TESTIMONY SUBMITTED TO THE PUBLIC HEALTH COMMITTEE

House Bill No. 5659

AN ACT CONCERNING THE VACCINATION OF ANIMALS

Senator Gerratana, Senator Somers, Representative Steinberg and members of the Public Health Committee. I appreciate the opportunity to offer written testimony for your consideration in opposition of HB 5659: AN ACT CONCERNING THE VACCINATION OF ANIMALS.

At the outset, we wish to state that the Department of Agriculture fully concurs with the points made by the Department of Public Health in its testimony in opposition to House Bill No. 5659. The guidelines set forth in the Compendium of Animal Rabies Control and Prevention, 2016, cited in the Department of Public Health’s testimony, is recognized nation-wide not only by animal health officials but also by public health officials, including the U.S. Centers for Disease Control and Prevention (CDC), as a foundation for state rabies control programs. The provisions in House Bill No. 5659 allowing veterinarians to vary vaccine dosages from label requirements and to use rabies antibody titer levels to determine the need for booster vaccinations are clearly inconsistent with Compendium guidelines.

Since the resurgence of rabies in Connecticut’s wildlife population in 1991, the Department of Agriculture, the Department of Public Health and the Department of Energy and Environmental Protection’s Wildlife Division, along with the Connecticut Veterinary Medical Association and municipal animal control officers, have worked diligently through a multi-agency approach in developing the necessary protocols and supporting statutes and regulations to control rabies in the state. Proper vaccination of dogs and cats against rabies is a crucial element of rabies control programs. When a large number of animals in a population are vaccinated against rabies and rabies management programs are in place, rabies is less likely to be transmitted to the public or other animals. In 1991, the Connecticut legislature recognized the importance of rabies vaccination in dogs and cats in order to reduce the risk of infection transmitted from wild animal reservoirs with the passage of Public Act No. 91-46 requiring dogs and cats to be currently vaccinated against rabies.

Allowing veterinarians to vary the dosage of rabies vaccine from label directions does not assure adequate, reliable immunity. Animal vaccines, including Rabies vaccines, are approved and licensed for use by the United States Department of Agriculture’s (USDA) Animal and Plant Health Inspection Service (APHIS). Licenses are granted only after vaccines are proven to be pure, safe, potent, and efficacious when used according to label instructions. Therefore, the efficacy of a vaccine is in question when not administered according to label directions. Furthermore, regulations list out requirements for the packaging and labeling of veterinary vaccine products to ensure that labeling provides adequate instructions for the proper use of the product, including vaccination schedules, warnings, and cautions.
Passage of House Bill No. 5659 providing veterinarians with the discretion to vary the dosage when administering rabies vaccines to individual animals may not be in the best interest or health of the animal. For example, the protocols for the management of dogs and cats exposed to rabid or suspect rabid wild animals is dependent on their rabies vaccination status. Animals not currently vaccinated, such as animals not vaccinated according to label directions, are likely to undergo a lengthy, off-property quarantine due to their level of risk in becoming infected which would not be the case if the animal was currently vaccinated.

Finally, a legal option [C.G.S. §22-339b(b)] is in place for veterinarians to request an exemption from rabies vaccination for an individual animal from the Department of Agriculture’s State Veterinarian. Since the implementation of this option in 2006, approximately 1500 animals have been granted exemptions at the request of their veterinarians.

Thank you for the opportunity for the department to provide written testimony in opposition to HB 5659: AN ACT CONCERNING THE VACCINATION OF ANIMALS.