

Critter Fixer Pet Hospital

Bob Rogers DVM

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July 15th, 2007

Texas Department of State Health Services
Dr Tom Sidwa
Zoonosis Control
1100 West 49th Street
Austin, Texas 78756

Dear Dr. Sidwa,

I am requesting the TDSPHS to allow a provision for an exemption from the rabies vaccination requirement for patients considered to be at risk of developing an adverse or life threatening reaction to repeated administration of rabies vaccine. I am asking for your support for such an addition to the existing ordinance requiring annual rabies vaccination for pets.

In making this decision please consider the following facts and enclosed scientific publications:

1. All rabies vaccines licensed by the USDA specify on their label, "For administration to healthy dogs and cats".

Ref: Compendium of Veterinary Drug Products 2007

2. There is a temporal association between adverse reactions like Vaccine Associated Sarcoma in cats and Immune Mediated Hemolytic Anemia And Immune Mediated Thrombocytopenia in dogs and cats.

Refs:

Weiss DJ and Tvedten HW. Erythrocyte Disorders in Small Animals, Clinical Diagnosis by Laboratory Methods. 4th ed. Eds Willard and Tvedten, WB Saunders, 2003; Chapter 3

Duval D, Giger U: Vaccine-associated immune-mediated hemolytic anemia in the dog. *J Vet Intern Med* 10:290-295, 1996

HogenEsch H, Azcona-Olivera J, Scott-Moncrieff C, Snyder PW, Glickman LT. Vaccine-induced autoimmunity in the dog. *Adv Vet Med* 1999; 41:733-747.

Chen RT, Pless R, DeStefano F. Epidemiology of autoimmune reactions induced by vaccination. *J Autoimmunity* 2001; 16:309-318.

Day, Michael J. BSc, BVMS (Hons), PhD, Vaccination as a Cause of Autoimmunity, Western Veterinary Conference 2005,

Hogenesch H, Axcona-Olivera J, Scott-Moncrieff C, Snyder PW, Glickman LT (1999), "Vaccine-induced autoimmunity in the dog", *Adv Vet Med*, vol. 41, pp.733-747.

Avoiding Vaccine Reactions in Dogs and Cats World Small Animal Veterinary Association World Congress Proceedings, 2003 Craig E. Greene

Hendrick MJ, Shofer FS, Goldschmidt MH, Haviland JC, Schelling SH, Engler SJ, Gliatto JM (1994), "Comparison of fibrosarcomas that developed at vaccination sites and at nonvaccination sites in cats: 239 cases (1991-1992)", *J Am Vet Med Assoc* vol 205, pp.1425-1429.

Kass PH, Barnes WG Jr, Spangler WL, Chomel BB, Culbertson MR (1993), "Epidemiologic evidence for a causal relation between vaccination and fibrosarcoma tumorigenesis in cats", *J Am Vet Med Assoc*, vol. 203, pp 396-405.

O'Rourke, Progress made in feline sarcoma research, JAVMA, vol 220, No 6, March 15, 2002.

Canine & Feline Immunization. In Symposium on Practical Immunology. R.D, Schultz Ed. Vet Clinics of N. Am., Nov. 1978

Gobar, Glenna M, Kass, Phillip H, World wide web based survey of vaccination practices, postvaccinational reactions, and vaccine site associated sarcomas in cats JAVMA, Vol. 220, No 10, May 15, 2002.

3. "Certain immune mediated diseases like hemolytic anemia, thrombocytopenia and poly arthritis may be triggered by the body's immune response to vaccine. In some cats a tumor called a fibrosarcoma may have grave consequences. "

Ref:

Immunization Information and Consent Form, Texas A&M University, College of Veterinary Medicine.

4. All Rabies vaccines currently licensed by the USDA as three- year vaccines are proven to have minimum duration of immunity of three years by challenge. All data submitted to the USDA demonstrated 100% efficacy for three years. This represents the minimum duration of immunity and the maximum duration of immunity is likely much longer. (Of course no vaccine is 100% effective, and there will be rare vaccine breaks. This is because a bite that occurs close to a cranial nerve allows the virus to readily enter the CNS. The animal will get rabies regardless of how many vaccines it has had.)

5. Rabies vaccine has been demonstrated to have a minimum duration of immunity of seven years by serology by Dr Ron Schultz, and 4 years for cats and 5 years for dogs by challenge by Aubert. Aubert's study shows that the chances of a dog or cat developing rabies in the United States that has had one rabies vaccination is less than one in eight million, (<1:8,000,000)

Refs:

Schultz, Ronald D, *Duration of Immunity to Canine Vaccines: What We Know and What We Don't Know*, Proceedings – Canine Infectious Diseases: From Clinics to Molecular Pathogenesis, Ithaca, NY, 1999, 22

Aubert Michel F, *The practical significance of rabies antibodies in cats and dogs*, Scientific and Technical Revue, 11(3) 735, 1992 Paris, France

6. Scientific data shows that beyond the second rabies vaccination, repeat administration of more rabies vaccines does not enhanced the immune status of the pet Antibody titers are not elevated; memory cell populations are not expanded. Antibodies from previous vaccines prevent the new vaccine virus from reaching the immune system.

Refs:

HogenenEsch Harm, Dunham Anisa D, Scott-Moncrieff Catharine, Glickman Larry, DeBoer Douglas J, *Effect of vaccination on serum concentrations of total and antigen-specific immunoglobulin E in dogs*, AJVR, Vol. 63, No. 4, April 2002, pg 611-616.

Wolf, Alice M., *Vaccinations-What's right? What's not?* Compendium on Continuing Education, Schering-Plough Animal Health, 1999.

Wolf Alice, *Vaccines of the Present and Future*, Proceedings of the World Animal Veterinary Congress, Vancouver 2001.

7. When the rabies vaccine is re-administered annually “the client is paying for something with no effect except the patient is being exposed to the risk of an adverse reaction.”

Refs:

Schultz, Ronald D., “*Are we vaccinating too much?*” JAVMA, No. 4, August 15, 1995, pg. 421.

8. The opinion of the American Association of Feline Practitioners is that “Administration of rabies virus vaccines to cats is subject to inconsistent state and local statutes. In some cases, the requirements fail to consider the duration of protection such vaccines induce; annual administration of rabies vaccines approved for triennial administration is required in many locals. Veterinary organizations should continue to work with state and local governing bodies to ensure that rabies

virus vaccine regulations are consistent with the known duration of immunity of available vaccines.”

Ref:

Richards J, 2000 Report of the American Association of Feline Practitioners and the Academy of Feline Medicine Advisory Panel on Feline Vaccines.

9. The opinion of the American Veterinary Medical Association Council on Biologic and Therapeutic Agents states; “Local and regional regulatory authorities mandate revaccination schedules including some that are more frequent than necessary as demonstrated by scientific evidence.

Ref:

Klingborg, Hustead, Curry Galvan, AVMA Council On Biologic and Therapeutic Agent’s report on cat and dog vaccines, JAVMA, Vol 221, No 10, Nov 15, 2002.

10. The position of the American Animal Hospital Association is; “Every effort should be made to change laws that require vaccination with this rabies product more often than every three years since annual vaccinations cannot be shown to increase efficacy and it is known to increase adverse events”

Ref:

Paul, Michael, Report of the American Animal Hospital Association Canine Vaccine Task Force: 2003 Canine Vaccine Guidelines, Recommendations, and Supporting Literature, AAHA Foundation, March 2003.

11. The Opinion of the National Association of State Public Health Veterinarians states: “There are no laboratory or epidemiologic data to support the annual or biennial administration of 3- year vaccines following the initial series.”

Ref:

Jenkins, S. R., Compendium of Animal Rabies Prevention and Control, 2003 Vet Med Today: Public Vet Med, JAVMA, Vol. 222, No 2, Jan 15, 2003

12. Rabies is rare in vaccinated animals.

Ref:

Compendium of Animal Rabies prevention and Control 2007, NASPHV, Inc. Part I, A, McQuestion, Yage, Ruppercht, Epidemiologic characteristics of rabies virus variants in dogs and cats in the US, JAVMA, 2001, 218, pp1939- 42.

I understand the purpose and responsibility of this Board is to protect public health. I am sure the Board will take into consideration a reasonable concern for the welfare of the pets.

Cats are getting cancer from vaccines. It is estimated that 22,000 cats will die every year from vaccine-associated sarcomas. The recommendation of the American Veterinary Medical Association Task Force on Vaccine –Associated Sarcomas is to reduce the number of vaccines given to cats.

A temporal relationship has been shown between vaccines and immune mediated hemolytic anemia in dogs. Again reducing the number of vaccines reduces the risk of adverse reactions.

The attending Veterinarian should be allowed some discretion in assessing the risk of the pet being exposed to rabies vs. the risk of an adverse and potentially fatal reaction to the vaccine should be taken into consideration. Any patient that has had an adverse reaction to a rabies vaccine like a vaccine associated sarcoma in cats or immune mediated hemolytic anemia in dogs is clearly at risk of another adverse reaction or death with the repeat administration of another rabies vaccine. Any pet that has had at least two rabies vaccinations in its lifetime is at very minimal risk of developing rabies, and it is unlikely that this patient will benefit from another vaccination. Any pet that has had at least two rabies vaccinations in its lifetime is of extremely low risk of transmitting rabies to a human.

Therefore it is reasonable that an exemption should be provided for in these and similar instances where repeat rabies vaccine administration will put the patient's life at risk.

Your consideration of these facts is appreciated.

Sincerely,

Bob Rogers DVM