

RENDERING & BARBITURATES

ANNETTE JONES, DVM

STATE VETERINARIAN AND DIRECTOR

ANIMAL HEALTH AND FOOD SAFETY SERVICES


CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE

PAULA BATARSEH

BRANCH CHIEF

MEAT, POULTRY, AND EGG SAFETY

CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE



FDA ZERO TOLERANCE

- Food Safety Modernization Act and Preventative Controls for Animal Food (2017)
- GMP's and HACCP → Barbiturates
- There is a zero tolerance for presence of barbiturates (reluctance to establish a “safe level”)
- Testing both Fats and Proteins – Residue leads to additional “controls”
- Necessary to divert and identify animals euthanized with barbiturates

REGULATIONS

- 3 CCR Section 1180.43.1 (2020)
- Requires marking of animals euthanized with barbiturates to be marked with an orange B on the forehead at least 4 inches in height





Section 1180.43.1. Euthanized Animals.

(a) All animals as defined in Food and Agricultural Code section 19201, including ratites, Camelidae, and Cervidae and those maintained in aquaria, petting zoos, zoological gardens, and other public exhibitions euthanized with barbiturates shall be marked with the letter “B” on the forehead by the person administering the Barbiturate. Each letter “B” shall be:

- (1) Made using an orange all-weather livestock marker or orange pavement marking spray paint approved by the Department as suitable for producing a permanent mark;
- (2) No less than four (4) inches in height unless the area to be marked is less than four (4) inches, in which case, the mark shall be as large as possible; and
- (3) Legible at a distance of not less than ten (10) feet.

(b) This section shall not apply to domestic dogs and cats or pet birds.

Meat, Poultry and Egg Safety Branch



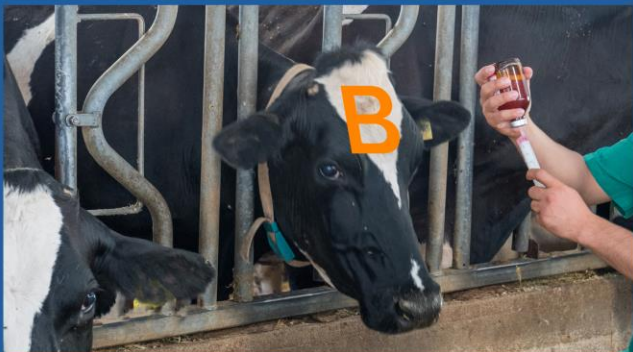
(916) 900-5004



rendering@cdfa.ca.gov



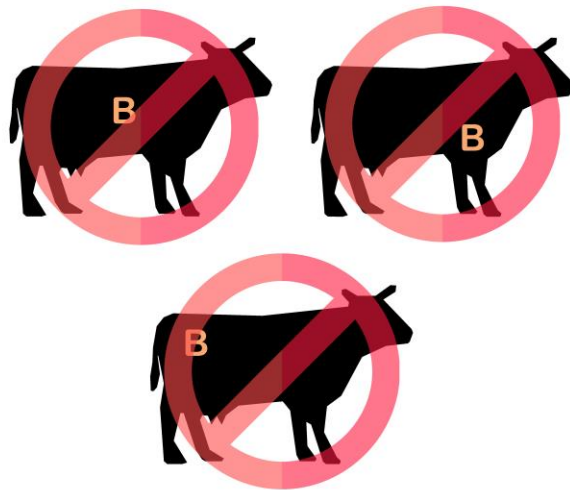
<https://www.cdfa.ca.gov/ahfss/mpes/Rendering/index.html>



California law* requires that animals euthanized with Barbiturates be marked with an orange B on the forehead at least 4 inches in height. Producers should avoid marking the animal with the letter B for any reason, in any other location.

* 3 CCR section 1180.43.1

Incorrect Markings



Meat, Poultry and Egg Safety Branch

 (916) 900-5004

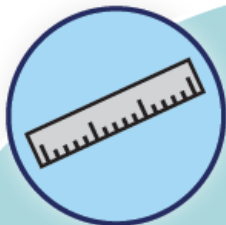
 rendering@cdfa.ca.gov

 <https://www.cdfa.ca.gov/ahfss/mpes/Rendering/index.html>

- *Producers wanting to avoid confusion with rendering pickup should avoid using a “B” in orange paint anywhere on the animal (Sometimes used to indicate “beef cow,” Banamine, etc.)*

NOTICE: EUTHANIZED LIVESTOCK/HORSES USING BARBITURATES

Effective July 30, 2020 all animals (not including domestic dogs, cats, and pet birds) euthanized with Barbiturates **must be marked with an Orange B on the forehead** at the time of euthanasia so that animals do not get rendered into animal feed or pet food.



No less than four (4) inches in height unless the area to be marked is less than four (4) inches, in which case, the mark shall be as large as possible.

Legible at a distance of not less than ten (10) feet.



Made using an orange all-weather livestock marker or orange pavement marking spray paint approved by the Department as suitable for producing a permanent mark.



Available on the CDFA website under “Guidelines”:
<https://www.cdfa.ca.gov/AHFSS/MPES/>

COLLABORATION SEEMS TO BE WORKING

- Strong DEA controls on barbiturates makes addressing residues relatively simple
- Prior to 2020, anecdotally, more veterinarians had been using barbiturates for euthanasia of farm animals than in prior decades – good to resurvey
- All three rendering companies in the state have fewer residue issues today than in 2020.
- Much more effective to address violations together initially through consultation with the practitioner

NEXT STEPS



- Continuing outreach with renderers / dead haulers / producers / veterinarians
- Consider additional rules to address potential cross contamination or transport issues to reduce the risk of an end product testing positive for barbiturate residues
- Handling remains for animals euthanized with barbiturates

QUESTIONS OR COMMENTS?

ANNETTE.JONES@CDFA.CA.GOV