

**Elizabeth Hart**  
[eliz.hart25@gmail.com](mailto:eliz.hart25@gmail.com)

**An open letter to representatives of the  
Australian Pesticides and Veterinary Medicines Authority,  
Australian Veterinary Association, Australian Small Animal Veterinary Association  
and Competition and Consumer Policy Division, The Treasury**

**Attention:**

24 January 2010

Allen Bryce, Program Manager, Veterinary Medicines  
Australian Pesticides and Veterinary Medicines Authority

cc:

- Eva Bennet-Jenkins, CEO, APVMA
- James Suter, General Counsel, APVMA
- Phil Reeves, Principal Scientist, Residues and Veterinary Medicines
- Simon Cubit, Manager, Public Affairs, APVMA
- Kylie Blakers, Public Affairs, APVMA
- Alan Hill, Public Affairs, APVMA
- Jenni Mack, Member of the APVMA Advisory Board
- Heather Yeatman, Chair of the APVMA Community Consultative Committee
- Elvira Currie, Senior Reviewer, Adverse Experience Reporting Program, APVMA
- John Owusu, Principal Evaluator, Veterinary Medicines Program, APVMA
- Raj Bhula, Program Manager, Pesticides Program, APVMA
- Mark Lawrie, President of the Australian Veterinary Association
- Marcia Balzer, National Communications Manager of the Australian Veterinary Association
- Bruce Twentyman, Deputy Veterinary Director of the Australian Veterinary Association
- Graham Swinney, President of the Australian Small Animal Veterinary Association
- Warren Foreman, President of the South Australian Division of the Australian Veterinary Association
- Ann Bounds, Senior Advisor, Competition and Consumer Policy Division, The Treasury

Dear Allen

**RE: UNNECESSARY VACCINATION OF PETS AND THE APVMA'S POSITION STATEMENT  
ON VACCINATION PROTOCOLS FOR DOGS AND CATS PUBLISHED ON 21 JAN 2010**

I acknowledge your email of 24 January 2010 responding to my 'open letter' dated 8 January 2010.

I will respond to your comments soon. The most important point to address urgently is the ambiguous sentence (which is included in the brief version of the APVMA's Position Statement, and also in the section on "The APVMA's position on re-vaccination intervals" in the full APVMA Position Statement), i.e.:

in some circumstances, such as communities with high prevalence of infection, annual revaccinations may be advisable.<sup>1</sup>

As I indicated in my email to you dated 22 January, I found this sentence confusing and contradictory. It undermines the APVMA's preceding sentence that:

The international veterinary community is now increasingly supporting the position that annual re-vaccination with core vaccines is not required on a life-long basis.<sup>2</sup>

I am astonished by your specious argument about annual revaccination of dogs in remote Aboriginal communities. As you admit, this is “not a situation that most Australian dogs or dog owners are familiar with”.<sup>3</sup>

As the questionable sentence in the APVMA’s Position Statement currently stands, I have no doubt that veterinarians will misconstrue this advice, and use it as an excuse to continue to unnecessarily revaccinate pets annually with MLV core vaccines in the general Australian dog population, particularly as it appears information on long duration of immunity with MLV core vaccines, and possible adverse reactions to vaccination, continues to be suppressed from the pet-owning public.

I have evidence that the veterinary profession is continuing to mislead pet owners into having unnecessary and possibly harmful vaccinations for their pets. I have already provided you with the results of a small survey I undertook before our meeting with the APVMA and AVA in September 2009, in which **eight out of the ten Adelaide veterinary surgeries contacted indicated that ‘annual’ vaccination of adult dogs with core MLV vaccines was still common practice**. Only two people contacted acknowledged ‘triennial’ revaccination, and this was only after I raised the topic. And as I have outlined numerous times previously, so-called ‘triennial’ revaccination has not been proven to be necessary either. (For the information of all addressees on this ‘open letter’, a copy of the survey results will be attached to the email covering this letter.)

**More recently, newspaper articles demonstrate that the veterinary profession is using the media as a means to advertise and promote unnecessary revaccination of pets.**

Media stories on parvovirus outbreaks are regularly used as a form of scare tactic and advertising for repeated vaccination of pets. These articles usually stress that pet owners should continue to have their pets revaccinated to protect against viral diseases such as parvovirus. Such articles are misleading as dogs that have been properly vaccinated with MLV core vaccines as puppies are likely to have lifelong immunity.<sup>4</sup>

For example, on 15 December 2009 a story headlined “Canine Deaths Mystery” in the *Adelaide Messenger*, reported that a ‘mystery disease’ with symptoms similar to parvovirus is killing dogs in the northern suburbs of Adelaide.<sup>5</sup>

The *Messenger* article reported that parvovirus was **not** the cause of the mystery disease. Nevertheless, the story was linked to a parvovirus epidemic that appears to be simultaneously sweeping the northern suburbs. Pet owners were urged to “immunise their dogs, at a cost of \$60-\$90, **even if the animal was vaccinated last year**”.<sup>6</sup> (My emphasis.)

A similar story titled “Be wary of mystery virus”, alluding to the ‘mystery virus’ with parvovirus-like symptoms, was reported in the *Roxby Downs Sun* on 22 December 2009. Pet owners were again urged to “make sure their pet’s vaccinations were **‘up to date’** as the busy holiday season approached”.<sup>7</sup> (My emphasis.)

Another story titled “Plea to protect pets” published on 5 January 2009 in Perth’s *In My Community* warned of an outbreak of ‘deadly parvovirus’ in Armadale. Pet owners were urged **“to keep their pet’s vaccinations up to date”**, and that **boosters should “be given annually”**.<sup>8</sup> (My emphasis.)

Similarly, a story titled “Warning to pet owners” in the *Western Weekender Penrith*, warned that vets were reporting a rise in the number of cases of parvovirus. The article noted that **“many vets recommend dogs to be boosted at least once a year** after the initial series of vaccinations when the dog is a puppy”.<sup>9</sup> (My emphasis.)

Another tactic to drum up repeat business is to warn of ‘new emerging strains of parvovirus’. For example two Queensland newspapers reported this story, with an article titled “Canine parvovirus outbreak – new strain emerging” in the *Allora Advertiser* on 17 December 2009<sup>10</sup> and another titled “New strain of parvovirus” in the *Warwick Daily News* on 22 December 2009. These stories reported that there is a “new emerging strain...called the CPV-2b strain in the area”<sup>11</sup>, i.e.:

We are recommending to all of our clients to check that their pet’s **boosters are up-to-date** and **even to consider getting a booster done again sooner than the anniversary date to ensure pets are protected against this newer strain of virus** over summer. Younger animals are at greater risk than older ones **but we still advise people to get their older animals vaccinated**.<sup>12</sup> (My emphasis.)

**Referring to this “newer strain of virus” as a means to urge pet owners to revaccinate their pets is misleading.** The Facts Sheets of the WSAVA guidelines include this information on MLV CPV-2 vaccines:

These vaccines contain canine parvovirus of various isolates, different genotypes and at various titres. Currently, four genotypes are recognised world-wide, which are referred to as CPV-2 (the original genotype), CPV-2a, **CPV-2b**, CPV-2c. All genotypes are antigenically comparable - vaccination with any one will provide protective immunity against all the other genotypes.<sup>13</sup> (My emphasis.)

So, dogs properly vaccinated with MLV vaccines for parvovirus are likely to be protected against CPV-2b. There is no need for these dogs to be revaccinated to protect them against this allegedly “newer strain”.

In relation to the article on the “Canine Deaths Mystery” reported in the *Adelaide Messenger*, I contacted Warren Foreman, the President of the South Australian Division of the Australian Veterinary Association, who was quoted in the article, to request more detailed information and statistics in relation to this story. I also copied my enquiry to Mark Lawrie, the President of the Australian Veterinary Association, and other AVA representatives.<sup>14</sup> My enquiry has been acknowledged<sup>15</sup> but I have not yet received a response to my questions. During my research I have discovered it is impossible to obtain statistics about disease prevalence in companion animals in Australia – both the AVA and APVMA have been unable to provide me with information.

The media articles referred to above, with their references to the dreaded parvovirus disease, and their exhortations for pet owners to ensure their pet’s vaccinations are ‘up to date’, are all part of the insidious process to compel pet owners to continue having repeated unnecessary vaccinations for diseases such as parvovirus for their pets. If the instigators of these articles were genuinely concerned about pets being vaccinated with MLV core vaccines in accordance with the latest scientific evidence, their emphasis would be on encouraging pet owners with unvaccinated pets to have them vaccinated, rather than urging pet owners with already vaccinated pets to have them needlessly revaccinated again and again.

There is no evidence that repeated vaccination with MLV core vaccines is necessary for properly vaccinated dogs. Repeated vaccination of adult dogs with MLV core vaccines are an unnecessary expense for pet owners, and needlessly puts pets at risk of an adverse reaction to vaccine products. This is unacceptable.

I suggest that many veterinarians are abusing their professional status by using their influence and authority to pressure trusting pet owners into having unnecessary and possibly harmful interventions for their pets. I will be pursuing this matter further with the President of the AVA, Mark Lawrie, and also with the Minister for Competition Policy and Consumer Affairs, Craig Emerson. Along with Bea Mies and Pat Styles, I have already made a formal submission to the

Minister on the Consumer Voices Issues Paper, requesting consumer protection for consumers of veterinary services in Australia, and I am awaiting a response. A copy of my submission is accessible via this internet link:

[http://www.treasury.gov.au/documents/1593/PDF/Elizabeth\\_Hart.pdf](http://www.treasury.gov.au/documents/1593/PDF/Elizabeth_Hart.pdf)

Allen, as it stands, the APVMA's Position Statement is not as clear and informative as it should be.

In an article titled "The public and effective risk communication", Lynn Frewer argues:

Risk communication must take account of the actual concerns of the public...When the public want information about a risk, they prefer a clear message regarding risks and associated uncertainties, including the nature and extent of disagreements between different experts. Furthermore, societal priorities for risk mitigation activities may not align with those identified by expert groups. ***Dismissing the former as irrelevant may result in increased distrust in the motives of regulators and industry, with consequences for public confidence in regulatory activities linked to public protection.*** Awareness and understanding of public concerns must be the basis of an effective risk management strategy.<sup>16</sup> (My emphasis.)

For many years, the public has received a one-sided and non-evidence based view on vaccination of pets with MLV core vaccines from most members of the veterinary profession. It is way past time that pet owners were provided with critical information. I do not believe that the veterinary profession can be trusted with this task, it is up to the Federal government regulator, the APVMA, to take leadership on this issue and ensure the public is properly informed.

I will forward my detailed critique of the APVMA's Position Statement in due course. In the meantime, here is a quick summary of two more glaring flaws in the APVMA's Position Statement:

### 1. Lack of information on duration of immunity

The public is still not being given specific information on long duration of immunity with MLV core vaccines. In the interests of transparency, the APVMA Position Statement should include pertinent information contained in the WSAVA guidelines, i.e. that **"dogs that have responded to vaccination with MLV core vaccines maintain a solid immunity (immunological memory) for many years in the absence of any repeat vaccination"**.<sup>17</sup> The public should also be advised that duration of immunity after vaccination with these vaccines has been demonstrated to be at least seven years, based on challenge and serological studies.<sup>18</sup> The 2006 AAHA canine vaccine guidelines advise that vaccines produced by the major biologics manufacturers against parvovirus, distemper virus and adenovirus **all** produce excellent immune responses and can be soundly and reliably administered at the discretion of the clinician in extended duration of immunity protocols.<sup>19</sup> Pet owners should be clearly advised that MLV core vaccines with 'annual' or 'triennial' revaccination recommendations are likely to provide long duration of immunity, probably lifelong.

### 2. Lack of information on adverse reactions

The information on adverse reactions in the APVMA's Position Statement is misleading. Information on the broad range of possible adverse reactions and long term health problems continues to be suppressed. I have already provided detailed information on this subject in my previous correspondence and papers.<sup>20</sup>

It is not just “members of the public” who are worried about the risk of adverse reactions. The WSAVA guidelines warn that “***we should aim to reduce the ‘vaccine load’ on individual animals in order to minimise the potential for adverse reactions to vaccine products***”.<sup>21</sup> The WSAVA guidelines also warn that there is “***gross under-reporting of vaccine-associated adverse events which impedes knowledge of the ongoing safety of these products***”.<sup>22</sup> Why is this information not being passed onto the public for their consideration? More information on the APVMA’s Adverse Experience Reporting Program (AERP) should be included. Members of the public should be informed that they can make their own Adverse Experience Report, and a link to the reporting form should be provided.

Allen, please advise me when the amended APVMA Position Statement will be posted on the APVMA’s website.

Regards  
Elizabeth Hart

#### Endnotes:

<sup>1</sup> APVMA’s Position Statement on Dog and Cat Vaccination Protocols (as published on 21 January 2010): [http://www.apvma.gov.au/news\\_media/news/2010/2010-01-21\\_vaccination\\_position.php](http://www.apvma.gov.au/news_media/news/2010/2010-01-21_vaccination_position.php)

<sup>2</sup> *Ibid.*

<sup>3</sup> Email correspondence from Allen Bryce, APVMA, dated 24 January 2010.

<sup>4</sup> As discussed in my previous report and papers, i.e.:

- Hart, Elizabeth. Is over-vaccination harming our pets? Are vets making our pets sick? 13 April, 2009:

[http://users.on.net/~peter.hart/Is\\_%20over-vaccination\\_harming\\_our\\_pets.pdf](http://users.on.net/~peter.hart/Is_%20over-vaccination_harming_our_pets.pdf)

- Hart, Elizabeth. Over-vaccination of pets – an unethical practice. 16 June 2009:

[http://users.on.net/~peter.hart/Overvaccination\\_of\\_pets\\_-\\_an\\_unethical\\_practice.pdf](http://users.on.net/~peter.hart/Overvaccination_of_pets_-_an_unethical_practice.pdf)

- Hart, Elizabeth. Over-vaccination: Are vets making our pets sick? Published in the July 2009 edition of Australian specialist dog breeder magazine, National Dog: [http://users.on.net/~peter.hart/Overvaccination\\_Are\\_vets\\_making\\_our\\_pets\\_sick.pdf](http://users.on.net/~peter.hart/Overvaccination_Are_vets_making_our_pets_sick.pdf)

- Hart, Elizabeth. The over-vaccination controversy continues... Published in the December 2009 edition of Australian specialist dog breeder magazine, National Dog: <http://users.on.net/~peter.hart/Overvaccination%20Controversy%20Continues.pdf>

<sup>5</sup> “Canine deaths mystery”. Adelaide *Messenger*, 15 December 2009: <http://news-review-messenger.whereilive.com.au/news/story/canine-deaths-mystery/>

<sup>6</sup> *Ibid.*

<sup>7</sup> “Be wary of mystery virus”. *Roxby Downs Sun*, 22 December 2009:

<http://www.roxydownssun.com.au/news/local/news/general/be-wary-of-mystery-virus/1711752.aspx>

<sup>8</sup> “Plea to protect pets”. *In my community*, 5 January 2010: <http://www.inmycommunity.com.au/news-and-views/local-news/Plea-to-protect-pets/7545267/>

<sup>9</sup> “Warning to pet owners”. *The Western Weekender Penrith Online*, 11 January 2010:

[http://www.westernweekender.com.au/index.php?option=com\\_content&task=view&id=1408&Itemid=50](http://www.westernweekender.com.au/index.php?option=com_content&task=view&id=1408&Itemid=50)

<sup>10</sup> “Canine parvovirus outbreak – new strain emerging”. *The Allora Advertiser*, 17 December 2009.

<sup>11</sup> “New strain of parvovirus”. *Warwick Daily News*, 22 December

2009: <http://www.warwickdailynews.com.au/story/2009/12/22/new-strain-of-parvovirus/>

<sup>12</sup> *Ibid.*

<sup>13</sup> WSAVA Guidelines 2007: [http://www.wsava.org/PDF/Misc/VGG\\_09\\_2007.pdf](http://www.wsava.org/PDF/Misc/VGG_09_2007.pdf)

<sup>14</sup> Email correspondence to Warren Foreman AVA, cc: Mark Lawrie, Bruce Twentyman, Marcia Balzer, AVA and Graham Swinney, ASAVA, dated 10 January 2010.

<sup>15</sup> Email response from Marcia Balzer, AVA dated, 22 January 2010.

<sup>16</sup> Frewer, Lynn. The public and effective risk communication. *Toxicology Letters* 149 (2004) 391-397.

<sup>17</sup> WSAVA Guidelines 2007: [http://www.wsava.org/PDF/Misc/VGG\\_09\\_2007.pdf](http://www.wsava.org/PDF/Misc/VGG_09_2007.pdf)

<sup>18</sup> *Ibid.*

<sup>19</sup> 2006 AAHA guidelines: Paul, M.A., Carmichael, L.E., Childers, H., Cotter, S., Davidson, A., Ford, R., Hurley, K.F., Roth, J.A., Schultz, R.D., Thacker, E., Welborn, L. 2006 AAHA Canine Vaccine Guidelines, Revised: <http://www.aahanet.org/PublicDocuments/VaccineGuidelines06Revised.pdf>

<sup>20</sup> - Hart, Elizabeth. Is over-vaccination harming our pets? Are vets making our pets sick? 13 April, 2009: [http://users.on.net/~peter.hart/Is\\_%20over-vaccination\\_harming\\_our\\_pets.pdf](http://users.on.net/~peter.hart/Is_%20over-vaccination_harming_our_pets.pdf)

---

- Hart, Elizabeth. Over-vaccination of pets – an unethical practice. 16 June 2009:

[http://users.on.net/~peter.hart/Overvaccination\\_of\\_pets\\_-\\_an\\_unethical\\_practice.pdf](http://users.on.net/~peter.hart/Overvaccination_of_pets_-_an_unethical_practice.pdf)

- Hart, Elizabeth. Over-vaccination: Are vets making our pets sick? Published in the July 2009 edition of Australian specialist dog breeder magazine, National Dog: [http://users.on.net/~peter.hart/Overvaccination\\_Are\\_vets\\_making\\_our\\_pets\\_sick.pdf](http://users.on.net/~peter.hart/Overvaccination_Are_vets_making_our_pets_sick.pdf)

- Hart, Elizabeth. The over-vaccination controversy continues... Published in the December 2009 edition of Australian specialist dog breeder magazine, National Dog: <http://users.on.net/~peter.hart/Overvaccination%20Controversy%20Continues.pdf>

<sup>21</sup> WSAVA Guidelines 2007: [http://www.wsava.org/PDF/Misc/VGG\\_09\\_2007.pdf](http://www.wsava.org/PDF/Misc/VGG_09_2007.pdf)

<sup>22</sup> *ibid.*