DATE

LEGISLATOR’S NAME

State of (YOUR STATE)

RE: Need to Amend the Flawed Rabies Vaccination Law

Dear LEGISLATOR’S NAME:

Over-vaccination for rabies is compromising the health of too many pets. Today’s protocols for the rabies vaccine fail to consider that animals may already have adequate antibodies for rabies and therefore do not require re-vaccination. In addition, sufficient antibodies can be stimulated with a lower vaccine dose*.* What becomes an “acceptable” risk for a manufacturer becomes an “unacceptable risk” to a pet owner. Over-dosing and over-vaccination cause chronic disease or death. The current rabies vaccination requirements are flawed.

The one-ml dose does not fit all size dogs. There are studies that prove that the rabies vaccine is size sensitive (*1,2,3,4).* You can use a lower dose to obtain a protective antibody response without over-stimulating the immune system. This reduces the number of reactions, especially in smaller or predisposed pets. Veterinarians, as well as breeders, have been lowering the dose to address vaccine reactions. Since titers are accepted as a measure of immunity and are used internationally for import purposes and by veterinarians themselves to establish their own immunity, it is time to do the same for the pets. Titers are an acceptable proof of protection and should be allowed by law. Vaccine certificates do not indicate immunity; they indicate prior vaccination only.

No science exists to support the “one vaccine size fits all*.”* It was an assumption and never based on science. The veterinary community should look to existing scientific studies which support change. New legislation is required to address the problem.

While the science may not be able to pinpoint exact causation for all adverse vaccine reactions, we know immune- mediated disease requires a trigger, and vaccines are a potent trigger. Reducing reactions should be a primary focus. Lowering the dosage for smaller pets and confirming protection with a titer will make vaccination safer. The role of the veterinarian, which is “to do no harm”, supersedes the flawed rabies law. Vaccination safety needs to be well covered during a veterinarian’s education, but is lacking as evidenced by reports coming into Protect the Pets. The current rabies law has created an underground battle within the profession. One group of veterinarians support a more cautious protocol, while another takes a more aggressive approach. This scenario is putting at risk the goal of vaccinating animals for rabies because adverse reactions are well known. As a result, pet owners are becoming non-compliant.

Currently, a rabies vaccine manufacturer stipulates their product’s use. Many veterinarians ignore the precaution on the vaccine inserts which state that vaccinations should only be given to healthy pets. In addition, most veterinarians do not explain the potential side effects, which are also listed on the vaccine inserts. Still other veterinarians are reducing the volume, based on personal experience with anaphylaxis in smaller pets. However, if these veterinarians come forward, they risk being attacked by the veterinary establishment, including loss of licensure and other sanctions.

In addition, adverse reactions are under-reported. Veterinarians often deny their role in vaccine reactions or attribute the reactions to another cause. By ignoring the issue, we are creating a public health concern and mistrust of the veterinary profession.

Vaccine failure and non-responders (the percentage that don’t respond to the rabies vaccine) point to the same logic *(5,6).* A vaccine certificate gives a false sense of security. Titers would expose pets who did not mount an immune response following vaccination and are therefore not protected. By identifying these non-responders, the existing rabies laws would be strengthened, further improving public health.

**Alert: Compendium of Animal Rabies Prevention and Control, 2016**. This document will be presented to you as the “gold standard” by State Public Health Veterinarians, the Public Health Department, and state affiliates of the American

Veterinary Medical Association (AVMA). They will argue that rabies titers do not directly correlate with protection.

First, this article clearly states that it is not peer reviewed. In any peer review process the scientists who have done the research must be consulted. Most recently, Dr. Ronald Schultz taught veterinary students immunology at the University of Wisconsin for years and has done more rabies challenge studies than anyone in the USA in the last 15 years. As an expert in the field, he should have been consulted. Dr. Schultz disagrees with the Compendium conclusion on immunology. If peer reviewed, the Compendium would have to be changed to say that a rabies titer is the only correlate with immunity in accordance with Dr. Schultz’s research. The references to the Compendium Serology section are using outdated and inaccurate information in other areas as well. The references also support the use of serology (titers). The pharmaceutical companies and the push for profits should not be allowed to influence veterinary science.

The detractors against this effort to amend the rabies law will falsely claim it will cost the pet owners and the state more money. The opposite is true. Rabies titer testing is currently done at veterinary laboratories; however, there is already an accurate in house “snap test” that will be made available commercially once the rabies law is amended. The retail price for the test can be set at $20 which is currently less than the vaccine. The current strategy employed by those trying to dissuade pet owners from rabies titer testing is to price the test as if it’s a luxury item often to the tune of $300. This is a blatant attempt to control the market and push pet owners into over-vaccinating their pets for pure profit motives. This is illegal and goes against consumer protection laws.

I implore all elected and appointed officials to look at the situation and improve our state rabies laws by bringing common sense and current science to the forefront. I will be contacting you shortly to see if you will support amending the rabies law.

There is a world-wide movement called Protect the Pets founded in 2006 by Dr. John Robb, DVM. Currently there are 20 states and three countries with Protect the Pets Facebook pages. At least four states will have legislation being introduced during the next session. The website [www.protectthepets.com](http://www.protectthepets.com/) is dedicated to getting the rabies laws changed around the country. It contains supporting scientific documents and other information. Dr. Robb is also available to discuss the needed legislative changes.

Sincerely,

NAME

ADDRESS

PHONE #/EMAIL

cc: Dr. John Robb, Founder, Protect the Pets – (203)731-4251 – drrobb@protectthepets.com

1. Moore GE, Guptill LF et al, Adverse events diagnosed within three days of vaccine administration in dogs, *J Am Vet Med Assoc* 2005;227:1102-1108.
2. Taguchi M, Namikawa K et al, Effects of body weight on antibody titers against canine parvovirus type 2, Canine distemper virus, and canine adenovirus type 1 in vaccinated domestic adult dogs. The *Can J Vet Research 2012;76:317-319.*
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