SB 1264
RELATING TO ANIMAL QUARANTINE

Senator Committees on
Agriculture
Higher Education, Culture, Arts and Historic Preservation

Joint Public Hearing - February 16, 1993
1:00 P.M., Room 405 SOT

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SB 1264 would amend Chapter 142, HRS, to provide for substantive changes to the requirements for quarantine of dogs and cats imported into the state.

Our statement on this measure does not constitute an institutional position of the University of Hawaii.

Critical examination of the State's policy regarding quarantine of imported dogs and cats is long standing. A task force convened in response to legislative request has issued recommendations, primary among which has been the conduct of an epidemiological serosurvey of mongoose and quarantined animal populations, results of which were presented to the 16th state legislature in March of last year.

To date, the Environmental Center has not contributed to the quarantine debate. We feel it appropriate to comment now for two reasons:

1. There appears to be a possibility, albeit very remote, that an introduction of a rabies virus may be transmissible to remnant populations of the endangered Hawaiian Hoary bat. Proliferation of the virus, which is lethal to bats, through the native bat population would severely compromise the survival probability of this federally protected species.

2. The Rabies Serosurvey report issued by the Department of Agriculture is widely referenced within the state in justification of current state policy on both quarantine and domestic animal vaccination requirements. Upon rigorous critical review, we find the report seriously flawed to the extent that its conclusion that the virus is not presently found in mongoose populations in the state is unsupported on the basis of the methods employed and the data presented.

With regard to the proposed amendments to quarantine procedures in SB 1264, we note that the Rabies Serosurvey report states that, "[t]he quarantined pets are not a high risk population for the development of rabies" (Section K.4., p. 65). Hence, if alternate methods for screening incoming domestic pets are verifiably no less effective and no more costly than the present system, there is no justification for preserving the status quo for its own sake. We would also add that a program of required rabies vaccination for all domestic dogs and cats is essential for the protection of public health and is a central element of accepted rabies control policy in most if not all other states.

The Serosurvey Report questions the "inherent variability of the Rapid Fluorescent Focus Inhibition Test (RFFIT) proposed for incorporation into the revised quarantine system. The opinions offered by the Department of Agriculture, the Center for Disease Control and the expert community contributing to the World Health Organization are clearly divergent in their assessment of this issue. However, independent expert review of the serosurvey results flatly states that the survey's deviations in serological results cannot be explained by statistical variability inherent in the RFFIT methodology. Our own review of methods described in the serosurvey report has identified critical deviations in sample labeling and control procedures from those routinely employed in scientific research and analysis. We suggest that to the degree that DOA/CDC concerns are based on the serosurvey results, those concerns are unsupported by scientifically reliable evidence.

Our formal review of the Serosurvey is in the final stages of peer review, and as soon as it is available, we will gladly provide copies to all interested parties.

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