

99-040-1



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Savannah River Ecology Laboratory

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Aiken, SC 29802

November 23, 1999

Docket No. 99-040-1
Regulatory Analysis and Development, PPD
The Animal Plant Health Inspection Service
Suite 3C03
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Dear Sirs:

I am writing in response to a notice (Docket No. 99-040-1) indicating that comments from the public are being invited concerning a proposed new rule regulating the use of vaccines for wolves, domestic dogs, and wolf-dog crosses. I strongly applaud the decision to now make vaccines developed for domestic dogs available and certifiable for use on wolves and wolf-dog crosses. In earlier correspondence with Richard L. Crawford, then Assistant Deputy Administrator of Animal Care of the Division of Regulatory Enforcement and Animal Care of your organization, I provided information concerning the taxonomic identify and close genetic relationships between dogs, wolves and their crosses. This information that I provided was based on my over 35 years of experience in research concerning the general biology, behavior and ecology as well as taxonomy of these forms.

I was very pleased in those earlier interactions with your organization to see your acceptance of the fact that wolves, dogs and their crosses are all members of the same taxonomic species—namely *Canis lupus* (see enclosed correspondence and other materials). On this basis then, there would be no logical reason to withhold the use of any vaccine developed for the use of any component of the domestic dog complex from use with all members of the wolf, dog, wolf-dog hybrid groups.

In point of fact, vaccine manufacturers routinely test their products for safety and efficacy on laboratory dogs of usually only one or two breeds at the most and/or randomly bred "pound strays" obtained from laboratory animal suppliers. Biochemically and physiologically speaking, these subjects which have formed the basis for vaccine testing are certainly no more genetically different from wolves and wolf-dog crosses than they are from many other breeds of domestic dogs, some of which (e.g. Dalmatians) have been

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shown to have quite striking biochemical attributes which are unique only to their own particular breed. If vaccines that have been tested on only a small number of breeds and laboratory-supplier's random-bred dogs, can be authorized for all such domestic dog breeds, there is certainly no logically nor scientifically-defensible reason to withhold the use of such vaccines from wolves and/or wolf-dog crosses. To now permit the use of vaccines on such animals will be an important step in further providing for the protection of both animals and the human public from dangers posed by animals that have been unreasonably denied access to immunization with such vaccines.

Please extend my congratulations to all of the members of your organization who have worked to bring-about this important change in your rules. Please let me know if I can provide you with any further information concerning my opinion on these matters.

Yours very truly,



I. Lehr Brisbin, Jr.
Senior Ecologist
Savannah River Ecology Laboratory

ILB/jg

Enc.