

November 22, 2019

Subject: URGENT - Animals euthanized with pentobarbital cannot be rendered.

Dear Doctor,

Darling Ingredients Inc. ("Darling") and other rendering companies provide an important biosecurity function through the collection and processing of animals that die other than by slaughter, including on-farm mortalities. The resulting rendered products such as animal protein meals and animal fats, are important sources of nutrients in livestock and poultry feeds.

The Food and Drug Administration (FDA) has determined that pentobarbital is a hazard in ingredients fed to pets and other animals and **that animals euthanized with pentobarbital cannot be rendered to make foods for pets, poultry and livestock. FDA has a zero tolerance for pentobarbital in animal food.**

Renderers cannot distinguish euthanized animals from animals that die from other causes and the rendering process does not inactivate pentobarbital. For euthanized livestock or other large animals to be rendered, non-chemical forms of euthanasia must be used.

Darling has implemented procedures to keep pentobarbital out of the rendering stream. We no longer accept horse mortalities for rendering, have attempted to educate various stakeholders on the importance of the issue, and require raw material suppliers to sign a barbiturate hazard control warranty before scheduling collection. In addition, Darling is testing finished fats for pentobarbital to determine if our pentobarbital controls are effective.

Despite these efforts, we have detected pentobarbital in some of our rendered fat. Levels of pentobarbital have been low (5 to 188 ppb) and the incidences sporadic in both frequency and location (state or region). **If we are unable to demonstrate that our preventive efforts are effective at controlling pentobarbital, we may be forced to curtail animal mortality collection practices in certain regions or in all areas to comply with the FDA regulations.**

Disposal of animals euthanized with pentobarbital is problematic. Such animals can no longer be rendered and other methods such as abandonment, shallow burial and composting can result in secondary poisoning of wildlife and domestic dogs. **Livestock owners and veterinarians responsible for such unintentional poisonings may be held liable and subject to fines and/or criminal prosecution under federal laws.**

Rendering is the preferred method for handling animal byproducts and mortalities. The cooking process used is validated to kill conventional pathogens, such as bacteria and viruses. **Please help us ensure that rendering remains a viable disposal option for animal mortalities and use non-chemical means to euthanize livestock.**

Respectfully,

 Region Vice President