

New Euthanasia Requirements Take Effect in California

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Most renderers have a zero tolerance for euthanasia solution in several of their products due to their own internal quality control systems and a relatively new and actively enforced FDA rule. Any mistake in separating euthanized animals from other fallen stock to prevent cross-contamination can shut them down. In support of this situation, a new regulation requiring marking euthanized animals went into effect on July 30, 2020. Veterinarians that euthanize animals (not including domestic dogs, cats, and pet birds) with barbiturates must mark the forehead with an Orange B that is at least four inches in height (or as large as fits), at the time of euthanasia. We have been asked about the use of alternate chemical euthanasia, and until more is known, a best practice is to also mark these animals on their forehead.

There are current carcass management challenges in California and this new regulation does not solve the problem beyond ensuring rendering remains a carcass disposal option where possible. This option is important because renderers play a critical role in converting materials to their highest and best use while protecting the environment. There is some good news. The CDFA recently issued a license to a new renderer in Southern California, expanding overall capacity. Like several existing renderers, this company will accept euthanized animals.

Thank you for being a key part of the carcass management solution by marking euthanized livestock and horses while we continue to work with stakeholders and other agencies to better understand the scope of the problem and search for other viable end of life options.

New Regulation

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. ■

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Additional resources for veterinarians include guidance for veterinary practices and informational handouts for pet owners:

CDPH Veterinary Public Health Section webpage on SARS-CoV-2 (cdph.ca.gov/Programs/CID/DCDC/Pages/VPHS-COVID-19.aspx):

- COVID-19 Guidance for Veterinary Practices – Guidance for in-clinic infection prevention and control measures and modification of veterinary appointment protocols

CDC webpage on COVID-19 and animals (cdc.gov/coronavirus/2019-ncov/animals/pets-other-animals.html):

- **Interim Infection Prevention and Control Guidance for Veterinary Clinics Treating Companion Animals During the COVID-19 Response** – Guidance for in-clinic infection prevention and control measures, modification of veterinary appointment protocols, recommended personal protective equipment (PPE) for each companion

animal history scenario, and instructions regarding extended use and reuse of PPE.

- **What You Need to Know About COVID-19 and Pets** – Handout with information on clinical signs and testing in animals, what to do if an owner thinks their pet is sick, and guidance for owners who test positive for COVID-19.
- **FAQs about COVID-19 and Animals** – Recommendations for pet owners on how to keep pets safe and manage contact with groomers, dog daycare, and other public areas.

In July 2020, OIE updated its document that provides considerations on sampling, testing, and reporting of SARS-CoV-2 test results for animals. The document describes high level principles to guide sampling and testing and the rationale for testing animals to manage risk. The document can be found on OIE's website: [oie.int/fileadmin/Home/MM/A_Sampling_Testing_and_Reporting_of_SARS-CoV-2_in_animals_3_July_2020.pdf](https://www.oie.int/fileadmin/Home/MM/A_Sampling_Testing_and_Reporting_of_SARS-CoV-2_in_animals_3_July_2020.pdf). ■