Welcome to the small farms podcast, a production of the small farms program at Iowa State University Extension and Outreach. In this episode, I will be interviewing Chris Clark, the southwest, Iowa Beef Specialist for Iowa State University Extension and Outreach to talk about the veterinary feed directive, and its implications for small farmers. I'm Christa Hartsook, small farms program coordinator, and we hope you enjoy the show. Chris, welcome to the show. Thanks for being on.

Chris Clark

Yeah, thanks for having me on the show.

Let's jump right in. Chris, what is the veterinary feed directive?

The veterinary feed directive is basically an alternative dispensing status. So people are probably pretty familiar with over the counter versus prescription drugs. Both in human medicine and in veterinary medicine. Those are the two traditional dispensing statuses. The veterinary feed directive is basically kind of a new dispensing status set up by the the FDA. From a producer's perspective, it will function very, very much like a prescription. From the perspective of the regulatory agencies and veterinarians, there's just a few tiny differences between a prescription and a VFD, or a veterinary feed directive. But basically, coming up here, in the very near future, we're going to see drugs that were traditionally over the counter feed grade antibiotics, we'll see those changed from over the counter to VFD. And that means that the producer will have to have a written veterinary feed directive from their veterinarian in order to buy and use those drugs.
Okay and Chris, what has really caused the VFD to come about? Why are we seeing this now?

the big thing is, is pressure from the consumer and pressure from the public pressure from activist groups, and the FDA is has been, I think, under pressure for quite a long time to do something about the use of antibiotics in agriculture. And we can debate on, you know, how problematic and, and stuff that use is, but there's a fear. And there is some evidence that antibiotic use can contribute to the development of organisms that are resistant to the antibiotics. So basically, we place selection pressure on those organisms. And over time, we're selecting for a population of pathogens that are resistant to the drugs that we have. So I think that's the big thing is that the FDA really wants to, to minimize the use of antibiotics to some extent, in animal agriculture. But they also want to make sure that we're using them a little more judiciously. If you look at the statistics, and you can find some really good numbers on the FDA website. Typically, there's a report where they, they describe the amount of drugs at least sold and dispensed, we don't have a way to really track end user and end to use. But traditionally, you can, you can pretty easily find the amount of drug that sold and distributed in the USA.

And if you get to looking at those statistics, the one thing that jumps out at you is that in animal agriculture, we do use an awful lot of feed grade antibiotics, some of which that are considered medically important in human medicine. And many of those have been available over the counter. So producers can purchase them and use them without really any veterinary oversight. And that's, that's the big change is coming up the first part of the 2017. Here, producers will no longer be able to buy and use those over the counter. Instead, they'll have to have a veterinary feed directive, which means they have to have some veterinary oversight.

Okay, what drug would I need to go and get a VFD for?

Yeah, that's a very important question. And the the big take home message is that this is really focused on antibiotics, okay, not other types of drugs. And it's really focused on feed additive antibiotics, feed additive antibiotics and water additive antibiotics. So anything put on the feed or water is going to be included.
and water additive antibiotics, okay. So any, any antibiotic that you would put in or on the feed, and any antibiotic that you would add to the water is potentially subject to this. Now, the other the other additional component here of classifying drugs, is that the FDA put out a document several years ago that it was kind of a guidance document kind of a risk assessment thing. And they classified all of the available antibiotics into two broad categories, those that are important, they call them medically important. But those are that are, excuse me, those that are medically important in human medicine, and those that are not. And it's a pretty extensive list. But when you really look closely, basically any antibiotic that we use in human medicine is on the list of medically important drugs. We're, we're kind of playing it safe. In a sense, we're, we're trying to conserve the effectiveness of all of those drugs that we might use in human medicine. Other drugs, and in beef production, which is kind of my area of expertise, one of the drugs that comes to mind is Rumensin, or bovatec would be another one. Those are called ionophores. They are technically antibiotics. But we don't use those at all in human medicine. And so those are not going to be affected by this. They're in that not important list, not medically important list. And so those won't be affected. It's also worth noting that injectables and pills boluses those kinds of drug applications are not affected. This is really just feed and water additive

Christa Hartsook 06:34
just feed and water. So if I need to give a shot of penicillin, I'm still okay to do so.

Chris Clark 06:39
For now. I think the writing's on the wall that down the road there, they're probably going to take a look at those two. But

Christa Hartsook 06:45
you bet. So Chris, let's say you know, I do you have some cattle that I know I need to treat, for example, and, you know, maybe doing so through the feed or the water has been my best way to do so in the past? Do I need to now have a vet come out and check them and then write the prescription? How does that work?

Chris Clark 07:06
So that's an excellent question. And for right now, it looks like every state will be able to, to use their own definition of what they call a VCPR, which is a veterinary client patient relationship. One of the requirements of of VFD is that the veterinarian writes the veterinary feed directive, I guess, as part of a valid and lawful veterinary client patient relationship. So when you get to look at it, those definitions, essentially, yeah, the vet is going to have to come out and examine the animals. Now, if you have a good relationship with that veterinarian, perhaps they come out once or twice a year for routine vaccination, pregnancy evaluation, things like that, you may not have to have a true examination and a true diagnosis before every veterinary feed directive is written. But you definitely have to have some type of a relationship where the veterinarian is familiar with your animals and your, I guess, your production management system.
Christa Hartsook 08:16
So when that vet then is writing that VFD for that, what kind of information is included? You know, Chris, I'm assuming length of time, you know, dosage, things like that?

Chris Clark 08:28
Yes, there is a pretty extensive list of information that's required. And it's kind of interesting, they'll say that there's no specific format that's required. So one of the comments that you'll hear from, from some of the FDA folks is that you can write a VFD on an on a napkin if you would like. But when you get to looking at the list of requirements and the list of required pieces of information, most of the time, it's probably wise to have some type of a pre fabricated form, so that you make sure that everything is included. So that information would include the basics, like veterinarians name, clinic address, that kind of thing. Obviously, contact information and name of the producer, the date of the VFD issuance, which is the date that the veterinarian writes it and signs it expiration date of the VFD paperwork. So that's kind of interesting too, because most of these will have no defined duration of time the VFD can be written for. And the way the FDA has set this up is that you can write it. The veterinarian has some some leeway, and some flexibility and they can write it for a specific time if they would like to for up to a maximum of six months, okay. So you know, if you had a pen of cattle you want to treat, and you weren't sure exactly when you were going to treat them. Or maybe it's a drug where you're going to use it continuously throughout the next six months, which there are a couple of those out there that are used that way. I could write it for a six month duration. Okay, let's see need the name of the VFD drugs, the species production class of animals, they have to approximate the number of animals to be fed indicate the drug level in the feed, which gets kind of complicated, but they have to put the veterinarian has to put the drug level in grams per ton, sometimes requires some math. Sometimes requires knowledge of your animals as to how big they are and how much they're eating? So estimated intake can can be a part of that equation. Let's see withdrawal time, any special instructions, cautionary statements, there are no expectations right now that we're going to have any VFD drugs approved for refills. So there is a thing on there where you have to put the number of reorders or refills that are authorized. I don't know why they even would have that on there, because you have to put zero, okay. But, and then I think one of the big things they want is a statement. Kind of like you'll see on prescription where it says it has to be used by or on the order of a licensed veterinarian. The VFD statement will say something like the use of feed containing this veterinary feed directive drug has to be done according to label directions, and according to directions of a licensed veterinarian and stuff like that.

Christa Hartsook 12:01
Chris, we talked about that, you know, these new regulations would be coming in 2017. When exactly will those be implemented? And, you know, required by producers to follow?

Chris Clark 12:14
So, implementation date is January 1 of 2017. And there's been a lot of discussion about, you know, what's that going to look like? Is there some kind of phased implementation? And the
know, what’s that going to look like? Is there some kind of phased implementation? And the answer, the simple answer to that is no. This goes into full effect at the stroke of midnight on New Year’s Eve. And even, you know, from the inspectors that I visited with even feed that may be in the bin in some kind of storage on the farm in the feed bunk but not yet consumed. Any of that, that would contain a VFD drug cannot be legally fed after midnight on New Year’s Eve without a VFD on file.

Christa Hartsook 13:06
Okay, Chris, this is obviously, you know, a product of the small farms program, the VFDs affect small producers as well.

Chris Clark 13:15
Yes, it absolutely does. The regulations really don’t specify anything about size of the operation. Size of the farm number of animals. It’s, it’s a comprehensive program that’s really, you know, effective for all producers.

Christa Hartsook 13:36
Yep, and I’m assuming including, you know, our listeners who might have kids with 4-H animals at home?

Chris Clark 13:43
Yes, yes, absolutely.

Christa Hartsook 13:45
All right.

Chris Clark 13:47
I know. Mike Anderson, who is our state 4-H leader, he recently put out a kind of a guidance document or a little fact sheet for the the 4-Hers. So, you know, if those 4-H families could maybe talk to their local extension services, they could probably get a copy of that if they haven’t received it by email already. And your local Extension offices are good, good resources. Your veterinarians are good resources, but it’s probably worth they’re worth preparing for. Just so you know, kind of a plan if you have to use a feed or a water based medication.

Christa Hartsook 14:25
You bet, absolutely. Chris, we've talked a little bit about you know, there would be some inspections. You know, we know we have to go through our veterinarians obviously for these
inspections. You know, we know we have to go through our veterinarian obviously for these.

How long do producers need to keep you know, records or the actual VFD itself? What are we looking at there in terms of regulation?

Chris Clark  14:45
So the VFD is required to be kept by all parties for two years. So when I say all parties, we've got three basic entities involved, the veterinarian and then what we call a distributor, which may or may not be the manufacturer of the feed, but it would be the CO-OP, the feed store, maybe the vet clinic, wherever you purchased that medicated feed, that would be the distributor. And then the producer, all three of those parties have to keep a copy of that VFD paperwork for two years, has to be readily retrievable, they don't specify really, that you have to keep it in any certain storage container or any certain storage form. Other than the veterinarian, they have to keep it in the original form in which they write it. For the producers, you know, if you have a paper copy, I would probably find a way to kind of back myself up. I would want probably a an electronic and a paper copy. Sure. But if you have a paper copy, and you have that filed away, where you can get to it in a timely manner, that that should work.

Christa Hartsook  16:08
Anything else that we need to know Chris, what anything else to help, you know, producers out there prepare?

Chris Clark  16:14
Yeah, you know, there are a couple big things that I usually emphasize. One is, is simply establishing that veterinary client patient relationship. So if you don't have a good relationship with a veterinarian, you probably need to contact a veterinarian and establish some type of relationship, have them come out and kind of take a look at your operation. Use them for some maybe kind of basic health management things, whether it be vaccinations or preg checks, or, you know, preconditioning calves, things like that. But, you know, let's give them an opportunity to get familiar with your operation.

Christa Hartsook  17:01
Sure.

Chris Clark  17:02
The other thing is record keeping, I think some producers struggle struggle with record keeping an eye, I would put myself in that category as well. But it's going to be important that we can document what was fed and when and to which animals, because, you know, part of that paperwork that you asked about in terms of keeping that VFD. If there were to be an inspection, the producer perspective on that is you're going to have to show that you follow the directions on the VFD. And that you fed it as described, and that you fed it according to label.
So you probably have to really start doing some feed records where you're at least documenting, if not individual feeding records for every single day, at least when you do use the VFDh drug document, what was fed, when it was fed and which animals received it. And I guess the last big point that I like to emphasize is that feed additive antibiotics have to be used according to the label. So when it comes to prescriptions, and you know, injectable drugs, things like that, we've got maybe a little bit of flexibility. If the veterinarian describes that, that they want you to use it in what we call an extra label manner. We can maybe adjust the dose or change the indication for which we're using it. You know, maybe adjust the duration of use things like that. We don't have that flexibility VFD drugs or with any feed additive antibiotic. So, essentially, you have to go back to the label, and follow that pretty precisely. What's really hard for a lot of people is that we've kind of been going with a guessing game for the last several months. Because all the labels have not yet been released. New labels are supposed to come out, actually starting tomorrow. They, they describe December 8, 9, and 10 as kind of their their goal for releasing some of these new VFD labels. So I think we're going to learn a lot here in the next several days, about exactly what those labels look like and what we can use, how we can use it for what indications things like that. But ultimately, we've got to follow that label. There are many examples of drugs that we would like to use in an extra label manner, to treat maybe conditions that the drug isn't labeled for or you know, things like that, and I really just caution people not to do those things. You know, play it, play it by the book, follow your directions on the label, follow your vet's directions, it's gonna be the best for everybody if we do a good job with that.

Christa Hartsook 20:08
Sure. Chris, is there one central spot within extensions resources that I can send folks for more information?

Chris Clark 20:17
Yeah, at the Iowa Beef Center, we put together what we call kind of a resource page. Great. So, you know, what I, what I noticed when we put together some some information about this, there are lots and lots of different groups that have some skin in the game. And they're all kind of trying to get information out there and, and be proactive. And so instead of trying to come up with something really new, and, and maybe unique, we just kind of decided, well, maybe it's best to link to all of these different groups and kind of what they're doing. So the Iowa Beef Center site. It's pretty easy to find, if you just Google Iowa Beef Center. It's iowabeefcenter.org is the website. And then if you scroll down that front page, there's a hyperlink there at the bottom, where you can go to our VFD resource page. And then that then links out to many different sites, including the FDA, it's good to get some of that information directly from the horse's mouth, so to speak, and, and the FDA has a really good website about the VFD. Okay, but there's an awful lot of information there. It takes some time and effort to sort through it. So we've added a lot of other sites as well. Different veterinary organizations, different pharmaceutical companies, some of the companies that are offering electronic VFD paperwork, they're offering kind of software packages and subscription services where you can handle all that VFD paperwork online. We've got links to some of those businesses and things like that. So it's a pretty good resource page, I think.
Christa Hartsook 22:09
Great. Thank you so much for being on Chris. I think this was really great information for our small farmers that are out there, and I really appreciate your time.

Chris Clark 22:16
Yes, no problem. Thanks for having me on the show.