



# Veterinary Feed Directive Changes for Arizona Livestock Producers

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## What is a VFD and how does it affect me as a producer?

Beginning January 1, 2017 some feed medications that were previously available over the counter will now require a VFD to obtain and use. These directives have been common in the swine industry, but now they will affect a much broader section of the livestock industry. A VFD is similar to a prescription from your veterinarian. A prescription is used for oral, topical, or injectable medications while a VFD applies to medications added to feed products. In the same way your vet would write you a prescription for certain medications indicating the animal(s), dosages, route and duration of administration your vet will now need to write a VFD for medicated feed products that fall under this new regulation.

## Do I need a VFD to obtain injectable antibiotics or vaccines?

No. Injectable antibiotics, vaccines, and other medications that are currently available for purchase over-the-counter are not included in the new VFD rule. These items will still be available for purchase by producers without the need for a VFD or prescription. The VFD rule is an effort to combat human antibiotic resistance, therefore it only applies to some types of antimicrobial feed products that are medically important to humans.

## Which feed products ARE included under the VFD ruling?

Antibiotics that are used in feed for therapeutic uses (to treat or prevent disease) and that are considered important for human medicine will fall under the new VFD guidelines. Antibiotics that are used in feed to treat or prevent disease but are not considered important for human medicine will remain available over-the-counter without a VFD. Under the new VFD rules, antibiotics that are used in feed only for growth promoting purposes will no longer be authorized for use, and companies will be withdrawing that claim from their labels. The full list of medications that will require a VFD order can be found here:

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

## Which feed products ARE NOT included under the VFD ruling?

Antimicrobial drugs that are not considered medically important in human medicine are not affected by the new VFD ruling. These include:

- Bacitracin
- Bambermycins
- Carbadox
- Ionophores (monensin, lasalocid, etc.)

In addition, some drugs are not antimicrobials and therefore are also not affected. These include:

- Coccidiostats (i.e. Amprolium, Diclazuril)
- Beta agonists (i.e. Ractopamine, Zilpaterol)
- Anthelmintics (i.e. Fenbendazole, Ivermectin)

## What is a “combination VFD drug”?

A “combination VFD drug” is an approved combination of drugs for use in animal feed to treat or prevent disease. If any one of the drugs in the combination falls under VFD rules, the entire combination will require a VFD order from a licensed veterinarian.

## What information is included on a VFD?

The VFD issued by your veterinarian must be written (non-verbal) and may be transmitted electronically. Blank VFD forms that meet FDA criteria are available from the American Veterinary Medical Association (AVMA) to your veterinarian. To be valid, the VFD order must contain all of the information listed below:

- Client’s name, address, and telephone number
- Veterinarian’s name, address, telephone number, license number, and the state issuing the license
- Location of the animals
- VFD date of issue
- VFD expiration (may be up to six months or the expiration date of the product, whichever occurs first)
- Name of VFD drug(s)
- Species and production class of animals to be fed the VFD product
- Level of VFD drug and duration of use

- Reason for VFD drug usage
- Feeding instructions with withdrawal times
- Special instructions and cautionary statements
- Number of authorized refills (determined by the drug being used)
- The statement: "Use of feed containing this veterinary feed directive (VFD) drug in a manner other than as directed on the labeling (extra label use), is not permitted."
- Affirmation of intent for combination VFD drugs
- Veterinarians signature

## Can I use any Veterinarian to get a VFD?

You can use any licensed veterinarian that has a valid veterinarian-client-patient relationship with you and your livestock.

## What is a valid veterinarian-client patient relationship (VCPR)?

The state of Arizona defines a valid Veterinarian Client Patient Relationship as follows (from A.R.S. § 32-2201):

*"Veterinarian Client Patient Relationship" means all of the following:*

(a) *The veterinarian has assumed the responsibility for making medical judgments regarding the animal's health and need for medical treatment and the client, owner or caretaker has agreed to follow the veterinarian's instructions.*

(b) *The veterinarian has sufficient knowledge of the animal to initiate at least a general or preliminary diagnosis of the animal's medical condition. Sufficient knowledge is obtained when the veterinarian has recently seen and is personally acquainted with the keeping and caring of the animal as a result of examining the animal, when the veterinarian makes medically appropriate and timely visits to the premises where the animal is kept or when a veterinarian affiliated with the practice has reviewed the medical record of such examinations or visits.*

(c) *The veterinarian is readily available for a follow-up evaluation or the veterinarian has arranged for either of the following:*

(i.) *Emergency coverage*

(ii.) *Continuing care and treatment by another veterinarian who has access to the animal's medical records*

## How do I obtain feed products under a VFD and what responsibilities do I have as a Producer?

Your veterinarian will issue three copies of a VFD: one for their records, one for the feed distributor (i.e. feed manufacturer, feed distributor, or retail store), and one for you, the producer. Once the feed distributor has a copy of a valid VFD they can distribute the product directly to you. All parties must retain records of VFD orders for a minimum of two years. Feed distributors must also retain sales receipts and distribution records for two years

and present them to FDA inspectors upon request. Producers who obtain a legal VFD order are obligated to follow all label and veterinarian directions on both the product and the VFD order. This includes complying with all dosage requirements, animals to be treated, and duration of use. Extra label use of a VFD medication is not permitted, therefore a veterinarian may not write a VFD order that is not consistent with the product's labeled instructions (e.g. dosage, duration of administration, route of administration, and species).

Further information regarding VFD compliance and procedures is available at the resources listed below, or by contacting your veterinarian.

## References

Stokka, Gerald, Charlie Stoltenow, and Neil Dyer. Understanding the Veterinary Feed Directive. Publication no. V1719. North Dakota State U Extension Service, 2014. Print.

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