

## CANIS ETHICA

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Chartres de Bretagne, February 13th 2016

**Mrs Monique ELOIT**

President

World Organization for Animal Health  
12, rue de Prony 75017 Paris, FRANCE

**Subject: Harmonization of technical requirements for veterinary product registration.  
France is conspicuously absent?**

Registered letter with acknowledgment of receipt # 1A 129 076 9350

- ✓ **France is the second largest producer of veterinary medicines and diagnostics**
- ✓ **France is the European leader in R & D with companies that invest 12% of their turnover**
- ✓ **France produces about 10% of veterinary products consumed in the world**
- ✓ **40% of veterinary drugs sold in France are for dogs and cats**
- ✓ **France has a dog or cat in half of its homes**
- ✓ **With operating margins of 25%, the profitability of the veterinary sector is as high as in human health**

Madam President,

Last December, we were writing to VIRBAC, ZOETIS and INTERVET, asking them to follow MERIAL example whilst changing the duration of immunity of their rabies vaccines on French soil, passing from one to three years on behalf of our Dogs better-being and European harmonization.

Indeed, there is a study on: Rabies Challenge Fund, led by Mrs. Kris Christine and Drs Jean Dodds & Ronald Schultz, in the United States, aiming at demonstrating that rabies vaccines currently on the market do preserve our Dogs for at least seven years<sup>1</sup>. While awaiting their brilliant achievement, three years duration of immunity for rabies vaccines is worldwide commonly validated.

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<sup>1</sup> Start point: 1992 French study by Dr. AUBERT Michel suggesting that present rabies vaccine provides immunity in dogs for 5 years.

Rev. sci.tech. Off. int. Epiz., 1992, 11 (3), 735-760 « Practical significance of rabies antibodies in cats and dogs »  
<http://www.oie.int/doc/ged/D8652.PDF>

Yet in France, although we do use the exact same vaccines, VIRBAC, ZOETIS and INTERVET continue to demand annual booster vaccination.

Mr. Bernard Vallat, former President of the World Organization for Animal Health liked to remind us that: "It should be remembered the control of threats to the health and welfare of animals such as bacteria, viruses, parasites and other pathogens cannot be achieved without the judicious use of drugs, vaccines and other veterinary products that act upon the health of animals, regardless of whether they are farmed, used for recreational purposes or kept as companion animals. However, these important factors of health are not innocuous products. It is acknowledged worldwide that their use must be strictly supervised, for in the absence of public sector controls, the risks associated with their imprudent use may exceed any potential benefit." His thinking was going way beyond antibiotics resistance threats.

We deplore the fact that VIRBAC, ZOETIS, INTERVET not only do they use notions of animal welfare everywhere on their brochures, websites while flouting our Dogs welfare in France under cover to protect their health and, in addition, they hide behind the excuse of burdensome, complicated, lengthy administrative procedures with different requirements from Drugs Regulatory Agencies concerned not to change their vaccination protocol today!

- ⇒ Europe calls for global harmonization of protocols for the well-being of all.
- ⇒ VICH main mission is the harmonization of technical requirements for registration of veterinary drugs. (VIRBAC, ZOETIS, and INTERVET: don't they have sits in the Steering Committee?)
- ⇒ The World Organization for Animal Health is the guarantor of animals health and welfare whilst working together with VICH of which it strongly plebiscites actions.

Then why, in 2016, in France, are we still compelled by VIRBAC, ZOETIS and INTERVET to vaccinate our Dogs annually with rabies drugs validated for three years everywhere else?

A prolific international scientific literature<sup>2</sup> warns against annual rabies vaccination. This is about our Dogs health and welfare.

Madam President, given your commitment to our country, your sensitivity to the health of Animal, its well-being, your past experience and your close relations with VIRBAC, ZOETIS and INTERVET through IVCH, we ask you to please work today towards a simplification of methods for the extension of immunity period on Dogs rabies vaccines, therefore preventing Pharmaceuticals Laboratories from all their excuses for not acting now. Just so, in France, we too, can experience discrimination free and safe vaccination of our Dogs.

Neighboring and overseas countries have removed the mystique surrounding twenty years old fear to see a drop in veterinary practices attendance endangering the health of dogs with triennial vaccinations. Today, our Dogs are full member of our families. France counts 7.26 million dogs so 1.29 dogs per French home. Pampered and loved, their health is a first concern for French citizens. Longer rabies duration of immunity could not weaken that strong tie.

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<sup>2</sup> <http://www.canisethica.org/actions/vaccination-bienfaisante/s-informer/>

In 2009, the Australian Veterinary Association (AVA) revised its policy to recommend less frequent vaccination for adult dogs for rabies vaccine. Vaccination for some diseases such as rabies are not needed on an annual basis

It would not occur to anyone to vaccinate Human populations annually against DTP, MMR or yellow fever until their death. Could ICH remain neutral if it was the case and pharmaceutical companies were so easily invoking internal/external administrative burdens in order not to stop such practices?  
No.

So what about our Dogs?

"The world will not be destroyed by those who do evil, but by those who watch and do nothing." Albert Einstein

Please accept, Madam President, the assurances of my highest consideration.



Mrs Thilo HANE  
President-Founder  
Canis Ethica

Attached documents:

- Letters to / Answers from VIRBAC, ZOETIS, INTERVET
- Copy of Kiara's immunization record (I imported her from Ireland) whose rabies vaccine is due in three years
- Copy of Umar's immunization record (my second dog) whose rabies vaccine is due within a year even though is exactly the same.

List of persons from whom the mail was distributed:

<b>Dr. Hervé MARION</b> VICH	<b>Mr. Julien BARRE</b> Ministry of Agriculture	<b>Mr. Jean-Louis HUNAUT</b> SIMV
<b>Dr. Jean-Claude ROUBY</b> Agency Vet. Med. Prod.	<b>Mr. Jérôme LANGUILLE</b> DGAL	<b>Dr. Jules MINKE</b> Virbac
<b>Dr. Florence CLIQUET</b> Laboratory Rabies, Wildl.	<b>Mrs. Caroline Leprêtre</b> Ministry of Agriculture	<b>Mr. Christophe Maisonneuve</b> Intervet
<b>Mrs. Patricia SHILLINGER</b> Haut-Rhin Senator	<b>Dr Michel BAUSSIER</b> Vet. Council of France	<b>Mrs. Vanessa DABLIN</b> Zoetis
<b>Mrs. Françoise GROSSETETE</b> European Congresswoman	<b>Dr. Eric GUAGUERE</b> AFVAC	<b>Mrs. Muriel ARNAL</b> One Voice