To Whom It Concerns:

I am submitting the following testimony in opposition to the proposed Bill No. 5659 (referenced) on the grounds that such legislation is, in fact, not in the public interest, does not serve to promote animal welfare or health, and will impose significantly higher costs on pet (dog & cat) owners while resulting in decreased rabies vaccination compliance within the State of Connecticut:

A. DISCRETIONARY VACCINE DOSAGE PROTOCOLS: The State of Connecticut is proposing that licensed veterinarians, while administering rabies vaccine to dogs and cats (currently mandated in the State of Connecticut), may use discretion selecting the dose (volume) of vaccine based on what is deemed in the "best interest of the animal's health".

It is critical to understand that ALL rabies vaccines licensed for use in animals in the US have been subjected to extensive safety and efficacy testing, at a prescribed 1.0 mL dose, to assess the ability of the vaccinated animal to withstand rigorous rabies virus challenge. By allowing discretionary reduction of the rabies vaccine dose (volume), the State of Connecticut accepts the fact that increasing numbers of animals will NOT receive PROTECTIVE IMMUNITY subsequent to vaccination, leaving more dogs and cats in Connecticut susceptible to rabies virus exposure.

Rabies vaccination protocols, recommended by the National Association of State Public Health Veterinarians and passed into law at the State level, have been highly effective in preventing rabies in domestic animals. The proposed Bill would unnecessarily increase the risk of rabies in domestic dogs/cats and, subsequently, in humans who have direct contact with dogs and cats.

B. USE OF A RABIES TITER TO DETERMINE THE NEED FOR RE-VACCINATION ("BOOSTER"):

The State Public Health Community throughout the US specifically states that a rabies antibody titer is not a legal index of immunity in lieu of revaccination. The reason: a rabies antibody titer has NOT been correlated with “protective immunity” in dogs or cats. The State of Connecticut is, therefore, considering a Bill that has no documented basis in immunology nor precedence in State law.

Furthermore, by enacting the proposed Bill, the State of Connecticut is stating that a rabies antibody titer may be “administered” to dogs/cats without regard for the: 1) specific test methodology to be used (there are several), 2) laboratories available to perform the test (there are ONLY 2 in the US), and 3) significant additional cost
imposed on pet owners for blood collection, sample submission, testing and reporting (costs that are NOT imposed on pet owners in any other State in the US).

C. LEGISLATION REQUIRING RABIES VACCINATION OF DOGS & CATS (currently mandated in the State of Connecticut) IS FOR THE PURPOSE OF PROTECTING THE (human) PUBLIC HEALTH, not the health of animals.

State mandates for rabies vaccination of dogs (beginning in the late 1950’s) resulted in a dramatic decline in animal, and human rabies, throughout the United States that continues today. In Connecticut, rabies vaccination has virtually eliminated the risk of canine rabies and the, therefore, significantly reduced the risk of rabies transmission from dogs to humans (rabies surveillance data available at: www.rabiesaware.org).

The proposed Bill, if enacted, would challenge the very basis of Connecticut legislation requiring rabies vaccination of dogs and cats while, at the same time, increasing the potential for human exposure to rabies virus through pets that, although vaccinated, are not immunized.

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(Dr. Ford is the Program Director of the National [US] Rabies Awareness Initiative; he is the editor and lead author of the American Animal Hospital Canine Vaccination Guidelines; he is a co-author of the American Association of Feline Practitioners Feline Vaccination Guidelines)