

2024 Veterinary Feed Directive Summary Report

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Executive Summary

Veterinary feed directives (VFDs) are written orders that establish veterinary oversight for the administration of certain drugs in animal feed to food-producing animals. The federal VFD rule requires livestock producers to have their animals evaluated and diagnosed by a veterinarian who can issue a VFD order to the livestock producer for the lawful use of feed containing a VFD drug. 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 expansion of federal oversight was intended to help mitigate the development of antimicrobial resistance in food-producing livestock. For the full scope of federal regulations pertaining to VFD orders, drugs, and VFD medicated feeds, refer to Title 21, Code of Federal Regulations (21 CFR) Part 558.6, found here: https://www.ecfr.gov/current/title-21/section-558.6.

California Senate Bill 27 (Hill, 2015) chaptered as Food and Agricultural Code (FAC) Division 7, Chapter 4.5, placed additional restrictions on 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, CDFA introduced the Antimicrobial Use and Stewardship (AUS) Program that mirrored and expanded upon FDA's antimicrobial resistance mitigation goals. AUS is the first program to span two CDFA divisions: the Inspection Services Division (ISD), which handles regulation, inspection, compliance, and enforcement; and the Animal Health and Food Safety Services Division (AHFSS), 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 comprises six sections:

- Background
- Data Summaries, Tables, and Figures
- Data on Manufacturing and Distribution Reports
- Compliance (new)
- Outreach and Education
- Conclusion

The data being reported encompasses a span of five years. For information specific to data reported prior to the five years in this report, 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:

 2023 Veterinary Feed Directive Summary Report <u>https://www.cdfa.ca.gov/is/ffldrs/pdfs/vfd_summary_report_2023.pdf</u>

- 2022 Veterinary Feed Directive Summary Report <u>https://www.cdfa.ca.gov/is/ffldrs/pdfs/vfd_summary_report_2022.pdf</u>
- 2020 2021 Veterinary Feed Directive Summary Report https://www.cdfa.ca.gov/is/ffldrs/pdfs/aus-vfd-summary-report-20-21.pdf
- 2019 VFD Summary Report <u>https://www.cdfa.ca.gov/is/ffldrs/pdfs/AUS_VFD_Summary_Report_2019.pdf</u>
- 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 from the last five years for medicated feed containing a VFD drug or combination of VFD drugs in California. See the previous VFD summary report links in the "General Information" section for any data reported prior to the last five years.

The following scenarios may lead to double reporting sales of VFD feed:

- Manufacturers of VFD feed that do not collect VFD orders and only sell VFD feed to other distributors.
- Distributors that do not manufacture VFD feed or collect VFD orders but sell product wholesale to another distributor for retail sales.
- and/or both may report sales on the same VFD feed in the supply chain.

The reporting period for each VFD order is determined by the issue date expressed on a VFD order. However, because the extent of time between issue and expiration date varies by VFD drug or combination of 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," "either/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 identified 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 Division 7, Chapter 4.5 and FAC Section 14902.5 is confidential and exempt under FAC Section 14407 from release under the California Public Records Act (CPRA) (Government Code Title 1, Division 10). As such, it will not be disclosed to any person or government agency, except to the Veterinary Medical Board (VMB), as appropriate.

Description of Tables and Figures¹

The information presented in the tables and figures is based on quarterly collections of VFD orders and other manufacturers or distributor VFD information from the last five years. True to the Scope of Reporting, data that does not meet the reporting threshold will be indicated by a "- " and categorized into NIR. 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, and
- 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 drugs approved by FDA for use in medicated animal feed, including VFD drugs, approved combinations with VFD drugs and additional information, please review the 21 CFR Part 558 at: https://ecfr.federalregister.gov/current/title-

21/chapter-I/subchapter-E/part-558.

Total number on FDA's Distributor Notification List: 9.889 (Includes locations in US, Canada, Puerto Rico, and Trinidad) Number of distributors in US: 9.868 (Includes locations in all 50 states) Number of distributors in CA: 104 CA VFD INTENT LIST (116) Manufacturer & Out of Unsure (5) Business (12) Distributor (12) Distributor (34) Veterinarians -Not currently Manufacturing or Dist. (4) Distributing (62)

Distributors

¹ The figure on the right represents 2024 VFD distributor statistics. There are 104 distributors on FDA's Distributor Notification List in California, but not all are currently distributing VFD feed.

Analytical Considerations

In the 2024 data, fluctuations for manufactured medicated VFD feed, as compared to previous years, were observed. This may have been affected by environmental factors including but not limited to varying weather patterns and disease outbreaks. For example, producers may be seeing secondary bacterial infections of their livestock herds and flocks due to stress factors like extreme heat crossing over seasons, drought, and/or disease outbreaks such as highly pathogenic H5N1 avian influenza (HPAI) and avian metapneumovirus, as occurred in 2024. These factors may affect the fluctuations seen in the 2024 data year because of one or any combination of extenuating factors present during the year.

California is one of the leading states in production of animal products. In 2024, California's cattle population, excluding lactating dairy cows (for which no VFD products are approved), was reported by the United States Department of Agriculture's (USDA) National Agriculture Statistics Service (NASS) at 6,200,000 animals. The poultry population including all classifications of chicken layers, broilers, turkeys and others was reported at 21,812,000 animals.

Veterinary Feed Directive Data Tables

The data shown in the following tables encompasses five years and is subject to fluctuations based on factors that include the timeliness of industry reporting and the date the summary report was published. Numbers are likely to be updated in future summary reports.

Veterinary feed directive order summary

Table 1a

	2020	2021	2022	2023	2024*
Total Number of VFD Orders¹	636	595	629	631	600
Number of VFD Collection Locations ²	39	27	31	27	29
Total Number of Locations VFD Orders Were Issued to ³	338	302	307	315	282
Total Number of Veterinarians Who Issued VFD Orders⁴	100	100	94	94	97

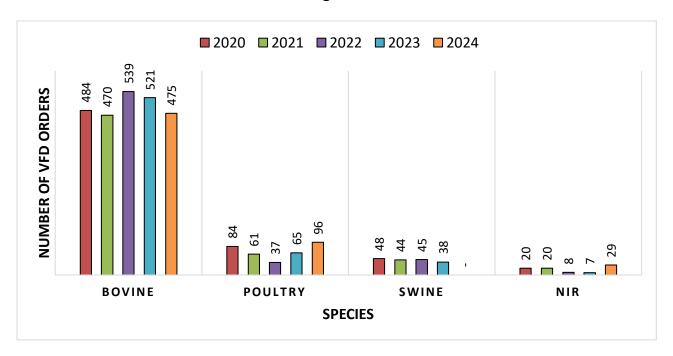
- Total number of VFD orders received from manufacturers and distributors located in California (CA), that are listed on FDA's Distributor Notification list. The total number of VFD orders includes only CA locations where the VFD feed is intended to be fed.
- Number of VFD collection locations is inclusive 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 2024 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

Table 2a

Species	2020	2021	2022	2023	2024*
Bovine	484	470	539	521	475
Poultry	84	61	37	65	96
Swine	48	44	45	38	_1
NIR²	20	20	8	7	29
Total	636	595	629	631	600

Figure 2a



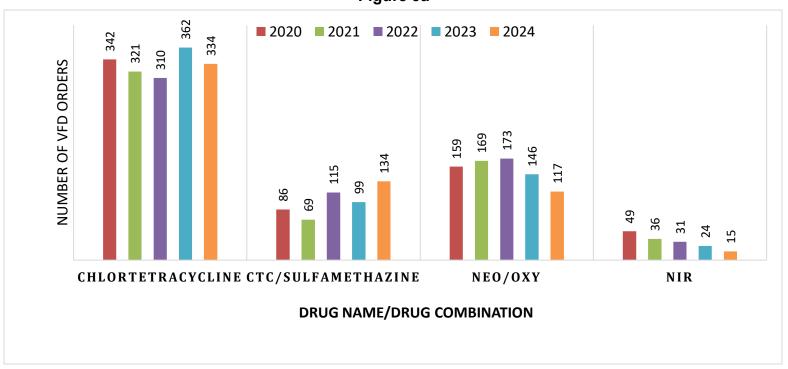
- * Total number of VFD orders received from manufacturers and distributors located in CA in the year 2024 will likely show fluctuations due to timeliness of reporting.
- 1. In 2024, VFDs collected with Swine as the specific species indicated did not meet the 5% reporting threshold and have been categorized into NIR.
- 2. NIR = Not Independently Reported. From 2020-2023, this category includes Aquaculture, Caprine, and Ovine. In 2024, swine was also included. These species independently represent less than 5% of the total VFD orders.

Number of VFD orders represented by drug name

Table 3a

Drug Name/Drug Combination Indicated on VFD Order	2020	2021	2022	2023	2024*
Chlortetracycline	342	321	310	362	334
CTC/Sulfamethazine	86	69	115	99	134
Neo/Oxy	159	169	173	146	117
NIR¹	49	36	31	24	15
Total	636	595	629	631	600

Figure 3a



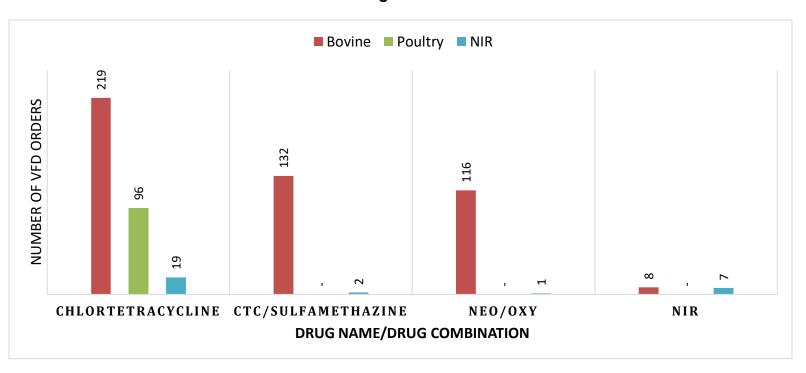
- * Total number of VFD orders received from manufacturers and distributors located in CA in the year 2024 will likely show fluctuations due to timeliness of reporting.
- NIR = Not Independently Reported. This category includes Florfenicol, Lincomycin, Oxytetracycline, Oxytetracycline/Sulfamethazine, Tilmicosin, and Tylosin. These drugs/combinations independently represent less than 5% of the total VFD orders collected.

Number of VFD orders by drug and intended species

Table 4a

Number of VFD orders by drug and intended species, reported for year 2024							
Drug Name/Drug Combination Indicated on VFD Order	Bovine	Poultry	NIR¹	Total			
Chlortetracycline	219	96	19	334			
CTC/Sulfamethazine	132	-	2	134			
Neo/Oxy	116	-	1	117			
NIR²	8	-	7	15			
Total 475 96 29 60							

Figure 4a



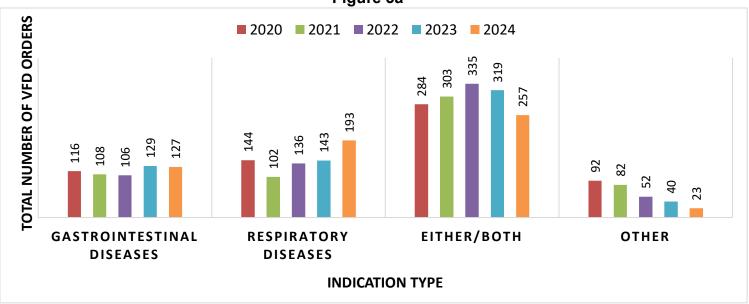
- NIR = Not Independently Reported. In 2024, this category for species includes Poultry, Swine, Aquaculture, Caprine, and Ovine. These species independently represent less than 5% of the total VFD orders.
- NIR = Not Independently Reported. In 2024, this category for drug name/drug combination includes Lincomycin, Oxytetracycline, Tilmicosin, and Tylosin. These drugs/drug combinations independently represent less than 5% of the total VFD orders.

Number of VFD orders by indication type

Table 5a

Indication Type	2020	2021	2022	2023	2024*
Gastrointestinal Diseases¹	116	108	106	129	127
Respiratory Diseases²	144	102	136	143	193
Either/Both ³	284	303	335	319	257
Other⁴	92	82	52	40	23
Total	636	595	629	631	600





- * Total number of VFD orders received from manufacturers and distributors located in CA in the year 2024 will likely show fluctuations due to timeliness of reporting.
- ^{1.} "Gastrointestinal (GI) Diseases" include bacterial enteritis, bluecomb disease, hexamitiasis, necrotic enteritis, porcine proliferative enteropathy, swine dysentery, swine ileitis, and transmissible enteritis.
- ^{2.} "Respiratory Diseases" include bacterial pneumonia, chronic respiratory disease, and other diseases of the respiratory tract.
- ^{3.} "Either/Both" is representative of two indications per VFD order, GI and respiratory diseases.
- 4. "Other" diseases include abortions, anaplasmosis, bacterial hemorrhagic septicemia, columnaris disease, fowl cholera, infectious synovitis, jowl abscesses, leptospirosis, liver abscesses, and vibrionic abortions.

Data on 2024 Manufacturing and Distribution

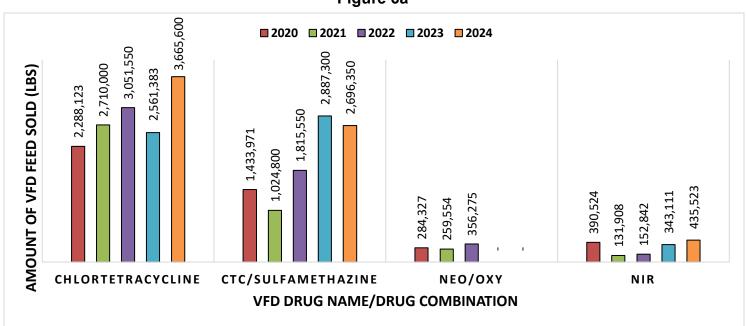
Amount of VFD feed sold by distributors

Reported for 2020 – 2024
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	2020	2021	2022	2023	2024			
Chlortetracycline	2,288,123	2,710,000	3,051,550	2,561,383	3,665,600			
CTC/Sulfamethazine	1,433,971	1,024,800	1,815,550	2,887,300	2,696,350			
Neo/Oxy	284,327	259,554	356,275	_1	-			
NIR²	390,524	131,908	152,842	343,111	435,523			
Total	4,396,945	4,126,262	5,376,217	5,791,794	6,797,473			

Figure 6a



- In 2023 and 2024 Neo/Oxy was categorized into NIR. The number of VFDs collected containing this VFD drug combination did not meet the threshold of independent reporting.
- 2. NIR = Not Independently Reported. In 2020 2022 this category includes Florfenicol, Lincomycin, Oxytetracycline, Tilmicosin, and Tylosin. In 2024, this category also includes Neo/Oxy. These drugs/combinations independently represent less than 5% of the total amount of drug sold by distributors.

[‡] This data could reflect double-reporting. For more information refer to "Scope of Reporting" section.

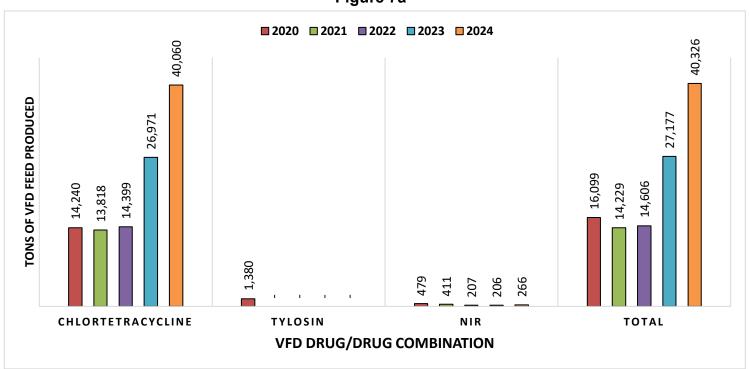
Tons of VFD feed produced by manufacturers

Reported for 2020 – 2024 Manufacturer report for tons of VFD feed produced data

Table 7a

Tons of VFD Feed Produced								
Drug Name/Drug Combination Used in VFD Feed	2020	2021	2022	2023	2024			
Chlortetracycline	14,240	13,818	14,399	26,971	40,060			
Tylosin	1,380	_1	-	-	-			
NIR ¹	479	411	207	206	266			
Total	16,099	14,229	14,606	27,177	40,326			

Figure 7a



NIR = Not Independently Reported. In this figure, this category includes Neo/Oxy, Oxytetracycline, and Tylosin from 2021-2024. In 2020, Neo/Oxy and Oxytetracycline are included, but Tylosin was independently reported. These drugs/combinations independently represent less than 5% of the total tons of VFD feed produced.

Outreach and Education

The Antimicrobial Use and Stewardship (AUS) programs in CDFA's Inspection Services Division (ISD) and Division of Animal Health and Food Safety Services (AHFSS) worked together to identify VFD orders that were not adhering to the standards set forth by 21 CFR Part 558.6. This collaborative effort led to the formulation of comprehensive educational materials for both veterinarians who issue VFDs and feed establishments that distribute VFD medicated feed, including the following¹:

- Common Issues on Veterinary Feed Directives
- Filling a Veterinary Feed Directive
- VFD Checklist

In 2022, the "California Department of Food and Agriculture's Livestock Veterinary Feed Directive Online Training" was released as a result of a collaborative effort between CDFA's ISD AUS Program, CDFA's Safe Animal Feed Education (SAFE) Program, and University of California (UC), Davis, partners at the Food Animal Residue Avoidance Databank (FARAD). More information on this training can be found on the CFRP's Run of the Mill blog: https://blogs.cdfa.ca.gov/CFRP/index.php/updated-veterinary-feed-directive-training-available-online/. The online program is developed to assist manufacturers and distributors navigate the specific federal regulations applicable to VFDs in the CFR, federal VFD drug approvals, identify and verify the elements of a complete and lawful VFD order prior to VFD feed distribution, the different types of VFD Type A medicated articles, Type B VFD medicated feed, and Type C VFD medicated feed, and more. This training has had 30 registrations since its release and was updated in 2024 to reflect additional needs by feed distributors and veterinarians. Additionally, the SAFE program revamped its website to include a page specifically geared to state and federal VFD resources, including the linked outreach documents listed above.

In 2024, AHFSS AUS engaged with 55 veterinarians, assembled and mailed 70 packets of tailored outreach and education materials, logged 37 phone consultations and emails with veterinarians to discuss VFD outreach materials, and worked with two veterinary hospitals to proactively review VFDs prior to issuance.

Both ISD AUS and AHFSS AUS programs performed outreach efforts to assist veterinarians who issue VFDs, as well as VFD distributors within California, to promote best practices to ensure a wholesome supply of meat and milk for California consumers. This outreach helps to better identify any inaccurate or incomplete fields on a VFD order, and that regulations for antimicrobial use in feed are being followed.

VFD Compliance

Since the inception of the AUS program, ISD AUS Inspectors have conducted VFD inspections at feed facilities, ranging from manufacturers and distributors to retail businesses that distribute VFD medicated feeds, to ensure cooperation and compliance with state and

¹ The listed documents can be found at https://www.cdfa.ca.gov/is/ffldrs/VeterinaryFeedDirective.html

federal laws. To further mitigate incomplete or inaccurate VFD orders being accepted when submitted by veterinarians and/or producers, inspection staff have taken an active role in collaborating with firms about the processes in place to collect and retain VFD orders. Staff review the VFDs with the firm and educate them on their ability to reject VFDs with missing or inaccurate information. The rejected VFD can be sent back to the producer or veterinarian for corrections, discarded, and a new VFD order issued.

Additionally, ISD AUS has proactively incorporated all firms listed on the FDA Distributor Notification List into their annual workplans to effectively assist firms being removed from FDA's list that have not, will not, or are not interested in distributing VFD feed. This will allow more targeted outreach and reduce communication with firms who are not selling applicable products. Most firms qualify for removal if they have not had a VFD order or sold VFD feed in over two years. The FDA Distributor Notification List can be found at: https://animaldrugsatfda.fda.gov/adafda/views/#/search.

Conclusion

This report illustrates the AUS Program's commitment to the collection and utilization of aggregated information to make analytical, science-based decisions; maintain transparency in reporting; and focus on issues related to One 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 issuance, manufacture, and distribution of medicated feed containing VFD drugs.

ISD AUS also continues to cooperatively assist the AHFSS AUS staff draft informational packets to veterinarians who require additional education on completing a VFD; which allows the programs to cooperatively develop customized outreach and education materials targeted at veterinary adherence to VFD regulations. More information on this outreach effort can be found on the AHFSS AUS VFD Resources website, https://www.cdfa.ca.gov/ahfss/aus/vfdresources/.

Moving forward, both divisions of the AUS Program will continue to work with VFD feed manufacturers, distributors, and veterinarians to ensure continued compliance with state and federal mandates through direct outreach, audits, VFD data collection, and enforcement, as needed.

AUS activities related to VFDs:

Outreach and education targeted to adherance of 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 - https://www.cdfa.ca.gov/is/ffldrs/LivestockDrug.html

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 -

https://www.fda.gov/regulatory-information/search-fda-guidance-

documents/cpg-sec-615115-extralabel-use-medicated-feeds-minor-species

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

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

FARAD

http://www.farad.org/

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

FDA 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

- FDA CVM GFI #209 The Judicious Use of Medically Important Antimicrobial Drugs in 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
- FDA 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
- FDA VFD Final Rule https://www.govinfo.gov/content/pkg/FR-2015-06-03/pdf/2015-13393.pdf
- FDA VFD Final Rule Homepage: https://www.fda.gov/animal-veterinary/development-approval-process/veterinary-feed-directive-vfd
- Veterinary Feed Directive Online Training registration link https://na.eventscloud.com/ereg/newreg.php?eventid=634458&t=9b1f964a98855 e97447e85a1fe87a073