



pennsylvania

DEPARTMENT OF AGRICULTURE
BUREAU OF PLANT INDUSTRY

May 7, 2018

CERTIFIED MAIL NO: 7017145000022122909

RETURN RECEIPT REQUESTED

CHAMPION PETFOOD USA INC
12871 BOWLING GREEN ROAD
AUBURN KY 42206

Company Representative,

On April 11, 2018, the Pennsylvania Department of Agriculture (hereinafter "PDA") conducted an inspection at JBS/MOPAC in Souderton, PA. The purpose of this inspection was to conduct a trace forward investigation to determine distribution of tallow that may contain pentobarbital, a drug not permitted in animal feed. During the inspection, PDA collected samples of tallow, with the brand name "Beef Fat" that had been retained from deliveries to your facility on 3/26/18 and 3/28/18.

Upon laboratory analysis, conducted by the University of California, Davis (hereinafter "UC Davis"), it has been confirmed that the Beef Fat delivered to your facility on 3/26/18 contained 56 ppb pentobarbital and the Beef Fat delivered on 3/28/18 contained 16 ppb pentobarbital. Enclosed with this letter is a copy of PDA's final laboratory report, with results from UC Davis. The results highlighted in yellow are the samples of tallow that were sent your facility.

This information is being provided to you as notification and is being courteously copied to The Food & Drug Administration as well as the University of Kentucky, Division of Regulatory Services. If you have questions regarding this matter, feel free to contact me at (717) 772-5216 or davdressle@pa.gov.

Sincerely,

David Dressler
Agronomic Program Specialist

cc: University of Kentucky, Division of Regulatory Services
Food & Drug Administration, Center for Veterinary Medicine
Food & Drug Administration, Philadelphia District Office

Enclosure

ATT 1
Champion Petfoods USA, Inc.
FEI 3011918744
5/16-5/17, 5/23/2018
JNH
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Report Date: 5/3/2018

Final Report

Collection Date: 4/11/2018 12:00 AM
Received Date: 4/11/2018 3:15 PM(JS)

Case Coordinator: Michael Hydock

Accession No: F1800054

JBS, MOPAC
741 SOUDER RD.
SOUDERTON PA 18964

Associated Parties

Facility	JBS, MOPAC	741 Souder Rd. Souderton, PA 18964
Regulatory Body	Bureau of Plant Industry - Agronomic and Regional Services	Attn: David Dressler, 2101 North Cameron Street Harrisburg, PA 17110

Purpose OF Test
REGULATORY

Reference Data

Collection Temp: AMBIENT

Receiving Temp: AMBIENT

Lab Findings

Laboratory Services

Sample Test Name

Slaughtered Mammal Byprod / Not Elsewhere Classified (NEC) / Heat Treated / Animal Fat Slaughtered Mammal By Prod. - A Y N 01 Sell by/Other: TANK#1 4/11/2018	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
RLB-15 - 1	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
Slaughtered Mammal Byprod / Not Elsewhere Classified (NEC) / Heat Treated / Animal Fat Slaughtered Mammal By Prod. - A Y N 01 Sell by/Other: TANK#2 4/11/2018	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
RLB-16 - 2	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
Slaughtered Mammal Byprod / Not Elsewhere Classified (NEC) / Heat Treated / Animal Fat Slaughtered Mammal By Prod. - A Y N 01 Sell by/Other: TANK#3 4/11/2018	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
RLB-17 - 3	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
Slaughtered Mammal Byprod / Not Elsewhere Classified (NEC) / Heat Treated / Animal Fat Slaughtered Mammal By Prod. - A Y N 01 Sell by/Other: 5.0.4545468	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
RLB-18 - 4	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
Slaughtered Mammal Byprod / Not Elsewhere Classified (NEC) / Heat Treated / Animal Fat Slaughtered Mammal By Prod. - A Y N 01 Sell by/Other: 5.0.489194	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.
RLB-19 - 5	OTHER IDENTIFICATION (SUBCONTRACT) Subcontract results made available in full with final report.

ATT 1
Champion Petfoods USA, Inc.
FEI 3011918744
5/16-5/17, 5/23/2018

General Results

Accession Number: F1800054

Final (5/3/2018)

JNH
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General Results

The five samples of beef tallow product associated with this accession were subcontracted to the California Animal Health and Food Safety Laboratory. All samples were shipped on 4/12/2018 and received at the subcontract laboratory on 4/19/2018 (Receipt was acknowledged by the laboratory on 4/20/2018). The final report of testing is attached in full under the subcontract laboratory's accession D1805401, issued on 5/3/2018.

An amended report was issued on 5/3/2018 at 08 29 38 AM, PST to replace the report issued on 5/12/2018 at 02:32:41 PM, PST. An amendment was made to correct an accessioning error.

Client Report History

Report Type	Delivery Method	Sent To	Date Sent
Final	US Mail	(741 Souder Rd. Souderton, PA 18964)	5/3/2018 2:19 PM

Bulletin(s)

The results of analysis reported within this document only relate to the items tested.

The results of analysis within this report shall only be reproduced in their entirety unless written approval is obtained from the laboratory.

Michael Hydock, Chief of Laboratory Division

5/3/2018
Date

Customer Requests

Customer Test Request:

The quantitation of pentobarbital in the part per billion range is requested by necessary means according to the laboratory's current quality system. Arrangements were made with the Food Emergency Response Network to subcontract the samples.

Attachment Table Of Contents

File Name	Attached To
D1805401_Addendum_1.PDF	Accession

ATT 1
Champion Petfoods USA, Inc.
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www.cahfs.ucdavis.edu



UC DAVIS VETERINARY MEDICINE

California Animal Health and Food Safety Laboratory
PO Box 1770, Davis, CA, 95617
(530) 752-5700

CAHFS Accession #: D1805401

Addendum Version 1

Ref.#:

Coordinator: Linda. Aston, PhD

E-Signed and Authorized by: Aston, Linda S. on 5/3/2018 8:29 38AM

Email To: Pennsylvania Dept of Ag, Food Safety and Lab Svcs
chadecker@pa.gov

Collection Site: Pennsylvania Dept of Ag, Food Safety and Lab Svcs
2305 N CAMERON ST
HARRISBURG PA 17110
Dauphin County

This report supersedes all previous reports for this case

Specimens Received: 5 Beef Tallow;

Date Collected: Date Received: 04/20/2018

Case Contacts

Table with 6 columns: Submitter, Name, Phone, Address, Location, State/Zip. Rows include FERN NATIONAL PROGRAM, Pennsylvanla Dept of Ag, Food Safety and Lab Svcs, and Dressler, David.

Specimen Details

Table with 5 columns: Animal/Source, ID Type, Taxonomy, Gender, Age. Row 1: 1, CAHFS Internal ID, Taxonomy, Gender, Age.

Clinical History

A rendered animal product (beef tallow) is suspected to be associated with a recent pet food product recall involving adulteration with pentobarbital. The feed regulatory program is performing a followup investigation and has collected products for surveying the suspected adulterant. The quantitation of pentobarbital in the part-per-billion range is requested by necessary means according to the laboratory's current quality system.

Toxicology

Reporting Limit (Rep. Limit): The lowest routinely quantified concentration of an analyte in a sample. The analyte may be detected, but not quantified, at concentrations below the reporting limit. Sample volumes less than requested might result in reporting limits that are higher than those listed.

Quantitation of pentobarbital in tallow was performed utilizing a Thermo Fisher Q-Exactive Orbitrap Mass Spectrometer (LC-HRMS) and an isotopically labeled internal standard of pentobarbital

These samples were analyzed on April 27th.

The results reported here apply only to the samples as received, and not to any other portion of the samples not received in the laboratory.

ORGANIC COMPND BY REQUEST

Table with 3 columns: Animal/Source, Specimen, Specimen Type. Row 1: 1, (1) F1800054-1, Beef Tallow

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Analyte	Result	Units	Rep. Limit	Units
Pentobarbital	240	ppb	2.0	ppb
1 (2) F1800054-2	Beef Tallow			
Analyte	Result	Units	Rep. Limit	Units
Pentobarbital	110	ppb	2.0	ppb
1 (3) F1800054-3	Beef Tallow			
Analyte	Result	Units	Rep. Limit	Units
Pentobarbital	61	ppb	2.0	ppb
1 (4) F1800054-4	Beef Tallow			
Analyte	Result	Units	Rep. Limit	Units
Pentobarbital	56	ppb	2.0	ppb
1 (5) F1800054-5	Beef Tallow			
Analyte	Result	Units	Rep. Limit	Units
Pentobarbital	16	ppb	2.0	ppb