



# Feed Distributor Responsibilities, Minor Species, 4-H, and Other Questions

Megan Van Emon  
Extension Beef Cattle Specialist



United States  
Department  
of Agriculture




National Institute  
of Food  
and Agriculture



WESTERN  
EXTENSION  
RISK MANAGEMENT  
EDUCATION  
Western State University

## Feed Distributor Responsibilities

- File one-time notice with FDA of intent to distribute VFD drugs
- ONLY fill a VFD order if VFD contains all required information
- Ensure animal feed containing the VFD drug complies with VFD order and label directions
- Retain VFD for 2 year



## Feed Distributor Responsibilities

- Retain records of receipt and distribution of all medicated animal feed containing VFD drug for 2 years
- Provide VFD orders for inspection and copying by FDA upon request
- Retain records of VFD manufacturing for 1 year and must be available for inspection and copying by FDA upon request

## Feed Distributor Responsibilities

- If you are originating distributor, you must obtain an acknowledgement letter from the receiving distributor before the feed is shipped
- If you are the originating distributor, you must retain a copy of each receiving distributor's acknowledgement letter for 2 years

## Feed Distributor Responsibilities

- All labeling and advertising contains the following 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.”

## Acknowledgement Letter

- Written communication provided to the original distributor from the receiving distributor when shipping animal feed containing a VFD drug in the absence of a valid VFD
- Different from FDA notification

## Acknowledgement Letter Requirements

1. Distributor will not ship the VFD feed to an animal production facility that does not have a valid VFD
2. Distributor will not ship the VFD feed to another distributor without receiving a similar acknowledgement letter
3. Distributor has complied with the distributor notification requirements

## Minor and Other Species

- Primary species
  - Cattle
  - Horses
  - Swine
  - Chickens
  - Turkeys
  - Dogs
  - Cats
- Minor Species
  - Any species other than “primary” species
    - Sheep
    - Goats
    - Buffalo/bison
    - Honey Bees

## AMDUCA

- Animal Medicinal Drug Use Clarification Act
  - Prohibits ANY extra-label use in medicated feeds
  - Includes minor species

## Minor Use and Minor Species Animal Health Act of 2004

- Minor use – drugs that are intended for use in major species for diseases that occur infrequently or in limited areas and only in small numbers of animals
- Intended to make more medications legally available for treatment of minor species and uncommon diseases in the major species

## Compliance Policy Guide 615.115

- “Agency ordinarily will not consider regulatory action if” ...
  - Medicated feed is approved in major species, but used in minor species
  - Medicated feed is limited to farmed or confined species
  - Medicated feed is used within the context of a valid VCPR
  - Extra-label use is limited to therapeutic treatments, not production purposes
  - Veterinarian is responsible for establishing withdrawal period

## Antimicrobials for Minor Species

- Goats
  - Monensin
  - Neomycin
- Sheep
  - Neomycin
  - Oxytetracycline
  - Chlortetracycline
  - Lasalocid

# Aureomycin

Indications	In complete feed Chlortetracycline g per ton
<b>Sheep</b> Breeding Sheep: Reduction in the incidence of (vibriotic) abortions caused by <i>Campylobacter fetus</i> infection susceptible to chlortetracycline.	80
<b>Swine</b> Increased rate of weight gain and improved feed efficiency.	10-50
Reduction in the incidence of cervical lymphadenitis (jowl abscesses) caused by Group E <i>Streptococci</i> susceptible to chlortetracycline.	50-100
Breeding Swine: Control of leptospirosis (reducing the incidence of abortion and shedding of leptospirae) caused by <i>Leptospira pomona</i> susceptible to chlortetracycline. Feed continuously for not more than 14 days.	400
<b>Sheep</b> Increased rate of weight gain and improved feed efficiency.	20-50

# CTC 4G

**SHEEP (Growing)**  
Increased rate of weight gain and improved feed efficiency. (20 to 50 g/ton). Add at less than 5 nor more than 12.5 pounds per ton to complete ration.

**SHEEP (Breeding)**  
Reducing the incidence of (vibriotic) abortion caused by *Campylobacter fetus* infection susceptible to Chlortetracycline. (80 mg/head/day; Feed 0.2 lb per 10 head per day.

## 4-H Animals

- All animals consuming feed with a VFD drug or combination VFD drug requires a VFD form
- 4-H advisor CANNOT be the client
  - Unless they are the primary caretaker
- Group of animals located at same location
  - Each person will need their own VFD

## FDA Checklist for VFD Inspection

- Randomly select 3 VFD forms at feed distributor
  - Stop at producer and veterinarian
- Veterinarian and Client information
- Premises specified on the VFD have animals from form
- Date of VFD order
- Affirmation of intent for VFD combination drug
- Vet's signature, electronic or written



## Tips for VFD Preparation

1. Determine which, if any, of your feeds contain feed-grade medications.
  - a) Consult veterinarian and feed distributor
2. Develop veterinary-client-patient relationship
3. Keep accurate records of all feed-grade medications
4. Have a designated storage area for VFD forms

Megan Van Emon  
Office: 874-8286  
Cell: 701-928-1096  
[megan.vanemon@montana.edu](mailto:megan.vanemon@montana.edu)

## Questions

