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## Restrictions on Antibiotics to continue

If you thought that the implementation of the Veterinary Feed Directive (VFD) rule on January 1 was going to be it for new restrictions on the usage of antibiotics in livestock, unfortunately, you were mistaken. Limiting the use of antibiotics has been and will continue to be a goal of consumers, retailers and policy makers.

The current agenda item is duration of use of antibiotics. When the FDA released the new VFD rules in October of 2015 they implied that extended duration or continuous medication was not a judicious use of antibiotics and that they would be considering new guidance in the future. Last fall the FDA asked for comments on the duration of therapy and plans to release guidance to pharmaceutical companies about potential label modifications. The deadline to submit comments is March 13, 2017 so you have just a few days to get your comments submitted.

The issue for the FDA is that long-term usage of an antibiotic is more likely to lead to antimicrobial resistance than single dose or short duration therapy. However, several diseases that we would like to prevent in beef cattle normally require longer duration of therapy. Several antibiotics that have been approved for cattle that transitioned from over the counter (OTC) to VFD in January either do not have speci-

fied duration of therapy or the label says to feed continuously. The FDA would like to restrict the maximum length that these antibiotics could be used.

Specifically for cattle, the FDA is reviewing the usage of chlortetracycline (CTC) to control anaplasmosis and prevent respiratory disease and liver abscesses and for tylosin to prevent liver abscesses.

Generally, we recommend that in areas where anaplasmosis is endemic that CTC should be used during the vector season to keep cattle from possibly dying from anaplasmosis. Cattle in the southern part of Iowa are in an area that is endemic with anaplasmosis and the fly season can range from late May until October.

Most feedlot cattle, unless being fed for a natural fed market, are medicated with tylosin (sometimes CTC) to prevent the formation of liver abscesses. Cattle on high-energy diets are at risk of developing acidosis and subsequently abscesses in the liver anytime during the feeding period (5-8 months).

If you are involved with raising cattle where control of anaplasmosis or liver abscesses is important, you should comment so that the FDA knows your concerns. At the end of January, there were about 200 comments that had been registered on this topic with the FDA and two-thirds of them were for consumers stating that the duration of therapy should be limited to 21 days. If you want to continue to have these tools available make sure the FDA knows the importance of preventing disease in your operation.

I would encourage to go to this web page <https://www.regulations.gov/docket?D=FDA-2016-D-2635> (google search FDA 2016 D 2635). Click on the notice posted in September of 2016 for the complete request and instructions from FDA then leave a comment by clicking on Comment Now button.

Specifically, the FDA would like you to answer these six questions.

1. When is the animal/class at risk of developing the disease?
2. For how long do you administer X antimicrobial for Y indication if the labeling says "feed continuously," or is silent on duration of use?
3. What factors influence your decision when determining the duration of use?
4. In addition to the drug labeling, what sources of information do you use in making a decision regarding duration of use?
5. What pros and cons do you see if durations of use are defined for all of these antimicrobials?
6. What reasonable alternatives to medically important antimicrobials, including other pharmaceutical or non-pharmaceutical approaches, are available for managing the diseases?

Below I provide some basic text that you can use to model your comment after but make yours as personal as you can, mentioning your family farm, importance of animal health and welfare and any experience you have had with the disease. Most of the comments from consumers are cut and pasted from an advocacy group, so while great in

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