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**A Submission to the
Royal College of Veterinary Surgeons
on the Draft Code of Professional Conduct
for Veterinary Surgeons**

24 June 2011

For the attention of:

Mr Christopher Murdoch
Secretary to the Review of the Guides to Professional Conduct Working Party
Professional Conduct Department
Royal College of Veterinary Surgeons
Belgravia House
62-64 Horseferry Road
London
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Mr Murdoch

RE: PROFESSIONAL CONDUCT AND COMPANION ANIMAL VACCINATION PRACTICE

My submission on the Royal College of Veterinary Surgeons' (RCVS) Draft Code of Professional Conduct for Veterinary Surgeons seeks to highlight that vaccination of companion animals is an area where veterinarians' professional conduct comes into question, in particular:

- the ongoing demands from veterinarians that pet owners have non-evidence based revaccinations for their pets every year or every three years, and
- the general failure to obtain informed consent from clients before vaccination of pets.

As companion animal vaccination is a major part of veterinary practice, the RCVS' new Code of Professional Conduct must make provision to ensure that veterinarians are properly educated and up-to-date on vaccination 'best practice', and ensure that appropriate vaccination of companion animals is discussed with pet owners in an informative and responsible manner in the best interests of their individual pet.

An effective system must be put in place to protect pet owners from being compelled to have unnecessary, and possibly harmful, interventions for their pets.

RECOMMENDATION: It is up to the RCVS to provide objective guidance on this matter. As companion animal vaccination is an important area of veterinary practice, I suggest the RCVS set up a working party to address this issue. Action on this matter is long overdue.

Discussion

Many veterinarians have seriously over-stepped the mark in the veterinarian/client relationship, and adopted a dictatorial attitude on companion animal vaccination practice. Many veterinarians fail to give their clients the opportunity to consider that the World Small Animal Veterinary Association's ([WSAVA Guidelines for the Vaccination of Dogs and Cats \(2010\)](#)) advise duration of immunity with core vaccines is "many years and may be up to the lifetime of the pet".¹

It is a very serious matter that many veterinarians fail to obtain informed consent from their clients before interventions for their individual pet(s).

For too many years, the public has received a biased and non-evidence based view of vaccination of pets. The self-appointed authority of veterinarians who dictate that pet owners have their pets revaccinated without scientific foundation must be challenged. Veterinarians do **not** have a mandate to dictate vaccination practice to their clients, it is their professional responsibility to provide **advice** on vaccination 'best practice'.

I suggest continuing unnecessary, and possibly harmful, vaccination of pets is a result of a combination of poor education of veterinarians in the areas of immunology and vaccinology (the WSAVA Vaccination Guidelines Group has warned that "there is an [urgent requirement](#) for education of practicing veterinarians in this area"²), and **non-evidence based** vaccine manufacturers' 'recommendations' to revaccinate adult dogs 'annually' or 'triennially' with modified live virus (MLV) core vaccine products to protect against canine parvovirus, canine distemper virus and canine adenovirus.

In Britain this most unsatisfactory situation has been compounded in that the British Veterinary Association's "Vaccination – The Facts" document previously indicated that it would be '**negligent**' to deviate from instructions on the vaccine product label, i.e.:

Vets must use vaccines in accordance with the licence stipulations. **It should be noted that it would be *negligent* of a vet to deviate from the medicinal data available to them and/or use a vaccine not in accordance with the instructions on the label and the summary of the product characteristics or data sheet.**³ (My emphasis.)

I raised this matter in [my open letter dated 22nd December 2009](#), addressed to the Australian regulator and Australian veterinary associations. (Refer to the section "Over-vaccination of pets – an international problem", see pp. 8-9.)

It is interesting to note that the word '**negligent**' has since been quietly removed from the BVA's "Vaccination – The Facts" document⁴, with no mention of this amendment being highlighted that I can see. The BVA's current "Vaccination – The Facts" document remains convoluted and obfuscatory, as does advice from the British Small Animal Veterinary Association (BSAVA)⁵, and the Veterinary Medicines Directorate⁶. The WSAVA 2010 guidelines also contain some ambiguities and inconsistencies which I discuss in my open correspondence and other documents, refer to links at the conclusion of this submission.

So it appears that veterinarians are confused about appropriate vaccination practice. During the recent BSAVA 2011 congress, veterinarian Ross Alan admitted he was 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.**⁷ (My emphasis.)

The public can have little confidence that companion animal vaccination practice is being managed responsibly, safely and effectively when veterinarians are confused by conflicting

advice from world experts, regulators and the pharmaceutical industry, and when they are being called upon to have possibly harmful interventions for their pets without evidence of benefit for their individual pet.

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!](#)

As companion animal vaccination is a major part of veterinary practice, the RCVS' new Code of Professional Conduct must make provision to ensure that veterinarians are properly educated and up-to-date on vaccination 'best practice', and ensure that appropriate vaccination of companion animals is discussed with pet owners in an informative and responsible manner.

As things stand, many pet owners are currently not being properly informed about crucial information concerning vaccination. In particular, they are not being provided with information in the WSAVA 2010 guidelines and in other scientific literature on:

- the likely long duration of immunity with MLV core vaccines, which is many years and **probably lifelong**;
- the **lack of evidence** to support manufacturers' revaccination recommendations on MLV core vaccine product labels;
- advice to "reduce the 'vaccine load' on individual animals in order to **minimize the potential for adverse reactions to vaccine products**";
- advice to "vaccinate each individual **less frequently by only giving non-core vaccines that are necessary for that animal**";
- the conflict between the early finish of puppy vaccination generally recommended on vaccine product labels (i.e. 10 or 12 weeks), and the later finish recommended in the WSAVA 2010 guidelines (i.e. 14-16 weeks), **which may mean that some pets undergoing an early finish are unprotected due to neutralization of the vaccine virus by maternally derived antibodies (MDA)**;
- **advice on titre testing**, with the opportunity to have a lab-based or in-surgery titre test for the animal to verify a response to core vaccination;
- **advice on isolation of vulnerable puppies**, and on how to transport vulnerable puppies to the veterinary surgery (a possible source of infection) for core vaccinations, (and titre testing, if desired by the pet owner); and
- **the potential risks of simultaneous vaccination and application of other medical products** (e.g. the heartworm injection) for individual animals.

Pet owners are not being given the opportunity to make an informed decision about the efficacy and safety of core and non-core vaccination in the best interests of their individual pet. In many instances, veterinarians are demanding that pet owners revaccinate already immune animals to access veterinary services, boarding kennels, pet insurance and other pet services. **This is wrong.**

I suggest the reluctance and inability of the veterinary profession to provide pet owners with a succinct and effective message on vaccination best practice, for serious diseases such as

parvovirus, is resulting in many pets not being appropriately vaccinated, as evidenced by the continual stream of media articles warning of parvovirus outbreaks in countries such as the UK, Australia, and the US. (Refer to [my open letter dated 26 March 2011](#) for more discussion on this, see pp. 3-5.)

I suggest if more pet owners were properly informed that appropriate core vaccination of puppies would likely protect their pets for life, more pet owners would seek to ensure their pets were appropriately vaccinated.

A succinct and effective message on vaccination and titre testing is urgently required

Pet owners must be advised of the latest and best vaccination recommendations and allowed to make an informed decision in the best interests of their individual pet.

A succinct and effective message on appropriate core vaccination of puppies is urgently required, including advice on the option of titre testing to verify a response to core vaccination.

Advice on isolation of vulnerable puppies, and on how to transport vulnerable puppies to the veterinary surgery for core vaccinations, and a subsequent titre test if desired by the pet owner, is also essential.

Non-core vaccination and other medical products, such as heartworm and flea products, must be carefully considered on a risk/benefit analysis for the individual animal, these products must not be pushed indiscriminately.

Informed consent must be obtained from the client before any intervention, including a signed consent form indicating the pet owner has been properly informed of their options, and the risks and benefits of the intervention.

Pet owners are likely to accept a small risk if it is substantially outweighed by the benefits, **but an animal should not be put at any risk with an intervention that has no proven benefit for the individual animal.**

Conclusion

RECOMMENDATION: It is up to the RCVS to provide objective guidance on this matter. As companion animal vaccination is an important area of veterinary practice, I suggest the RCVS set up a working party to address this issue. Action on this matter is long overdue.

Over the past two and a half years, I have prepared a number of submissions, papers and articles on pet vaccination, and also undertaken extensive correspondence on this subject with organisations such as the Australian Pesticides and Veterinary Medicines Authority, the Australian Veterinary Association and the Australasian Veterinary Boards Council.

As over-vaccination and over-servicing of pets is a widespread international problem, I have also forwarded my material to parties in other countries, including the RCVS, British Veterinary Association, British Small Animal Veterinary Association, and the Veterinary Medicines Directorate in the UK; and the American Veterinary Medical Association, American Animal Hospital Association, and the Center for Veterinary Biologics in the US, plus veterinary boards, veterinary schools and others etc.

The Registrar of the RCVS, Miss Jane Hern, has 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](#). Miss Hern has never acknowledged my correspondence.

The material I have produced discusses a broad range of issues in relation to companion animal vaccination, including reference to international vaccination guidelines; duration of immunity of vaccines; potential adverse experiences after vaccination; education of vets; conflicts of interest for veterinarians, vaccine manufacturers and government regulators; professional and ethical responsibility, informed consent etc.

I request that the material I have produced on the topic of over-vaccination of pets be considered with this submission.

The material can be accessed via the following hyperlinks:

- [Email to Anna-Maria Brady, VMD \(23 June 2011\)](#) requesting evidence to support the veterinary industry's call for revaccination of pets.
- [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).
- [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.
- [Email to Anna-Maria Brady, VMD \(15 May 2011\)](#) with questions re core vaccine product labelling in regards to duration of immunity.
- [Email to James Suter, APVMA \(20 April 2011\)](#) with further questions re the APVMA's responses to adverse experience reports being marked 'COMMERCIAL-IN-CONFIDENCE'.
- [Email to Anna-Maria Brady, VMD \(1 April 2011\)](#) providing a pet owner's perspective on pet vaccination.
- [Open letter to Barry Smyth, President of the AVA](#); Peter Punch, Chair of the AVBC; Eva Bennet-Jenkins, CEO, APVMA (26 March 2011): A formal complaint re the continuing calls for already immune animals to be needlessly, and possibly harmfully, revaccinated.
- [Examples of reports in the Australian media about parvovirus outbreaks](#) during the period Dec 2009 to March 2011.
- [Email to James Suter, APVMA \(6 March 2011\)](#) "Request for information re adverse experience reporting / possible conflicts of interest".
- [Email to Mark Kelman, Virbac / ASAVA \(7 February 2011\)](#) re further questions about the Virbac Disease WatchDog
- [Email to Allen Bryce, APVMA \(31 January 2011\)](#) re adverse experiences after vaccination
- [Email to Mark Kelman, Virbac / ASAVA \(26 January 2011\)](#) re alarming statistics regarding parvovirus and the Virbac Disease WatchDog.
- [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.
- [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).

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- [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".
 - [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.
 - [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).
 - [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.
 - [Letter to the Editor submitted to veterinary industry magazine, The Veterinarian:](#) 'A pet owner's perspective of the vaccination controversy' (7 June 2010).
 - [Examples of reports in the Australian media about parvovirus outbreaks](#) during the period December 2009 - July 2010.
 - [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).
 - [Too many needles ! Unnecessary vaccination exposed](#) (February 2010, article published in National Dog in April 2010).
 - [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).
 - [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.
 - [The over-vaccination controversy continues](#) (article published in National Dog in December 2009).
 - [Results of a random mini-survey](#) of Adelaide veterinary surgeries' vaccination practice for adult dogs (September 2009).
 - [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".
 - [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 fully-referenced paper is a summary of my 'over-vaccination' report dated 13 April 2009 with additional information.

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- [*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.

Yours sincerely

Elizabeth Hart

Independent Advocate for Judicious Vaccine Use

¹ 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.

² [WSAVA Vaccination Guidelines Group webpage](#):

³ British Veterinary Association: Vaccination – The Facts: http://www.bva.co.uk/public/documents/Vaccination_FAQs.pdf (as accessed in December 2009).

⁴ British Veterinary Association: Vaccination – The Facts: http://www.bva.co.uk/public/documents/Vaccination_the_facts.pdf (as accessed in June 2011).

⁵ There are two copies of the "Policy Statement on Canine and Feline Vaccination Protocols, Nosode Vaccines and Adverse Reactions to Vaccines" on the BSAVA website, one under "Companion Animal Vaccination" dated September 2007: <http://www.bsava.com/Advice/PolicyStatements/CompanionAnimalVaccination/tabid/164/Default.aspx> and another one under "Canine and Feline Vaccination Protocols" dated October 2010:

<http://www.bsava.com/Advice/PolicyStatements/CanineandFelineVaccinationProtocols/tabid/1325/Default.aspx>
<http://www.bsava.com/Advice/PolicyStatements/CanineandFelineVaccinationProtocols/tabid/1325/Default.aspx>

⁶ Refer to VMD Position Paper on Authorised Vaccination Schedules for Dogs:

http://www.vmd.defra.gov.uk/pdf/vaccines_VMDpositionpaper.pdf and John Fitzgerald's (Director of Operations, VMD) letter to the Veterinary Record regarding "Canine vaccination schedules". February 27, 2010, pp. 280-281.

⁷ Jacob, Catherine. Different perspectives on vaccination advice. Veterinary Record. April 16 2011, pp. 395-396.