

This is a comment on Docket No. 99-040-1

This docket recommends allowing relabeling of canine biologics for use in wolves and wolfXdog crosses (wolfdogs).

I am enthusiastically IN FAVOR OF THE PROPOSED CHANGES for the following reasons:

1. As stated in the docket there is good genetic evidence that wolves and dogs are the same species, and have been reclassified as such by the American Society of Mammalogists. The well known canine evolutionary biologist Robert Wayne stated in a recent article in the scientific journal Trends in Genetics: "Dogs are grey wolves, despite their diversity in size and proportion; the wide variation in their adult morphology probably results from simple changes in developmental rate and timing". In fact, more recent molecular genetic studies have revealed that it is difficult to separate dogs and wolves evolutionarily because they are so closely related. Dogs and wolves have more genetic identity than do races of humans, therefore it makes no sense to separately regulate their biologics.
2. There are up to 2 million wolfdogs being kept in the United States as companion animals. Denying rabies vaccination to these animals, based on the non-approval of the vaccine, has probably created a large pool of companion animals that are susceptible to rabies. Since this fatal disease is epidemic in wild animals, particularly on the east coast, it is imperative that all dogs and cats be vaccinated. Because vaccinating a wolfdog against rabies has been an off label use, and the Rabies Compendium has previously recommended against vaccination of wolfdogs, veterinarians have been reluctant to vaccinate animals labeled as wolfdogs. Relabeling the vaccine for use in wolves and wolfdogs will avert a potentially devastating human health hazard by allowing all companion canines access to the vaccine.
3. Since there is no way currently to tell if an animal is a wolfdog, wolfdogs can really only be identified if labeled as such by their owners. There are many animals sold as wolfdogs that are really only dog breed mixes having a wolfy appearance, but the owner labels them wolfdogs. Alternatively, there are many wolfdogs being reported to authorities as dog mixes because of the extreme political pressure against having a wolfdog. Thus, there are many wolfdogs in the United States that are being labeled on official documents by their owners as dogs at the same time that many dog breed mixes are being labeled as wolfdogs. Since a veterinarian can't use the rabies vaccine for legal purposes (e. g. licensing) on an animal the owner labels a wolfdog, there are dogs that are being denied the vaccine and wolfdogs that are being vaccinated. This state of affairs makes no biological or medical sense. Because the scientists of the April 1996 advisory committee unanimously agreed that dog biologics would be fine for use in wolves and wolfdogs, allowing this change would standardize the current uneven treatment of companion canines by the veterinary establishment and improve public health in the long run.



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