



2020-2021 Veterinary
Feed Directive
Summary Report

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# **Executive Summary**

Veterinary feed directives (VFDs) are written orders that establish veterinary oversight for administration of certain drugs in animal feed to food-producing animals. In 2015, the United States Food and Drug Administration (FDA) introduced legislation that extended the list of drugs requiring VFD orders to include medically important antimicrobial drugs (MIADs) that had previously been available over the counter. This shift in federal regulation, intended to help mitigate against the development of antimicrobial resistance, established requirements that all livestock producers must have their animals evaluated and diagnosed by a veterinarian who would issue a VFD order, thereby allowing producers to lawfully feed their livestock a feed containing a VFD drug, such as a MIAD, under veterinary oversight.

California Senate Bill 27 (Hill, 2015), chaptered as Food and Agricultural Code (FAC) Sections 14400-14408, placed additional restrictions on medically important antimicrobial drugs (MIADs) used in livestock production and mandated the California Department of Food and Agriculture (CDFA) to gather information on sales within the state.

In 2017, the California Department of Food and Agriculture (CDFA) introduced the Antimicrobial Use and Stewardship (AUS) Program that mirrored and expanded upon the FDA's antimicrobial resistance mitigation goals. AUS is the first program to overlap two CDFA divisions: the Feed, Fertilizer, and Livestock Drugs Regulatory Services (FFLDRS) Branch in the Inspection Services Division, which handles regulation, inspection, compliance, and enforcement; and the Animal Health and Food Safety Services (AHFSS) Division, which focuses on stewardship, surveys and studies, judicious use, and best on-farm practices. The divisions work cooperatively to promote public health and welfare via a safe and stable food supply for California.

#### General Information

This report is broken out into four main sections:

- Background
- Data Summaries, Tables and Figures
- Data on 2020 2021 Manufacturing and Distribution Reports
- Looking Forward

For additional information specific to the background and definitions of VFDs, manufacturing and distributing VFD feed, or CDFA's data collection methods, please reference previous years' VFD Summary Reports at the links below:

- 2019 VFD Summary Report https://www.cdfa.ca.gov/is/ffldrs/pdfs/AUS VFD Summary Report 2019.pdf.
- 2017 2019 Quarter 1 VFD Summary Report https://www.cdfa.ca.gov/is/ffldrs/pdfs/AUS VFD Summary Report 2017-19.pdf

### Scope of Reporting

This report summarizes manufacturing and distribution data for medicated feed containing a VFD drug or combination of VFD drugs in California. The reporting period that each VFD order falls into is determined by the issue date. However, because the extent of time between issue and expiration date varies by VFD drug or combination VFD drugs, AUS will periodically receive VFD orders outside of the requested reporting periods causing slight variations in the data shown in previous years. The data reported is categorized by:

- the MIADs used to manufacture VFD medicated feed,
- the species the feed is intended for,
- and the indication for use as it falls into the category of "respiratory disease,"
   "gastrointestinal disease," "both," or "other"

Data will be categorized into "Not Independently Reported (NIR)" when VFD orders issued to a single species or a single type of VFD drug represents less than 5% of the total VFD orders collected in a year. Also, if a reported species on a VFD order, or the VFD drug(s), make up less than 5% of the total manufactured or distributed medicated feed, it will be captured within the NIR category. The NIR category is designed to protect the confidentiality of producer information that may be easily reidentified based on rare or unique characteristics, such as when a VFD drug is used for only one species.

For reference to the number of livestock animals in California by year, refer to United States Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS) database

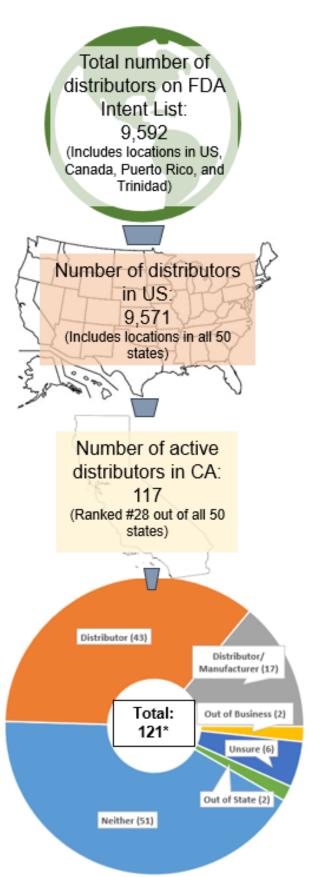
at https://www.nass.usda.gov/Statistics\_by\_State/California/index.php.

#### **Protecting Confidential Information**

To provide the public a summary of information collected under Food and Agricultural Code (FAC) Division 7 Chapter 4.5, this information is being reported in a manner consistent with maintaining confidentiality of a business or an individual's information in accordance with FAC Section 14407.

All data collected is subject to extensive internal review prior to publication. If it is determined that summary information would identify, or have the potential to identify, an individual or business, the data is reported as "Other" or "Not Independently Reported." The report includes a list of information that is included in the "Other" or "Not Independently Reported" categories.

Data collected under FAC Chapter 4.5 and Section 14902.5 is confidential and exempt under FAC Section 14407 from release under the California Public Records Act (CPRA) (Government Code Chapter 3.5, commencing with Section 6250). As such, it will not be disclosed to any person or government agency, except to the Veterinary Medical Board (VMB), as appropriate.



\*1 distributor is not on FDA's Intent List; firm has been notified to submit VFD Intent Letter

### **Description of Tables and Figures**

The information presented in the tables and figures is based on quarterly collections of VFD orders and other manufacturer or distributor VFD information. Whether data is reported independently or not independently will vary each year depending on factors that could lead to revealing personally identifying information (PII) of a business or producer. Some factors may include, but are not limited to:

- disease outbreaks
- environmental factors
- different drugs being approved or used
- firm location changes

These extenuating factors between years may make it difficult to directly compare certain data in either table or figure form. Additionally, AUS will periodically receive updates or corrections to the information previously given in VFD orders after their original submission date. Should this occur, it may cause slight variations in the data provided for years already reported. Some figures may have the following abbreviations for VFD drugs:

- Chlortetracycline (CTC)
- Neomycin (Neo)
- Oxytetracycline (Oxy)

For a list of FDA-approved drugs for use in medicated animal feed, including VFD drugs, approved combinations with VFD drugs and additional information, please review the Code of Federal Regulations at:

https://ecfr.federalregister.gov/current/title-21/chapter-l/subchapter-E/part-558.

# **Veterinary Feed Directive Data Tables**

The data shown in the following tables is subject to fluctuations based on factors that include timeliness of industry reporting and the summary report publishing date. Numbers are likely to update in future summary reports.

### Veterinary feed directive order summary

Reported for 2017 – 2021 Veterinary feed directive order data

#### Table 1a

	2017	2018	2019	2020	2021*
Total Number of VFD Orders <sup>1</sup>	639	634	714	649	595
Number of VFD Collection Locations <sup>2</sup>	41	36	36	39	27
Total Number of Locations VFD Orders Were Issued to <sup>3</sup>	298	287	337	338	302
Total Number of Veterinarians Who Issued VFD Orders⁴	113	112	111	101	100

- Total number of VFD orders received from manufacturers and distributors located in California (CA), that are listed on FDA's VFD intent list. The total number of VFD orders includes only CA locations where the VFD feed is intended to be fed.
- Number of VFD collection locations is inclusive of all manufacturers and distributors in CA that received VFD orders.
- 3. Total number of locations to which VFD orders were issued represents the locations where the animals were housed.
- 4. Total number of veterinarians who issued VFD orders are licensed veterinarians who deemed that VFD feed should be used for treatment.
- \* Total number of VFD orders received from manufacturers and distributors located in CA in the year 2021 will likely show fluctuations due to timeliness of reporting. Reporting periods are determined by the VFD issue date and is not a guarantee of when the VFD will be received by the manufacturer, or distributor, or submitted for collection to CDFA.

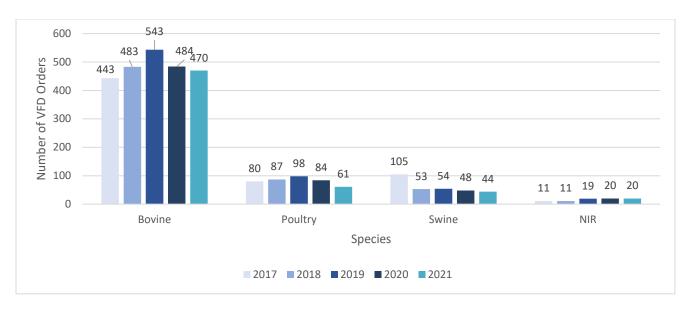
### Number of VFD orders represented by intended species

Reported for 2017 – 2021 Veterinary feed directive order data

Table 2a

Species	2017	2018	2019	2020	2021*
Bovine	443	483	543	484	470
Poultry	80	87	98	84	61
Swine	105	53	54	48	44
NIR¹	11	11	19	20	20
Total	639	634	714	636	595

Figure 2a



- \* Total number of VFD orders received from manufacturers and distributors located in CA in the year 2021 will likely show fluctuations due to timeliness of reporting.
- <sup>1.</sup> NIR = Not Independently Reported. This category includes Aquaculture, Caprine, and Ovine. These species independently represent less than 5% of the total VFD orders.

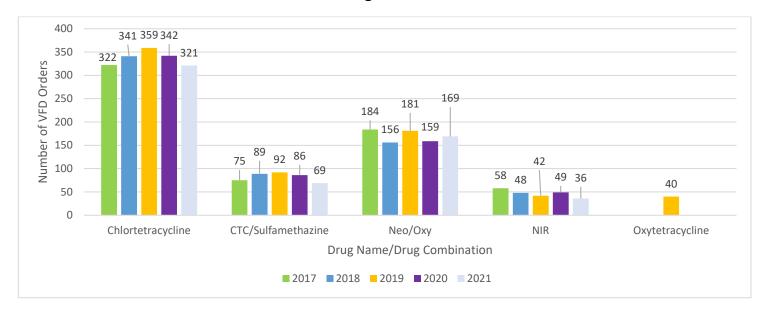
### Number of VFD orders represented by drug name

Reported for 2017 – 2021 Veterinary feed directive order data

Table 3a

Drug Name/Drug Combination Indicated on VFD Order	2017	2018	2019	2020	2021*
Chlortetracycline	322	341	359	342	321
CTC/Sulfamethazine	75	89	92	86	69
Neo/Oxy	184	156	181	159	169
NIR¹	58	48	42	49	36
Oxytetracycline <sup>2</sup>	-		40	-	-
Total	639	634	714	636	595

Figure 3a



- \* Total number of VFD orders received from manufacturers and distributors located in CA in the year 2021 will likely show fluctuations due to timeliness of reporting.
- NIR = Not Independently Reported. This category includes Chlortetracycline/Tiamulin, Florfenicol, Lincomycin, Oxytetracycline, Neomycin, Tiamulin, Tilmicosin, Tylosin, and Virginiamycin (only represented in 2017). These drugs/combinations independently represent less than 5% of the total VFD orders collected.
- <sup>2</sup> Oxytetracycline is represented in 2019 due to higher number of VFD orders for specific non-combination drug and not in NIR.

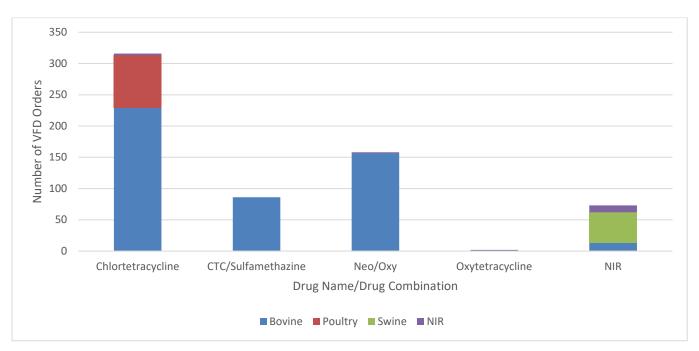
### Number of VFD orders by drug and intended species

Reported for 2020 Veterinary feed directive order data

Table 4a

	2020				
Drug Name/Drug Combination Indicated on VFD Order	Bovine	Poultry	Swine	NIR¹	Total
Chlortetracycline	229	84	-	4	317
CTC/Sulfamethazine	86	1	1	1	86
Neo/Oxy	156	1	1	2	158
Oxytetracycline	-	1	1	2	2
NIR <sup>2</sup>	13	1	49	11	73
Total	484	84	49	18	636

Figure 4a



- <sup>1.</sup> NIR = Not Independently Reported. This category for species includes Aquaculture, Caprine, and Ovine. These species independently represent less than 5% of the total VFD orders.
- <sup>2.</sup> NIR = Not Independently Reported. This category for drug name/drug combination independently represents Chlortetracycline/Tiamulin, Florfenicol, Lincomycin, Neomycin, Oxytetracycline, Tiamulin, Tilmicosin, and Tylosin.

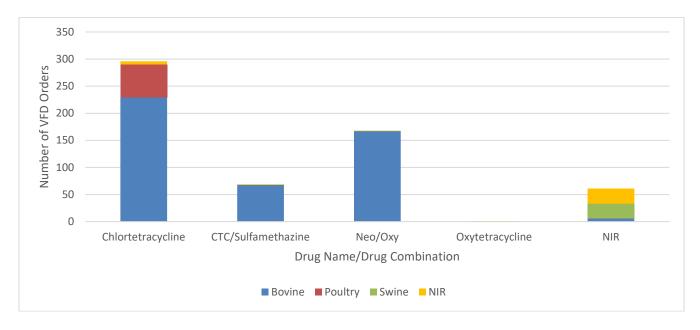
### Number of VFD orders by drug and intended species

Reported for 2021\*
Veterinary feed directive order data

Table 4b

	2021				
Drug Name/Drug Combination Indicated on VFD Order	Bovine	Poultry	Swine	NIR¹	Total
Chlortetracycline	229	61	-	6	296
CTC/Sulfamethazine	68	-	-	1	69
Neo/Oxy	167	-	1	1	168
Oxytetracycline	-	-	1	1	1
NIR²	6	-	27	28	61
Total	470	61	27	37	595

Figure 4b



- Total number of VFD orders received from manufacturers and distributors located in CA in the year 2021 will likely show fluctuations due to timeliness of reporting.
- NIR = Not Independently Reported. This category for species includes Aquaculture, Caprine, and Ovine. These species independently represent less than 5% of the total VFD orders.
- NIR = Not Independently Reported. This category for drug name/drug combination independently represents Chlortetracycline/Sulfadiemthoxine, Chlortetracycline/Tiamulin, Florfenicol, Lincomycin, Neomycin, Oxytetracycline, Tilmicosin, and Tylosin.

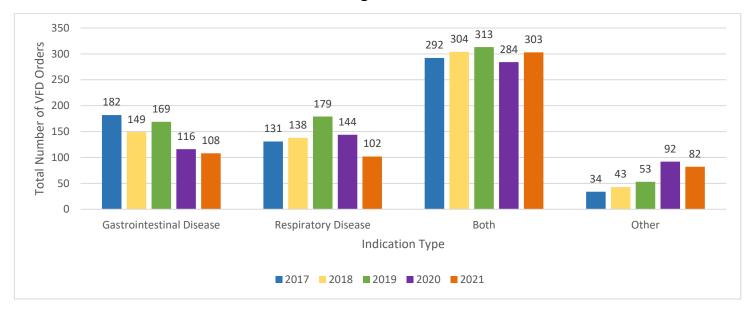
### Number of VFD orders by indication type

Reported for 2017 – 2021 Veterinary feed directive order data

Table 5a

Indication Type	2017	2018	2019	2020	2021*
Gastrointestinal Disease <sup>1</sup>	182	149	169	116	108
Respiratory Disease²	131	138	179	144	102
Both <sup>3</sup>	292	304	313	284	303
Other⁴	34	43	53	92	82
Total	639	634	714	636	595

Figure 5a



- Total number of VFD orders received from manufacturers and distributors located in CA in the year 2021 will likely show fluctuations due to timeliness of reporting.
- Gastrointestinal (GI) Diseases include bacterial enteritis, bluecomb disease, coccidiosis, hexamitiasis, necrotic enteritis, porcine proliferative enteropathy, swine dysentery, swine ileitis, and transmissible enteritis.
- 2. Respiratory Diseases include bacterial pneumonia, chronic respiratory disease, and respiratory disease.
- 3. "Both" is representative of two indications per VFD order, GI and Respiratory diseases.
- <sup>4.</sup> "Other" diseases include abortions, anaplasmosis, bacterial hemorrhagic septicemia, columnaris disease, fowl cholera, infectious synovitis, jowl abscesses, leptospirosis, liver abscesses, and vibrionic abortions.

# Data on 2020-2021 Manufacturing and Distribution

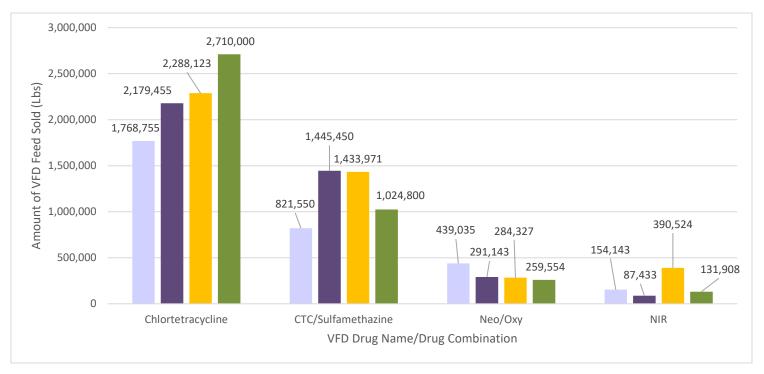
### Amount of VFD feed sold by distributors

Reported for 2018 – 2021
Distributor report for amount of VFD feed sold data

Table 6a

Total pounds (lbs) of VFD feed sold								
Drug Name/Drug Combination Used in VFD Feed	2018	2019	2020	2021				
Chlortetracycline	1,768,755	2,179,455	2,288,123	2,710,000				
CTC/Sulfamethazine	821,550	1,445,450	1,433,971	1,024,800				
Neo/Oxy	439,035	291,143	284,327	259,554				
NIR	154,143	87,433	390,524	131,908				
Total	3,183,483	4,003,481	4,396,945	4,126,262				

Figure 6a



NIR = Not Independently Reported. This category includes CTC/ Tiamulin, Florfenicol, Lincomycin, Neomycin, Oxytetracycline, Spectinomycin, Sulfadimethoxine, and Tiamulin. These drugs/combinations independently represent less than 5% of the total amount of drug sold by distributors.

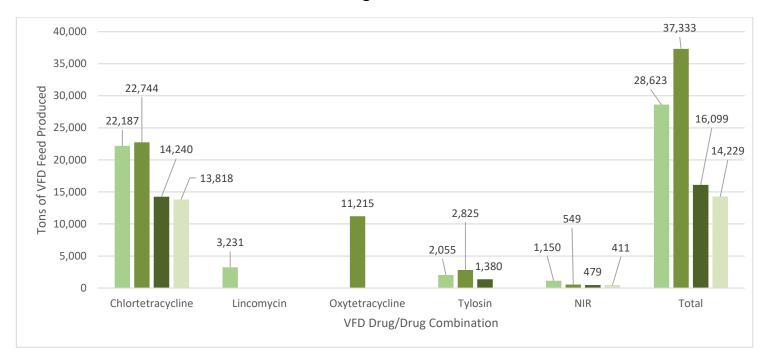
### Tons of VFD feed produced by manufacturers

Reported for 2018 – 2021 Manufacturer report for tons of VFD feed produced data

Table 7a

Tons of VFD Feed Produced							
Drug Name/Drug Combination Used in VFD Feed	2018	2019	2020	2021			
Chlortetracycline	22,187	22,744	14,240	13,818			
Lincomycin	3,231	-	-	-			
Oxytetracycline	-	11,215	-	-			
Tylosin	2,055	2,825	1,380	-			
NIR	1,150	549	479	411			
Total	28,623	37,333	16,099	14,229			

Figure 7a



NIR = Not Independently Reported. This category includes CTC/Sulfamethazine, Lincomycin, Neo/Oxy, Oxytetracycline, Tiamulin, and Tilmicosin. These drugs/combinations independently represent less than 5% of the total tons of VFD feed produced.

### Conclusion

This report is the illustration of efforts outlining the AUS Program's commitment to collecting and utilizing aggregated information to make analytical, science-based decisions; maintain transparency in reporting; and focus on human and animal health. It is the intent of AUS to collect, review, and present VFD data transparently to the public while maintaining data confidentiality in accordance with FAC Section 14407. The intent of this report is to help the public gain a better understanding of the issuing, manufacture, and distribution of medicated feed containing VFD drugs.

While 2020 and 2021 were challenging years, the AUS Program continued to work towards implementing the mandate of the AUS law. Moving forward, the AUS Program will continue work with VFD feed manufacturers, distributors, and veterinarians to ensure continued compliance with these mandates through direct outreach, audits, VFD data collection, and enforcement, as needed.

### AUS VFD has Compliance Measures for:

Outreach and education targeted at veterinary adherance to VFD regulations

Annual visits to distributor locations on FDA's VFD Intent List

Surveillance of online sales

Ensuring VFD compliance with manufacturers and distributors

Quarterly collection of VFD orders

### References

#### Links

AUS Guidelines for Judicious Use -

https://www.cdfa.ca.gov/ahfss/AUS/docs/Guidelines Judicious Use of Antimicrobia ls Livestock.pdf

AUS Report to the Legislature -

https://www.cdfa.ca.gov/ahfss/AUS/docs/CDFA AUS Report 2019.pdf

AUS Principles of Antimicrobial Stewardship -

https://www.cdfa.ca.gov/ahfss/AUS/docs/Antimicrobial Stewardship Principles.pdf

AUS Veterinarians' Guidelines for Judicious Use of Antimicrobials -

https://www.cdfa.ca.gov/ahfss/AUS/docs/Guidelines Veterinarians Judicious Use of Antimicrobials Livestock.pdf

AUS Website - https://www.cdfa.ca.gov/ahfss/AUS/Stewardship.html

CDFA Commercial Feed Regulatory Program -

https://www.cdfa.ca.gov/is/ffldrs/CommercialFeedReg.html

CDFA Inspection Services - https://www.cdfa.ca.gov/is/

CDFA Livestock Drug Program - <a href="https://www.cdfa.ca.gov/is/ffldrs/LivestockDrug.html">https://www.cdfa.ca.gov/is/ffldrs/LivestockDrug.html</a>

CDFA Safe Animal Feed Education Program -

https://www.cdfa.ca.gov/is/ffldrs/safe.html

CDFA VFD Page - https://www.cdfa.ca.gov/is/ffldrs/VeterinaryFeedDirective.html

CDFA Website - https://www.cdfa.ca.gov/

CPG Sec 615.115 Extralabel Use of Medicated Feeds for Minor Species - <a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cpg-sec-615115-extralabel-use-medicated-feeds-minor-species">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cpg-sec-615115-extralabel-use-medicated-feeds-minor-species</a>

eCFR Part 558 New Animal Drugs for Use in Animal Feeds -

https://www.ecfr.gov/current/title-21/chapter-l/subchapter-E/part-558/subpart-A/section-558.4

FDA 2017 Summary Report on Antimicrobials Sold or Distributed for Use in Food-Producing Animals - <a href="https://www.fda.gov/media/119332/download">https://www.fda.gov/media/119332/download</a>

FDA CVM GFI #120 Veterinary Feed Directive Regulation Questions and Answers - <a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-120-veterinary-feed-directive-regulation-questions-and-answers">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-120-veterinary-feed-directive-regulation-questions-and-answers</a>

- FDA CVM GFI #209 The Judicious Use of Medically Important Antimicrobial Drugs in Food-Producing Animals <a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-209-judicious-use-medically-important-antimicrobial-drugs-food-producing-animals">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-209-judicious-use-medically-important-antimicrobial-drugs-food-producing-animals</a>
- FDA CVM GFI #233 Veterinary Feed Directive Common Format Questions and Answers <a href="https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-233-veterinary-feed-directive-common-format-questions-and-answers">https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-233-veterinary-feed-directive-common-format-questions-and-answers</a>
- FDA VFD Final Rule <a href="https://www.govinfo.gov/content/pkg/FR-2015-06-03/pdf/2015-13393.pdf">https://www.govinfo.gov/content/pkg/FR-2015-06-03/pdf/2015-13393.pdf</a>
- FDA VFD Final Rule Homepage: <a href="https://www.fda.gov/animal-veterinary/development-approval-process/veterinary-feed-directive-vfd">https://www.fda.gov/animal-veterinary/development-approval-process/veterinary-feed-directive-vfd</a>