wasn't really a call that came in, but a person.

"Brad Roe came running in our front door saying the plant was on fire," White said. "What he didn't tell us was that anyone was inside."

Brad Roe was operations manager of the plant and his father, Emmett J. Roe, was the owner.

Not only were there nearly 90 people working in the plant that morning, but the doors meant to serve as emergency exits were locked from the outside making escape impossible. Later, it was determined that Emmett Roe had personally ordered the doors to be locked — according to a survivor — to prevent employees from stealing chicken from the plant. . . .

North Carolina Labor Commissioner Cherie Berry took office 10 years after the fire at Imperial Foods in Hamlet, but that gap has not distanced her from the responsibilities of enforcing labor safety reforms made in the tragedy's wake.

"The tragic fire at Imperial Foods in Hamlet in 1991 led to major reform in 1992 by the N.C. General Assembly," Berry said in an email to the Daily Journal. "The reform included an expansion of the number of (Occupational Safety and Health) compliance officers, enforcement focus on high-risk industries and the authorization of fines to be levied against governmental entities for noncompliance." . . .

Survivor Annette Zimmerman, who lives with the memories of the fire, said that while she recognizes some changes have been made, they did not go far enough to prevent another Imperial Foods fire.

"The only good that could come from such a tragic event would be for workplace policies and OSHA laws to have changed," Zimmerman said. "To have more inspectors go in and identify things that are wrong and actually make the companies pay to get things fixed. I think, to a small degree, it did happen. I don't think there's been enough done."

Source: <https://www.govtech.com/em/disaster/stories-of-the-year-imperial-foods-fire-25-years-later.html>

Questions: What is the document? Who created it? When was it created?

Document 4

2021 marked the 30th anniversary of the fire at Imperial Foods. In this report that aired on the Raleigh-based TV station WRAL, one journalist provides an update on workplace safety enforcement in North Carolina. The link below includes a [short news video about the 30th anniversary](#).

‘30 years in anguish.’ Survivor reflects on the horrors of Hamlet industrial fire

September 3, 2021

By Bryan Mims, WRAL reporter

In 1991, a fire broke out at the Imperial Foods plant in Hamlet. At least two doors were locked and trapped people inside. Twenty-five people died, while 54 more people were injured trying to escape.

For Annette Zimmerman, it’s been “30 years of tears.”

Somewhere on the grounds of the plant, Zimmerman laid on the ground -- stepped on by coworkers running for their lives.

“Thirty years of pain [and] 30 years of anguish,” said Zimmerman. . . .

Zimmerman said the doors were locked because managers thought workers were stealing chicken. . . .

Zimmerman said someone picked her up and carried her to safety. Since that day, she’s had two lower back surgeries and four neck surgeries, with another to go. . . .

Thirty years later, community members came to the grounds of the plant to remember. The building is long gone, and in its place a granite marker and 25 crepe myrtles.

John Drescher, a longtime journalist who covered the tragedy, said that 30 years of workplace safety data shows North Carolina going in the wrong direction and in danger of forgetting the lessons of Hamlet.

“As the time goes on, memory fades, but there are some real danger signs,” said Drescher. “This was an entirely preventable tragedy.”

He said that while state fire codes are tougher, the state has 25 percent of its 117 workplace safety inspector jobs vacant.

Source: <https://www.wral.com/30-years-in-anguish-survivor-reflects-on-horrors-of-hamlet-industrial-plant-fire/19857356/>

Questions: What is the document? Who created it? When was it created?