

MEMO



TO: BFO Advisory Councillors and County/District Representatives
FROM: Richard Horne
DATE: April 6, 2018
RE: Update on Rabies Vaccination Requirement

As of July 1, 2018 all dogs, cats, cattle, sheep, and horses intended to come in contact with the general public must be vaccinated for rabies. However, animals accessible only to the person or persons that are responsible for the care and control of such an animal will be exempt from the rabies vaccination requirement. "Persons responsible for the care or control" of an animal is a broad category that would include any individuals involved in looking after the daily or health needs of an animal and/or individuals responsible for handling, showing, or commercially transporting an animal.

We believe, based on our discussions with the Minister's Office and with staff at the Ministry of Health and Long-Term Care that this requirement will not apply to the vast majority of cattle in the province. Animals participating in 4-H and other livestock events (e.g. fall fairs and the Royal) would not be subject to the requirement provided "reasonable measures" (e.g. signage, physical barriers, etc.) are in place to prevent persons not authorized to handle or interact with animals from accessing animals. BFO is still seeking clarity on what the province will deem as a "reasonable measure".

Based on our understanding, the rabies requirement is focused on "animal experience" events and interactive animal exhibits where members of the public are intended to handle or pet the animals. Public events where cattle are present, such as The Royal, fall fairs, farm tours, Breakfast on the Farm, etc., do not, in our opinion, fall under the "animal experience" definition and should therefore not be subject to the requirement. BFO is working with OFA and the Sheep Farmers of Ontario to get further clarity on this. We will keep you updated when new information is provided.

Attached, please find a FAQ document provided by the Ministry of Health and Long-Term Care, which addresses many of the initial questions BFO put forward when the regulation was announced.

Please distribute this information within your counties and districts and please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Horne", with a long horizontal stroke extending to the right.

Richard Horne
Manager of Policy and Issues

Encl.



Population and Public Health Division

Ontario's Rabies Immunization Requirements for Animals Frequently Asked Questions

Why has the ministry changed rabies immunization requirements for animals in Ontario?

Changes to rabies immunization requirements for animals in Ontario were required in order to ensure consistent implementation of public health rabies prevention and control measures across the province to align with the modernization of the Ontario Public Health Standards. Under Section 96(4)(e) of the Health Protection and Promotion Act, the Lieutenant Governor in Council may make regulations requiring and governing the immunization of domestic animals against any disease that may adversely affect the health of any person. O. Reg. 567 (Rabies Immunization) under the HPPA has required rabies vaccination of dogs, cats and certain classes of livestock in Ontario since 1986. However, rabies immunization requirements for animals have previously varied from health unit to health unit. As of July 1, 2018, all rabies immunization requirements will apply uniformly across all health units in the province. This includes immunization of certain classes of livestock which previously only applied in certain health units.

What is meant by “persons responsible for the care or control” of horses, cattle or sheep?

“Persons responsible for the care or control” of an animal is a broad category which would include any individuals involved in looking after the daily or health needs of an animal and/or individuals responsible for handling, showing, or commercially transporting an animal. Examples of individuals who would fit into this category include:

- owners and their immediate family members
- prospective owners
- trainers
- handlers
- drivers
- shippers
- ring crews
- lay and veterinary inspectors
- barn and farm staff
- abattoir workers
- grooms
- hotwalkers
- jockeys and exercise riders
- farriers and hoof trimmers
- sheep shearers
- veterinary staff, including veterinarians and technicians
- artificial insemination and ultrasound technicians

Do animals participating in 4-H and other livestock events (e.g., Royal Winter Fair) have to be vaccinated against rabies?

Animals participating in 4-H events, including clubs, clinics and shows would not be subject to the requirement for rabies vaccinations unless these animals are intended to come into direct contact (*e.g.* petting, feeding) with the general public. When animals are kept or held in areas which may be accessible to the general public, reasonable measures (*e.g.* signage, physical barriers, *etc.*) should be used to prevent persons not authorized to handle or interact with animals at fairs, clinics and shows from accessing animals in holding or stabling areas.

What kind of settings do fall under the scope of the rabies immunization requirements for livestock in Ontario?

Horses, cattle and sheep in settings where the general public is encouraged and/or expected to have direct contact with these animals must be vaccinated against rabies. Examples of settings that fit into this category include petting zoos; corporate birthday party, and other “animal experience” events; and interactive animal exhibits where members of the public are intended to handle or pet the animals. Therapy animals, service animals and riding school horses would also fall under the scope of the immunization requirements.

How often will vaccinations be required?

Section 4(b) of O. Reg. 567 specifies that rabies immunizations must be administered in accordance with the instructions of the manufacturer who produced the vaccine. Reimmunization of animals would therefore be required as per the product monograph of the vaccine administered.

What about horses at racetracks or boarding stables?

Horses at racetracks, training centres and other private facilities like broodmare farms would not fall under the scope of the rabies immunization requirement, as these facilities are not accessible to the general public.

Boarding stables would not fall under the scope of the rabies immunization requirement; however, if boarded horses are easily accessible to riding students or visitors to the riding school, or students need to get riding horses from pastures where both boarded horses and riding school horses are kept, then they would need to be vaccinated.

Why does the rabies immunization requirement apply to horses at riding schools?

Horses at riding schools regularly come into contact with members of the public that come in for riding lessons, including friends and family members of students of the school. Numerous horse bites occurring in riding school settings are reported to health units every year.

Who is responsible for ensuring that animals which need to be immunized against rabies are immunized?

Individuals having the care and custody of an animal are responsible for ensuring that animals in their care and custody are in compliance with applicable rabies immunization requirements. According to veterinary fee guides for Ontario, the cost of rabies immunizations for livestock species should not exceed approximately \$25.00 per animal.

Do we have enough vaccine?

The vast majority of Ontario livestock will not fall into the category of animal requiring rabies vaccination. There are no indications of shortages in the availability of animal rabies vaccines in Ontario. If a situation arose where rabies vaccines were not available due to supply shortages, then, as is the ministry's standard practice in addressing any vaccine supply shortage, interim guidance would be provided until the supply was restored.

Do livestock on community pastures or other pastures have to be vaccinated against rabies?

Only livestock that are accessible to persons other than those responsible for their care and control have to be vaccinated against rabies. Animals on community pastures, or kept on pasture outdoors will not have to be vaccinated against rabies unless they are intended to come into direct contact with the general public. Individuals trespassing on pastures would not be considered members of the general public for this purpose.

How are the rabies immunization requirements for animals enforced in Ontario?

Animal rabies immunization requirements in Ontario are primarily enforced by health units conducting investigations after an animal bite to a human has been reported to public health. However some municipalities and health units may choose to take a more proactive approach in settings such as petting zoos or interactive animal exhibits. Only designated individuals under the Provincial Offences Act, such as public health inspectors or municipal by-law officers, can enforce provincial regulations. Consistent interpretation of immunization requirements across health units will be addressed through communications, training and education sessions for health units prior to the amended regulation coming into force on July 1st, 2018.

How is the ministry planning on notifying the veterinary community of the changes in rabies vaccination requirements?

An implementation plan for the changes to the rabies vaccination requirements coming into force as of July 1, 2018 is being developed by the ministry in collaboration with the College of Veterinarians of Ontario, the Ontario Veterinary Medical Association, and the Ontario Association of Veterinary Technicians. The ministry will be engaging with several other veterinary groups (i.e. the Ontario Association of Equine Practitioners, Ontario Association of Bovine Practitioners, and Small Ruminant Veterinarians of Ontario) and is proposing face to face meetings to present the rabies immunization requirements

How is the ministry planning on notifying fairs, producers and other agricultural industry stakeholders?

To date, the ministry has, and given a presentation at the annual conference of the Ontario Association of Agricultural Societies in February. A detailed presentation will be given at the next meeting of the Ontario Livestock and Poultry Council to address any questions or concerns that have arisen since December 2018, when a brief summary of the regulatory amendments was provided. In addition, a webinar to agricultural partners such as Beef Farmers of Ontario, OFA, OSF, 4H, the Ontario Association of Community Pastures, Ontario Equestrian, and other agricultural groups are under development.