

INTER OFFICE
MEMO

NATIONAL RENDERERS ASSOCIATION, Inc.

3150 DES PLAINES AVE.

DES PLAINES, ILLINOIS 60018

TEL. 827-8151

AREA 312

DATE:

September 2, 1971

TO: All Active & Associate Members

COMES TO:

FROM: Dean A. Specht

SUBJECT: IMPORTANT - PCB's in Animal By-Products

Another new and serious problem for our industry has developed rapidly during the past few months and it has all the potential for a full-blown crisis. Without minimizing the Salmonella problem we have been living with, this could be far greater.

We speak of contamination of our finished products - both proteins and fats - with PCB's known by their full name as Polychlorinated Biphenyls. PCB's are largely found as heat transfer agents in closed systems, but are also found in lesser concentrations in some cleansing agents and disinfectants. While USDA allows a tolerance in ready-to-eat poultry and pork of 5 ppm (parts per million) and .5 ppm in eggs and egg products, FDA presently allows no tolerance for PCB's in animal feeds and, thereby, lies the problem. PCB's were found to contaminate meat and bone meal and tankage at a level of 1 ppm in Illinois and 10,000 pounds had already been incorporated into animal feeds so the feed was voluntarily held off the market. There are other cases we could relate since the 100,000 birds at Holly Farm were destroyed, but they would only serve to demonstrate further the problem we currently face. PCB's tend to concentrate in the fat of animals, making the contamination in meat scrap and tankage especially serious in the eyes of FDA. Urge you to read the enclosed for more details on this problem.

We assure you that NRA is moving quickly on this matter. Members in widely separated geographical areas have been asked to cooperate in a product testing program to provide accurate data on PCB levels. We have also received splendid cooperation from other members who have been involved with the PCB problem and presently have test results of their own.

MUNS 098512

A meeting will be held with FDA just as quickly as factual information becomes available...this week, if possible. Hopefully, we will be able to urge FDA to set a reasonable tolerance by pointing out that we cannot deliver PCB-free fats and proteins without PCB-free raw material.

Action You Could Take

Should a member wish to spot check his own production, please share a copy of the result with NRA. We assure you the information will be kept in absolute confidence with no reference as to company name or location. If high levels of PCB's are detected, it may be well to take one step further in an attempt to isolate high levels of PCB in principal suppliers' raw materials. There will always remain, of course, the problem of what is to be done with the tons of raw material if it is not rendered. Be aware, too, that cleaning agents could contain high levels of PCB's - check the label to be sure.

We will keep you advised of developments as they occur. Meanwhile, should you have some facts which would be valuable to us in our efforts, we urge you to call us immediately.

DAS:rjw:jaf

Enc.