



Department of  
Agriculture and Markets

# Access to Rendering Services for Euthanized Horses

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# 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



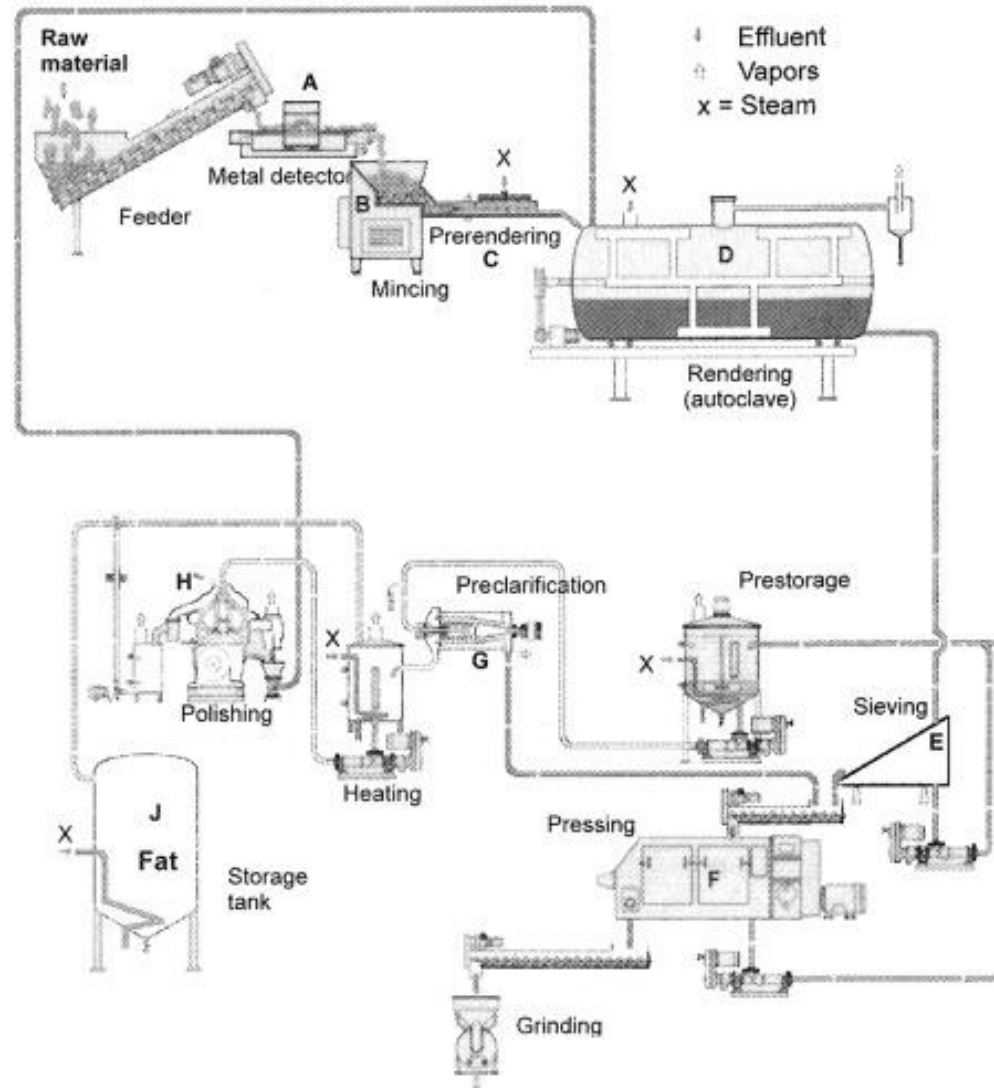
# Dragging them “out back”

- 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...

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ANIMALS

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

Ed Cara  
2/21/18 2:30pm • Filed to DOGGOS

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Photo: Getty

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## ██████████ confirms euthanasia drug in popular dog food brands

By [Phyllis Entis](#) on March 4, 2018

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 manufactured 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:** KOC3199-3060

## 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:

[Add to a new shopping list](#)

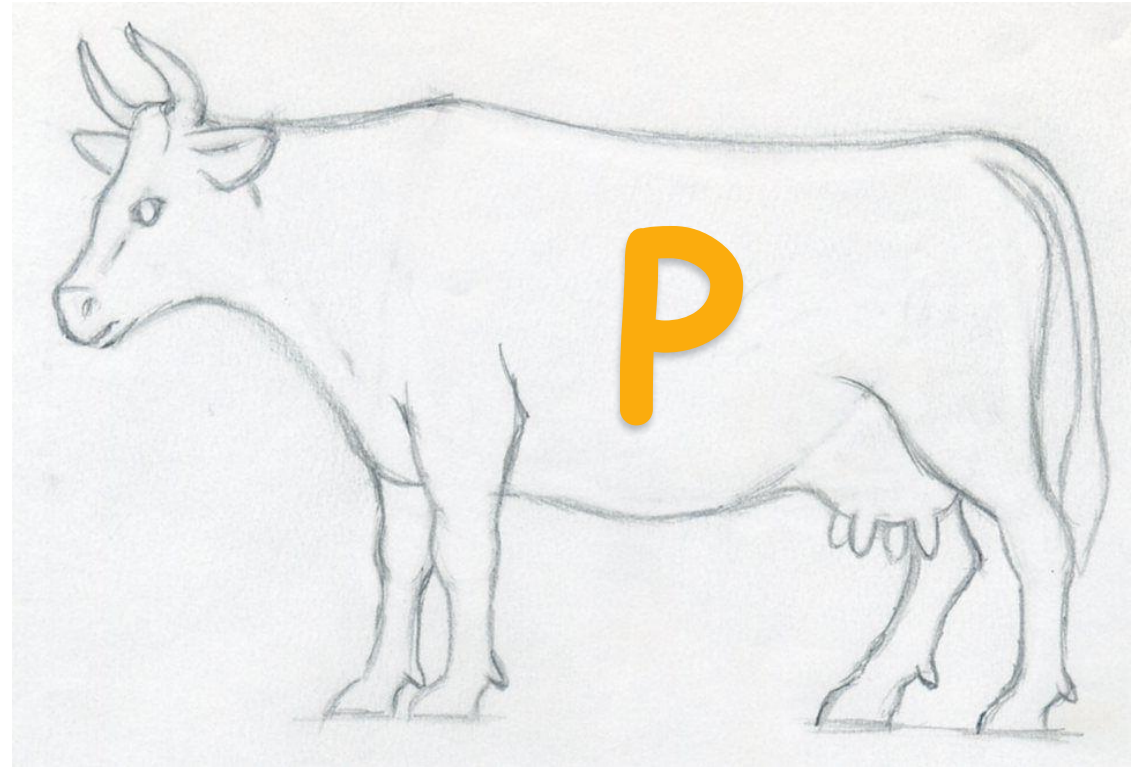
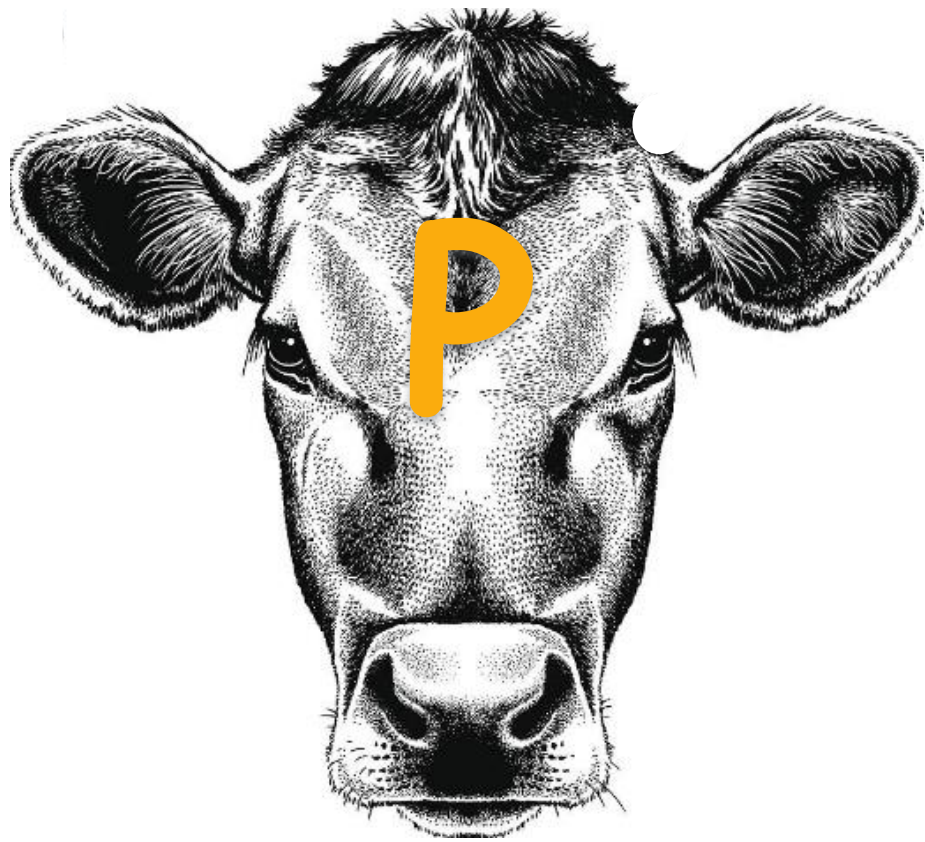


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# North American Rendering Association Efforts

- 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



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# 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?