



# *Special Report*

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## RENDERING ALTERNATIVES FOR DEER PROCESSORS

By STEVE KRUT

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On November 12, the Center for Veterinary Medicine, a component of the U.S. Food & Drug Administration, issued a notice that materials from deer or elk that have or are likely to have Chronic Wasting Disease (CWD) cannot be used as an ingredient in feed for any animal species.

An immediate result was that a significant part of the rendering industry told customers they would not pick up any materials from cervids. Game processors were left scrambling for disposal alternatives.

The FDA notice said the prohibition against deer or elk materials in animal feeds would apply to cervids which tested positive for CWD, farm-raised herds which tested positive, free-ranging animals from endemic areas in Colorado and Wyoming, deer from the eradication zone in Wisconsin and deer from any new area designated as having shown CWD infection. Renderers, concerned they could not be certain that any deer or elk are CWD free without testing, sent statements to processors they would not pick up any bone or other material from deer or elk. The FDA, while not demonstrating any scientific evidence that CWD can be harmful to humans or to animals, such as cattle or hogs, termed its directive "prudent."

The most common alternative for processors to dispose of this material is an approved landfill. These facilities are sealed so that they can decompose the material and not have it, or the prion which supposedly carries CWD, leach into the ground water system. Most landfills are municipally operated and their decision on whether to accept such materials is determined by the state agency responsible for environmental protection.

AAMP has contacted the U.S. Environmental Protection Agency to secure a letter asserting that the agency has no problem with this disposal method. However, game processors should protect themselves by obtaining permission for dumping cervid materials in the landfill. Transportation to these facilities must be accomplished in sealed containers, which may require a permit in some jurisdiction. This is to assure no leakage of materials during transport. Dumpsters could be used, but AAMP strongly suggests notifying the hauling company or landfill that deer or elk materials will be deposited and obtaining permission.

Burying materials on private land or on unapproved sites may violate local, state or federal laws.

Some processors have considered accepting only boneless venison for further processing to eliminate disposal problems. Others have suggested returning bone and other waste materials to the hunter. Both of these concepts may solve the problem for the plant operator, but may accelerate the CWD problem by having waste materials dispersed in open fields, near watercourses or in unacceptable places by hunters who have not disposal sites.

Another approach for disposal may be composting. AAMP can provide a list of existing composting sites (check the AAMP website [www.aamp.com](http://www.aamp.com) for updates).

Individuals interested in developing their own composting operations may obtain additional information from a composting video produced by Cornell University with sponsorship from AAMP. The video is priced at \$25 plus \$5 shipping and handling and can be ordered through the AAMP office.

Some states and universities have waste reduction systems that use a chemical process to digest the materials quickly and kill and CWD prion. For more information on this process, check out the Agri-Lyzer heading on the AAMP website.

These systems are now produced in smaller sizes and can be transported on a small trailer. Priced in the \$60,000 to \$80,000 range, they could be utilized by multiple plants and could serve as an off-season income source for disposal of road kill, dead pets, restaurant grease, or even bio-hazard materials.

AAMP is continuing to press for government assistance with CWD research, control, and disposal concerns.