

The Veterinary Feed Directive:

What Does It Mean to Small Ruminant Producers

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As we have all heard, antibiotic resistance is continually increasing in the environment. We have seen it in livestock production as well. To identify the antibiotic in which a disease, such as a respiratory disease, is resistant and susceptible, diagnostic samples are tested for culture and sensitivity. Over the years of practice, I see more resistance to certain antibiotics that have been used routinely on the farm. The Food and Drug Administration (FDA) published three reports in December 2013 outlining the upcoming changes for the use of antibiotic products in production animals (livestock). The goals of these changes are to:

1. promote judicious use of antibiotics,
2. protect public health, and
3. help limit the development of antimicrobial resistance.

On June 2, 2015, the FDA finalized the Veterinary Feed Directive (VFD) rule. After a brief comment period, the rule went into effect on October 1, 2015. Briefly stated, the rule removes all antibiotic use in livestock that was associated with growth and/or feed efficiency or long term use that allowed extended time for bacteria to develop resistance. Antibiotics approved for use under the VFD regulation will be for prevention, treatment and/or control of specific bacterial diseases.

VFD drugs, which are animal drugs intended for use in or on animal feed but are limited to use under the professional supervision of a licensed veterinarian, will require a VFD beginning January 1, 2017. The VFD is a written (nonverbal) statement issued by a licensed veterinarian that orders the use of a VFD drug or combination VFD drug in or on an animal feed. The VFD can be issued on paper or electronic.

Veterinarians who issue a VFD must have a valid Veterinary-Client-Patient-Relationship (VCPR) with the producer for whom they are writing the VFD. Some states define the VCPR for their

Table 1. A VCPR is present when all of the following requirements are met:

- The veterinarian has assumed the responsibility for making clinical judgments regarding the health of the patient and the client has agreed to follow the veterinarian's instructions.
- The veterinarian has sufficient knowledge of the patient to initiate at least a general or preliminary diagnosis of the medical condition of the patient. This means that the veterinarian is personally acquainted with the keeping and care of the patient by virtue of a timely examination of the patient by the veterinarian, or medically appropriate and timely visits by the veterinarian to the operation where the patient is managed.
- The veterinarian is readily available for follow-up evaluation or has arranged for the following: veterinary emergency coverage and continuing care and treatment.
- The veterinarian provides oversight of treatment, compliance and outcome. Patient records are maintained.

veterinarians and if they don't, the state follows the definition defined by the American Veterinary Medical Association (AVMA). See **Table 1** which defines the requirements of a valid VCPR. **It is crucial that a producer develops a good working relationship with their veterinarian and establishes a valid VCPR prior to January 1, 2017.** They should not expect to walk into a veterinary clinic and require the veterinarian to issue a VFD without the veterinarian having a working relationship with that producer.

Other veterinarian's VFD responsibilities are:

- Must be licensed to practice veterinary medicine
- Must prepare and sign a written VFD (paper or electronic) including all required information.
- Issue the VFD in compliance with the conditions for use approved, conditionally approved or indexed including the duration of use and expiration of the VFD.
- Write the name of the VFD drug on the VFD
- Include information about the location of the animals that would

allow someone to locate the animals.

- Provide a copy of the VFD to the producer (client) and feed distributor.
- Maintain all original VFD records for 2 years

The producer that has been issued the VFD is required to feed the animal feed containing a VFD drug only to animals based on the VFD that was issued by their licensed veterinarian. They cannot feed the feed beyond the expiration date on the VFD and the VFD record must be maintained for 2 years.

Is a VFD required for feeds with ionophores (i.e. Monensin, Deccoquinat, Lasalocid)? No, ionophores will not require a VFD, unless combined with a medically important antibiotic with an approved label, i.e. a VFD drug. See Table 2 for current and future VFD drugs.

So what are the implications to small ruminant producers? A VFD drug will have a specified claim that has been approved by FDA for prevention, treatment and/or control of a specific bacterial disease. For example, chlortetracycline (CTC) is labeled for use in sheep for up to 14 days at a dose of 10mg/lb to prevent or treat bacterial enteritis due to E. coli or bacterial pneumonia due to susceptible isolates of Pasteurella. This and one other label claim

TABLE 2: CURRENT AND FUTURE VFD DRUGS

Currently Approved VFD Drugs		Approved for Use in the Following Major Species
Avilamycin		Swine
Florfenicol		Swine
Tilmicosin		Cattle, Swine

Ingredient Class	Drugs Changing from OTC to VFD in 2017	Approved for Uses in the Following Major Species
Aminoglycosides	Apramycin	Swine
Aminoglycosides	Neomycin	Cattle, Swine
Lincosamides	Lincomycin	Swine, Chickens
Macrolides	Erythromycin	Swine, Chickens, Turkeys
Macrolides	Oleandomycin	Swine, Chickens, Turkeys
Macrolides	Tylosin	Cattle, Swine, Chickens
Penicillins	Penicillin	Swine, Chickens
Streptogramins	Virginiamycin	Cattle, Swine, Chickens
Sulfas	Sulfamerazine	(minor species only)
Sulfas	Sulfaquinoxaline	Chickens, Turkeys
Tetracyclines	Chlortetracycline	Cattle, Calves, Swine, Chickens, Turkeys
Tetracyclines	Oxytetracycline	Cattle, Calves, Swine, Chickens, Turkeys

for the use of CTC to prevent or control abortion due to *Campylobacter* species in sheep are the only FDA approved label claims that will be acceptable on January 1, 2017 for sheep. There are no approved VFD drug claims approved for use in goats.

In the past, our only access to utilize drugs not approved for use in small ruminants has been through AMDUCA (Animal Medicinal Drug Use Clarification Act) and ELDU (Extra Label Drug Use) by prescription from a licensed veterinarian. This includes all drugs utilized by producers either by prescription or over the counter (OTC) that are not approved for use in small ruminants. **Currently stated, there will not be any extra label use of drugs accepted on VFDs.** This means that if a goat producer walks into a feed store on January 1, 2017 and would like to purchase a bag of feed with CTC in it to control an abortion problem, the producer will not be able to purchase this product because their **veterinarian is not allowed to issue a VFD for extralabel use of an antibiotic in feed.**

There has been some misunderstanding about the use of injectable antibiotics becoming unavailable due to the Veterinary Feed Directive. As stated in this article, the VFD only applies to medically important antibiotics that will be utilized in feed or water. But, as stated in the previous paragraph, it is extremely important to develop a working relationship with your veterinarian because extra label use of injectable antibiotics does require a prescription from your veterinarian.

It is my hope, that the new VFD regulation inspires many small ruminant producers to establish working relationships with their veterinarians and learn to use their expertise in production medicine along with health care of their flock/herd. For further information about the VFD and/or VFD drugs here are some other resources:

<http://www.fda.gov/safeeed>

To find small ruminant veterinarians in KY, visit www.kysheepandgoat.org/small-ruminant-vets.html

<http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm482106.htm>

<http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm482107.htm>

<http://feedstuffs.com/vfd.aspx>

AVMA VFD page:
<https://www.avma.org/KB/Resources/Documents/AVMA-VFD-form.pdf>

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