Texas A&M AgriLife Extension

EAG-024
1/16

The Veterinary Feed Directive:
What Producers Need to Know

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By January 1, 2017, if a livestock or dairy producer wants to feed his animals certain medicated feeds, he cannot simply go to the feed store, purchase the feed, and dump it in the feed bunk. Amendments to the Veterinary Feed Directive (VFD), a federal regulation from the US Food and Drug Administration (FDA), make the process more complicated for producers, veterinarians, and feed suppliers.

What is the VFD?

Before enacting the VFD in 1996, the FDA recognized two categories of animal drugs: over-the-counter and prescription. Because requiring prescriptions for animal feeds containing antibiotics was considered impractical, medicated feeds were classified as over-the-counter.

In 1996, the FDA added a third category, VFD drugs, to the list. Significant amendments, known as the Second VFD Rule, were published in June 2015. The VFD concept attempts to balance the need for antibiotic use to protect animal health with concern about how the overuse of antibiotics both in the livestock industry and in human medicine might contribute to antibiotic resistance. The revised VFD rules ensure that antimicrobial drugs are used for therapeutic (to treat sick animals), rather than production purposes and that licensed veterinarians supervise such use.

The amendments make three significant changes:

- Drug sponsors will modify labeling for certain products by withdrawing production uses such as increased rate of weight gain and allowing only therapeutic uses.
- Medicated feed additives designated as medically important, previously considered over-the-counter, will be VFD drugs subject to the new rules. The term medically important includes all drugs considered important for therapeutic use in humans.
- A veterinarian must complete a VFD form before a producer can buy VFD drugs, even those in medicated feeds.

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What drugs are affected?

The VFD amendments affect only those antimicrobials that are medically important and administered in feed or water.

An antimicrobial is a "substance of a natural, semisynthetic, or synthetic origin that kills or inhibits the growth of microorganisms but causes little or no damage to the host."* All antibiotics are antimicrobials, but other medications are not. Ivermectin, for example, is not an antimicrobial, and VFD rules do not apply to its use.

For VFD rules to apply, a drug must be both an antimicrobial and medically important. The FDA website has a list of affected drugs at http://www.fda.gov/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/JudiciousUseofAntimicrobials/ucm390429.htm.

VFD rules apply only to drugs administered in feeds; injected drugs are not affected. For example, VFD rules apply to tetracycline used in a feed mixture, but not if the same drug is injected.

How do producers buy medicated feed?

First, to purchase any VFD drug or feed containing these drugs, a producer must consult a veterinarian with whom there is a veterinary-client-patient relationship, meaning that the veterinarian has worked with the client, can make clinical judgments about patient health, has sufficient knowledge of the patient by examining the animal or facilities, and can provide follow-up care.

Second, producers who own animals in different states must obtain a VFD form from a veterinarian licensed in the state where the animals are located.

Though no specific format is required, the VFD form must specify the medication to be obtained and include:

- Name and contact information for the veterinarian and the producer
- Location of the animals
- Species of animal to receive the feed
- Approximate number of animals to receive the feed
- Indication for the use of the drug
- VFD issuance date
- Expiration date of the VFD approval
- Name of the allowed drugs
- Level of drug permitted in the feed
- Duration of use
- Number of refills
- Withdrawal time
- Special instructions and cautionary statements

A producer may not dispense the drug for extra-label use; it may be used only according to the approved labeling. And, because drug sponsors are revising the labels in light of the new rules, using certain drugs for production uses will no longer be allowed.

A veterinarian may not write a VFD for an extra-label use. For example, a drug labeled for sheep may not be used in cattle; consequently, a veterinarian may not write a VFD for a sheep drug for a cattle producer. Similarly, a veterinarian may not write a VFD for production enhancement purpose for a drug that, based on the label, is allowed only for therapeutic use.

Photo by Steve Byrns, Texas A&M AgriLife Communications

*Michigan State University Antimicrobial Resistance Learning Site at amrls.cvm.msu.edu/pharmacology/antimicrobials/antimicrobials-an-introduction

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Third, the producer takes the completed form to the feed supplier to obtain the feed the veterinarian has approved. The producer can then use the product, but must do so in agreement with the requirements imposed on the label. Each VFD form includes an expiration date that states the last day the product may be fed to the animals, regardless of the purchase date. The expiration date complies with any labeling requirements, but cannot exceed six months.

The feed supplier, veterinarian, and producer must keep copies of all VFD forms for two years. The veterinarian keeps the original document.

When do the new VFD rules begin?

The new rules went into effect October 15, 2015 for all medications previously categorized as VFD drugs. For all drugs formerly classified as over-the-counter but now considered VFD, the target implementation date is January 1, 2017. Drug manufacturers are revising labels to limit allowable uses to therapeutic purposes.

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