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July 2012

Southwest Region

## Veterinary Oversight for Dairy Farms

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Recently, the FDA released several "guidance documents: that have established their current and future policy regarding the use of antimicrobial drugs in food-producing animals.

Of particular importance to FDA is phasing out the production uses of these drugs in food animals and phasing in veterinary oversight. In dairy cattle, we do not use these drugs as frequently as the beef, poultry and swine industry due to the fact there is no labeled indication for these products in lactating cows. The main production or feed efficiency product we use in dairy cattle is Rumensin (monensin), and this class of drugs is exempted from the FDA guideline.

**Why are these issues important to dairy veterinarians and producers?** There are some products we use in dairy replacement heifers, such as tetracycline in the feed to treat or prevent pneumonia, that will in the future require veterinary oversight. It is also important for producers to realize that it is likely these FDA policies will shift to injectable antibiotics, as well, meaning a loss of "over the counter" status. Finally, FDA has repeatedly stated that the No. 1 common factor in violative residues in marketed dairy cattle is a lack of a valid veterinary-client/patient relationship.

The food animal industry is being scrutinized and unfairly blamed for antibiotic resistance in people. We all know there is antibiotic resistance in food animals and in people. The exact mechanisms are unclear. However, the food animal agriculture industry is under attack for unregulated and unsupervised use of antibiotics. It is my opinion that the industry either needs to embrace and accept veterinary oversight of drug use on their operations or eventually we will have more and more regulations with fewer and fewer products to treat and manage disease on our farms.

**How will I get antibiotics for feed for my heifers if needed?** You will still be able to acquire these products: however, you will no longer be able to purchase them without a veterinary "prescription." The FDA is only applying these guidelines to those antibiotics of importance to humans, such as sulfas, penicillins, and tetracyclines. The "prescription" is called a Veterinary Feed Directive (VFD). The VFD process is currently undergoing changes to make it more "user-friendly." So, sometime in the next three years, if your nutritionist wants to have these products mixed into the feed, you will probably need to contact your veterinarian for a VFD.

**Does this mean injectable products will all be prescription?** The recent documents released by the FDA do not mention injectable products, only feed and water additives. The likely reason for this is that on a total-pounds-of-use basis, more antibiotics are used in the feed. Also, feed and water additive products are labeled for production uses, which the FDA states is not "judicious" use of antibiotics. The first step in the FDA guidelines is to have drug manufacturers withdraw the labeled indications that are not for treatment, prevention or control of disease. It is likely that injectable, oral and intramammary products will become prescription only at some time in the near future. The FDA wants to ensure that veterinarians are involved at some point in the decision-making process of using antibiotics. This does not mean we need to treat every sick animal on your farm. It does mean that your veterinarian should be involved and offer guidance on how to diagnose, treat and prevent diseases on your operation.

Your veterinarian does not want to squeeze every dollar out of your farm operation. We do want to help you be successful and ensure the health of your animals. Veterinary oversight is really veterinary help. We want to help you have healthy, productive animals.



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