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Continuing annual over-vaccination of dogs with core MLV vaccines

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Wed, Apr 23, 2014 at
1:29 PM

To: kareena.arthy@apvma

Cc: "BRYCE, Allen" <allen.bryce@apvma>, stefanie.janiec@apvma, Ron Schultz <schultzr@svm.vetmed.wisc>, Richard Squires <richard.squires@jcu>, atsuji@mail.ecc.u-tokyo, "Marian C. Horzinek" <horzinek>, Jolle Kirpensteijn <jollenl>, rbford@ncsu, "Brady, Anna-Maria" <a.brady@vmd.defra>, Laurie Larson <larsonl@svm>, Bea Mies <beatemies>, president@ava, david@adelaidevet, Brian Martin <bmartin@uow>, robert@vineyardvet, mark.kelman@virbac

For the attention of:

Ms Kareena Arthy
Chief Executive Officer
Australian Pesticides and Veterinary Medicines Authority (APVMA)

Ms Arthy

Further to my previous extensive correspondence with the APVMA and others on the subject of over-vaccination of dogs. (Please refer to hyperlinked list of correspondence below, including correspondence with Dr Allen Bryce, Executive Director of the APVMA's Veterinary Medicines Program. My colleague Bea Mies has also undertaken extensive correspondence on this matter.)

The APVMA's Position Statement - Vaccination Protocols for Dogs and Cats, last amended in September 2010, notes:

The APVMA does not support the retention of label statements that direct or imply a universal need for life-long annual revaccinations with core vaccines. The APVMA supports the AVA's vaccination policy and is of the view that product labels should be amended to align with that policy. **The APVMA is working with vaccine registrants with a view to updating labels.** (My emphasis.)

Link: http://www.apvma.gov.au/use_safely/vaccination.php

It is now April 2014 and still core vaccine products with an annual revaccination 'recommendation' remain on the market. For example Virbac Australia's Canigen C4 DHA2PPI Quadrivalent Living Vaccine states: **"An annual booster is recommended"**: <http://www.infopest.com.au/extra/asp/infopest/nra/labels.asp?prodcode=47373> (Note: The label for Virbac's Canigen DHA2P Trivalent Living Vaccine is currently not accessible on the PUBCRIS website.)

On what evidence is this 'recommendation' for an 'annual booster' with core vaccines based?

In August 2013, I forwarded a letter to Professor Ronald Schultz of the World Small Animal Veterinary Association's Vaccination Guidelines Group, challenging the confusing and misleading use of the term 'booster' in relation to canine core modified live virus (MLV) vaccines for parvovirus, distemper virus and adenovirus, suggesting that use of the term 'booster' is resulting in extensive **over-vaccination of already immune dogs**. My letter can be accessed via this link: http://users.on.net/~peter.hart/Query_re_MLV_boosters.pdf

In his email response of 22 August 2013, Professor Schultz said:

"I agree that the term "booster" is misleading in that many of the already immune dogs probably receive no beneficial "booster effect" from an infectious vaccine because the virus (e.g. CDV, CPV-2, CAV-2) is immediately neutralized. Therefore, it cannot infect the cells and replicate! It is only in those dogs that have no viral antibody that the vaccine will booster the immune system, both the cellular and humoral response to the virus. It is these antibody negative dogs that I recommend revaccinating, not dogs with detectable antibody. There are, however, components of the vaccines that are almost always boosted such as fetal bovine serum components and other extraneous proteins that are in all vaccines. Obviously, these are components of the vaccine we don't want to boost especially in a dog that genetically is predisposed to an adverse reaction (e.g. hypersensitivity). That is why we are trying to prevent annual revaccination with the Core Vaccines that provide long term immunity in a majority of most dogs, but not all!" (*Note: CDV, CPV-2 and CAV-2 are the canine diseases distemper virus, parvovirus and adenovirus [hepatitis]).*

It is my strong suspicion that annual revaccination of dogs with core MLV vaccine products remains prevalent practice in Australia. See for example the attached article published in Dogs NSW in September 2013: "The Deadly Canine Parvovirus - Is Your Dog At Risk?". My response to this article is attached. Also attached is the response by pro-annual vaccination vet Robert Zammit, and Virbac/ASAVA's Mark Kelman.

See also this 'Vaccination Guide' from Greencross Vets which recommends revaccination every year with core vaccines for distemper, hepatitis and parvovirus (and non-core vaccines parainfluenza and bordetella): http://www.greencrossvet.com.au/Docs/Vaccination_Guide_Dog.pdf

Pet owners and their pets are being grossly exploited by the prevalent practice of over-vaccination due to the non-evidence based revaccination 'recommendations' on APVMA approved core MLV vaccine product labels. I also strongly suspect most pet owners are not being informed of the option of in-clinic and lab-based antibody titre testing to verify a response to core MLV vaccination.

Ms Arthy, on what evidence does the APVMA continue to re-register canine core MLV vaccine products which recommend repeated revaccination of adult dogs?

I request your urgent response on this matter.

Sincerely
Elizabeth Hart

See below hyperlinks to some of my correspondence, submissions and articles on over-vaccination of pets:

Key documents:

- [Over-vaccination of pets – an unethical practice](#) (16 June 2009). My essay summarises the issue of over-vaccination of pets.
- [Is over-vaccination harming our pets? Are vets making our pets sick?](#) (13 April 2009). My detailed and fully-referenced report was tabled at a special meeting convened by the Australian Pesticides and Veterinary Medicines Authority on 15 April 2009 to discuss the problem of unnecessary vaccination of pets.

Correspondence with the Australian Pesticides and Veterinary Medicines Authority

(APVMA), Australian Veterinary Association (AVA), and others:

- **Email to James Suter, Australian Pesticides and Veterinary Medicines Authority (20 April 2011)** with further questions re the APVMA's responses to adverse experience reports being marked 'COMMERCIAL-IN-CONFIDENCE'.
- **Email to Australian Veterinary Boards (19 May 2011)** enquiring if the APVMA's Position Statement on Vaccination Protocols for Dogs and Cats had been circulated to veterinarians, as requested by the APVMA in September 2010.
- **Open letter to Barry Smyth, President of the Australian Veterinary Association;** Peter Punch, Chair of the Australasian Veterinary Boards Council; Eva Bennet-Jenkins, CEO, Australian Pesticides and Veterinary Medicines Authority (26 March 2011): A formal complaint re the continuing calls for already immune animals to be needlessly, and possibly harmfully, revaccinated.
- **Email to James Suter, Australian Pesticides and Veterinary Medicines Authority (6 March 2011)** "Request for information re adverse experience reporting / possible conflicts of interest".
- **Email to Allen Bryce, Australian Pesticides and Veterinary Medicines Authority (31 January 2011)** re adverse experiences after vaccination
- **Open letter to the veterinary profession and industry (9 August 2010)** re use of the media to promote over-servicing in the veterinary profession- unnecessary, and possibly harmful, vaccination of companion animals.
- **Response to Allen Bryce (23 June 2010)**, Program Manager, Veterinary Medicines, Australian Pesticides and Veterinary Medicines Authority re unnecessary, and possibly harmful, vaccination of companion animals, and the APVMA's Position Statement on Vaccination Protocols for Dogs and Cats.
- **Open letter to Allen Bryce (17 June 2010)**, Program Manager, Veterinary Medicines, Australian Pesticides and Veterinary Medicines Authority re unnecessary, and possibly harmful vaccination of companion animals, and the APVMA's Position Statement on Vaccination Protocols for Dogs and Cats.
- **Open letter to Mark Lawrie (May 2010)** (Immediate Past) President of the Australian Veterinary Association re over-servicing in the veterinary profession – unnecessary, and possibly harmful, vaccination of companion animals (6 May 2010, with an update added on pages 3-4 on 23 May 2010).
- **Open letter to the Australian Pesticides and Veterinary Medicines Authority (24 January 2010)**, Australian Veterinary Association, Australian Small Animal Veterinary Association, and Competition and Consumer Policy Division, The Treasury re unnecessary vaccination of pets and the APVMA's Position Statement on Vaccination Protocols for Dogs and Cats.

- [Open letter to the Australian Pesticides and Veterinary Medicines Authority \(8 January 2010\)](#), Australian Veterinary Association and Australian Small Animal Veterinary Association re unnecessary vaccination of pets and the APVMA's Position Statement on Vaccination Protocols for Dogs and Cats.
- [Open letter to the Australian Pesticides and Veterinary Medicines Authority \(22 December 2009\)](#), Australian Veterinary Association and Australian Small Animal Veterinary Association re over-vaccination of pets / APVMA Position Statement / vaccine product labelling issues.
- [Is over-vaccination harming our pets? Are vets making our pets sick?](#) (13 April 2009). This detailed and fully-referenced report was tabled at a special meeting convened by the APVMA on 15 April 2009 to discuss the problem of unnecessary vaccination of pets.

Correspondence with the UK Veterinary Medicines Directorate (VMD):

- [Email to Anna-Maria Brady, UK Veterinary Medicines Directorate \(23 June 2011\)](#) requesting evidence to support the veterinary industry's call for revaccination of pets.
- [Email to Anna-Maria Brady, UK Veterinary Medicines Directorate \(15 May 2011\)](#) with questions re core vaccine product labelling in regards to duration of immunity.
- [Email to Anna-Maria Brady, UK Veterinary Medicines Directorate \(1 April 2011\)](#) providing a pet owner's perspective on pet vaccination.
- More emails on this topic are accessible on the VMD website: http://www.vmd.defra.gov.uk/public/vaccines_letters.aspx#hart

Correspondence with Virbac Animal Health (Disease WatchDog):

- [Email to Mark Kelman, Virbac / Australian Small Animal Veterinary Association \(7 February 2011\)](#) re further questions about the Virbac Disease WatchDog
- [Email to Mark Kelman, Virbac / Australian Small Animal Veterinary Association \(26 January 2011\)](#) re alarming statistics regarding parvovirus and the Virbac Disease WatchDog.
- [Email to Mark Kelman, Virbac / Australian Small Animal Veterinary Association \(31 July 2010\)](#), re canine vaccination protocols.

Submissions on the subject of unnecessary vaccination of pets:

- [A Submission to the Royal College of Veterinary Surgeons \(24 June 2011\)](#), on the Draft Code of Professional Conduct for Veterinary Surgeons.

- [A Submission on the National Scheme](#) for Assessment, Registration and Control of Use of Agricultural and Veterinary Chemicals Discussion Paper in relation to “Unnecessary, and Possibly Harmful, Use of Companion Animal Vaccines” (10 February 2010).
- [Submission to Craig Emerson MP \(17 July 2009\)](#), Minister for Competition Policy and Consumer Affairs, on the Consumer Voices Issues Paper: “Request for consumer protection for consumers of veterinary services in Australia”.

Correspondence to Members of Parliament:

- [Email to Senator Joe Ludwig, Minister responsible for the APVMA \(26 November 2011\)](#), complaining about the failure of ‘self-regulation’ of veterinarians.
- [Letter to Craig Emerson MP \(4 July 2010\)](#), Federal Minister for Competition Policy and Consumer Affairs re submission on the Consumer Voices Issues Paper: “Request for consumer protection for consumers of veterinary services in Australia”.
- [Letter to Tony Burke MP \(17 June 2010\)](#), Federal Minister responsible for the Australian Pesticides and Veterinary Medicines Authority, re unnecessary, and possibly harmful, vaccination of companion animals, and the APVMA’s Position Statement on Vaccination Protocols for Dogs and Cats (17 June 2010).

Articles and summaries re over-vaccination of pets:

- [The Australian campaign for ethical and evidence-based vaccination of companion animals](#) (February 2012)
- [Vaccination failure!](#) There is a potential for maternally derived antibodies (MDA) to interfere with a puppy’s response to core vaccination. (Article published in the May 2011 edition of National Dog).
- [Important Information for Dog Owners – Vaccination Update July 2010](#) (An earlier version of this article was also published in National Dog Volume 13, No. 6).
- [Letter to the Editor of The Veterinarian magazine \(8 June 2010\)](#) Response to Aine Seavers’ article “Three-year vaccination intervals: a different view from the parvo trenches of practice-land”.
- [Letter to the Editor of The Veterinarian magazine \(7 June 2010\)](#): ‘A pet owner’s perspective of the vaccination controversy’.
- [Too many needles ! Unnecessary vaccination exposed](#) (February 2010. Article published in National Dog in April 2010).
- [The over-vaccination controversy continues](#) (Article published in National Dog in December 2009).
- [Over-vaccination: Are vets making our pets sick?](#) (June 2009. Article published in

National Dog in July 2009).

- [Over-vaccination of pets – an unethical practice](#) (16 June 2009). This essay summarises the issue of over-vaccination of pets.


Media reports re over-vaccination of pets:

- [Media reports re over-vaccination of pets in Australia August –October 2010](#)
- [Examples of reports in the Australian media about parvovirus outbreaks](#) during the period Dec 2009 to March 2011.

3 attachments

 **Dogs NSW Parvovirus Sept 2013.pdf**
3756K

 **E Hart response DogsNSW_Jan 2014.pdf**
134K

 **Vet response Jan 2014.pdf**
2428K