

**Elizabeth Hart**

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The Hon Dr Craig Emerson MP  
Minister for Competition Policy and Consumer Affairs

4 July 2010

Dear Minister

**Re: Consumer Voices Issues Paper –  
Request for consumer protection for consumers of veterinary services in Australia**

On 17 July 2009 I submitted a response to the **Consumer Voices Issues Paper**, in which I outlined the lack of consumer protection for consumers of veterinary services in Australia.

In particular, I provided an example of over-servicing in veterinary practice whereby veterinarians mislead pet owners into having their dogs vaccinated every year with modified live virus (MLV) vaccines for viral diseases such as parvovirus. There is no scientific evidence to support this practice of revaccination, yet veterinarians in Australia continue to coerce pet owners into having these unnecessary, and possibly harmful, interventions for their pets. They have been supported in this unethical practice by the Australian Pesticides and Veterinary Medicines Authority (APVMA), which has allowed manufacturers' non-evidence based revaccination recommendations on MLV vaccine products without question for many years.

Canine vaccination guidelines first published in the United States in 2003 recommended **against** annual vaccination with MLV vaccines. The most recent dog and cat vaccination guidelines issued by the World Small Animal Veterinary Association (WSAVA) (first published in the Journal of Small Animal Practice in September 2007, and subsequently revised and published in June 2010) advise that core vaccines for viral diseases such as canine parvovirus should not be given needlessly **"because duration of immunity (DOI) is many years and may be up to the lifetime of the pet"**.

The WSAVA guidelines warn that **"...we should aim to reduce the 'vaccine load' on individual animals in order to minimize the potential for adverse reactions to vaccine products"**. This advice is wantonly ignored by members of the veterinary profession. **Unnecessary vaccination of companion animals is blatant exploitation of pet owners and a threat to companion animal health and welfare.**

My submission on the **Consumer Voices Issues Paper** is attached for your information. Also attached is my recent correspondence to Tony Burke, Federal Minister responsible for the APVMA, plus my recent open letters to Dr Allen Bryce, Program Manager, Veterinary Medicines, APVMA; and Dr Mark Lawrie, Immediate Past President of the Australian Veterinary Association, plus a letter to the editor of *The Veterinarian*. A document including links to my extensive research on the topic of unnecessary vaccination of pets is also attached. (Please note that you are officially included as an addressee in my latest open letter to Dr Allen Bryce, APVMA.)

Over the past 21 months of my campaigning for action on this problem, I have also contacted the Heads of Veterinary Schools, State Veterinary Surgeons Boards, the Australasian Veterinary Boards Council, and various international bodies. The response from all these organisations has been most unsatisfactory, as no organisation appears willing to take responsibility for regulation of the veterinary profession.

**Dr Emerson, your department has also failed to act on this matter, a matter which is relevant to the 12 million Australians associated with pets.** I received no formal response to my submission on the **Consumer Voices Issues Paper**, and my subsequent enquiries to Ann Bounds, Senior Advisor, Competition and Consumer Policy Division, met with an unsatisfactory response.

In your capacity as Minister for Competition Policy and Consumer Affairs, **I request your urgent attention to this matter and request that the Federal government initiate urgent action to ensure effective regulation of the veterinary profession to protect pet owners and companion animals from misleading and unethical veterinary practice.**

I look forward to your early response.

Yours sincerely

**Elizabeth Hart**

**Attachments:**

- **Submission on the Minister for Competition Policy and Consumer Affairs' Consumer Voices Issues Paper: Request for consumer protection for consumers of veterinary services in Australia** (17 July 2009):  
[http://www.treasury.gov.au/documents/1593/PDF/Elizabeth\\_Hart.pdf](http://www.treasury.gov.au/documents/1593/PDF/Elizabeth_Hart.pdf)
- **Response to Allen Bryce, 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** (23 June 2010):  
[http://users.on.net/~peter.hart/Response\\_to\\_Allen\\_Bryce\\_APVMA\\_23\\_June\\_2010.pdf](http://users.on.net/~peter.hart/Response_to_Allen_Bryce_APVMA_23_June_2010.pdf)
- **Letter to Tony Burke MP, 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):  
[http://users.on.net/~peter.hart/Letter\\_to\\_Tony\\_Burke\\_Minister\\_for\\_APVMA\\_June\\_2010.pdf](http://users.on.net/~peter.hart/Letter_to_Tony_Burke_Minister_for_APVMA_June_2010.pdf)
- **Open letter to Allen Bryce, 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** (17 June 2010):  
[http://users.on.net/~peter.hart/Open\\_Letter\\_to\\_Allen\\_Bryce\\_APVMA\\_June\\_2010.pdf](http://users.on.net/~peter.hart/Open_Letter_to_Allen_Bryce_APVMA_June_2010.pdf)
- **Letter to the Editor submitted to veterinary industry magazine, The Veterinarian: 'A pet owner's perspective of the vaccination controversy'** (7 June 2010):  
[http://users.on.net/~peter.hart/Letter\\_to\\_the\\_Veterinarian\\_June\\_2010\\_E\\_Hart.pdf](http://users.on.net/~peter.hart/Letter_to_the_Veterinarian_June_2010_E_Hart.pdf)
- **Open letter to Mark Lawrie, 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):  
[http://users.on.net/~peter.hart/Open\\_letter\\_to\\_the\\_AVA\\_re\\_continuing\\_unnecessary\\_vax\\_May\\_2010.pdf](http://users.on.net/~peter.hart/Open_letter_to_the_AVA_re_continuing_unnecessary_vax_May_2010.pdf)
- **Examples of articles reporting on parvovirus outbreaks in the Australian media during the period December 2009 – June 2010 promoting 'annual' vaccinations or that vaccinations be kept 'up to date' or similar**  
[http://users.on.net/~peter.hart/Media\\_articles\\_re\\_parvovirus\\_Dec\\_2009\\_to\\_June\\_2010.pdf](http://users.on.net/~peter.hart/Media_articles_re_parvovirus_Dec_2009_to_June_2010.pdf)