

## **Antibiotic Use and the Veterinary Feed Directive: Part 2**

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Hopefully by now most of us are aware of the new drug regulations coming into effect in January 2017. These changes will undoubtedly cause some confusion as well as some inconvenience to cattle producers, veterinarians, feed distributors and manufacturers alike. Last month we discussed both the current and the new regulations pertaining to antibiotic use in food animals. This month we will discuss some of the most frequently asked questions I've been receiving from both producers as well as veterinarians on the upcoming new drug regulations.

*What is a VFD?*

- A veterinary feed directive (VFD), also known as a VFD order, is a written statement issued by a licensed veterinarian that orders the use of a VFD drug or combination VFD drug in or on animal feed.

*What type of medications will require a VFD after Jan. 1, 2017?*

- Medicated feeds containing antibiotics that are important to both human and animal health (also known as “dual use” antibiotics) will require a VFD. These include antibiotics currently used in cattle feeds such as chlortetracyclines, oxytetracyclines, and tylosin. Anthelmintics (dewormers), coccidiostats, ionophores, and a few other antimicrobials that are not routinely used in humans will not be affected. A complete and updated list of drugs that will be transitioning to VFD status can be found at: <http://www.fda.gov/animalveterinary/developmentapprovalprocess/ucm071807.htm>

*How do I know if my current mineral or feed contains a medication that will require a VFD?*

- Read the feed tag. Many premixes and minerals, such as “fly control” minerals, contain low levels of antibiotics. The product information sheet will contain a list of all medications as well as any related cautionary or withdrawal statements. After Jan. 1, 2017 all VFD products will contain the following statement on the label: “Caution: federal law restricts medicated feed containing this veterinary feed directive drug (VFD) to use by or on the order of a licensed veterinarian.”

*If I have a supply of medicated feed left over at the end of 2016, can I still use it?*

- Yes, however you will need to obtain a VFD from your veterinarian in order to use any medicated feeds after Jan. 1, 2017, even if you have previously purchased the product and have it in your possession.

*Can I still mix my own feed using a VFD drug?*

- Yes, you can continue to mix your own feed as long as you have a VFD order to get the medication needed to do so.

*Will the VFD order allow for generic substitutions of a drug?*

- Yes, generic substitutions for a pioneer drug are allowable as long as the veterinarian authorizes the use of an approved generic drug.

*Can I still obtain injectable over-the counter (OTC) antibiotics?*

- Yes, regulations involving the acquisition and use of OTC injectable antibiotics are currently not under revision. OTC medications administered in the water that are currently available, such as neomycin, sulfas, and tetracyclines, will require a prescription from your veterinarian for use after Jan. 1, 2017.

*Can my veterinarian call in a VFD order to my local feed distributor?*

- No. VFD's can be issued in hard copy/paper form, electronically, or by fax, but they cannot be issued verbally.

*Will my local co-op be able to have these medicated feeds on hand when I need them, or will I have to wait a period of time before receiving my feed?*

- As long as your feed distributor (co-op, feed mill, etc.) has a "letter of intent" on file with the FDA, and an "acknowledgement letter" with the drug supplier or feed manufacturer, they will be able to keep a stock of medicated feeds on hand to distribute to customers with a valid VFD.

*I have cattle located in several locations throughout the state. Do I need a VFD for each premise?*

- No. A VFD can be written for multiple locations owned by the same person as long as the feed is acquired from the same distributor.

*Once I obtain a VFD from my veterinarian, how long is it good for?*

- A VFD will have both an expiration period and a duration of use specified on it. The *expiration period* refers to how long the VFD is valid for. This will be determined by either the product label or by your veterinarian after evaluating the medical needs of your animal(s), and cannot exceed a period of 6 months. The *duration of use* refers to the amount of time an animal or group of animals should be fed the medicated product. The duration of use will be specified by the labelled directions for that particular drug.

*Can a veterinarian distribute VFD products?*

- Under VFD regulations, a veterinarian can distribute VFD products as long as they notify the FDA that they intend to distribute animal feeds containing a VFD product. This one-time "notification letter" essentially establishes the veterinarian as a VFD distributor, and

allows them to fill a VFD order. As a recognized distributor, the veterinarian must follow all rules pertaining to VFD distributors.

*This ruling will require a lot of paperwork. How long should I keep copies of VFD's?*

- The producer, veterinarian, and feed distributor must keep records for 2 years. VFD manufacturers must keep product manufacturing records for 1 year.

*What can I do to prepare for the new regulations?*

- Discuss the drug laws as well as the upcoming changes with your herd veterinarian and review medications that you currently use. If you don't have a herd veterinarian, now is the time to establish a good veterinary-client-patient relationship. Focus on disease prevention strategies such as fly control and preconditioning programs for calves, which may reduce the need for antimicrobials, rather than worrying about where that next bag of medicated feed is going to come from. Evaluate your herd health record-keeping practices since new rules will require additional recordkeeping and documentation. If you use medications in feed, understand the VFD process so that future implementation will be smooth.

Here in the US, we want to continue to enjoy one of the safest and most affordable food supplies in the world. It's our job to ensure consumer confidence and continue to provide safe and wholesome food products by the way we manage our cattle. We can do that by understanding and practicing the judicious use of antimicrobials. For the most current information on drug laws or veterinary feed directives, contact your herd veterinarian or visit the FDA's website at: <http://www.fda.gov/animalveterinary/developmentapprovalprocess/ucm071807.htm>.