

FDA, VFD, and VCPR – What Does this All Mean to Beekeepers? Jerry J. Bromenshenk, Ph.D.;
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Veterinary Feed Directive (VFD), January 1, 2017 Proposed in 2013, the US Food and Drug Administration (FDA) published a revised Veterinary Feed Directive (VFD) on January 1, 2017. This new Act applies to any food-producing animals (cattle, pigs, poultry, fish, etc.), including honey bees! The overall goal is to limit and decrease the amount of antibiotics in the food that we consume. Simply stated: (1) Bees and their beekeepers now need veterinarians, (2) Antibiotics can only be obtained by prescription or a veterinary food directive on written order by a veterinarian, (3) Over-the-counter sales of antibiotics have more or less been removed (antibiotics are no longer available at farm and ranch supply stores), and (4) Advertising of antibiotics and claims of growth promotion are prohibited.

The VFD applies specifically to three antibiotics used to treat bees, other animals, and humans. These include: (a) oxytetracycline for control of European Foul brood, (2) tylosin for treatment to control oxytetracycline-resistant foul brood, and (3) lincomycin. Depending on individual state regulations, beekeepers may be able to use antibiotics to treat colonies with low levels of American Foul Brood, or they may be required to burn affected colonies. Although previously little used by beekeepers, the third listed antibiotic, lincomycin apparently has been approved for use in beehives since 2012. Depending on the antibiotic and method of administration, a beekeeper either needs a prescription for water soluble forms (oxytetracycline, tylosin, or lincomycin) or a Veterinary Feed Directive for dry, powdered forms (oxytetracycline as a sugar dust) of the antibiotic. The prescription or VFD must be issued by a licensed veterinarian. The actual antibiotic products can only be obtained from the veterinary clinic, a licensed pharmacist, or a licensed and approved supplier. Montana beekeepers can have their prescription or VFD filled by Western Bee in Polson, which is especially useful to large scale beekeepers.

What is not commonly known or clearly explained in the FDA Directive is that each beekeeper needs to set up a formal patient relationship with a veterinarian (VCPR). FDA says: In “order for a VFD to be lawful, the veterinarian issuing the VFD must: (1) Be licensed to practice veterinary medicine; and (2) Be operating in the course of the veterinarian’s professional practice and in compliance with all applicable veterinary licensing and practice requirements, including issuing the VFD in the context of a veterinarian-client-patient-relationship (VCPR) as defined by the State.

Clearly, most beekeepers, as well as veterinarians and the state licensing boards never anticipated having bees as patients. Typically, veterinarians providing service for herd animals like cattle use VCPRs. We found that others often asked – what should be in a VCPR for bees? Ohio has an online example for all animals, and I obtained permission to modify it to better fit Montana state directives. I have asked that my example VCPR be posted on the WAS Facebook and Web page. Please note, neither beekeepers nor veterinarians anticipated that the federal directive would include bees. Regardless, it is unlikely to be rescinded, changed, or modified to exclude bees. The goal is to ensure that antibiotics, and only the proper antibiotic, at correct dosage and application, for the appropriate bacterial disease are authorized by a licensed veterinarian; when needed, for the proper purpose, and in the amounts needed. Hoarding of antibiotics and carry-over from year to year should not occur. The beekeeper receives the amount needed for the time specified and for the number of colonies that require treatment. To meet the requirements of the FDA directive, each and every beekeeper needs to establish a patient (client) relationship with a veterinarian. Finding a veterinarian to provide service to bees can be difficult, especially in rural areas. All of this is new to them, and many are justifiably concerned that their license could be suspended or revoked if they inadvertently break the rules. For all small scale beekeepers and for the local bee clubs and associations, I recommend visits to local veterinarians by your more experienced beekeepers, each taking along a copy of an example VCPR. Use that as a starting point toward establishing a veterinarian-client-patient-relationship. In addition, our Montana Board of Veterinary Medicine emphasized: Do not call a veterinarian and start the conversation by stating that you ‘need a prescription or a VFD for antibiotics for your bees and you need it right away’. In essence,

you are asking the veterinarian to violate the new FDA directive, especially if the veterinarian doesn't know you.

Finally, few veterinarians have any training in bees, bee diseases, bee colony inspection, or how to safely work bees. The advice from our state Veterinary Board was that the beekeeping community may have to 'train' the veterinarian. That seems to be a rather risky approach – having beekeepers of unknown experience teach their veterinarians. As such, in Montana the I, the University of Montana's School of Extended and Lifelong Learning, the State Board of Veterinary Medicine, and the State Veterinary Association are working to develop and provide appropriate training to veterinarians willing to provide their services to bees and beekeepers. I've always thought that bees need veterinarians – I just didn't think this was how it would happen.

Veterinary Client / Patient Relationship (VCPR)

Agreement for Montana Honey Bee Colonies

Name of Clinic:

This agreement reaffirms a relationship between the Veterinarian of Record (VoR) and the client that they are committed to use drugs in a safe, effective and appropriate manner, which includes avoiding residues in honey.

- No medication will be used in a manner that is not listed on the label unless directed by the veterinarian and written in the treatment protocols for the client by the VoR.
- The client and veterinarian agree to keep accurate and detailed treatment records (i.e., apiary ID, date, drug, dosage, route of administration, personnel involved).
- Regardless of where drugs (prescription or over-the-counter) are obtained their use should be consistent with this agreement.
- The veterinarian will provide consultation and oversight of treatment records and drug use for client apiaries.
- All withholding times between drug administration and honey flows will be provided by the veterinarian and followed by the client or representative.
- The client is responsible to immediately notify the veterinarian of any honey residue violations.
- All medications will be stored, labeled, and administered only to colonies within registered apiaries according to state and federal regulations.
- Prescription medications can only be used for colonies within registered apiaries for which they were prescribed.

The VoR is unique to all other veterinarians working with the client in that this veterinarian is responsible for providing appropriate oversight and treatment protocols of all drug usage. All other veterinarians working on the farm should notify the VoR of their recommendations and/or actions regarding treatment protocols.

This document is to be reviewed annually by the client and the VoR.

Client: _____ Veterinarian of Record (VoR): _____

Signed: _____ Signed: _____

Date: _____ Date: _____