

## Keys to VFD Compliance

Here are some key compliance steps for the Veterinary Feed Directive (VFD):

- The issuing veterinarian is required to keep the original VFD. The feed mill/distributor and the producer (client) must each keep a copy of the VFD. Hardcopy or electronic versions are allowed.
- The VFD and records of the related feed distribution must be kept by the respective parties for two years.
- Each VFD includes a specific expiration date. Medicated feed remaining after the related VFD has expired cannot be fed to any animals without obtaining a new VFD. This includes any feed leftover in a bin or feeder. It must be disposed of in accordance with state regulations for medicated feed.

Talk with your veterinarian about using any antibiotics that fall under the new VFD requirement. Most antibiotics labeled for use in swine will be affected by the VFD rule. However, a few compounds are not affected. These include bacitracin, tiamulin, carbadox, ionophores and bambermycin. For a list of affected products, go to [www.pork.org/antibiotics](http://www.pork.org/antibiotics)



## Recommit to On-farm Record-keeping

Everyone from producers to veterinarians to feed processors are keeping records associated with VFDs and prescription water antibiotics with the FDA's new policies.

- The Pork Quality Assurance® Plus (PQA Plus®) program provides guidance on the type of records that FDA is requiring.
- The "Pen or Individual Pig Treatment Record" within PQA Plus provides guidance in recording the number of animals, reason for treatment, product name and who administered the treatment, as well as other data needed.
- FDA is requiring producers to keep hard copies or electronic versions of all VFDs for two years and one year for all water prescriptions.
- The issuing veterinarian is required to maintain the originals for the same timeline.
- Distributors or mills who manufacture VFD feed also are required to keep VFD copies for two years.
- Any of these records must be accessible to FDA on request.



### PQA Plus® is Here to Help

The Pork Quality Assurance® Plus (PQA Plus®) on-farm education and certification program outlines Good Production Practices to help guide pork producers and their employees in the responsible use of antibiotics on the farm. Here's a look at the Five Principles:

- **Principle 1:** Take appropriate steps to decrease the need for the application of antibiotics.
- **Principle 2:** Assess the advantages and disadvantages of all antibiotic use.
- **Principle 3:** Use antibiotics only when they will provide measurable benefits.
- **Principle 4:** Fully implement management practices for responsible use of animal-health products into daily operations.
- **Principle 5:** Maintain a working veterinary-client-patient relationship.

PQA Plus also provides useful tools that can be applied on the farm to help navigate the new regulatory transition, such as:

- Drug storage inventory sheet
- Medicated feed-mixing record
- Pen/individual treatment record

A NEW VERSION OF PQA PLUS WAS LAUNCHED at the 2016 World Pork Expo, including a section on responsible antibiotic use. For more information about PQA Plus, go to [www.pork.org/certification](http://www.pork.org/certification).

## USCARE

### A CHECKLIST FOR ANTIBIOTIC SUCCESS

- ✓ **UNDERSTAND** the new feed (Veterinary Feed Directive) and water (prescription) rules: As of Jan. 1, 2017, growth promotion use of medically important (to human health) antibiotics is not allowed. Only therapeutic use (treatment, control, prevention) for a specific animal health condition is allowed under the direction of a veterinarian.
- ✓ **STRENGTHEN** your veterinary-client-patient relationship (VCPR): Schedule periodic herd visits with your veterinarian and review health monitoring and herd health strategies.
- ✓ **COMMUNICATE** with your feed mill: Ensure the mill personnel understand and are implementing new VFD recordkeeping procedures for antibiotics and that stringent feed delivery protocols are in place.
- ✓ **ASSESS** your herd health and welfare strategies: Sit down with your veterinarian to outline production and management changes to maximize animal health and minimize antibiotic use.
- ✓ **RENEW** your commitment to responsible antibiotic use: Stay up to date with PQA Plus certification and make it part of your worker education program.
- ✓ **ENSURE** your record-keeping compliance: For producers, this means keeping copies (print or electronic) of each VFD for two years and prescription records for one year.

## MAKE SURE YOU'RE IN COMPLIANCE

**NEW** 2017  
ANTIBIOTIC RULES



The NEW veterinary feed directive (VFD) for medically important feed-grade antibiotics and the prescription rule for water-based antibiotics ARE NOW IN EFFECT.

# New Antibiotic Rules Are Underway

The U.S. Food and Drug Administration (FDA) has implemented new regulations for antibiotic use on the farm. The effort is focused on eliminating medically important (to human illness) antibiotics for growth promotion purposes in food-animal production.

According to the new rules, medically important antibiotics can only be used for therapeutic use – to treat, control or prevent specific diseases under veterinary guidance. Over-the-counter (OTC) purchases of these human medically important antibiotics will cease. Drugs such as carabadox are still available OTC. Only feed-grade and water-based antibiotics are affected. Producers, veterinarians, drug companies, feed mills and feed suppliers are facing new requirements, including expanded record-keeping.

In keeping with its goal of healthy people, safe food and healthy pigs, the U.S. pork industry supports FDA's antibiotic strategy and oversight. On the farm, pork producers are committed to identifying ways to ensure responsible use of antibiotics to protect public health, to promote pig health and welfare and to ensure pork safety.

*“Producers should always be working closely with their veterinarians to look for new ways to improve their overall antibiotic stewardship.”*

– Dave Pyburn, DVM, Pork Checkoff



## Know Your Role in Extralabel Drug Use

You may have heard about extralabel drug use (ELDU) of certain drugs over the years, but it's never been more important to be knowledgeable about the critical role both veterinarians and producers play in keeping people and pigs healthy as it relates to proper and legal antibiotic use. Of course, only a licensed veterinarian can authorize the use of a drug in an ELDU manner and only if it is allowed by law.

As before FDA's new antibiotic rules went into effect on Jan. 1, 2017, **extralabel use of medicated feeds, including medicated feed containing a veterinary feed directive (VFD) drug or a combination VFD drug, remains illegal.**

### Examples considered extralabel uses and therefore not permitted include:

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

Unlike medicated feeds, the use of injectable drugs in an ELDU manner remains allowable under a valid Veterinary Client Patient Relationship (VCPR), but with certain limits. For example, under a VCPR, a producer with veterinary oversight or a veterinarian could use injectable drugs to treat a joint infection in a sow, despite it not being a listed use on the label.

## Guidance for the New Rules

All sectors of animal agriculture, from drug companies to producers and veterinarians to feed mills, are collaborating to implement the FDA's new antibiotic regulations. Here's a snapshot of FDA's guidance.

**Guidance 209:** In 2010, FDA outlined its intent and recommendations regarding growth promotion uses of medically important antibiotics in food-animal production. FDA also specified that veterinarian oversight will increase for the remaining therapeutic applications (prevention, treatment and control) of medically important antibiotics. This action applies to both feed-grade and water-based antibiotics.

**Guidance 213:** On Dec. 11, 2013, FDA initiated a three-year transition process to complete its food-animal antibiotic strategy. This action requests animal-health companies to outline intentions to voluntarily remove any production/growth promotion uses from product labels of medically important antibiotics. The guidance also eliminates over-the-counter status of these medications and increases veterinary oversight for on-farm therapeutic use by requiring a veterinary feed directive (VFD) for feed applications and a prescription for water treatments. Implementation began on Jan. 1, 2017.

**Final VFD Rule:** On June 3, 2015, FDA announced the final VFD rule. The final rule outlines specific requirements of the VFD process for medically important antibiotics administered through feed for disease prevention, treatment and control.



## Be Sure to Have a Valid Vet-Client-Patient Relationship

Before a VFD may be issued, a valid veterinary-client-patient relationship (VCPR) is required, and that definition is outlined by the state where the pigs being treated reside. In simplest terms, this means that a pork producer must have a working relationship with a veterinarian and commit to developing a plan that satisfies all VFD requirements. The veterinarian will need to be familiar with the herd's production and health profile.

For producers in states without VCPR requirements for VFDs, the veterinarian will follow the federal VCPR standards, which are outlined within the FDA regulation. The agency has listed the VCPR status of states on its website, along with the key elements of the federally defined VCPR. Note that the list may change as states update their veterinary practice requirements. To determine whether your state or federal definition of a VCPR prevails, go to the FDA tab at [www.pork.org/antibiotics](http://www.pork.org/antibiotics).



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Visit [pork.org/antibiotics](http://pork.org/antibiotics) for more information.



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