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Antibiotic use and future records necessary to keep the government and our customers happy

Matt Anderson, DVM

Suidae Health and Production, Algona, Iowa

For decades livestock producers, and the veterinarians that are responsible for animal health, have depended on antibiotics to help fight bacterial diseases that occur in livestock populations. In more recent decades antibiotics have also been utilized as growth promotants for the more efficient rearing of livestock. This has become a highly emotional, highly publicized concern under the notion that misused or overused antibiotics in livestock production can cause antibiotic resistance in bacterial populations which then has the potential to cause human illness or death.

While, as scientists, the idea of the creation of resistance in bacterial populations is not foreign to us what directly causes this and what impact it has on human health is hotly debated and little proved. Be that as it may, there is significant pressure being applied to how antibiotics are used in animal populations and real change appears to be coming. Guidance for industry (GFI) documents 209 and 213 are in existence and portend change for livestock producers and veterinarians. The veterinary feed directive language is under review and seems to imply an expanded role, with expanded responsibilities, for food animal veterinarians. Increased veterinary oversight would seem to be on the near horizon.

Judicious use of antibiotics has become a mantra that livestock industries have embraced and should continue to defend. During a period of time in which animal welfare is more important to us than ever, we should not underestimate the role of antibiotics in regard to good animal welfare and husbandry practices. As such, it behooves us all to know, understand and comply with those practices that we have been tasked with relative to prescription, dispensing, use and record keeping.

Under the current language in GFI 209 and GFI 213 antibiotic uses outside those necessary for assuring animal health would be eliminated. There would also be a 'migration' of marketing status of some current antibiotics so that more direct veterinary oversight can be achieved. As I read this, at least some medications that are available 'over the counter' now would be available only as dispensed products or as prescribed products. What kind of veterinary-client-patient relationship is necessary to allow

veterinarians to prescribe antibiotics for food animals to livestock growers hasn't been fully worked out yet. It is certainly reasonable to believe that the veterinary-client-patient relationship will remain a cornerstone of good animal health care. It is also certain that having a good documented health plan together with written (and archived) animal health records will be more important than ever.

While there is an overt initiative within government to tighten regulation surrounding the use of antibiotics, there is also industry driven initiative that heads us in this direction. Most major pork packers now mandate that grower/suppliers are PQA Plus certified. Seven of the ten good production practices (GPP's) stated within the PQA Plus program deal directly with on farm medication use and record keeping. Early feedback from third party verification of PQA Plus site assessments reveals that most veterinarians and producers are doing a good job but that we need to strengthen record keeping in some areas. A common area that is critiqued is documentation of the individual that performed the treatment.

The FDA performed an on farm inspection for a producer that we work very closely with. The first thing that they asked that producer to verify was that they had a demonstrable veterinary-client-patient relationship. They then started making sure that there were only approved products on the farm. They followed up by inspecting every product on the farm to make sure it had an approved label and that products weren't past their expiration date. Health record keeping relative to the products and relative to the animals treated was very important in the process.

During the talk that accompanies this paper we'll talk specifically about what processes and records are necessary for veterinarians and producers to maintain compliance and a little bit about the culture that is driving this. We will also spend time discussing the alphabet soup that is VCPR, VFD, PQA, and AMDUCA because 'We Care' and because we want to stay in compliance with FDA.

