

VFD'S: THE FEED INDUSTRY PERSPECTIVE



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Outline



- Describe Industry's Role
- What are our responsibilities?
- How to track compliance?
- How to educate/engage customers regarding the new VFD rule
- Now what?

Industry's Role



- ❑ Comply with the new Federal VFD Rule
- ❑ Comply with cGMP for manufactured medicated animal feeds (21 CFR Part 225)
- ❑ Comply with State Feed Law
- ❑ Provide distributor(s)/client(s) with correct, properly labeled VFD feed.
- ❑ Provide distributor(s)/client(s) with correct information and answers.

Animal Drugs Expected to become VFD Drugs

- Chlortetracycline
- Tylosin
- Hygromycin B
- Sulfamerazine
- Lincomycin
- Sulfamethazine
- Neomycin
- Virginiamycin
- Nicarbazin
- Oxytetracycline
- Penicillin
- Sulfadimethoxine plus Ormetoprim

Distributors Responsibilities

(21 CFR Part 558.6)

- ❑ File a one-time notice with FDA of intent to distribute VFD drugs.
- ❑ Must notify FDA within 30 days of any change in ownership, business name or business address.
- ❑ Fill a VFD order only if the VFD contains all required information (21 CFR 558.6(c)(1)).
- ❑ Ensure that all labeling and advertising displays the caution 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.” (21 CFR 558.6(a)(6))

Distributors Responsibilities

(21 CFR Part 558.6)

- ❑ Do not mix VFD feed with other medicated feeds unless authorized by the VFD.
- ❑ Do not distribute VFD feed past the VFD expiration date. If, you still have feed left, get a new VFD.
- ❑ Do not transfer VFD feed to another user.
- ❑ Keep VFD records (orders, receipt and distribution) a minimum of 2 years, minimum may be longer in some states.
- ❑ Manufacturing records of VFD containing feeds must be kept for 1 year (cGMP requirement, 21 CFR 225).
- ❑ Make records available to FDA for inspection upon request.

How to Track Compliance



- ❑ Follow all applicable parts of 21 CFR Part 558.6
- ❑ Follow all applicable parts of 21 CFR Part 225
- ❑ Register in writing with the CVM as a VFD feed distributor prior to distributing VFD feeds.
- ❑ If you distribute VFD feeds to other distributor(s), obtain an Acknowledgement letter {Part 558.3(b)(11)} before feed is shipped.
- ❑ Keep VFD copies for a minimum of 2 years. Need to be accessible and organized (when requested during an inspection).

Customers Responsibilities

(21 CFR Part 558.6)

- ❑ Must only feed VFD upon receipt of valid VFD from Veterinarian.
- ❑ Follow VFD exactly, including withdrawal times.
- ❑ Do not feed VFD feed past the VFD expiration date. If, you still have feed left, get a new VFD.
- ❑ Do not transfer VFD feed to another user.
- ❑ Feed only to the species/class of animals indicated on the VFD.

Customers Responsibilities

(21 CFR Part 558.6)



- ❑ Do not mix VFD feed with other medicated feeds unless authorized by the VFD.
- ❑ No off label or extra label use.
- ❑ Keep VFD records a minimum of 2 years, minimum may be longer in some states.
- ❑ Make records available to FDA for inspection upon request.

Now What? You are a producer



- Learn what your responsibilities are.
- Assess your operation and how the new Rule will impact your operation(s).
- Understand the VFD process.
- Know what makes a VFD valid.
- Talk with your veterinarian now.
- Talk to your servicing feed mill/feed suppliers now.

Now What? You are a veterinarian:



- Learn what your responsibilities are.
- Understand the VFD process.
- Know what makes a VFD valid.
- Talk with your clients now.
- Talk with your clients' servicing feed mill(s), determine in advance how to get the VFD to the correct location in the mill.

Now What? You are a Feed Mill/Distributor of VFD Feeds

- Learn what your responsibilities are.
- Understand the VFD process.
- Know what is a valid VFD.
- Register with the CVM in writing.
- Obtain Acknowledgement Letters before shipping VFD Feeds to distributors.
- Talk to your distributors and customers now.