



Guidance Number: GU5122JJW

Subject: Guidance to the School Food FOCUS-The Pew Charitable Trusts Standard for Certified Responsible Antibiotic Use to Minimize the Use of Antibiotics in Poultry

Distribution: QA Division Auditors

1 Purpose

This document provides guidance to auditors for audits of poultry complexes that have implemented the School Food FOCUS-The Pew Charitable Trusts Standard for Certified Responsible Antibiotic Use (CRAU) to Minimize the Use of Antibiotics in Poultry.

NOTE: Entities that are current on the Official Listing of Approved USDA Process Verified Programs for “No Antibiotics Ever” *and audited for compliance with CRAU* are considered to meet this standard for antibiotic use.

2 Audit Frequency

Poultry complexes will be audited at the frequency noted in the Program procedure for which the client applies. The onsite audit shall include the following locations and farm visits:

- 2.1 Feed mill(s), hatchery, slaughter and further processing plants. If possible, schedule the hatchery visit at a time of *in ovo* vaccination.
- 2.2 Four farms (could have multiple barns). Where possible/applicable, include one or two farms where medically important antibiotics have been used recently. Otherwise, the farms should be randomly selected.

3 Definitions

3.1 “Therapeutic use” is restricted to the following three categories:

- 3.1.1 The use of antibiotics with analogues to human drugs (Table 1) in poultry diagnosed with bacterial disease at a level and durations expected to effectively treat the disease.
- 3.1.2 The use of antibiotics with analogues to human drugs (Table 1) in healthy poultry if there is a medical reason, determined and on a medication ticket or other written document by a licensed veterinarian, to believe that the birds are at significantly increased risk for developing a clinical bacterial infection or after an exposure to infectious bacteria but before the onset of clinical signs or laboratory confirmed disease (prophylaxis). Antibiotics should be given at treatment level as indicated on the label or on the veterinarian prescription (in the case of off label use).
- 3.1.3 The use of antibiotics with no analogues to human drugs (Table 2) in poultry may be used only according to label directions.

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3.2 “Non-therapeutic use” is defined as use of antibiotics with analogues to human drugs (Table 1) in the absence of microbial disease, known (documented) disease exposure, or a medical reason to believe there is a significant risk for developing a clinical bacterial infection. Non-therapeutic use includes administration of antibiotics with analogues to human drugs (Table 1) for growth promotion, feed efficiency, weight gain, or in the absence of documented exposure.

3.3 Valid veterinarian-client-patient relationship (VCPR)

A valid VCPR is defined as one in which:

- 3.3.1 A veterinarian has assumed the responsibility for making medical judgments regarding the health of (an) animal(s) and the need for medical treatment, and the client (the owner of the animal or animals or other caretaker) has agreed to follow the instructions of the veterinarian.
- 3.3.2 There is sufficient knowledge of the animal(s) by the veterinarian to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s).
- 3.3.3 The practicing veterinarian is readily available for follow-up in case of adverse reactions or failure of the regimen of therapy. Such a relationship can exist only when the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal(s) by virtue of examination of the animal(s), and/or by medically appropriate and timely visits to the premises where the animal(s) are kept.
- 3.3.4 A feed containing a Veterinary Feed Directive drug (a VFD feed) shall NOT be fed to animals in absence of a lawful VFD issued by a licensed veterinarian in the course of the veterinarian’s professional practice and within the confines of a valid veterinarian-client-patient relationship.

3.4 CRAU compliance is at risk if antibiotics with analogues to human drugs (Table 1) are used for prophylaxis for more than two consecutive growing cycles.

- 3.4.1 If antibiotics with analogues to human drugs are used for prophylaxis for more than two consecutive growing cycles, a written veterinary statement indicating the underlying problem(s) and a plan of action to correct the problem(s) must be sent to School Food FOCUS and a copy retained for auditor review. School Food FOCUS address and contact information for this report will be provided upon approval into the CRAU program.
- 3.4.2 If the underlying problem has been resolved, the veterinary statement may indicate that a successful solution has been found that does not include the prophylactic use of antibiotics, and that no further plan of action is needed.
- 3.4.3 Veterinary documentation of treatment and outcomes must include culture and sensitivity reports.

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4. Classes of Drugs by Category

4.1 TABLE 1. THERAPEUTIC USE ONLY:

Medically Important Antibiotics / Antibiotics with Human Analogues

Class of antibiotics	Conforming Use	Non-Conformance
Aminoglycosides (Spectinomycin, Neomycin)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation
Cephalosporins	Subcutaneous use in day old chicks and day old turkey poults	ANY USE EXCEPT Day 1 = NC
Lincosamides (Lincomycin)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation
Macrolides (Tylosin, Erythromycin, Tilmicosin, Oleandomycin)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation
Penicillin (Penicillin G procaine)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation
Streptogramins (Virginiamycin)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation

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Sulfonamides (Sulfanitran, Sulfadimethoxine, Sulfamethazine, Sulfaquinoxaline, Sulfathiazole)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation
Tetracyclines (Chlortetracycline, Oxytetracycline)	Veterinarian diagnosis of bacterial disease or exposure to disease. Documents: Veterinary record of diagnosis (laboratory results can substitute for veterinary record), antibiotic specifically named, dosage, duration of treatment, and estimate of # of animals to be treated (exact count can substitute for estimate)	No documentation Insufficient documentation Missing documentation

4.2 TABLE 2. Drugs NOT currently considered important in human medicine, as their use at this time is believed to present minimal risk to public health.

Class of antibiotics	Conforming Use	Non-Conformance
Bacitracin	Use in strict accordance with the label	Any use that is not in accordance with label
Bambermycin (flavomycin)	Use in strict accordance with the label	Any use that is not in accordance with label
Ionophores (lasalocid, monensin, narasin, salinomycin)	Use in strict accordance with the label	Any use that is not in accordance with label

4.3 TABLE 3. Drug classes NOT approved for use in poultry:

Class of antibiotics	Conforming Use	Non-Conformance
Carbapenems	NONE	ANY USE = NC
Chloramphenicol	NONE	ANY USE = NC
Cyclic polypeptides (e.g., colistin, polymixin)	NONE	ANY USE = NC
Furazolidine, Nitrofurazone, other nitrofurans	NONE	ANY USE = NC
Glycopeptides (e.g., vancomycin)	NONE	ANY USE = NC
Lipopetides	NONE	ANY USE = NC
Oxazolidinones	NONE	ANY USE = NC
Pleuromutilins	NONE	ANY USE = NC
Quinolones (e.g., enrofloxacin)	NONE	ANY USE = NC
Quinoxalines (e.g., carbadox)	NONE	ANY USE = NC

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