Access to Rendering Services for Euthanized Horses

David Smith, DVM
Director, Division of Animal Industry
New York State Dept. of Agriculture and Markets
Pentobarbital Euthanasia

- Relatively simple, fast, predictable
- Acceptable to owners
- Controlled substance
- Persists in the animal’s carcass
How did New York get here?

- On farm burial was common
- Sometimes deads were taken to a remote part of the farm
- For many years, rendering companies picked up dead cattle and other livestock for a small fee
Burial got less attractive

• Farm size
• More worries about water
• More neighbors
Dragging them “out back”

- Was never a good option
- Disease Risk
- Wildlife
- Domestic animals
- Neighbors
Pressure on Renderers

• Fuel costs
• Hide prices
• Labor
• Demand weak
• Fees
4-D Disposal Operators

• Pick up dead stock
• Salvage the hide
• De-bone the carcass
• Chill or freeze the boneless meat
• Sell the boneless to pet food manufacturers
And then…

GIZMODO
How Does a Euthanasia Drug Keep Ending Up in Dog Food?

Food Safety News
confirming euthanasia drug in popular dog food brands

The FDA has posted notice of a voluntary recall by The [Company] Inc. of canned dog food after the company confirmed pentobarbital in tallow used to manufacture the affected products.
What? Why is pentobarbital in dog food?

• Most likely explanation:
  • Tissues from a cow or horse euthanized with pentobarbital drug was mixed into dog food or dog food components.

• Probably not a new phenomenon
Then why is it a problem now?

- Greater awareness due to media reports
- Sensitivity of test methods outpaced FDA’s ability to set tolerance levels.
- Tests in 10 ppb range will find pentobarb in facilities that never handled a euthanized horse.
Pet food manufacturers studied the risks of all raw materials

- They concluded the highest risk belonged to boneless meat salvaged from dead farm animals
- Contracts with renderers: No farm mortalities!
- 4-D Operators were cut off with 2 days’ notice
What does this mean for farmers and horse owners?

• Fewer carcass disposal options
• Pay for hauler, landfill
• Bury dead stock
• Compost
• Incinerate?
Somebody ought to do something

- NYSDAM worked with Farm Bureau and NEDPA to get information on disposal out to farmers
- Discussed ways to keep chemically euthanized animals out of rendering and pet food
- Worked with Cornell Waste Mgmt Institute and DEC to hold meetings
Proposed regulation in New York

- All large animals euthanized with pentobarbital – based solutions
- Requires injection with denaturant solution
- Requires application of warning tag
- Exemption for immediate burial
POSSIBLE DESIGNS FOR CARCASS TAGS
Denaturant Example

Price: $29.95

Item Number: KOC3499-3060

Denaturant
Use for purposes of identifying meat products not intended to be used for human food. All ingredients making up this meat decharacterizer are non-toxic so that the product is safe to handle even in its concentrated form and do not affect byproducts intended for pet foods. The identifiable blue color penetrates all the meat parts making them easily identifiable. Has prior USDA authorization as a denaturant for meat products intended for disposal for purposes other than human food.

- FD&C dye - blue
- A non-toxic, odor-free denaturant consisting of all natural ingredients
- Can be used on meat and poultry
- Safe in pet food
- Cleans easily with water
- Dilute 1 part denaturant to 32 parts water
- 1 gal

Quantity: 1 [ADD TO CART]

Add to a new shopping list
North American Rendering Association Efforts

• Literature search to find documentation to establish tolerance level for pentobarbital in rendered products.
• Studies to examine the fate of pentobarbital in animal tissues.
• Simplified carcass marking
North American Rendering Association Recommendations
North American Rendering Association Recommendations

• Preserve remaining services
• Identify chemically euthanized carcasses
• Whenever possible use alternate means
• Encourage US FDA to research and publish tolerance level
• Standard test method needed
Pet Food Manufacturers’ Concerns

- Concerned about their brands
- Concerned about present zero tolerance
- Perception of equine protein in pet diets
Is it time to recognize rendering as a public good or service?
QUESTIONS?