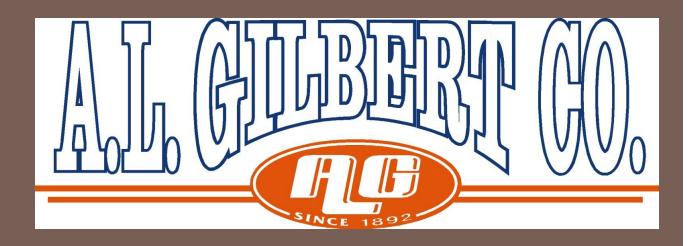
# VFD'S: THE FEED INDUSTRY PERSPECTIVE



Marit Arana, PhD, PAS, Dipl. ACAS

#### 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
- Hygromycin B
- Lincomycin
- Neomycin
- Nicarbazin
- Oxytetracycline
- Penicillin
- Sulfadimethoxine plusOrmetoprim

- □ Tylosin
- Sulfamerazine
- Sulfamethazine
- Virginiamycin

### 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 you 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 you 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.