

# THE ANIMAL COUNCIL

**P.O. Box 168, Millbrae CA 94030**

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Via Facsimile (916) 324-0384

May 28, 2013

Senator Ed Hernandez, Chair  
Senator Joel Anderson, Vice Chair  
Senate Committee on Health  
State Capitol, Room 2191  
Sacramento CA 95814

Attention: Bill Consultant

Re: AB 272, Rabies: Vaccinations, as amended April 19, 2013, OPPOSE

Dear Chairs and Members:

Please register our opposition to the above-captioned bill and include our organization on your Committee's Bill Analysis opposition list.

The Animal Council is a non-profit, tax-exempt under IRC Section 501(c)(4) organization founded in 1991 to seek positive, humane solutions to the challenges of ideological animal activists through study, analysis and application of animal husbandry, statistics and law, and to preserve human benefit from all species, breeds and registries.

In 1991, TAC was appointed to the California Department of Health Services Animal Welfare, Public Health and Safety Working Group which met over a period of years. A copy of the participant list is attached. We used this opportunity to develop a broad understanding of scientific, public health and policy issues of rabies. We maintain on our website a record of rabies epidemiology in California. [http:// www.theanimalcouncil.com/Reference.html](http://www.theanimalcouncil.com/Reference.html)

We have closely monitored AB 272 with increasing concern:

Scientific knowledge, thinking and policy issues about rabies and other vaccines continually evolve over time. What sounded like "junk science" 20 years ago is now well established practice. Legislation involving rabies vaccines is best approached cautiously and conservatively with recognition that a broad range of interest groups have stakes and expertise *and* with consideration of existing laws and practices.

For example, the sponsor of AB 272 is only one of the organizations that had been represented on the DHS Working Group and does not represent veterinary medicine or practitioners nor animal owners. Supporters include only two more of those members, and both have law enforcement interests.

The California rabies control program based on the 4 month old standard for dogs is covered by state statutes and regulations as well as parallel local ordinances throughout the state and some, but not all, are also keyed to non-vaccine provisions with a 4 month age reference. California has been extremely successful in keeping the incidence of rabies in dogs (and cats) to little more than zero as we have documented on our website over many years. There has never been interest or perceived need to lower this to three months. Dogs brought to California from 3-month states or transported to those states have not had problems nor needed re-vaccination. Practitioners in 3-month states administer the final non-rabies “puppy” vaccine at 12 weeks and wait until 15 weeks to rabies vaccinate in order to minimize the risks of inefficacy of the rabies vaccination or auto-immune reactions that can endanger the health or even lives of young puppies. These risks are further minimized by waiting for the current 4-month standard.

AB 272 as written, lowering the age of canine rabies vaccination from 4 to 3 months does not represent consensus of the recognized stakeholders in rabies vaccine policy, is unwarranted based on California’s successful rabies control program, and possibly counter-productive, and would make other statutory and ordinance provisions throughout the state inconsistent in unnecessary, unforeseen and impractical ways that will create confusion and be costly to resolve.

For these reasons, we respectfully oppose AB 272.

Very truly yours,



SHARON A. COLEMAN  
President, The Animal Council

Cc: Author, Committee Members

Attachment

**ANIMAL WELFARE, PUBLIC HEALTH AND SAFETY WORKING GROUP**

SPONSORED BY

THE STATE OF CALIFORNIA  
DEPARTMENT OF HEALTH SERVICES  
VETERINARY PUBLIC HEALTH UNIT

OCTOBER 11, 1991  
9:45 A.M. - 3:45 P.M.  
601 NORTH 7TH STREET, ROOM 771, SACRAMENTO

ANIMAL WELFARE, PUBLIC HEALTH AND SAFETY WORKING GROUP

The purpose of the Animal welfare, Public Health and Safety Working Group is to provide a decision making forum to assist the Department of Health Services, Veterinary Public Health Unit (VPHU) in meeting its Year 2000 Public Health Goals.

The goal of the first meeting of the Working Group is to identify and prioritize problems which must be solved in order to meet the VPHU Year 2000 Public Health Goals.

Department of Health Services (DHS) Staff:

Larry Barrett, D.V.M., M.S., Chief  
Veterinary Public Health Unit

Kevin Reilly, D.V.M., M.P.V.M.  
Veterinary Public Health Unit

Dena Mangiamele, D.V.M., M.P.V.M.  
Veterinary Public Health Resident

Attendees / Participants:

The Animal Council  
Judith Brecka

California Animal Control Directors Association, Inc.  
Dan Morrison, Legislative Liaison

California Board of Examiners in Veterinary Medicine  
Arthur Hazarabedian, D.V.M., President

California Conference of Local Health Officers  
Ira Lubell, M.D., Santa Cruz County Health Officer

California Farm Bureau Federation  
Ria de Grassi, Director, National Affairs & Research

California Federation of Dog Clubs  
Cathie A. Turner

Attendees / Participants Continued:

California Veterinary Medical Association  
Thomas Kendall, D.V.M.

Cat Fanciers' Association, Inc.  
Joan Wastlhuber, Director-At-Large

The Fund for Animals  
Virginia Handley, California Coordinator

Humane Society of the United States  
Charlene Drenon, Director, West Coast Regional Office

National Pet Alliance  
Ms. Leigh Polli, Secretary

State Humane Association of California  
Sadie W. Super, Executive Director

University of California, Davis, School of Veterinary Medicine  
Bruno Chomel, D.V.M., PhD., Epidemiology and Preventive Medicine