Ray Niles Center for Veterinary Medicine Division of Compliance









Residue Avoidance

The Primary Causes and How to Avoid Them





What Are The Primary Causes?

- The number one cause is failure to maintain written treatment records.
- The number two cause is failure to properly identify treated cows.
- The number three cause is failure to maintain a drug inventory system.





The Best Way to Avoid Residues

 READING, UNDERSTANDING, AND FOLLOWING ALL THE DIRECTIONS FOR USE ON THE DRUG LABEL IS THE MOST IMPORTANT CONTROL MEASURE FOR PREVENTING A RESIDUE!





Six Ways to Help Avoid Residues

 In addition to the most important step of always following the label directions, here are six (6) other suggested control measures to help avoid violative drug residues in milk & meat:





 Always have a valid veterinarian-client-patientrelationship (VCPR).

 Working closely with your veterinarian is a good way to help avoid residues.





- Keep a Record of All Animal Treatments
- Failure to keep animal treatment records is a major cause of violative drug residues in milk and meat. Good records include; the identity of treated animals, diagnosis, drug used, time treated, the duration of treatment, milk discard time, and slaughter withhold time.





 Identify (ID) Treated Cows and Calves or Keep Them Separated from Non-Treated Cattle.

• It is a good idea to use two types of ID like two leg bands or a leg band and a paint mark.





Keep an Inventory of Drugs Used

 It is important for you to record every drug you purchase, how you use it, and when you dispose of unused product.





 Limit the Need for Animal Drugs. Animal Drug Use Cannot Replace Sound Management Practice and Control Measures.

 Prevent disease in your animals, emphasize good animal husbandry practices, vaccinations, biosecurity, health maintenance, and diagnose sick animals early. Work with your veterinarian to select appropriate treatments.

Train People Who Medicate Your Animals

 People responsible for the care of your livestock should be adequately trained to recognize the signs of the common diseases that may occur in your operation as well as trained in proper drug use, ID of treated cows, and record keeping.

Tissue Residue Inspections May Reveal:

- Failure to follow withdrawl times
- Illegal extralabel use of drugs (which includes inadequate pre-slaughter withdrawal period)
- Illegal sales of veterinary prescription drugs
- Illegal use of bulk drugs
- Use of unapproved new animal drugs





Tissue Residue Inspections May Reveal:

- Cross-contamination of animal feeds with drugs due to poor Good Manufacturing Practices (GMPs) for Medicated Feeds (21 CFR Parts 225 or 226)
- Misuse of drugs in medicated animal feeds
- Failure to follow good animal husbandry practices



Tissue Residue Inspections May Reveal:

- •Diversion of treated/medicated animals intended for rendering purposes to slaughter for human consumption
- •Failure to adequately identify animals treated with drugs





DRUG	2005	2006	2007	2008	Total	Percent
Amikacin	4	2	0	1	7	0.20%
Ampicillin	6	10	13	8	37	1.04%
Ceftiofur	*	*	*	71	71	1.99%
Dihydrostreptomycin	14	10	8	3	35	0.98%
Florfenicol	1	0	0	0	1	0.03%
Flunixin	121	133	262	233	749	20.99%
Furazolidone	1	1	0	0	2	0.06%
Gentamicin	77	95	58	50	280	7.85%
	2	1	0	0	3	
Kanamycin						0.08%
Lincomycin	0	0	1	0	1	0.03%



DRUG	2005	2006	2007	2008	Total	Percent
Neomycin	22	28	23	21	94	2.63%
Oxytetracycline	31	30	21	32	114	3.20%
Penicillin	301	358	413	304	1376	38.57%
Phenylbutazone	2	0	4	3	9	0.25%
Sulfachlorpyridazine	0	1	0	0	1	0.03%
Sulfadimethoxine	102	158	159	135	554	15.53%
Sulfamethazine	24	33	33	22	112	3.14%
Sulfathiazole	1	2	0	0	3	0.08%
Tetracycline	16	16	7	15	54	1.51%
Tilmicosin	17	27	14	4	62	1.74%
Tylosin	1	0	1	1	3	0.08%
	743	905	1017	903	3568	

^{*} Prior to July 28, 2008 USDA could not quantitate Cefiofur





Table 40b Specific FAST Violative Residues 2006 Inspector Generated Sampling Results

Pro- duc-																		Totals
tion Class	Ami lacin	Ampi cillin	Dihydro strepto mycin	Genta mycin	Kana mycin	Neo mycin	Oxy tetra cycline	Peni cillin	Tetracy cline	Tilmi cosin	Tylo sin	Sulfa diazine	Sulfadi metho xine	Sulfa metha zine	Sulfa metho xazole	Sulfa thia zole	Fluni xin	
Beef Cows ³	0	2	0	28	0	8	12	36	0	11	0	0	6	16	0	1	5	125
Bob veal ³	0	0	0	9	0	95	14	13	3	1	1	0	7	10	4	0	1	158
Bovine	0	0	0	0	0	0	1	1	0	0	0	0	2	0	0	0	1	5
Bulls ³	0	0	0	4	0	1	1	1	0	3	0	0	0	2	0	0	0	12
Diary cows ³	2	10	10	89	1	28	29	359	15	25	0	0	158	30	0	2	130	888
Formu la fed- veal ³	0	0	0	0	0	3	0	1	0	0	0	4	0	0	0	0	0	8
Heavy Calves ³	0	0	0	11	0	7	1	4	0	1	0	0	4	6	0	0	1	35
Heifers	0	0	0	3	0	0	1	2	0	0	0	0	0	0	0	0	0	6
Market Swine	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Non-FFV	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	0	0	3
Steers ³	0	0	0	4	0	2	0	4	0	0	0	0	3	0	0	0	1	14
Totals	2	12	10	148	1	144	59	422	18	42	1	4	180	66	4	3	139	1,255

 $^{^3}$ Animals with multiple violations, $\,^4$ Non-FFV = Non-formula-fed veal

Table 40b Specific FAST Violative Residues Pro-2006 Inspector Generated Sampling Results duc-Dihydro Oxy tion Genta Tetracy Neo Ami Ampi Kana Peni strepto tetra mycin cline kacin cillin Class cillin mycin mycin mycin cycline Beef $Cows^3$ 60.1% Bob vea13 Bovine Bulls³ 10.0% 40.4% Diary cows³ Formu la fed-vea13 Heavy Calves³ Heifers Market Swine Non-FFV⁴ Steers^3 Totals

Pro- duc-	2000 Inspector Generated Sampling Results								
tion Class	Tilmi cosin	Tylo sin	Sulfa diazine	Sulfadi metho xine	Sulfa metha zine	Sulfa metho xazole	Sulfa thia zole	Fluni xin	
Beef Cows ³	11	0	0	6	16	0	1	5	125
Bob veal ³	1	1	О	7	10	4	0	1	12.6% 158
Bovine	0	0	О	2	0	0	0	1	5
Bulls ³	3	0	О	0	2	0	0	0	12
Diary cows ³	25	0	О	17.8% 158	3,4% 30	0	2	14.6% 130	70.8% 888
Formu la fed- veal ³	О	0	4	0	0	0	0	0	8
Heavy Calves ³	1	0	О	4	6	0	0	1	35
Heifers	О	О	0	0	0	0	0	0	6
Market Swine	О	0	0	0	1	o	О	0	1
Non-FFV ⁴	1	0	0	0	1	0	0	0	3
Steers ³	0	0	0	3	0	0	0	1	14
Totals	42	1	4	180	66	4	3	139	1,255

GOOGLE THESE WEBSITES

Compliance policy guide 654.200

Compliance police guide 615.200

Compliance policy 7371.006











QUESTIONS??

Ray Niles

Division of Compliance

FDA, Center for Veterinary Medicine

7519 Standish Place, HFV-233

Rockville, MD 20855

Tel: 240-276-9213

Fax: 240-276-9241

E-mail: raymond.niles@fda.hhs.gov



