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## SENATE COMMITTEE ON AGRICULTURE

Senator Melissa Hurtado, Chair

2025 - 2026 Regular

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<b>Bill No:</b>	AB 411	<b>Hearing Date:</b>	7/1/25
<b>Author:</b>	Papan		
<b>Version:</b>	4/23/25		
<b>Urgency:</b>	No	<b>Fiscal:</b>	Yes
<b>Consultant:</b>	Reichel Everhart		

**Subject:** Livestock carcasses: disposal: composting

### **SUMMARY:**

This bill authorizes, notwithstanding existing prohibitions, a livestock carcass resulting from a routine livestock mortality event or on-farm processing to be composted if certain conditions are met.

### **BACKGROUND AND EXISTING LAW:**

Existing law:

- 1) Establishes the Meat, Poultry & Egg Safety Branch (MPES) under CDFA:
  - a. Licenses and inspects renderers who recycle animal carcasses, packing house waste and inedible kitchen grease.<sup>1</sup>
- 2) Establishes the Rendering Advisory Board:
  - a. The Board is responsible for advising the Secretary of CDFA on matters related to the rendering industry.<sup>2</sup>
- 3) Establishes the Department of Resources Recycling and Recovery (CalRecycle):
  - a. Responsible for establishing minimum standards for solid waste handling, transfer, composting, transformation, and disposal, as specified, including livestock carcasses.<sup>3</sup>
- 4) Establishes the composting of unprocessed mammalian tissue (e.g. cattle, goats, sheep), including but not limited to, flesh, organs, hide, blood, bone and marrow is prohibited.<sup>4</sup>
- 5) States animal carcasses from animals on pasture or rangeland shall be managed so as to prevent the creation of excessive vectors or other adverse

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<sup>1</sup> <https://www.cdfa.ca.gov/AHFSS/MPES/>

<sup>2</sup> <https://www.cdfa.ca.gov/ahfss/MPES/Rendering/RIAB.html>

<sup>3</sup> California Public Resources Code, Section 43020

<sup>4</sup> California Code of Regulations Title 14 Section 17855.2

public health/well-being conditions. This language aligns with many local county ordinances.<sup>5</sup>

- 6) Establishes that the State Veterinarian shall impose a quarantine if he or she believes, upon any basis reasonably supportable by standard epidemiological practice or credible scientific research, that a population of domestic animals or food product from animals has contracted, or may carry, an illness, infection, pathogen, contagion, toxin, or condition that, without intervention, could transmit illness that could kill or seriously damage other animals or humans, including, in addition to the original condition, those clinically plausible secondary illnesses, infections, pathogens, contagions, toxins, or conditions arising from effects of the original.<sup>6</sup>
- 7) Allows animal owners to bury an animal that has passed from a routine mortality on the owner's property after the animal dies if the burial is within 3 miles of where the animal died.<sup>7</sup>
- 8) States if an animal dies from a contagious disease, the animal shall not be used for the food of any human being, domestic animal, or fowl.<sup>8</sup>
- 9) States the carcasses of animals with any contagious disease shall be disposed of by means prescribed by the California Department of Food and Agriculture, Division of Animal Industry.<sup>9</sup>
- 10) States during an emergency, CDFA may work with Cal EPA, including CalRecycle and the water boards, and local jurisdictions to allow temporary disposal at permitted landfills.<sup>10</sup>
- 11) Defines "Animals" to mean burros, cattle, goats, horses, mules, sheep, swine and other large domesticated animals and poultry.<sup>11</sup>
- 12) Defines "Rendering" to mean all recycling, processing, and conversion of animal and fish materials and carcasses and inedible kitchen grease into fats, oils, proteins, and other products that are used in the animal, poultry, and pet food industries and other industries.<sup>12</sup>

### **PROPOSED LAW:**

This bill:

- 1) Adds, notwithstanding Section 19348 and regulations adopted by the Department of Resources Recycling and Recovery, any part of a livestock

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<sup>5</sup> California Code of Regulations Title 14 section 17823.5

<sup>6</sup> Food and Agricultural Code Section 9562

<sup>7</sup> Food and Agricultural Code Section 19348

<sup>8</sup> Food and Agricultural Code Section 9143

<sup>9</sup> Natural Resources Code § 17823.5

<sup>10</sup> Food and Agricultural Code Section 19348(b)

<sup>11</sup> Food and Agricultural Code Section 19201

<sup>12</sup> Food and Agricultural Code Section 19213

carcass resulting from a routine livestock mortality event or on-farm processing may be composted if all of the following requirements are met:

- a. The composting of the carcass is conducted in accordance with best management practices for livestock composting adopted by the secretary in collaboration with the Department of Resources Recycling and Recovery and the State Water Resources Control Board.
  - b. The total amount of composting material onsite at any one time does not exceed 100 cubic yards, inclusive of livestock carcasses.
  - c. All composting material, including livestock carcasses, comes from an agricultural site or sites owned or leased by the owner of the livestock carcasses.
  - d. The composting activity occurs on an agricultural site owned or leased by the owner of the livestock carcasses.
    - i. If the activity occurs on an agricultural site owned or leased by the owner that is not the site where the carcasses were generated:
      1. The activity shall occur in the county in which the carcass was generated or within an adjacent county;
      2. The transport of the carcasses shall comply with all applicable state and local laws and regulations.
  - e. After the composting material is converted into cured compost, the cured compost is applied to an agricultural site owned or leased by the owner of the livestock carcasses that produced the cured compost and in compliance with the best management practices adopted pursuant to paragraph (1).
  - f. The operator of the composting operation notifies the applicable local enforcement agency of the facility within 30 days of commencing operation, including the location and operator contact information.
- 2) Defines the following:
- a. “Livestock” to mean any mammalian animal described in Section 19201.
  - b. “On-farm processing” means the slaughter of the livestock under circumstances authorized by subdivision (c) of Section 19020.
  - c. “Routine livestock mortality event” means the death of the livestock from a natural cause. It does not include any of the following:
    - i. The death of the livestock due to being euthanized using barbiturates.
    - ii. The death of the livestock from a disease listed on the department’s List of Reportable Conditions for Animals and Animal Products published pursuant to Section 9101.

- iii. The death of the livestock in a location that is under a quarantine imposed pursuant to Section 9562.

**ARGUMENTS IN SUPPORT:** According to the author:

“Assembly Bill (AB) 411 offers ranchers a practical and environmentally friendly method of handling livestock carcasses by allowing them to compost the remains on-site.

“Currently, composting is not allowed. As such, many ranchers face significant challenges disposing of livestock remains. While they can transmit the remains to a rendering facility, often such facilities are out of reach, leaving ranchers with limited and less-than-ideal options. They can let carcasses decompose naturally, move them to disposal pits or bone piles, or bury them. Unfortunately, decomposition and bone piles attract predators, leading to dangerous interactions with live animals. Decomposition can also lead to serious health and environmental concerns. Bone burial is subject to complex regional regulations that make the method costly.

“On-site composting is a sustainable, cost-effective option that allows ranchers to manage their operations efficiently, safely, and responsibly. AB 411 offers a proactive approach to protecting both livestock and the environment.”

The California Cattlemen's Association, and Roots of Change, co-sponsors of the bill, and others write in support of the bill stating:

“Many ranchers without adequate access to rendering facilities, landfills, or burial elect to allow carcasses to decompose in large “bone piles,” which are attractants for predators such as gray wolves, bears, mountain lions, and coyotes, and can result in increased livestock-predator interactions that risk the loss of additional livestock or the take of depredating predators.”

**ARGUMENTS IN OPPOSITION:**

In an “Oppose Unless Amended” letter from the Pacific Coast Renderers Association and the California Grain and Feed Association States:

“While we empathize with farmers and ranchers who face challenges in managing livestock mortalities where rendering services are unavailable,

we are concerned that AB 411 is overly broad in its application, bypassing existing law and creating the potential for unregulated composting operations statewide, even where they could harm public health and safety or where rendering services are available. As such, we suggest the bill should be narrowed to address legitimate concerns in rural Northern California counties or areas with limited access to rendering facilities. We look forward to working with you and the sponsors to responsibly address these concerns.”

The letter requests several amendments that would limit the scope to only farmers and ranchers, reduce the allowable amount of mammalian tissue, mandate composting facility requirements and best management practices, and limit applicability to mortalities occurring outside of existing rendering facility service areas. The amendments are outlined under the “Comments” section below.

### **COMMENTS:**

Farmers and ranchers have limited options when it comes to disposing of on-ranch animal mortalities and butcher waste resulting from on-farm slaughter operations. Unfortunately, some farmers and ranchers may not have access to rendering plants or they have to go to great lengths to have a few carcasses hauled to a rendering plant or collection centers.

Farmers and ranchers located in a rural area with no access to a rendering plant or collection center are often opting to utilize “bone piles.” These are piles where carcasses are allowed to decompose. Unfortunately, bone piles attract predators such as wolves and mountain lions, putting all livestock and people on the farm or ranch at risk of being attacked.

In 2022, a study titled “Livestock Mortality Composting to Mitigate Livestock Predator Interactions” provided data on the composting of four adult cows versus nearby bone piles using wildlife trail cameras. The results showed:

Bone piles attracted an average of 390 predator visits in year one and 292 in year two. In contrast, the compost pile had only 8 visits total across both years. The study demonstrated that composting livestock mortalities dramatically reduces the attraction of large predators (e.g., wolves, mountain lions, bears) compared to untreated bone piles.<sup>13</sup>

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<sup>13</sup> <https://escholarship.org/uc/item/84p5h3fk>

Additionally, the study documented consistent high temperatures ( $\geq 131^{\circ}\text{F}$  for  $\geq 72$  hours) in the compost piles—ensuring pathogen reduction—while best management practices were followed.

The USDA (United States Department of Agriculture) recognizes composting as a viable method for disposing of livestock mortality. It involves decomposing animal carcasses using a mixture of manure, carcasses, and coarse plant material, like straw, peanut hulls, or soybean hulls. This process, when properly managed, can effectively reduce pathogens and create a usable soil amendment. APHIS hosts an online Carcass Management Course Composting Module.

APHIS created this module because the department recognizes effective management of carcasses and associated materials is a critical component of a successful response during an animal health emergency.<sup>14</sup> Carcass management measures contain, treat, or destroy contaminated or potentially contaminated materials in order to:

- Prevent spread of disease outbreak
- Protect the environment by preventing contamination of soil, water, and air by carcasses
- Protect decaying carcasses from insects and scavengers which can transport pathogens to other locations
- Safeguard public health by removing potentially contaminated food products from the human food supply
- Safeguard animal health by removing potentially contaminated feed from the animal feed supply.

Does composting degrade pathogens? CalRecycle recognizes composting can be an effective means of reducing pathogens to acceptable levels in organic soil amendments. High temperatures associated with the composting process are responsible for killing pathogens.<sup>15</sup>

During composting, beneficial bacteria and fungi use organic feedstock as a source of energy. They grow and reproduce quickly, releasing an enormous amount of heat that warms the compost pile. Under thermophilic (hot) conditions of 135–165 degrees Fahrenheit, biochemical processes accelerate and beneficial microbes quickly deplete the compost of needed oxygen.

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<sup>14</sup> <https://www.aphis.usda.gov/sites/default/files/9-composting.pdf>

<sup>15</sup> <https://www2.calrecycle.ca.gov/Publications/Download/378?opt=dln>

USDA recognizes rendering as a valuable tool: APHIS acknowledges that rendering is an efficient way to dispose of carcasses while also providing other benefits, such as a source of protein for animal feed.<sup>16</sup>

Rendering of livestock carcasses: Rendering of animal carcasses has many benefits such as, but not limited to:

- 1) Reducing food waste by turning animal byproducts into animal feed, pet food and biofuels
- 2) Reducing the carbon footprint compared to other disposal methods
  - a. Reducing the number of decaying organic matter out of landfills
  - b. Reducing five times more greenhouse gases
  - c. Conserving 3.7 billion gallons of water each year<sup>17</sup>
- 3) Killing pathogens and promoting biosecurity as a result of high temperatures associated with rendering
- 4) Providing an accelerated timeline for the disposal of livestock carcasses

How many rendering facilities and collection centers are there in California?

There are five extreme heat rendering facilities (EHRF) in California as of 2024, located in the central valley (Fresno to Sacramento), San Bernardino County, and Sonoma County. There are 47 dead animal hauler companies licensed by the California Department of Food and Agriculture (CDFA) as of 2024. These haulers are involved in collecting animal carcasses for transport to licensed rendering plants or other disposal methods. CDFA licenses and inspects rendering facilities and dead animal haulers through its Meat, Poultry, and Egg Safety (MPES) Branch.

When is composting preferable to rendering? There are certain circumstances when composting would be the preferred method in disposing of a livestock carcass. These include, but are not limited to:

- 1) Disease considerations: When managed properly, composting can kill most livestock pathogens due to the heat generated by microbial activity.<sup>18</sup>
- 2) Logistical considerations: composting can be useful for on-farm mortality management whether it is for a few animals or during an emergency as declared by the state veterinarian. Some farms and ranches find it difficult to access rendering services.

<sup>16</sup> <https://www.aphis.usda.gov/sites/default/files/7-rendering.pdf>

<sup>17</sup> <https://thesustainabilityalliance.us/cattle-rendering-sustainability-success-story/#:~:text=Rendering%20reclaims%20and%20conserves%203.7,5%2C604%20Olympic%2Dsize%20swimming%20pools.>

<sup>18</sup> <https://www.ndsu.edu/agriculture/extension/publications/animal-carcass-disposal-options-rendering-incineration-burial-composting#:~:text=Also%2C%20starting%20a%20fresh%20compost,digging%20into%20the%20frozen%20ground.>

- 3) Affordability: Some smaller farms may find the cost of rendering a hindrance, opting for bone piles instead of rendering. Costs for rendering can range from \$350 to \$600 per carcass.<sup>19</sup>

On June 23, 2025, the committee received a letter from the Pacific Coast Renderers Association and the California Grain and Feed Association that states they have taken an “Oppose Unless Amended” position on the bill stating:

“Rendering has been recognized in the state of California as “vital to public health and welfare” because it effectively eliminates bacteria and disease while recycling organic waste into nutrient-rich and other high-value products.”

Their letter continues:

“While we empathize with farmers and ranchers who face challenges in managing livestock mortalities where rendering services are unavailable, we are concerned that AB 411 is overly broad in its application, bypassing existing law and creating the potential for unregulated composting operations statewide, even where they could harm public health and safety or where rendering services are available. As such, we suggest the bill should be narrowed to address legitimate concerns in rural Northern California counties or areas with limited access to rendering facilities. We look forward to working with you and the sponsors to responsibly address these concerns.”

The letter provides recommended amendments to address their concerns:

- Limit the scope to farmers and ranchers. The bill currently includes mobile animal harvesting facilities, which generate significant amounts of offal, meat, and bone scraps. These operations have specialized equipment and should follow established disposal methods through licensed facilities rather than on-site composting.
- Reduce the allowable amount of mammalian tissue. The bill permits composting up to 100 cubic yards of composting, which can contain 10 full size cows, resulting in up to 40 cows a year in a concentrated, unregulated composting area.
- Limit applicability to mortalities occurring outside of existing rendering facility service areas. Focus the additional management

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<sup>19</sup> <https://www.bplivestockremoval.com/services.html>



options to Northern California counties where service is severely limited.

The Committee considers this bill to be laying the foundation of a viable alternative for farmers and ranchers, however, there are areas that could see improvements. Moving forward, the Committee would encourage the author's office to clarify in the bill that best management practices will include:

- 1) Protection protocol for groundwater
  - a. Recharge areas
  - b. Setbacks from wells<sup>20</sup>
- 2) Proper management of compost piles
- 3) Enforcement and penalties for failing to follow best practices
- 4) Collaboration with local enforcement agencies
- 5) Protection of public health
- 6) Protection of food supply

The Senate Rules Committee has double referred this bill to the Senate Environmental Quality Committee as the second committee of referral. Therefore, if this measure is approved by this committee, the motion should include an action to re-refer the bill to the Senate Committee on Environmental Quality.

### **PRIOR ACTIONS:**

Assembly Floor:	79 - 0
Assembly Appropriations Committee:	14 - 0
Assembly Agriculture Committee:	8 - 0

### **SUPPORT:**

California Cattlemen's Association (Co-Sponsor)  
 Roots of Change (Co-Sponsor)  
 Agricultural Council of California  
 Butte County Local Food Network  
 California Association of Environmental Health Administrators (CAEHA)  
 California Certified Organic Farmers (CCOF)  
 California Climate & Agriculture Network (CALCAN)  
 California Farm Bureau Federation  
 California Wool Growers Association

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[https://www.waterboards.ca.gov/rwqcb5/water\\_issues/confined\\_animal\\_facilities/general\\_order\\_guidance/dairy/setbacks\\_and\\_buffers/setbacks\\_and\\_buffers.pdf](https://www.waterboards.ca.gov/rwqcb5/water_issues/confined_animal_facilities/general_order_guidance/dairy/setbacks_and_buffers/setbacks_and_buffers.pdf)

Californians Against Waste  
Community Alliance With Family Farmers  
Defenders of Wildlife  
Modoc County Board of Supervisors  
People Food and Land Foundation  
Slow Food Sonoma County North  
Tomkat Ranch  
Western United Dairies

**OPPOSITION:**

California Grain & Feed Association  
Pacific Coast Renderers Association

**-- END --**