

Background Information on Veterinary Feed Directives (VFD's)

There are two main Guidance for Industry documents that serve as guidelines for writing VFD's:

Guidance #209: The development of microbial (bacteria, viruses, fungi, parasites, etc.) resistance to drugs poses a serious public health threat. Misuse/ overuse of antimicrobials creates selective evolutionary pressure. These drugs must be used judiciously in both animal and human medicine to slow the development of resistance.

Main principles:

1. Any antimicrobial drug listed as medically important for human therapeutics in Appendix A of Guidance #152 (listed on next page) will no longer be used for improvement in feed efficiency or rate of gain. This rule specifically applies to those drugs used in feed or water for food animals. Use these drugs only as needed for assuring animal health. *If you don't need it, don't use it!!*
2. These medically important antimicrobials, when used in the feed and water (including additives in milk replacer) of food animals will require a VFD.

Guidance #213: This guidance gives recommendation for companies to comply with Guidance 209. These recommendations outline the information needed on each VFD, record keeping requirements, and responsibilities of the veterinarian, feed distributor, and client. Client responsibilities are explained on the next page, and in the FDA's brochure "Veterinary Feed Directive (VFD): Producer Requirements".

Notable details:

1. Any extralabel use of medicated feed is illegal.
2. Any use of a medically important drug for a production purpose (feed efficiency/ rate of gain) is extralabel, and therefore illegal.

Veterinary Feed Directive

Definition: A veterinary feed directive (**VFD**) is a written statement/ form filled out by a licensed veterinarian that allows the producer to use a specific antimicrobial drug in their feed or milk replacer.

A VFD will outline a certain drug to be used in feed/milk replacer for a specific group of animals. This drug may only be fed for a certain length of time, once started (**duration of use**). There will also be an expiration date on the VFD, and the duration of use must not exceed this expiration date. Feeding the medicated feed after the expiration date is **illegal**.

Example: A VFD is written for a group of swine using the drug Tilmicosin. The expiration date is 90 days, with a duration of use of 21 days. This means that when the VFD is issued, the client has 90 days to obtain the feed and complete the 21-day course of therapy. It will do them no good to pick up the feed after Day 69, because the duration cannot be finished within 90 days. They may also get a new VFD to finish out the complete 21 days.

Can only the owner of the animals order a VFD?

No. The “client” specified on the VFD may be the owner or other caretaker of the animals. It is the person responsible for the care and feeding of the groups listed on the VFD.

Which drugs are included?

A list* of “medically important” antimicrobials has been provided by the FDA. This list includes:

- Aminoglycosides: Gentamycin, Neomycin
- Lincosamides: Lincomycin
- Macrolides: Tylosin, Tilmicosin (Pulmotil)
- Penicillins (natural): Penicillin G
- Streptogramins: Virginiamycin
- Sulfonamides: TMP-SMZ and other sulfas
- Tetracyclines: Chlortetracycline (CTC), Oxytetracycline, Tetracycline

*List included in Appendix A of Guidance for Industry #152. Will be updated periodically by FDA.

These drugs, in combination with any other drug, will also need a VFD.

Client’s responsibilities

- Keep a valid Veterinarian-Client-Patient Relationship (VCPR) with your veterinarian by setting up herd visits or herd work (pregnancy checking, bull testing, bangs vaccinating) on the farm/ premises at least once per year.
- Discuss with your veterinarian why the drug is needed, and in which animals/ age groups.
- Do not feed medicated feed to any animals not specified on the VFD. This is illegal.
- Do not feed medicated feed after expiration date on VFD. This is illegal.
- **Keep a copy of the VFD for AT LEAST 2 YEARS.** Be able to produce a copy of this form upon the FDA’s request. If you are emailed a digital copy of your VFD, keep this in a digital format. You may also print it out to have an additional hard copy for your own use.
- If a refill is needed that is not specified on the VFD, call your veterinarian.