

New Federal Feed Rules Coming Soon

Two big changes will hit the livestock industry as of Jan 1, 2017. One is the Veterinary Feed Directive (VFD) and the second is a signed veterinarian-client-patient-relationship (VCPR) agreement. Both will affect various sectors of the agriculture industries.

A VFD is simply a document, much like a prescription, that must be subscribed to a feed supplier before a medicated feed can be purchased or fed by an agricultural producer. According to the United States Department of Agriculture; “The VFD final rule outlines the process for authorizing use of VFD drugs (animal drugs intended for use in or on animal feed that require the supervision of a licensed veterinarian) and provides veterinarians in all states with a framework for authorizing the use of medically important antimicrobials in feed when needed for specific animal health purposes.”

In a recent article, Marty Short, IFA Nutrition Advisor, explained the concerns that spurred the initiation of the VFD rule. In previous year’s concerns have come up worldwide that certain pathogens are developing resistance to antibiotics used to treat infections in humans, thus making the treatments less effective for people. Some antibiotics currently used to treat animals are classified as “Medically Important” are also used in human medicine. Some consumers are expressing concern that antibiotics in animals may have other human health risks. Regardless of the accuracy of these concerns, the Food and Drug Administration has taken steps to change how antibiotics may legally be administered to food-producing animals, thus implementing the new VFD rule.

The VFD requires a licensed veterinarian, under a VCPR, to examine and diagnose animal conditions and determine if the use of a VFD-medicated feed is necessary. The

veterinarian issues a VFD by filling out a preprinted, multipart form supplied by the sponsors. These forms are available to download on the drug sponsor's websites. The producer then gives the completed form to the feed supplier, who is then authorized to manufacture and distribute the feed in accordance with the VFD. The VFD may only apply for a maximum of 6 months. The law also requires the veterinarian, producer and distributor to keep copies of the signed VFD for a minimum of two years.

The VCPR is a written document representing how the producers and the veterinarians are working together to make sure animals stay healthy. A valid VCPR exists when the veterinarian takes responsibility for making medical judgements regarding health and the need for medical treatment. The client has also agreed to carefully follow the veterinary instructions. Next, the veterinarian must have sufficient knowledge of the animals to make a general or initial diagnosis. Finally, the veterinarian must be available for follow-up in the case of animals having contrary reactions or failing to respond to the recommended medicine.

There are many responsibilities for the livestock producer, feed distributor and licensed veterinarian. The producer may only use animal feed that has been issued a VFD to specific animals. They cannot feed the VFD feed to animals after the expiration date on the VFD. They must also provide a copy of the VFD to the distributor if the veterinarian sends the distributors copy through them.

A feed distributor has specific responsibilities to the FDA. First, they must file a one-time notice with FDA of intent to distribute VFD drugs, and notify FDA within 30 days of any change in ownership, business name, or business address. They can fill an VFD order only if the VFD contains all required information. Distributors must make sure that the animal feed complies with the terms of the VFD and is correctly identified. Labeling must clearly display the

cautionary statement that federal law restricts the feeding of medicated feed containing a VFD drug only on order of a licensed veterinarian. It is also the responsibility of the distributor to obtain a letter of acknowledgement before the feed is actually shipped. Feed suppliers will be very careful about strictly following these guidelines.

Veterinarians must write VFD orders in the context of a VCPR, issue a signed VFD that is in compliance with the drug to be fed and must provide all required information. They may enter information to more specifically identify the animals to be treated/fed the VFD feed. If a combination of drugs is being used in the VFD the vet must provide the livestock producer and feed distributor with a copy of the VFD order and again keep the original for two years.

The key to getting along with this new rule are preparation and planning because there will be no exceptions to this decree. Farmers and ranchers must take extra care in the management practices of raising healthy animals, but there will be no room for last minute runs to the feed store to purchase those “Medically Important” drugs.

Consumers must know that agricultural producers are committed to producing quality products that are wholesome and safe to eat. Farm and ranch families comprise less than 2% of America’s population yet they feed 318.9 million people in America. We will all work together to meet the expectations that have been set by the FDA.

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