

02.04.17 Rules Governing Dead Animal Movement and Disposal  
Minutes of March 15, 2022, 9 a.m.  
Meeting held via video and teleconference

Host/Facilitators: Lloyd Knight, ISDA  
Dr. Scott Leibsle, ISDA  
Chanel Tewalt, ISDA

Stakeholders Present: Cameron Mulrony, ICA  
Troy Smith, DEQ  
Marv Patten  
David Callister, U of I Extension Educator  
Bob Naerebout  
Garret Visser, Wildlife Federation

Department Staff: Holly Holman, DVM  
Christie Hammons, DVM  
Katy Devries, OAG  
Dallas Burkhalter, OAG

Lloyd Knight called meeting to order, and outlined the rulemaking process. This is the first of two meetings.

Dr. Leibsle, State Veterinarian, presented the rule and program updates. The department has investigated 38 complaints that were all investigated within 24 hours and resulted in two enforcement actions.

Dr. Leibsle explained that language recommended for deletion is in following the directive of the Governor's Executive Order to eliminate any unnecessary language.

Dr. Leibsle pointed out there are currently no documents listed as Incorporated by Reference, but there is a reference in Section 030 regarding disposal methods "determined by the Administrator." Dr. Leibsle asked the group if there should be methods incorporated by reference. Dr. Leibsle commented that NRCS and USDA both have documents or standards in place.

Cameron Mulrony asked if other documents are regional or national and compare with moisture we get in the NW. Dr. Leibsle stated they are national standards; moisture conditions are taken into consideration with each protocol.

Marv Patten recommended that the NRCS document be incorporated. It would be better for industry and the agency.

Under Section 010 Definitions, the group agreed with the recommended language.

David Callister commented that the definition of domestic livestock was not clearly spelled out in dead animal definition.

Dr. Leibsle reviewed the methods under Section 030 and commented that all methods are applicable in all situations or species; burial is open for discussion; there are several setbacks and variables; this rule is does not define rationale for setbacks.

Marv Patten suggested an evaluation into possible variances related to gradient from surface water. A burial site might be down gradient from the surface water. Canals are typically above ground/above grade and sealed so burial of a carcass in close proximity to an irrigation canal would not affect the water body.

David Callister said in reference to standardizing setbacks that if there is just one number instead of four, it gets hard to find a burial spot.

Regarding disposal in an approved sanitary landfill, Dr. Leibsle explained that contagious diseases can remain in soil for extended periods of time and continue to be contagious to other animals. Proper disposal should be identified. Idaho only has two landfills that meet criteria for disposal of prion-infected carcasses. Another method for consideration is to have dedicated dumpsters throughout the state for wildlife or domestic cervidae. ISDA and Idaho Dept. of Fish & Game would need to collaborate on how to dispose of prion carcasses in this manner.

With the review of the rule complete, discussion was open:

- Marv Patten – It is appropriate to establish protocol to dispose of animals be approved by state veterinarian. It is something that needs addressed for when the situation arises.
- Garret Visser – Is there currently a protocol in place (related to CWD cases or other prion issues)? Dr. Leibsle responded there is not currently anything on record for disposal of prion-infected carcasses. Garret Visser – Fish & Game is working to manage and address these issues now. It would be appropriate time given the state that we are at with wild cervids. It is appreciated that agencies are working together. It was agreed that it would be appropriate and reasonable to establish protocol for disposal and should be addressed. Options are currently limited. What can be offered to livestock producers to handle those carcasses? Dr. Leibsle asked that any suggestions be submitted.
- David Callister – Relating to the need to bury (carcasses with prion concerns), why is burning not a good option? Dr. Leibsle replied that burning must be approved by ISDA and a DEQ permit is required. Burning does not deactivate prions.
- Composting – Dr. Leibsle explained that there needs to be some outreach to educate producers as to what is proper composting.
- Dr. Leibsle confirmed chemical digestion and incineration, are options and approved methods of carcass disposal. No changes being made. ISDA has an Air Curtain Burner, but it has not been used and is not the most efficient.
- Troy Smith with DEQ commented that the Surface Water Bureau is not knowledgeable about burning but he will check with other DEQ staff and follow up.
- Marv Patten suggested leaving the allowance for variances by Administrator in number 11. Would be special cases where it would be important for a decision be made by the agency.

Dr. Leibsle responded that written comments and recommendations are encouraged. The next meeting is Wednesday, April 6, at 9 a.m.

Meeting adjourned at 9:40 a.m.