



Elizabeth Hart <eliz.hart25@gmail.com>

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## Request for evidence to support veterinary industry's call for revax of pets

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From: **Elizabeth Hart** <eliz.hart25@gmail.com>  
Date: Thu, Jun 23, 2011 at 9:04 PM  
Subject: Request for evidence to support veterinary industry's call for revax of pets  
To: "Brady, Anna-Maria" <a.brady@vmd.defra>  
Cc: "Dean, Steve" <s.dean@vmd.defra>, "m.j.day" <M.J.Day@bristol>, Ron Schultz <schultzr@svm>, richard.squires@jcu, atsuji@mail.ecc.u-tokyo, roger.bunvet@, jollenl@, davidfwadsworth@, Walt Ingwersen, info@rcvs.org.uk, registrar@rcvs.org.uk, bvahq@bva.co.uk, administration@bsava.com, "Catherine O'Driscoll (chc)", jlnw2@, "r.m.gaskell", Mark Holmes, Pauline, Sally, rbford@ncsu, Jason Merrihew@aahanet, Rick.E.Hill@aphis, Dr. Lynne White-Shim@avma, Eva.Bennet-Jenkins@apvma, James.Suter@apvma, jennimack2, hyeatman@uow, allen.bryce@apvma, phil.reeves@apvma, president@ava, David Imrie execasava@ava, asava@ava, david@adelaidevet, mark.kelman@virbac, Marcia Balzer <communications@ava>, ted.whittem@unimelb, glenfb@unimelb, mlawrie@ava>, Julie Strous <eo@avbc>, Peter Charles Doherty, j.atkinson@vmd.defra, p.green@vmd.defra, r.woodland@vmd, k.primeau@vmd.defra, colinrw@unimelb, Beate Mies

Your Ref: #323746, dated 11 May 2011, and email dated 1 June 2011

Dr Brady

Re your email dated 1 June 2011, delaying a response to my email dated 15 May 2011.

In my email dated 15 May I asked you two questions, i.e.

1. If the paper titled "Three-Year Duration of Immunity in Dogs Following Vaccination Against Canine Adenovirus Type-1, Canine Parvovirus, and Canine Distemper Virus [Gore T. et al. Veterinary Therapeutics. Spring 2005, Vol. 6, No. 1.], which refers to Intervet's Continuum DAPP vaccine, is also pertinent to Nobivac DHP, or otherwise provide me with the correct reference; and
2. for a reference in the scientific literature to support your statement: "**to maintain this protection after the duration of the primary vaccination has lapsed, it will be necessary to stimulate the immunological memory by a single vaccination, hence in the case of Nobivac DHP, the recommendation for a single booster after three years, as this is the proven duration of immunity for this individual product**". (My emphasis.)

**These are straightforward questions seeking evidence which is relevant to the unnecessary vaccination of pets' debate.**

**Clear and informative answers to these questions will help to inform my future research and correspondence on this matter.**

In my email to you dated 1 April 2011, I included a quote from Nobel Laureate Professor Peter Doherty, a world-renowned expert in cell-mediated immunity, regarding the repeated vaccination of dogs with live vaccines. In personal correspondence, Professor Doherty advised me he did not see **“a whole lot of sense”** in it, and acknowledged that I have **“every right to question this, and to ask for the published evidence that supports the practice”**[1].

Over the past two and a half years, since the death of my own dog after unnecessary vaccination, I have repeatedly asked a variety of parties for scientific evidence to support the practice of ‘annual’ or ‘triennial’ revaccination of adult dogs with MLV core vaccines, but my requests have been repeatedly ignored.

The VMD’s “Aims and Responsibilities” document notes:

The vision of the Veterinary Medicines Directorate is the responsible, safe and effective use of veterinary medicinal products. In working towards achieving this vision the VMD aims to protect public health, animal health and the environment and promote animal welfare by assuring the safety, quality and efficacy of veterinary medicines.[2]

**Dr Brady, it is essential that the results of studies supporting the use of medicinal products such as vaccines be openly available and easily accessible for scrutiny to ensure the public’s confidence in “the responsible, safe and effective use of veterinary medicinal products”.**

My experience indicates that there is a lack of transparency and accountability in this area, and that the public can have little confidence that companion animal vaccination practice is being managed responsibly, safely or effectively, particularly with veterinarians such as Ross Alan, an attendee at the recent BSAVA 2011 Congress, admitting they are confused, saying:

At present we risk being in a situation where what is recommended by world experts differs from that of advice by the regulators and the pharmaceutical industry. This confusion can help no one, **least of all those the vaccines are designed to help most.**[3] (My emphasis.)

As well as confusion about duration of immunity after vaccination with MLV core vaccines, there is also confusion about appropriate vaccination of puppies, with the potential for maternally derived antibodies (MDA) to interfere with a puppy’s response to core vaccination. I have recently prepared an article on this topic from a pet owner’s perspective, which has been published in the specialist online dog breeder magazine [National Dog](#). A copy of the article is attached and is also accessible via this hyperlink: [Vaccination failure!](#)

Dr Brady, I commenced my enquiries on canine vaccine products, (including queries re duration of immunity), with the VMD in June 2009.

Please see attached copies of my correspondence with the VMD, i.e. with you, Lorna Shelley of the Legislation Team, and Steve Dean, CEO of the VMD.

Professor Dean has also been formally included as a cc addressee on my open letter correspondence dated [6 May 2010](#), [17 June 2010](#), [23 June 2010](#), [9 August 2010](#), and [26 March 2011](#). I also forwarded Professor Dean a copy of [my letter to The Veterinarian dated 7 June 2010](#).

Professor Dean has been generally dismissive of my open letter correspondence with the Australian Pesticides and Veterinary Medicines Authority (APVMA), Australian Veterinary Association (AVA) and the Australasian Veterinary Boards Council (AVBC) regarding unnecessary, and possibly harmful, vaccination of pets, **despite the fact my arguments are also relevant in an international context.**

I appreciate that my more recent correspondence with you has been acknowledged by inclusion of it on the [Vaccines section of the VMD website](#), along with [my open letter dated 26 March 2011](#).

I suggest in the interests of consistency, and also transparency and accountability, my earlier correspondence with the VMD should also be uploaded to the VMD website. I have attached copies of this correspondence, which I think will give an indication of the difficulty I have encountered in trying to obtain evidence to support the veterinary industry's call for repeated vaccination of pets.

Dr Brady, it is unacceptable that the VMD has continued to stall on properly and clearly responding to my enquiries for **two years**.

**I request your unambiguous, informative and prompt response to my two straightforward questions, repeated here again for your convenience:**

1. Is the paper titled "Three-Year Duration of Immunity in Dogs Following Vaccination Against Canine Adenovirus Type-1, Canine Parvovirus, and Canine Distemper Virus [Gore T. et al. Veterinary Therapeutics. Spring 2005, Vol. 6, No. 1.] pertinent to Nobivac DHP? If not, please provide me with the correct reference in the scientific literature; and
2. please provide a reference in the scientific literature to support your statement: ***"to maintain this protection after the duration of the primary vaccination has lapsed, it will be necessary to stimulate the immunological memory by a single vaccination, hence in the case of Nobivac DHP, the recommendation for a single booster after three years, as this is the proven duration of immunity for this individual product"***. (My emphasis.)

Yours sincerely  
**Elizabeth Hart**  
Independent Advocate for Judicious Vaccine Use

Att: Correspondence with the VMD since June 2009.

**\* Further background on the subject of unnecessary, and possibly harmful, vaccination of pets is accessible via this hyperlink: [Papers and correspondence re vax of pets- E Hart](#)**

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[1] Email response from Professor Doherty, dated 30 March 2011.

[2] [VMD's Aims & Responsibilities](#) (as at 20/6/11).

[3] Different perspectives on vaccination advice. Veterinary Record. April 16 2011, pp. 395-396.