
Management Issues That You Need To Know About

Dr. Matt Hersom

Extension Beef Cattle Specialist

Dept. of Animal Sciences

The nine most
terrifying words in the
English language are:

**"I'm from the
GOVERNMENT
and I'm
HERE
to HELP."**

- Ronald Reagan



Topics of Concern

- Veterinary Feed Directive
- Food Safety and Modernization Act

Veterinary Feed Directive (VFD)

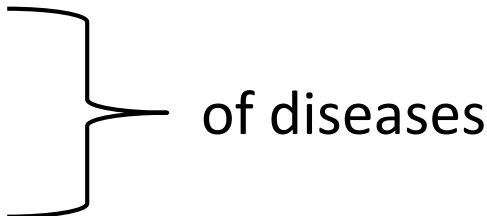
- What is the VFD
 - Federal regulation from the Food and Drug Admin.
 - Regulate the use of drugs, in this case animal drugs
 - History
 - Originally passed in 1996
 - Created to classes of drugs
 - Over the counter (OTC)
 - Prescription



Veterinary Feed Directive (VFD)

- What Does the VFD Do?
 - Changes Product Labeling
 - Remove production claims i.e. “increased rate of weight gain”, and only state uses for therapeutic health issues
 - Change Drug Designation
 - From OTC to prescription for “medically important”
 - VFD form
 - “paperwork”

Veterinary Feed Directive (VFD)

- Why the VFD
 - ANTIBIOTIC RESISTANCE or at least the fear of it
 - Regulate and Preserve efficacy of antibiotics used in human medicine
 - Limit animal antibiotics to the following uses
 - Prevention
 - Treatment
 - Control of diseases
 - Makes vets responsible for feed use of all antibiotics considered medically important to humans

Veterinary Feed Directive (VFD)

- Limit animal antibiotics to the following uses
 - Prevention
 - means that a disease risk must be present and the use prevent infection prior to animals becoming sick/infected
 - Treatment
 - means that animals are exhibiting signs of disease that can be treated by a VFD additive
 - Control
 - is invoked when a percentage of the animals are already sick, exhibiting signs of disease and the use of a VFD can decrease the spread of the disease

Veterinary Feed Directive (VFD)

- Written order by a licensed veterinarian to use a VFD medication
 - Not a prescription
 - Does not apply to injectable antibiotics
- Does allow some disease diagnosis by trained non-vets
 - Vet must develop and document training



Veterinary Feed Directive (VFD)

Who Will This Affect?

- Cattle owners
- Veterinarians
- Feed retailers

How Will This Affect?

- Valid vet-client-patient relationship
- VFD form
- Paperwork retention
- ❖ *Some thought/planning*



Veterinary Feed Directive (VFD)

- Items included/considered on VFD form
 - Name, address, phone of owner and vet
 - Location of the cattle
 - Number and approximate BW
 - Effective date and Expiration date
 - Withdrawal time
 - Notes of VFD or OTC drug combinations/limitations
 - Total amount of VFD medication and total amount of feed to be mixed recorded on form
 - Feeding instructions

VFD - Simplified Scenario

Calves at Weaning

- Experience pneumonia
- Vet visit or previously discussed diagnosis triggers

VFD Written

- Feed Antibiotic treatment indicated
- VFD details are written, specific, time and use limited

Feed Treatment

- Obtain product from distributor/retailer
- Feed according to VFD instructions/restrictions

Veterinary Feed Directive (VFD)

- What Drugs are Affected?
 - Chlortetracycline (Aureomycin, CLTC, Pennchlor)
 - Chlortetracycline + Sulfamethazine (Aureo S 700)
 - Neomycin + Oxytetracycline (Neo-Terramycin, Neo-Oxy)
 - Oxytetracycline (Terramycin, Pennox)
 - Tylosin (Tylan)
 - Virginiamycin (V-Max)

Veterinary Feed Directive (VFD)

- What Drugs are Not Affected?
 - Ionophores, Parasite controls, Insect controls
 - Amprolium (Corid)
 - Bacitracin (Albac, BMD)
 - Bambermycin (Gainpro)
 - Decoquinatate (Deccox)
 - Fenbendazole (Safe-Guard)
 - Laidlomycin (Cattlyst)
 - Lasalocid (Bovatec)
 - Melengestrol Acetate (MGA)
 - Methoprene (Altosid)
 - Monensin (Rumensin)
 - Morantel (Rumatel)
 - Poloxslene (Bloat Guard)
 - Ractopamine (Optaflexx, Actogain)
 - Tetraclovinphos (Rabon)

Veterinary Feed Directive (VFD)

- Legal So What?
 - Must have a valid VFD to feed a VFD medicated feed
 - Violate the federal Food, Drug, and Cosmetic Act Without VFD, feed would be considered unsafe, adulterated, and misbranded
 - Animal consuming a VFD feed with out a valid VFD form is considered **adulterated**
 - Penalties (21 U.S.C. Sections 331-334)

Veterinary Feed Directive (VFD)

- Legal So What?
 - Penalties (21 U.S.C. Sections 331-334)
 - FDA seek imprisonment, monetary penalty, injunctive relief, and/or seizure of property
 - 1 year in prison and fine up to \$1,000
 - Repeat offenders: 3 yrs and \$10,000
 - Veterinarian violation: liability and penalties from state vet board

VFD FAQ's

- **Will cattle owner/manager have to see a vet to get a VFD?**
 - *Not necessarily, if a VCPR is in place with developed use guidelines and training.*
- **Will a VFD antibiotic be allowed in breeding cattle?**
 - *It depends on the approved label. The one product that exists needs to go through VFD approval by the company.*

VFD FAQ's

- **Will one VFD cover cattle in multiple states?**
 - *No. Separate VFDs are required one from a vet licensed in each state.*
- **Will one VFD cover cattle in multiple pastures?**
 - *Yes, for the same health condition on the same premises. Still have to follow drug label relative to confinement or feed mixing.*

VFD FAQ's

- **What flexibility will producers have for dosing with a VFD medication?**
 - *None. Follow the label, follow the VFD or it is off-label, extra-label use.*
- **What flexibility will there be for mixing a VFD medication?**
 - *Essentially the same as there has been before. Restrictions exists for combinations, dosing, etc.*

VFD FAQ's

- **Will VFD antibiotics have withdrawal times?**
 - *Yes, it will depend on the VFD antibiotic.*
- **How long does a VFD remain in effect after written?**
 - *Each VFD will have an “effective date” and “expiration date”.*
 - *Expiration date will depend upon the product used, limit to 180 days. Product can't be fed after expiration date, requires a new VFD.*

Food Safety Modernization Act (FSMA)

- Federal law that enables FDA to:
 - Focus on prevention of food safety issues rather than reactionary
 - Enforcement authority for compliance with prevention and risk-based safety standards
 - Hold imported foods to similar standard as domestic
 - Build integrated national food safety system

FSMA for Animal Food

- Current Good Manufacturing Practices
 - CGMP standards for animal food industry
 - Human CGMP are sufficient for by-product used by animals (brewers, pulp, whey)
 - Further processing by-products will require CGMP
- Facilities must establish HACCP protocols
 - Hazard analysis
 - Preventative controls
 - Monitoring/Verificiation/Corrective action
 - Recall plan

FSMA for Animal Food

- Supply Chain Program
 - Risk-based supply chain program for material
 - Use approved suppliers
 - Rely on other entities in distribution to control hazard
- Defined “Farm” for operations not subject to rule
 - is an operation under one management in one general, but not necessarily contiguous, location devoted to the growing of crops, the harvesting of crops, the raising of animals (including seafood), or any combination of these activities.

FSMA for Animal Food

- Feed Mills
 - Farm that raises cattle and operates a feed mill
 - Feed mill is considered part of farm and is exempt
 - Feeding of animals is contracted to grower, feed mill owned by contractor
 - Feed mill is not part of farm and subject to prevention control
 - Full vertically integrated operations
 - Feed mill is part of farm
 - FDA is concerned they are not regulated, but produce a large amount of feed.
 - Intent to publish future regulatory rules

FSMA for Animal Food

- What about.....?
 - Hay/silage production for sale
 - Other crops/feeds for sale
- *Might get regulated?*
- *Might be able to use further supply chain entities as responsible parties?*

Regulatory Issues Summary

- All for the “good of the industry” and “safety of food products”
- Great intentions, but challenge in implementation
- Increase in regulatory oversight and paperwork
- No increase in \$\$ for doing any of this
- Much of this is federal un-funded mandates
- This is what more government looks like