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0 in general consultative status
 in the Economic and Social Council
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November 29, 1999

Docket Number 99-040-1
 Regulatory Analysis and Development
 PPD, APHIS
 Suite 3C03
 4700 River Road, Unit 118
 Riverdale, MD 20737-1238

On behalf of The Humane Society of the United States (HSUS), I would like to comment on Docket Number 99-040-1 for the proposed rulemaking by APHIS (USDA), regarding Viruses, Serums, Toxins, and Analogous Products; Definitions. The HSUS is this nation's largest animal protection organization, with more than 7 million members and constituents in the United States. The HSUS employs legislative and legal experts, wildlife biologists, veterinarians, educators, investigators, and animal care and control experts. The HSUS' mission is to promote the protection of all animals.

The HSUS understands that sufficient evidence exists to support the vaccination of wolf-dog hybrids against rabies virus, using vaccines currently available for use in domesticated dogs. Although the lack of approved vaccines has in the past been a useful tool for prohibiting and regulating ownership of these animals, at the same time this situation has allowed thousands of wolf-dog hybrids to exist within the United States without benefit of vaccination against this deadly disease, risking the lives of both animals and humans. The HSUS believes that a safe and effective rabies vaccine approved for use in wolf-dog hybrids will be an important asset for the protection of animals and of public health.

Despite the availability of such a vaccine, however, The HSUS will continue to oppose and strive to prohibit the breeding and keeping of wolf-dog hybrids as companion animals. These hybrids of wild and domesticated species do not live successfully as wild animals, and their size, strength, and unpredictable temperament make them unsuitable for life as companion animals to humans. Wolf-dog hybrids are typically quite destructive and adept at escaping from enclosures; the result is that they are usually kept in outdoor enclosures, where their risk of exposure to rabid wildlife may be increased. At least 12 people have been killed by wolf-dog hybrids in the United States, despite estimates that only 100,000 to 300,000 of these animals exist in this country. Many wolf-dog hybrids live lives of misery, after being purchased by persons who see them as status symbols or as icons of "wild nature", rather than as companion animals who need

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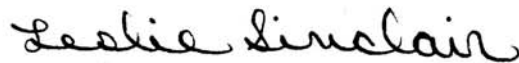
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and deserve responsible care. Their size, temperament, and destructive nature too frequently result in aggression to humans and other animals, sentencing wolf-dog hybrids to isolated lives in chained enclosures.

Although recent information indicates strong genetic similarity between wolves and dogs, hybrids of these two species are not domesticated animals, and The HSUS does not believe breeding or keeping of these animals as companion animals is in the best interest of human society, or of the wolf-dog hybrids themselves. The HSUS sincerely hopes that, should your agency decide to amend the regulations to allow rabies vaccines approved for use in canines to also be used for wolf-dog hybrids, you will present that decision to the public accompanied by language which clearly states that such amendment does not carry with it implicit condonation of the keeping or breeding of wolf-dog hybrids as companion animals, but merely seeks to protect existing animals and the general public from the threat of this fatal disease.

On behalf of The HSUS, I thank you for the opportunity to provide this commentary. Any question about it may be directed to me

Sincerely,



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