

# THURSTON COUNTY AGRICULTURE ADVISORY COMMITTEE

McLane Building Conference Room  
5033 Harrison Ave NW, Olympia, WA 98502

## Minutes for September 24, 2015

Members Present: Chery Sullivan, Robert McIntosh (Vice-Chair), Richard Mankamyer, Mary DiMatteo, EJ Zita (Chair), David Nygard, Eric Johnson, and Pat Labine

Staff Present: Charissa Waters

Guests Present: Kevin McDowell, Cat Marrier, Dr. Minden Buswell, and Joe Baker

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The meeting was called together at 7:00 by E.J. Zita followed by round table introductions of the members and staff.

Guest Speakers: Joe Baker, Mindy Buswell, USDA veterinarian, Cat Marrier USDA feed and milk specialist—working on a project in DC developing a curriculum for training officials and spoke on the announcement of this rule in June. FSMA came out recently as well, which may affect distributors. Cat can address any questions about that.

News sharing was saved until later as well as the approval of agenda and minutes because of the guest speakers.

### **Presentation: Overview of New VFD Rule.**

Guest speakers handed out a draft guidance document that is meant to help farmers keep in compliance. Mindy adapted the power point from the FDA from Dragan Momcilovic DVM, PhD, DACT (veterinary medical officer who worked on this rule).

Antimicrobial Resistance (AMR) is the main issue and these rules and regulations came out as the new directive to ensure that these drugs are used as intended. This is a shared stewardship among ag, environment, and humans. The U.S. government and USDA recognize that this is a serious issue and are reaching out to groups like ours to find solutions.

VFD stands for Veterinary Feed Directive drugs. It got started to avoid the issues with prescription drugs. The first VFD rule came out on Dec 8, 2000 and the 2<sup>nd</sup> June 3, 2015. They wrote these with the intention that farmers will not need a prescription from veterinarians for these VFD drugs. The second rule will become effective after Oct 1, 2015.

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A new list of drugs will be added to the VFD list by the end of 2016. It is online with the FDA but is very long and doesn't reference the specific drugs.

The intention of this is to have more veterinarian supervision of these medications (but will not necessarily need a prescription) to avoid misuse and overuse. If it is a VFD drug the veterinarian will have to write an order (not a prescription) for its purchase and have an established relationship with the client. Patt Labine asked a question about which drugs this pertains to. This is a feed rule only, it does not include injectables but would include some that are administered via water.

The New Rule (21 CFR 558.6 (a)) goes over the general requirements, responsibilities, and codifies the rule. General requirements: animal feed with a VFD drug or combo may be fed to animals only upon a lawful VFD issued by a veterinarian. A VFD feed must not be fed to animals after the expiration date on the VFD. The documents must be maintained for two years in case of inspection. Patt asked the question about the use of antibiotics for growth enhancers. There are 3 different ways to use antibiotics. Right now the drug companies are doing a good faith activity and working with the FDA to cover those growth enhancing drugs (FDA documents 209 and 213 have asked the companies to phase out the drugs of medical importance for growth promotion and all major companies are on board). Doug had a question about what a distributor is considered. There are different types of distributors; growers, suppliers, etc. if they are distributing they must have a VFD from a vet. The drug will be tracked throughout and stops at the end user (the animal being treated).

VFD drugs can only be used as labeled (there is no off label use for anybody even the vets) and in the context of a veterinary client patient relationship (VCPR). A draft definition of the WA State VCPR is out now (through the VMA) and it is important for people to read it and comment on it. Input is needed from vets and farmers for the language to be applicable. Currently the federal VCPR definition is used. The federal VCPR definition is very broad in order to allow flexibility. The FDA decided to keep it open but a state can adopt the FDA rule and then enhance it (they have to operate at or above it). Oregon is working on defining the VCPR as well and are now getting stakeholders together as well as gathering producer input.

The guest speakers highly recommended that the committee reads the VCPR definition and provide input on this language (available through the Dept. of Health). *This draft is very new information.*

The group had questions about which drugs this will include (i.e. for foot baths). The guest speakers did not know the answer. If the product has the potential to be used as a feed drug

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but can also be used for a foot bath it may still need a VFD order. Most drugs do not need a VFD now but many more drugs will be added to the list by the end of 2016.

Conclusions: VFD is a tool for ensuring proper use of antimicrobial drugs in animal feed and vets are key in minimizing the potential for rise in antimicrobial resistance. The new rule only updates the old rule. These drugs will still be available but vets will play a larger role. This only applies to medically important VFD drugs.

Question: Robert asked if there are any standards for vets to determine the use of the VFD.

Answer: It is illegal for the vet to order any off label use. These details are in the draft rule document that was handed out.

Question: Robert asked if there are any enforcement provisions.

Answer: Right now they are developing a plan for compliance for inspectors.

**Approval of meeting minutes.** The minutes were amended and passed as amended.

The agenda was discussed, changes were suggested, and it was approved as amended.

Next meetings: No meeting in November because of Thanksgiving. The meeting in December was set for the 10<sup>th</sup> from 7-9pm.

**News:** Chery was accepted into the ag-forestry leadership program.

The meeting was adjourned at 9 pm.

*Respectfully submitted by Charissa Waters*