

CDQAP Quality Assurance Update - April 2021

A Plan for Rendering Disruptions

By Dr. Michael Payne, UC Davis, School of Veterinary Medicine and Director, CDQAP

Regulations make emergency mortality disposal mind-bendingly complex. CDFA, the dairy industry, renderers, and other regulatory agencies are working on short-term and long-term solutions.

Only four of the state's 46 rendering facilities process animal mortalities. Those that do typically operate at near capacity, meaning a heat event or mechanical problem in a single plant can disrupt mortality pick-up for hundreds of producers throughout a broad swath of the state. California dairy producers experienced large-scale service disruptions in 2006, 2017, and 2020 due to mechanical failures and heat events. During each of these incidents, CDQAP has spear-headed development of [county-by-county emergency disposal plans](#).

Multi-Jurisdictional Roadblocks

The reason why a comprehensive, state-wide solution has been so hard to achieve is because it is so complex, impacting the missions of numerous agencies. Regional boards may not allow on-farm composting or on-farm burial. Composting mammalian tissue is a violation of state regulation. Landfills almost never accept material from other counties. Counties' Board of Supervisors are often reluctant to convene special sessions in order to pass emergency proclamations for incidents not already in the public eye. Producers are responsible for arranging carcass transportation and disposal. A quarantine order from the State Veterinarian is usually required for non-permitted transportation to alternative disposal sites. A Governor's Emergency Order is needed to waive environmental laws governing those destinations. Because of environmental regulations and local residential resistance, expansion of rendering capacity remains almost impossible.



CDFA Steps Up to the Plate

Work is being done to get a long-term, coordinated plan in place. While the California Department of Food and Agricultural does oversee the rendering industry, it has no authority over the laws, regulations, or policies of the other involved agencies. With the encouragement and support of the dairy industry, CDFA has taken on the task of coordinating the development of multi-agency, region specific, shovel-ready mortality management plans.

"Carcass management is a daunting challenge or it would already be fixed," says State Veterinarian Dr. Annette Jones, "But it is one of our

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Chopping and Planting Require Sampling

By Deanne Meyer, Ph.D.,
Livestock Waste Management
Specialist, UC Davis, Department
of Animal Science, UC ANR



Winter rains were few this year. Forage harvest is a bit light, depending on your location and water use. It's important to remember to sample forage.

Sampling forage from each field is an important component in managing nitrogen on your dairy. This information is useful to you and important for nutrient management compliance. For dairies in priority 1 or priority 2 nitrate management zones, the data will be essential.

A quick reminder for dairies in the Central Valley:

- Record harvest weight (tons) by field.
- Take representative samples of forage from each field where manure was applied.
- Submit samples for laboratory analyses.
- Sample soil on required fields (likely 20%).
- Sample solid manure.
- Sample manifested manure.
- Track quantity of manure applied to fields and where it goes.
- Take quarterly samples of liquid manure.

For dairies on the North Coast you'll want to record manure applications and harvest yields too.

Keep the samples coming and your records up to date!

Is Your Dairy Open or Closed?

No matter where a dairy is in California, it's important to contact the local Regional Water Quality Control Board when the dairy is vacant. Annual record keeping and reporting is still required of a vacant dairy. If a facility is going through closure, there are distinct requirements within each region. Contact your regional board to determine what is needed prior to the closure inspection. Annual fees are paid until the facility completes closure.

A Plan for Rendering Disruptions *continued*

highest priorities. We've engaged the relevant sister agencies and have our best people on it.”

Rendering Industry – CDFA has begun discussions and written surveys with rendering company representatives, both individually and through its [Rendering Industry Advisory Board](#), the RIAB. The goal is to develop a comprehensive understanding of the challenges faced when heat events or mechanical problems overwhelm the state's rendering capacity.

State Agencies – CDFA has similarly begun conducting extensive interviews with other regulatory stakeholders including CalRecycle, CalEPA, Office of Emergency Services, and the State and Regional Water Boards. The goal of these efforts is to develop a precise understanding of legal parameters the agencies must operate under, and what potential legislative initiatives might be needed to enact novel solutions.

Industry – CDFA invited dairy trade organizations including Ag Council, California Dairy Campaign, Milk Producers Council, and Western United Dairies to participate in the Rendering Industry Advisory Board and its new Technical Working Group. Finally, CDFA is currently initiating meetings with dairy industry representatives to begin coordinating on short-term and long-term options. This ensures industry input on how practical potential solutions might be.

Short-Term Fixes and Long-Term Solutions

There are a number of potential long-term solutions ranging from pre-approved emergency landfill waivers, to investment in disposal or storage infrastructure, to allowing emergency composting. Given the number of agencies that need to be brought into the planning process, however, it seems unlikely that a long-term solution will be in place this year.

This summer CDFA will create an industry-regulatory task force the moment it anticipates or learns of a service disruption. The plan would be to have all the necessary stakeholders on the same set of conference calls to expedite emergency action. This would include not only state agencies and the dairy and rendering industries, but local county board, landfill and environmental representatives as well.

“Our goal is to add our personnel and expertise to speed the response when rendering is suddenly not available,” says CDFA's Dr. Jones, “The permanent fix is a larger problem and will take longer, but this summer's emergency disposal needs can't wait”.

Time to Check Cow Cooling Systems

For California cows with access to shade but not fans or sprinklers, losses are estimated to average \$110/cow/year. For everything you need to know on the subject, visit CDQAP's webpage [Heat Stress in Dairy Cows](#).

Heat Stress Prevention



Available at <https://cdqap.org/ruminations>

