

Residue Violator List

A List No Cattleman Should Be On!

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The FSIS website also provides a monthly "Residue Violator Alert List." That list contains the names and addresses of parties responsible for repeat residue violations. Repeat violators are those individuals who have sold a residue positive animal for slaughter on more than one occasion within a 12-month period. The alert list dated April 1, 2010 included 15 producers, all from the dairy & veal segment. No producers from Minnesota, but one from Wisconsin and a number from California are listed as a repeat violators list.

An analysis of the 132 page FSIS "Same Source Supplier - Residue Violator List" for the period April 15-22, 2010 on the website indicated the following about the residue positive animals.

Total Positive Residue Tests = 1,521 carcasses (7 days)

Positive Tests by Animal Type?

Cattle = 1,501 (98.700%)	Goats = 11 (0.007%)
Swine = 5 (0.003%)	Horses = 3 (0.001%)

Cattle Group Break Down

Dairy & Veal = 1,372 (91.5%)	Beef = 129 (8.5%)
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Types of Animal Testing Positive?

Cows Dairy = 837	Veal Calves = 535
Cows Beef = 68	Steers = 25
Heifers = 15	Heavy Calves = 14
Goats = 11	Bulls/Stags = 7
Swine = 5	Horses = 3

Top 10 positive test states?

Wisconsin = 311	California = 305	Pennsylvania = 169
New York = 154	Texas = 68	Ohio = 45
Minnesota = 42	Iowa = 39	Michigan = 36
Vermont = 35		

Types of Residue?

Ampicillin	Carbadox	Chlortetracycline
Desfuroylcefiofur	Dihydrostreptomycin	Fenbendazole
Florfenicol	Flunixin	Furazolidone
Gentamicin	Ivermectin	Moxidectin
Neomycin	Oxytetracycline	Penicillin
Phenylbutazone	Polybrominated Diethyl Ether	
Sulfadimethoxine	Tetracycline	Tilmicosin
Tulathromycin	Xylazine	

Where residue was found? Injection Site, Kidney, Liver & Muscle

On an average week about 654,000 head of cattle, 2.1 million hogs, 48,000 sheep and a much smaller number of goats, bison, and other minor meat animals are slaughtered and inspected by USDA-FSIS. What's the take away for cattlemen from FSIS's weekly reports?

(1) Overall the incidence of residue positive animals that are mistakenly presented for slaughter is a very small element of the average weekly slaughter volume. The 1,521 residue positive animals represent about 0.054% of the 2.8 million plus animals that go to slaughter on an average week. While 0.054% is a very small percent, that is still about 1 of very 1,842 animals being rejected.

Despite the small percentage of animals being rejected and the fact that problem animals are being discovered and rejected, "**preventable mistakes**" are still occurring at the live animal production stage. It is in everyone's interest to drive the number of rejected animals down to as close to zero as possible.

(2) Beef producers and dairymen can not continue to accept that our segment of the industry is currently responsible for the lion's share of rejected animals that reach the slaughter plant on any given week. 1,501 of the 1,521 head (98.7%) of livestock rejected during the week ending April 22, 2010 were from the cattle industry.

Well over three times more swine than cattle are processed on an average week, however cattle essentially accounted for 130 pages of the 132 page listing of rejected livestock during the week of April 22, 2010. That should cause every beef and dairy producer to take notice and redouble efforts to eliminate rejected animals.

(3) All beef producers, including dairymen that consider milk as their primary product and meat as a secondary product must work to reduce the number of residue positive rejected animals presented for slaughter. Each segment (beef and dairy) have unique animal health requirements that require vaccinations and may require treatment of an animal. In some cases the vaccination or treatment is administered by the producer, in other cases it may be administered by the producer's veterinarian.

It is critical that cow-calf, stockers, feeders, veal producers and dairyman all fully understand how to manage livestock that have been administered animal health products that have a specified withdrawal period before that animal is again qualified to enter the human food chain. Livestock producers and their herd veterinarian must work as a team and make sure that withdrawal periods are strictly adhered to and that everyone fully understands the proper procedures for administering all types of animal health products. See additional articles on this page for additional information on the residue issue.

Consequences of a Residue Violation

When a producer ships an animal to market that tests positive for a prohibited residue that carcass is pulled from the line and is disposed of in accordance with the regulations that apply to the type of residue involved. Residue positive carcasses are a head-ache for processing plants; they create additional costs including segregation, special tracking requirements and disposal of the offending carcass. By law processors must open their records to FSIS and FDA inspectors to allow determination of who presented the rejected animal for sale and slaughter.

More important than the extra costs, no cattle producer, processing plant, branded product, wholesaler or retailer wants to be associated with a food product that has tested positive for a prohibited residue. Even though the system works and the residue positive carcass is removed from the human food chain, any animal reaching the processing plant that is not qualified for slaughter brings undesirable attention to the industry.

While finding and removing problem animals from the system is an indication that the inspection system works, it also clearly indicates that preventable mistakes are being made back on the farm. Producing food for the dinner table brings with it huge responsibilities for everyone involved. Consumers generally have a high degree of confidence in the products farmers and ranchers produce for them. To maintain that high level of confidence producers must ensure that arrival of a residue positive animal at a processing plant is an exceptionally rare event.

When an animal is rejected by FSIS that information is passed to the US Food & Drug Agency (FDA). The FDA has broad jurisdiction over violations of food safety standards. FDA investigates and takes any necessary action, which will range from issuing a warning letter to bring civil sanctions and/or criminal charges. FDA warning letters are also made public at: www.fda.gov/ICECI/EnforcementActions. Receiving a warning letter is no small matter. Here are just a few sections of an actual warning letter posted on FDA's website.

"Dear Mr. ..., On January 13 through January 25, 2010, the U.S. Food and Drug Administration (FDA) conducted an investigation of your operation located at This letter notifies you of the violations of the Federal Food, Drug, and Cosmetic Act (the Act) that we found during our investigation of your operation. We found that you offered for sale an animal for slaughter as food that was adulterated. Under section 402(a)(2)(C)(ii) of the Act, 21 U.S.C. 342(a)(2)(C)(ii), a food is deemed to be adulterated ..., unsafe under section 512 of the Act, 21 U.S.C. 360b. Further, under section 402(a)(4) of the Act, 21 U.S.C. 342(a)(4), a food is deemed to be adulterated if it has been held under insanitary conditions whereby it may have been rendered injurious to health."

"Specifically, ..., you sold a dairy cow, ..., for human consumption. analysis identified the presence of sulfamethazine at 4.02 parts per million (ppm) in the liver tissue and 1.31 ppm in the muscle tissue. FDA has established a tolerance of 0.1 ppm for residues of sulfamethazine in the uncooked edible tissues of cattle as codified in Title 21, Code of Federal Regulations (C.F.R.) The presence of this drug in edible tissues from this animal in this amount causes the food to be adulterated within the meaning of section 402(a)(2)(C)(ii) of the Act, 21 U.S.C. 342(a)(2)(C)(ii).

Our investigation also found that you hold animals under conditions that are so inadequate that medicated animals bearing potentially harmful drug residues are likely to enter the food supply. you failed to maintain complete treatment records. Your records did not include the drug used, the dosage amount, the route of administration, and who administered the drug. Food from animals held under such conditions is adulterated within the meaning of section 402(a)(4) of the Act, 21 U.S.C. 342(a)(4)."

We also found that, you did not use Antibacterial Sulfamethazine Sustained Release Bolus, as directed by its approved labeling. Use of this drug in this manner is an extra-label use. See 21 C.F.R. 530.3(a). The extra-label use of approved animal or human drugs in animals is allowed under the Act only if the extra-label use complies with sections 512(a)(4) and (5) of the Act, 21 U.S.C., including that the use must be by or on the lawful order of a licensed veterinarian within the context of a valid veterinarian/client/patient relationship. Our investigation found that you administered, to a dairy cow, ..., without following the withdrawal period contained in the approved labeling.

Your extra-label use ..., was not under the supervision of a licensed veterinarian, in violation of 21 C.F.R. 530.11, you caused the drugs to be unsafe and adulterated The above is not intended to be an all-inclusive list of violations. As a producer of animals offered for use as food, you are responsible for ensuring that your overall operation and the food you distribute is in compliance with the law. You should take prompt action to correct the violations

Failure to do so may result in regulatory action without further notice such as seizure and/or injunction. You should notify this office in writing of the steps you have taken to bring your firm into compliance with the law within fifteen (15) working days of receiving this letter. Your written response should be sent to Compliance Officer, U.S. Food and Drug Administration,

This kind of "train wreck" can be avoided by becoming a Beef or Dairy Beef Quality Assurance (BQA) certified producer. Beef Check-off dollars developed these programs specifically to provide producer education on this subject. See adjoining article for more info.

How to Avoid Residue Mistakes

Why is this important? Obviously, no one wants to eat any food that is contaminated. Contaminates can have health effects including illness, damage to vital organs and allergic reactions.

Secondary to causing harm, failure to solve the issue may result in FDA severely restricting the use of pharmaceuticals in food-producing animals. That will increase costs to livestock producers and consumers.

The record shows that cull dairy cows are the most frequent violators, however, anyone that raises livestock for human consumption must ensure residue standards are not violated.

Do's

- (1) Work closely with a licensed vet. Ensure both you and they understand that avoiding residue issues always takes priority over an animal going to market.
- (2) Strictly follow dosage rates and methods for administering a drug. When in doubt consult with your veterinarian.
- (3) Keep records. Record - animal ID, treatment date, who administered the treatment, drug used, dosage, route administered and the withholding period.
- (4) Clearly ID all treated animals. Use a special ear tag, leg band, collar or paint marker. Do not remove the ID until the withholding period has been met.
- (5) Ensure all treated animals are kept segregated from animals that are soon to go to market.
- (6) Keep all pharmaceuticals stored in a secure area. Allow access only to individuals that are fully trained in their use.
- (7) Always follow label instructions. Do not experiment.

Do Not's

- (1) Do not use med's that are not approved for cattle. That includes medicines that may be approved for use in other animal species.
- (2) Do not mix medications together. That can result in totally unpredictable results.
- (3) Do not give more than 10 cc of a product in one injection site.
- (4) Do not attempt an off-label use of any drug. Only licensed veterinarians are authorized to vary from label instructions. If off-label use undertaken by your vet - make sure the vet provides you with clear guidance as to the withholding period.

Common Mistakes.

- (1) Failing to follow the label instructions.
- (2) Using a higher dose than recommended. Violating the dosage level results in invalidating the withholding time.
- (3) Poor record keeping - not recording or losing track of the withholding period for a treated animal.
- (4) Mistaken identity - mixing recently treated animals with animals bound for market.