

The Veterinary Feed Directive

Questions and Answers for Oregon Livestock Producers

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As of January 2017, Oregon livestock producers must comply with a new federal law that fundamentally changes the way feed-grade antibiotics are used in their operations. New FDA guidelines are being implemented to both promote the judicious use of medically important antimicrobial drugs in food animals and reduce the overuse of antibiotics in livestock populations. The new law is an effort to reduce the likelihood of increased bacterial resistance to antibiotics while at the same time maintaining a safe and wholesome domestic food supply.

The new law affects producers or caretakers of important livestock species (such as cattle, swine, poultry, and sheep) and the veterinary profession. Since the 1940s, livestock producers have used feed-grade antibiotics not only to prevent, control, or treat infections caused by bacteria, but also to promote growth and efficiency in animals. Beginning January 2017, certain antibiotics administered via feed and water can only be used under the supervision of a veterinarian. Livestock producers must obtain a **Veterinary Feed Directive (VFD)** that is signed by a veterinarian before purchasing medically important feed-grade antibiotics. Antibiotics added to water for food animal consumption will also require a veterinary prescription. The law also removes growth promotion and efficiency claims on feed labels because the FDA no longer recognizes these claims as a legitimate use of antibiotics (Figure 1, page 2).

What is a veterinary feed directive for medicated feed?

A VFD for medicated feed is a statement in writing, issued by a licensed veterinarian in the course of the veterinarian's professional practice, that authorizes the use of a VFD drug or combination VFD drug in or on animal feed. A VFD is similar to a prescription written by a medical doctor: the attending veterinarian writes a VFD to treat a specific disease or illness that he or she has diagnosed while working with the operation. The VFD authorizes the livestock producer or caretaker to purchase feed-grade antibiotics to treat specific animals, with the restriction that the drug must be used in accordance with the label

Remember:

- Feed or water antibiotics that are medically important to human health will require veterinary oversight.
- Determine whether you use antibiotics in your operation's feed or water.
- Develop and implement a health management plan with a veterinarian licensed in your state.
- Work closely with your veterinarian and jointly develop a response to scenarios that may involve VFD drugs.
- Understand and adhere to the VFD requirements for record keeping.

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as well as with the conditions for use approved, conditionally approved, or indexed by the FDA. Under the VFD rule, medically important, feed-grade antibiotics require a VFD and can no longer be made available over the counter.

What is a veterinary-client-patient relationship?

Within Oregon, a veterinary-client-patient relationship (VCPR) is the foundation of the livestock health care system. The VCPR exists when the veterinarian has:

- Sufficient knowledge of an animal to initiate treatment based at least on a general or preliminary diagnosis of the animal’s medical condition
- Seen the animal within the last year and is personally acquainted with the animal’s care by virtue of a physical examination or by medically appropriate and timely visits to the premises where the animal is kept

It is imperative that a veterinarian assumes the responsibility for making medical judgments regarding the health of an animal and the need for medical treatment. It is equally important that the client (the owner or caretaker of the animal or animals) has agreed to follow the instructions of the veterinarian. The practicing veterinarian also must be readily available for follow-up in case of adverse reactions or failure of the therapy regimen.

Which medications are affected?

The VFD ruling affects medications that are important in human and livestock healthcare. Table 1 highlights the human-animal medications affected by the new rules and animal-only medications that are not affected. Products that are not medically important, such as ionophores or bacitracin, may be used without a VFD. Furthermore, the label on medications not requiring a VFD may continue to promote feed efficiency and growth enhancement because there is no evidence that the bacterial populations treated are remotely related to human health. However, medically important products, such as feed-grade forms of penicillin and tetracycline, must be purchased with a VFD, and the labels on these products may not claim either improved feed efficiency or enhanced growth—only prevention, control, or treatment of specific infectious conditions.

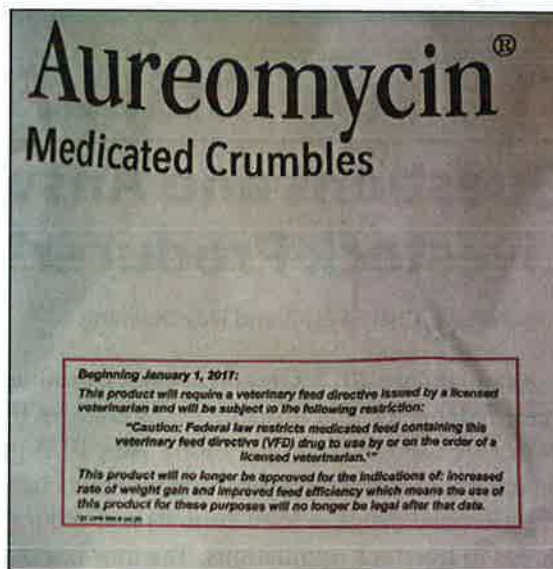


Figure 1: Aureomycin Medicated Crumbles with the VFD precaution.

Table 1: Classifications of medications affected and not affected by the Veterinary Feed Directive

| Affected <i>Medically important (human-animal)</i> | Not affected <i>Not medically important (animal only)</i> |
|--|---|
| penicillins | ionophores |
| cephalosporins | carbadox |
| quinolones | coccidiostats |
| fluroquinolones | bacitracin |
| tetracyclines | dewormers |
| macrolides | Tiamulin |
| sulfas | bambermycin |

You can find a list of affected medications on the FDA website: <http://www.fda.gov/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/JudiciousUseofAntimicrobials/ucm390429.htm>

On a practical basis, a producer must be careful to use a VFD antibiotic consistent with the product label. Be aware that each company has its own specific label-approved antibiotic as well as combinations of antibiotics and other feed additive compounds. Do not substitute a drug from one manufacturer for another manufacturer’s equivalent drug unless the labels are identical in terms of approved drug combinations. For example, at this time generic chlortetracycline cannot be fed in combination with Bovatec®, but Aureomycin®, which contains chlortetracycline, is approved for feeding in combination with Bovatec®.

How do I use a VFD feed?

The VFD feed is limited to the animals at the operation that are specified on the VFD. Livestock producers must use the VFD feed according to the information on the feed label and on the VFD. **Extra-label use of medicated feed is not permitted under the VFD rule.** Therefore, VFD feeding instructions cannot conflict with the instructions on the feed label.

What records do I need to keep?

Livestock operators and caretakers are required to keep records of all VFD orders for at least 2 years from the date they are issued. Set up a place where you can file and easily access all your VFD orders. The FDA may conduct an inspection and request a copy of VFDs on the premises.

What is my responsibility?

The livestock operator's or caretaker's responsibility is to:

- Provide VFD feed to animals identified on the VFD as directed by the veterinarian
- Adhere strictly to the expiration date on the VFD (which generally applies only for 6 months)
- Provide a copy of the VFD order to the feed distributor if the issuing veterinarian sends the distributor's copy of the VFD through you

- Keep records of each VFD order for a minimum of 2 years
- Provide copies of all VFD records to the FDA upon request

Going forward with the VFD

The VFD rule puts the veterinarian in charge of all medically important antibiotics fed in livestock production. Therefore, it is important to build a relationship with your veterinarian so that he or she is truly part of your operation's management team. Then you will have the management pieces in place for decisions on whether feeding antibiotics is an effective tool for your operation. Ask your veterinary professional to work with you to establish a health management plan for your operation, and review its effectiveness on a regular basis. Overall, the VFD rule on when to use feed-grade antibiotics in livestock production will improve our decision-making and herd health in the long run.

References

Moore, P., Evenson, A., Luckey, T., McCoy, E., Elvehjem, C., & Hart, E. (1946). Use of sulfasuxidine, streptothricin, and streptomycin in nutritional studies with the chick. *Journal of Biological Chemistry*, 165, 437-441.

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