

Veterinary Feed Directive: what do I need to know?

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Abstract

In 1996, the Animal Drug Availability Act created a new category of products called veterinary feed directive (VFD) drugs. These are livestock antibacterial drugs (medically important) intended for use in or on animal feed. Any animal feed containing a VFD drug to be used in animals will be required to have a veterinarian issue an order, called a veterinary feed directive (VFD), providing for such use. The purpose of this rule is to limit the use of medically important antibiotics in livestock to those considered necessary for assuring animal health, and only for treatment, control and prevention of disease. The VFD is an authorization granted by a licensed veterinarian who is familiar with the client's operation and provides health, management, and treatment recommendations. This type of professional relationship is known as a veterinary-client-patient/producer relationship (VCP). Medicated feed articles have a number of approved claims and uses; however, the use of VFD drugs does not permit any extra-label drug use.

Whenever antibiotics are used, resistance by susceptible bacterial populations is likely to occur. However, our stewardship responsibility is to use all of these products in a judicious manner and to demonstrate a greater awareness and accountability in this arena.

Key words: VFD, veterinary feed directive, antibiotics, feed

Résumé

En 1996, la loi sur l'*Animal Drug Availability* a créé une nouvelle catégorie de produits que l'on appelle les aliments médicamenteux sous ordonnance vétérinaire. Ces drogues antibactériennes (médicalement importantes) pour le bétail se retrouvent sur ou dans les aliments destinés aux animaux. Tout aliment animal contenant une drogue sous une telle ordonnance qui sera utilisée avec des animaux nécessitera une ordonnance d'un vétérinaire (une prescription d'aliments sous ordonnance vétérinaire) qui autorisera son utilisation. Le but de cette règle est de limiter l'utilisation d'antibiotiques médicalement importants pour le bétail aux seuls cas qui sont jugés nécessaires pour assurer la santé animale et seulement pour le traitement, le contrôle et la prévention de la maladie. La prescription est une autorisation octroyée par un vétérinaire accrédité qui est familier avec l'élevage du client et qui fait des recommandations au

niveau de la santé, de la régie et du traitement. Ce type de relation professionnelle est connu sous le nom de relation vétérinaire-client-patient. Les aliments médicamenteux ont des utilisations approuvées. Toutefois, l'utilisation d'aliments médicamenteux sous ordonnance vétérinaire ne permet pas de dérogation des directives de l'étiquette.

La résistance de populations bactériennes susceptibles est probable dès qu'on utilise des antibiotiques. Néanmoins, une utilisation raisonnée implique une utilisation judicieuse de ces produits. Il faut aussi pouvoir démontrer que nous sommes conscients de la situation et responsables.

What is a VFD?

Producers have been safely and effectively administering medicated feed to prevent and treat diseases in their livestock for years. On January 1, 2017, new regulations will require livestock producers who use certain medicated feeds to obtain a Veterinary Feed Directive (VFD) from their veterinarian in order to purchase those feeds. A VFD is simply a permission slip (written order) from your veterinarian, to use certain medicated feeds (medically important antibiotics). If you haven't already, develop a strong VCP with your clients. This will help you understand their operations when the time comes and they need a VFD. For more information: [link to https://www.ag.ndsu.edu/publications/landing-pages/livestock/veterinary-feed-directive-v-1719](https://www.ag.ndsu.edu/publications/landing-pages/livestock/veterinary-feed-directive-v-1719).

For help with calculations the AAFCO website has a feed and drug calculator, the link is provided (<http://www.aaeco.org>).

For a short list of drugs transitioning from over the counter (OTC) to VFD access the following site: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm482107.htm>

- Class
 - Aminoglycosides – Neomycin, Neo-Oxy
 - Macrolides – Tylan, Pulmotil
 - Streptogramins - Virginiamycin
 - Sulfas – Sulfamethazine, Aureo S 700
 - Tetracyclines – chlortetracycline, Aureomycin, Pennchlor
 - Oxytetracycline, Terramycin

For a short list of water soluble drugs transitioning from OTC to VFD access the following site: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm482106.htm>

Who does the Veterinary Feed Directive (VFD) affect? Veterinarian, Livestock Producer, Feed Dealers?

Veterinarian – only a veterinarian licensed in the client's state can write a VFD order. The veterinarian must also have a veterinarian-client-patient relationship (VCPR) with the client. The VCPR regulations may be different for each state. Access the following site to learn how this is defined in your state: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm460406.htm>.

Livestock producer – producers who use VFD drugs to treat or prevent disease in their livestock need to obtain a VFD order to feed those drugs. Producers are only allowed to use the VFD drug as written by the veterinarian, and may only use it for the length of time defined by the veterinarian (see VFD template at end of document).

Feed stores – feed stores that plan to sell VFD drugs must notify the FDA prior to their first VFD drug sale. Anyone selling medicated feed products must be sure that their customer has obtained a VFD for regulated products. In general, 1 VFD order should be filled entirely by 1 feed store. The feed store needs to keep record of receipt and distribution of VFD drug transactions for 2 years. Access the following sites for more distributor requirements: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm455414.htm>
<http://www.fda.gov/downloads/AnimalVeterinary/DevelopmentApprovalProcess/UCM455479.pdf>

Where do you get a Veterinary Feed Directive Order?

A VFD must be written by a licensed veterinarian who has a veterinarian-client-patient relationship with the client. You can issue a VFD to your client by fax or other electronic means (texting is not allowed), mail, or direct delivery. A veterinarian does not have to issue a VFD just because a producer requests one! The veterinarian is required to have a working relationship with the client and to be familiar with the client's livestock. At times a veterinarian may require a visit before writing you a VFD or he/she may refuse to issue a VFD.

The following websites provide more about the veterinarian-client-patient relationship:
http://www.fda.gov/AnimalVeterinary/ResourcesforYou/ucm380135.htm#Valid_Veterinarian-Client-Patient_Relationship
<http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm460406.htm>
<https://www.avma.org/public/PetCare/Pages/VCPR-FAQs.aspx>

Where do you use a Veterinary Feed Directive Order?

A hard copy veterinary feed directive (VFD) order can be used at any location that sells the ordered VFD drug. The customer must present the VFD order to the store at the time

of purchase. An electronic VFD order can only be used at the location where the veterinarian sent the order. That does not mean they don't have a choice! The client can request that the veterinarian send the order to the store of his/her choice. You might wonder if half the order can be filled at one location and half at another location? Generally this is not acceptable. More producer requirements can be found at the following website: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm455413.htm>

Why does the Veterinary Feed Directive have an Expiration Date AND a Duration of Use?

The expiration date tells the client at which date they are no longer authorized to feed the VFD drug. The duration of use explains how long the drug can be fed to the animals. Let's say the VFD expires 90 days after it was ordered, and the duration of use is for 20 days. The producer must complete the 20 days of feed sometime between when the VFD was ordered and 90 days. If he/she waits until day 85 of the 90 days to begin the 20 day regimen, the feed can only be fed 5 days before the client is required to cease feeding the VFD drug. If this happens, the client must contact you to request a new VFD order. Visit the following website for more producer requirements: <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm455413.htm>

Label Definitions?

- Disease treatment: administered only to animals exhibiting clinical signs of disease.
- Disease control: administered to a group of animals when a proportion of the animals in the group exhibit clinical signs of disease.
- Disease prevention: administered to a group of animals, none of which are exhibiting clinical signs of disease, in a situation where disease is likely to occur if the drug is not administered.
- Growth promotion: sometimes referred to as feed efficiency, administered to growing, healthy animals to promote increased weight gain. Such uses are typically administered continuously through the feed or water on a herd- or flock-wide basis.

Common Questions

- What happens if feed mill messes up amount of feed-grade antibiotic in feed?
- What if a VFD feed is needed in an emergency (i.e., weekend for milk replacer)?
- Who keeps a record of the VFD?
- Can a producer stockpile VFD products/feeds?
- If a common problem is anticipated (weaning calves, for example), can you issue a VFD before the client needs it?

- Footrot and/or pinkeye, extralabel use?
- Phone conversation with producer, with feed distributor?
- Qualified veterinarian?
- What constitutes a VCPR?
- Are distributors liable?
- Who's enforcing and who's checking?
- Current inventory?
- Returning unused complete feed?
- Can a VFD be written for more than 1 use and dose?
- If a VFD drug is approved for use within a range of drug levels, then the veterinarian may specify a particular drug level within that range, or authorize use at any drug level within the range by putting the entire authorized range on the VFD.
- Combination VFD-exempt feed additive with VFD antibiotic?
- mg/hd/day or gm/ton or both?
- What are "extralabel uses" of a VFD drug
 - "Extralabel use" is defined in FDA's regulations as actual or intended use of a drug in an animal in a manner that is not in accordance with the approved labeling.

- Feeding the animals VFD feed for a duration of time that is different from the duration specified on the label,
- Feeding VFD feed formulated with a drug level that is different from what is specified on the label, or
- Feeding VFD feed to an animal species different than what is specified on the label.

Antimicrobial Stewardship

- Prevention of infectious disease requiring antibiotics is the key
- A correct diagnosis is important
- Keep records of antibiotic use
- Follow label directions
- Extralabel antibiotic use must follow FDA regulations

APPENDIX A: BLANK VFD IN THE RECOMMENDED COMMON FORMAT

Veterinary Feed Directive

Veterinarian: _____ Client: _____
Address: _____ Address: _____
(business or home) _____
Phone: _____ Phone: _____
Fax or email (optional): _____ Fax or email (optional): _____

Drug(s) Name: _____ Drug(s) Level: _____ g/ton Duration of use: _____

Species and Production class: _____ Number of reorders (refills) authorized (if permitted by the drug approval): _____

Indications for use (as approved): _____

Caution (related to this medicated feed, if any): _____

USE OF FEED CONTAINING THIS VETERINARY FEED DIRECTIVE (VFD) DRUG IN A MANNER OTHER THAN AS DIRECTED ON THE LABELING (EXTRALABEL USE) IS NOT PERMITTED

Approximate Number of Animals: _____

Premises: _____

Other identification (e.g. age, weight) (optional): _____

Special Instructions (if any): _____

Affirmation of intent (for combination VFD Drugs) (check one box)*:
(*For VFD drugs for which there are no approved VFD combinations, only the first affirmation statement should be included on the VFD)

This VFD only authorizes the use of the VFD drug(s) cited in this order and is not intended to authorize the use of such drug(s) in combination with any other animal drugs.

This VFD authorizes the use of the VFD drug(s) cited in this order in the following FDA-approved, conditionally approved, or indexed combination(s) in medicated feed that contains the VFD drug(s) as a component:

Drug(s)	Drug Level(s) and any Special Instructions

This VFD authorizes the use of the VFD drug(s) cited in this order in any FDA-approved, conditionally approved, or indexed combination(s) in medicated feed that contains the VFD drug(s) as a component.

◀ **Withdrawal Time** (if any): This VFD Feed must be withdrawn _____ days prior to slaughter ▶

VFD Date of Issuance: _____ (Month/Day/Year) VFD Expiration Date: _____ (Month/Day/Year) (As specified in the approval; cannot exceed 6 months after issuance)

Veterinarian's Signature: _____

All parties must retain a copy of this VFD for 2 years after the date of issuance



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