

Irish Wolfhound Club of America, Inc.

June 28, 2010
Senate Public Health Committee
State Capitol Room 2191
Sacramento, CA 95814

Subject: **Support AB 2000** as Amended on June 2, 2010
VOTE 'YES' ON AB 2000

Dear Senators:

I am writing on behalf of the Irish Wolfhound Club of America (IWCA) and the IWCA Legislative Committee (IWCA-LC). The IWCA is the parent club for Irish Wolfhound owners nation-wide, as well as the anchor for 14 regional and local clubs. Two of the oldest of those regional clubs are located in California, thereby giving this breed a substantial California presence with a strong vested interest in the activities of its elected officials.

The IWCA and IWCA-LC support AB 2000, a bill that would allow medically necessary exemption from the California State mandated rabies vaccination requirement. This bill would exempt the owner of a dog from the vaccination requirement upon determination of a licensed veterinarian, on an annual basis; the dog may have a potentially lethal reaction to the vaccination due to currently having a compromised immune system, or has a documented medical record of a preexisting condition. AB 2000 creates a medical exemption for appropriately defined dogs.

We'd like to address the letter from the California Department of Public Health, dated June 8, 2010. The CDPH writes: "There is no scientific evidence that canine rabies vaccines are associated with severe or a high rate of vaccination reactions" and references "a recent study published by the U.S. Department of Agriculture (USDA) found that rabies vaccines used for dogs, nearly 120 million doses distributed in the United States."

The USDA study [i] that the CDPH cites does not support the above conclusion. Instead, it states: "Rabies vaccines are the most common group of biological products identified in adverse event reports received by the CVB [USDA Center for Veterinary Biologics]. The USDA study includes scientific evidence of many dogs that had some severe adverse reactions associated with rabies vaccination, including death, lack of consciousness, anaphylaxis, ataxia, circulatory shock, and numerous other adverse reactions. The USDA study also states: 'nearly 10,000 adverse event reports (all animal species) were received by manufacturers of rabies vaccines...Approximately 65% of the manufacturers' reports involved dogs.'"

The CDPH letter further asserts that rabies vaccination does not have a "high" rate of severe adverse reactions, which is generally understood to mean relative to other vaccines. Perhaps that is so; however, no other vaccine that dogs receive is legally mandated. Veterinarians are able to exercise medical judgment in not administering parvo, distemper, and other elective vaccines to dogs that are not sufficiently healthy to be vaccinated. However, California veterinarians under current law are forbidden from exercising any medical judgment with rabies vaccines because they are legally mandated. This is a predicament that AB 2000 would address.

The CDPH letter goes on to state: "There are no contradictions listed on the label for canine rabies vaccines." This is somewhat misleading as both Merial and Wyeth both include instructions for their rabies vaccines indicating they are to be used to vaccinate "healthy" dogs [ii,iii]. Logically this means these vaccines are contraindicated for unhealthy dogs.

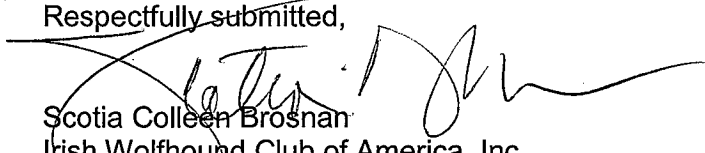
The CDPH letter also states: "Standard veterinary immunization protocols already exist to prevent common vaccine adverse reactions." In their 2006 Canine Vaccine Guidelines, the American Animal Hospital Association recommends against vaccinating unhealthy dogs [iv]: "veterinary medicine has advised against vaccination during illness."

A number of states, including Alabama, Florida, Colorado, Connecticut, Maine, Massachusetts, New Jersey, New York, Rhode Island, Virginia, Wyoming and Wisconsin, successfully provide medical exemption from rabies vaccination without quarantine provisions. We encourage your support of this important legislation, similarly safeguarding the health and welfare of the companion canines of Californians.

By carving out an appropriately narrow exemption for the small number of dogs that are too unhealthy for rabies vaccination, AB 2000 is consistent with the instructions from rabies vaccine manufacturers and with standard veterinary immunization protocols from the American Animal Hospital Association, both of which stipulate that vaccination is for healthy dogs.

The IWCA-LC on behalf of the IWCA membership, many of whom are residents of California, respectfully urges you to vote 'YES' when AB 2000 is brought to a vote.

Respectfully submitted,



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