

## Understanding FDA's New Livestock 'Antibiotic Rules' for 2017

New Food and Drug Administration rules mandate that feed and water antibiotic used for livestock after Jan. 1, 2017 will require veterinarian oversight.

In short, this means that picking up 50-pound bags of feed antibiotic additive, or half-pound packages of water soluble antibiotic additives will not be a spur of the moment action anymore, but rather will require a Veterinary Feed Directive, or a prescription.

All food-producing animals fall under these guidelines.

In 1996, Congress enacted the Animal Drug Availability Act to manage approval and marketing of animal drugs and medications.

Livestock managers that use any feed additive antibiotics for management of disease will be required to have veterinary oversight (regular veterinary visits and exams) prior to a VFD or prescription, and will only be able to use a selected antibiotic for specific disease conditions.

Extra-label use of feed antibiotics will also become illegal. Previous to 2017 some of these antibiotics were available for over-the-counter use and extra-label use per a veterinarian's direction.

Inspections by the FDA have already begun at the distributor level, and will continue down to the farm level to ensure legal use of antibiotics. Fines and/or movement restrictions of medicated animals will serve as disciplinary measures for unlawful usages.

After Jan. 1, 2017 farm storage of antibiotics will be allowed only for the prescribed periods, with any excess amounts having to be discarded. Prior storage of on-farm antibiotics (previous to Jan.1, 2017) will fall under these restrictions and will require a VFD (for feed) or prescription (for water) before use in 2017.

Livestock managers should enlist the aid of their veterinarian as soon as possible to prepare for compliance to these new levels of federal regulation.

In short, the new rules require that antibiotics used in the feed, or the water, for livestock will require veterinary intervention first.

Injectable antibiotics are not included at this time, but likely will be in the future, as in the European Union. The days of picking up a bag of Aureo 4G, or AS700, while you are in town are soon to be over.

The veterinary intervention can be one of a couple ways. First would be a sick call by the veterinarian to check out the animal, and any others in the pen with it. Second, if the first step was already done, then call the veterinarian's office to update on the condition of the animals. To be clear, a call for every sick animal is not necessarily required if the same condition is worsening (in the individual animal, or in the herd).

If it is a new problem or condition, that will require a new exam. Several questions have already arisen regarding the new rules and how antibiotics have been used up until now. These include:

Is medicated milk replacer included? Yes, it is considered feed for the calf/lamb/piglet so it will require a VFD each time.

Is feeding aureomycin at weaning still allowed for prevention of pneumonia? Yes, if the bag is labeled for that. No extra label use will be allowed. Foot rot antibiotics will not be allowed for pneumonia unless the label lists both.

Can feed still be ground on the farm and then antibiotic added? Yes, the antibiotic as a feed additive can be purchased with a VFD, and then added to the feed. The kicker is that generally there has to be disease first, and then the added antibiotic is only allowed for up to three weeks (or less per the label). No continuous use will be allowed.

Can I have a standing order with a feed mill for antibiotics? Yes, if that is the way the VFD is written.

Can I buy my medications ahead of time (in 2016) for use in the future to avoid having to do this paperwork and a veterinary visit? No, all feed or water medications on the farm on Jan 1, 2017 will need a VFD or prescription to go with them, and they can only be used for up to three weeks.

Can I change between water and feed medication of the same antibiotic? Yes, if there is a VFD or prescription written for its use that way.

Can I purchase an injectable and add it to the feed or water to avoid the paperwork and veterinary involvement? No. This is considered extra-label-use, and is going to be strictly enforced with fines and/or restrictions on sale of livestock.

Can I borrow antibiotics from a neighbor, or use overrun from another group of animals? No, again this is considered extra-label-use, and is strictly forbidden, and will have the same fines or restriction of sales.

Do I need to call the veterinary office every time I have a sick animal? Yes, probably. Somehow there needs to be professional oversight according to the new federal rules.

The FDA will not allow treatment of animals without some oversight, and will strictly enforce this by on-farm inspections. The inspections can be with, or without, prior notice (they may just show up without warning).

They will trace the trail from the antibiotic distributor (for example, from the distributor to the veterinarian to the farm), and are already doing this in some places for practice.