



Elizabeth Hart <eliz.hart25@gmail.com>

Re: Your participation in the session on pet vaccination at the BSAVA conference today

Elizabeth Hart <eliz.hart25@gmail.com>

Fri, Apr 1, 2011 at 3:55 PM

To: "Brady, Anna-Maria", "Dean, Steve", "m.j.day", Ron Schultz, richard.squires, atsuji, 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@cam, "r.m.gaskell", Mark Holmes, Bea Mies, Pauline, Sally, rbford@ncsu, jason.merrihew, Rick.E.Hill, "Dr. Lynne White-Shim", "BENNET-JENKINS, Eva", "SUTER, James", jennimack2, Heather Yeatman, "BRYCE, Allen", "REEVES, Phil", president@ava, David Imrie, "Cristina Sacco, asava@ava.com.au, david@adelaidevet, mark.kelman@virbac, Marcia Balzer <communications@ava.com.au>, ted.whittem@unimelb, glenfb@unimelb, Mark Lawrie, Julie Strous, Peter Charles Doherty

For the attention of:

Dr Anna-Marie Brady
Veterinary Medicines Directorate

Dr Brady

RE: Your participation in the session on pet vaccination at the BSAVA conference today

I have corresponded with you previously on the topic of vaccination of pets, refer to emails commencing in June 2009.

I understand you are participating in a session at the BSAVA conference today titled: "**Vaccination advice: regulatory, industry and guidelines group perspectives**".

As is also the case in Australia, **it appears the perspective of the pet owner, i.e. the major stakeholder in ethical and effective vaccination of pets, is not being represented.**

It has been my experience that international government regulators, industry and the veterinary profession work together on managing the vaccination controversy, **in a way that hitherto has not worked in the best interests of pet owners and their pets.**

I have reiterated the issues surrounding this matter in my recent open letter on this topic. My open letter can be accessed via this hyperlink: [Open letter to AVA, AVBC, APVMA March 2011](#)

While my recent open letter has been primarily addressed to the Australian authorities, **it is also relevant in an international context, and refers to examples of veterinarians promoting unnecessary vaccination of pets in the UK media.** (See pp. 4-5)

I am in the process of forwarding this open letter onto a number of parties, noted in the cc list and others, but it has already been forwarded to Steve Dean of the VMD, plus senior

members of the RCVS, BVA and BSAVA.

As an executive agency of [defra](#), the VMD is a servant of the public and should also be aware of its responsibilities to pet owners and their pets. **To date, the VMD has not responded effectively to my concerns about unnecessary, and possibly harmful, vaccination of pets.** [Catherine O'Driscoll](#)[1] of Canine Health Concern has also had extensive, but ultimately unsatisfactory, correspondence on this topic with Steve Dean, Chief Executive of the VMD.

As my recent open letter details, there is **no evidence** that animals that have responded to modified live virus (MLV) core vaccines benefit from repeated 'annual' **OR** 'triennial' revaccination with these products, yet many of these products on the market in countries such as the UK, Australia and the US have prescriptive 'annual' and 'triennial' revaccination recommendations which are **not grounded in science**.

On the subject of repeated (unnecessary) vaccination of pets, in his paper "Vaccine use and disease prevalence in dogs and cats"[2] Marian Horzinek (a previous member of the WSAVA Vaccination Guidelines Group (VGG)) asks:

"Why has veterinary medicine adopted a practice that causes raised eyebrows in the biomedical environment, e.g. when talking to immunologists?"

Recently I approached a renowned immunologist, [Professor Peter Doherty](#), the first person with a veterinary qualification to win a Nobel Prize (1996), to ask his opinion of repeated MLV vaccination of pets.

In my email[3] to Professor Doherty, I asked:

Are you not concerned that people professing to be scientists, i.e. vets, are misleading the pet owning public into having repeated medical interventions for the pets which are unnecessary, and possibly harmful, and thereby bringing vaccination practice into disrepute?

In particular, do you think it acceptable that vets demand that dogs be revaccinated every year with MLV vaccines to protect against parvovirus, distemper virus and adenovirus? Would it be acceptable if doctors started demanding that humans be likewise revaccinated every year to protect against measles?

Professor Doherty replied[4]:

Dear Elizabeth, Apologies for not replying earlier. I don't know the evidence base for repeatedly vaccinating dogs with live vaccines and, as a non-dog owner for some years, **don't see a whole lot of sense in it. I think that you have every right to question this, and to ask for the published evidence that supports the practice.** The last dog we had was in the USA, and **I don't recall having him re-vaccinated every year.** (My emphasis.)

Professor Doherty "**cannot see a whole lot of sense**" in repeatedly vaccinating dogs with live vaccines. He also agrees that I "**have every right to question this, and to ask for the published evidence that supports the practice**".

During my research and correspondence on this matter, I have repeatedly asked for evidence to support 'triennial' revaccination of pets with MLV core vaccines. **My requests have been ignored.**

Intervet Schering Plough's Nobivac DHP vaccine[5] is an example of a so-called 'three year vaccine'. The SPC for this vaccine product makes a definitive statement that **duration of immunity** with this vaccine **is three years**, and makes the following prescriptive 'booster' revaccination recommendation:

"To maintain protection a single booster dose is recommended **every three years**". (My emphasis.)

On what scientific basis is this recommendation made? What evidence is there that to **maintain protection** a single booster dose is of benefit **every three years**?

I suggest that Nobivac DHP has a **minimum** demonstrated duration of immunity of three years, **and no endpoint to duration of immunity has been demonstrated**.

I suggest it is misleading to include a prescriptive recommendation that "to **maintain protection** a single booster is recommended **every three years**", particularly as the World Small Animal Veterinary Association's ([WSAVA Guidelines for the Vaccination of Dogs and Cats](#)[6] (2010), **which have been sponsored by Intervet Schering-Plough**, note that the duration of immunity with core vaccines "**is many years and may be up to the lifetime of the pet**." The Fact Sheets of the WSAVA 2010 guidelines also note that:

"DOI after vaccination with MLV vaccines is 9 years or longer, based on challenge and serological studies."

The SPC for Nobivac DHP provides brief advice on the possible adverse reactions to this vaccine, e.g. swelling at the site of the injection, or anaphylaxis etc. I have already argued in my previous articles and correspondence on this matter that **insufficient research has been undertaken into the possible adverse reactions to vaccination, including delayed reactions and long term health problems**. (On this topic, please refer to [pp. 7-14](#) of my open letter to the Australian Pesticides and Veterinary Medicines Authority and representatives of the Australian and international veterinary profession / industry, dated 17 June 2010. This open letter was also forwarded to Steve Dean of the VMD, and Jane Hern of the RCVS.)

As noted in my recent open letter, senior veterinary academics have raised concerns about the possibility of harm with vaccination. For example, the WSAVA 2010 guidelines note that:

"...we should aim to reduce the 'vaccine load' of individual animals in order to minimize the potential for adverse reactions to vaccine products."

The WSAVA Vaccination Guidelines Group also acknowledge that:

"There is gross under-reporting of vaccine associated adverse events which impedes knowledge of the ongoing safety of these products."

During a [roundtable discussion on titre testing](#)[7], a summary of which was published in 2002, Richard Ford, Emeritus Professor of Medicine at the College of Veterinary Medicine, North Carolina State University, and a member of the Canine Vaccine Task Force of the American Animal Hospital Association (AAHA), in reference to changing vaccination recommendations, said:

"I believe that repeated injections of immunogenic proteins can potentially be harmful. I work on the internal medicine service in a busy referral teaching hospital.

My colleagues and I are all concerned about the inordinate number of cases we see of autoimmune disease like immune-mediated hemolytic anemia, thrombocytopenia, and polyarthritis - more than ever before.” (My emphasis.)

Another participant, Jory Olsen, said:

“I think we underestimate how many problems overvaccination may be causing...At our practice, we think overvaccination probably causes immunologic problems or at least contributes to immunologic problems. I think there are a vast number of other diseases - immunologic or degenerative diseases such as atopy, chronic allergies, asthma, and other air-way diseases - that are exaggerated by, caused by, or stimulated by overvaccination. But it is impossible to prove.” (My emphasis.)

And Professor Ronald Schultz, a member of the WSAVA VGG and AAHA Canine Vaccine Task Force noted:

“I tell practitioners that vaccines are drugs, albeit biological drugs. I remind them that they would not consider it good medicine to give an unnecessary pharmaceutical drug on a recurring basis. I think it is even worse to give a vaccine, or biological drug, that isn't necessary. The possible adverse consequences of a vaccine generally far outweigh the adverse consequences of a pharmaceutical drug. A pharmaceutical drug is usually much more restricted in its action. However, each time we stimulate an immune response, we have to look at the effect on all body systems - not only on anti-body responses or cell-mediated immunity, but also on interactions with the endocrine system and the nervous system.” (My emphasis.)

Given the concerns of these senior veterinary academics, **it is deplorable that pet owners are not being properly warned about the dangers of unnecessary vaccination of pets, and that practising veterinarians are not fulfilling their professional responsibility to their clients by providing up-to-date and objective advice on vaccination best practice.**

In his “concluding remarks” regarding a series of articles on pet vaccination, published in Veterinary Microbiology (117) in 2006, Marian Horzinek noted:

A science-based code of practice **could be at variance with industry interests**, and progress is curtailed. This is in nobody’s interest, and **a concerted action of the profession, academia and industry is required to break this stalemate.** (My emphasis.)

Given the continued unnecessary vaccination of pets in countries such as the UK, Australia and the US, it appears this stalemate has not yet been broken. **It is about time somebody started working in the best interests of pet owners and their pets, the major stakeholders in ethical and effective vaccination of pets.**

Dr Brady, as a representative of a government agency, the VMD, **I request that you also consider the rights of citizens/pet owners in your contribution to the session on vaccination today.**

I also request that you provide me with feedback on the outcomes of this session.

Please note this email and your response will be forwarded to other parties with a responsibility for, or interest in, ethical and effective vaccination of pets.

I look forward to your response.

Yours sincerely
Elizabeth Hart

References:

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- [1] [Correspondence between Catherine O'Driscoll, CHC, and Steve Dean, Chief Executive, VMD](#)
 - [2] Horzinek M. Vaccine use and disease prevalence in dogs and cats. *Veterinary Microbiology* 117 (2006) 2-8
 - [3] Follow-up email to Professor Doherty, dated 28 March 2011.
 - [4] Email response from Professor Doherty, dated 30 March 2011.
 - [5] Nobivac DHP SPC. Revised 22/12/2009 – AN 00121/2009.
 - [6] Day, M.J., Horzinek, M.C., Schultz, R.D. World Small Animal Veterinary Association's (WSAVA) [Guidelines for the Vaccination of Dogs and Cats](#). *Journal of Small Animal Practice*. Vol. 51. June 2010.
 - [7] [Titer testing and vaccination: A new look at traditional practices](#). Published by Veterinary Healthcare Communications, Lenexa, Kansas. 2002.
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