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Update on the Veterinary Feed Directive (VFD)

As of January 1, 2017 producers will need a written Veterinary Feed Directive (VFD) from a licensed veterinarian for a VFD drug. In order for a Veterinarian to write a VFD, a valid Veterinarian-Client-Patient-Relationship (VCPR) must be in place and documented. The VFD drugs are to be used for the **treatment** of clinical disease as diagnosed by a Veterinarian and include antibiotics added to feed, water, or milk/milk replacers. Examples include (but not limited to): Oxytetracycline, Chlortetracycline, Tylosin, and Neomycin.

How do I know if a drug is a VFD drug, rather than an OTC drug?

Read the label. All labeling and advertising for VFD drugs, combination VFD drugs, and feeds containing VFD drugs must prominently display the following cautionary statement: "Caution: Federal law restricts medicated feed containing this veterinary feed directive (VFD) drug to use by or on the order of a licensed veterinarian." Over-the counter (OTC) drugs do not have this statement.

How does a producer obtain a VFD Feed?

Producers must obtain a VFD order from their veterinarian, then send, or take, the VFD order to a feed manufacturer or supplier to get the VFD feed. A VFD is a written statement issued by a licensed veterinarian in the course of the veterinarian's professional practice that authorizes the use of a VFD drug in or on an animal feed. This written statement authorizes the client (the owner of the animal or animals or other caretaker) to obtain and use animal feed bearing or containing a VFD drug or combination VFD drug to treat the client's animals only in accordance with the conditions for use approved, conditionally approved, or indexed by the FDA. A VFD is also referred to as a VFD order.

In order to obtain a VFD order from a Veterinarian you must have a valid VCPR!

What is an "expiration date" on the VFD?

The expiration date on the VFD specifies the last day the VFD feed can be fed.

A VFD feed must not be fed to animals after the expiration date on the VFD- if the course of treatment cannot be finished prior to the expiration date of the VFD, then it should not be started. You should contact your veterinarian to request a new VFD order.

How do I use a VFD feed?

The VFD feed must be used according to the information specified in the labeling and on the VFD. This means for example that the feed can only be used for the indications and duration of use specified on the label and VFD, and in the animals at premises specified in the VFD. Furthermore, if the VFD authorizes use of a VFD drug in an approved combination, that combination also must be used according to the labeling and VFD.

What is an "extra-label use" of a VFD drug and is it allowed?

"Extra-label use" is defined in FDA's regulations as actual or intended use of a drug in an animal in a manner that is not in accordance with the approved labeling. One example would be feeding the animals VFD feed for a duration of time that is different from the duration specified on the label. No need for any other examples- use as directed!

Extra-label use of VFD feed (or any other medicated feed) is not permitted!

What Should Be on a VFD Order?

This information is required on a lawful VFD order:

- Veterinarian's name, address, and telephone number;
- Client's name, business or home address, and telephone number;
- Premises at which the animals specified in the VFD are located;
- Date of VFD issuance;
- Expiration date of the VFD;
- Name of the VFD drug(s);
- Species and production class of animals to be fed the VFD feed;
- Approximate number of animals to be fed the VFD feed by the expiration date of the VFD;
- Indication for which the VFD is issued;
- Level of VFD drug in the feed and duration of use;
- Withdrawal time, special instructions, and cautionary statements necessary for use of the drug in conformance with the
 approval;
- Number of reorders (refills) authorized, if permitted by the drug approval, conditional approval, or index listing;
- 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";
- Veterinarian's electronic or written signature.

You may also see the following optional information on the VFD:

- A more specific description of the location of the animals (for example, by site, pen, barn, stall, tank, or other descriptor the veterinarian deems appropriate);
- The approximate age range of the animals;
- The approximate weight range of the animals; and any other information the veterinarian deems appropriate to identify the animals at issue.

What are my responsibilities as the "client"?

As the client, a producer must:

- Only feed animal feed bearing or containing a VFD drug or a combination VFD drug (a VFD feed or combination VFD feed) to animals based on a VFD issued by a licensed veterinarian;
- Not feed a VFD feed or combination VFD feed to animals after the expiration date on the VFD;
- Provide a copy of the VFD order to the feed distributor if the issuing veterinarian sends the distributor's copy of the VFD through you, the client;
- Maintain a copy of the VFD order for a minimum of 2 years; and provide VFD orders for inspection and copying by FDA upon request.

For more information talk with your Veterinarian.

Also more information available at: http://www.fda.gov/safefeed.

Prepared by: Allison Maslack, DVM; Adapted from FDA VFD Producer Requirements

A LAWFUL VFD HAS TO BE COMPLETE!