

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.

Questions Regarding Changes to O. Reg 567: Rabies Immunization Responses to the Ontario Federation of Agriculture

A. General:

1. How is rabies transmitted from livestock to humans?

Rabies infection is caused by the rabies virus. The virus is spread through the saliva of infected animals. Infected animals can spread the virus by biting another animal or a human. Transmission can also occur when infected saliva gets into an open cut, sore or other wound, or when infected saliva comes into contact with mucous membranes in the mouth, nose, or eyes.

2. Who pays for the vaccine and for the veterinarian's professional fee to administer it?

Animal owners are responsible for paying for rabies vaccination of their animals, including any veterinary fees for administration.

3. How long after vaccine is administered can the animal go to an off-farm event and be considered adequately immunized?

O. Reg. 567 does not contain a requirement for immunization to occur a specific number of days prior to livestock being accessible to persons other than those responsible for their care and control. However, animals are considered to have an adequate immune response to immunization 30 days after the administration of the vaccine.

4. How long does immunity last after vaccination?

Rabies vaccination and re-vaccination of livestock species is required to be administered in accordance with rabies vaccine product monographs. Most currently available livestock rabies vaccines licensed in Canada require revaccination of animals on an annual basis, with the following two exceptions:

- 1) Vaccination of sheep with Imrab® Large Animal or Imrab® 3, which require an initial booster vaccination of the sheep at 12 months after the primary vaccination, and then revaccination every 3 years thereafter
- 2) Vaccination of horses with EquiRab® with Havlogen® - requires revaccination every 14 months

5. For animals receiving the vaccine, what are the withdrawal periods for milk and slaughter? (The purpose of the withdrawal periods is to ensure that foods do not contain residues of pharmacologically active substances in excess of the maximum residue limit.)

Animal owners should consult with the veterinarian administering the rabies vaccination with respect to withdrawal periods for milk and slaughter. All currently available livestock rabies vaccines in Canada have a label requirement for a 21-day withdrawal period prior to slaughter following rabies vaccination of cattle, sheep and horses. There are no specific label requirements for withdrawal periods for milk.

B. Specific questions relating to the December 2017 Regulatory Amendment:

6. Why was the proposed regulatory amendment notification posted for an extremely short 14-day comment period on the provincial regulatory registry? And why was the farm community not consulted prior to the regulatory change being made?

The 45 day posting period is general practice; however there are circumstances when ministries may request a truncated posting depending on the government's legislative/regulatory calendar and opportunities to bring forward amendments.

Initially proposed changes to O. Reg. 567 were posted on the Regulatory Registry in November 2017, and comments were received from a number of stakeholders, each of which was considered carefully. Changes to rabies immunization requirements primarily affect health units responsible for enforcing those requirements, and individuals who operate petting zoos, animal exhibits and other settings where animals are intended to come into direct contact with the general public, and not the general agricultural sector.

7. Was a regulatory impact assessment conducted by the Ministry?

Preliminary Regulatory Impact Assessments were conducted on all regulatory amendments submitted to the Legislation and Regulations Committee.

On and after July 1, 2018, R.R.O. 1990, Regulation 567 will require that all livestock “for which a rabies vaccine licenced for use in Canada is available” shall be immunized against rabies with the exception being made for only livestock “that is accessible only to the person or persons who are responsible for the care and control of such animal”.

Restricting Access

8. What does “accessible” mean?

“Accessible” means able to be reached or easily gotten to, meant in the narrow sense of being within the physical reach of a person. An animal that can be directly touched by a person would be considered accessible to that person.

9 What measures (signage; barriers) must be taken to ensure livestock are not accessible to people¹ (anyone deemed not to be “responsible for the care and control” of the livestock) to meet the requirements for the livestock to be exempt from needing to be vaccinated?

When animals are kept or held in areas which may be accessible to the general public, reasonable measures (e.g. signage, physical barriers, supervision of animals etc.) should be used to prevent persons not authorized to handle or interact with from doing so. The nature and combination of measures required to effectively prevent unauthorized interaction will depend on the circumstances of an individual setting or premises.

10. The exemption, as stated in the regulation, suggests measures must be taken to restrict people’s access to livestock (as opposed to controlling livestock’s access to people). What are appropriate barriers to prevent people from accessing animals at a farm or at an off-farm event? Are livestock fences considered sufficient barriers, even when people can climb fences?

Physical barriers (including double barriers), signage, supervision of animals and combinations of these measures would all constitute examples of barriers to prevent people from accessing animals. Determining which barriers, or combination of barriers, would be appropriate to prevent people from accessing animals will depend on the setting. Animals out on private or community pastures that are not intended to come into contact with the general public would not be subject to the rabies immunization requirement; in this case, livestock fences would be considered sufficient barriers, and individuals trespassing on pastures would not be considered members of the general public for this purpose.

11. At what distance should people stand back from these barriers?

The general public should be kept out of arm’s reach of animals behind barriers in order to prevent the possibility of a bite or other exposure to the animal’s saliva occurring.

12. When livestock are on public display at events/public spaces such as farm tours, fall fairs, auctions, etc. can “reasonable measures” be taken to restrict livestock from being accessible to people, so a livestock rabies vaccination is not required?

Reasonable measures restricting the general public’s access to livestock at events such as farm tours, fall fairs, auctions, etc. can be implemented such that the exemption from the livestock vaccination requirement would apply.

¹ In this document “people” refers to persons who are not “responsible for the care and control” of the livestock.

13. How will the ministry evaluate/determine what is a “reasonable measure” to prevent livestock from being accessible to people in places where animals are openly on display to the public, despite the intent not to have people access the animals (e.g. The Royal Agricultural Winter Fair)?

Determination of what reasonable measures should be in place to prevent livestock from being accessible to people in a specific setting can be made on the basis of a consultation with the local public health unit responsible for that jurisdiction.

14. When livestock are restrained or contained, would posting signage for people, stating that livestock are not to be accessed, be deemed sufficient for the purposes of the exemption?

Different settings will require different measures to prevent access to livestock by the general public, depending on how livestock are confined or restrained. In most cases, a combination of physical barriers making it reasonable difficult to access an area or an animal and signage would likely be considered sufficient.

Those responsible for the care and control of the livestock:

15. Under what circumstances would a person be deemed to be “responsible for the care and control” of an animal?

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

16. Under what circumstances would a visitor to a farm be deemed to be “responsible for the care and control” of livestock?

Visitors to a farm would not be deemed to be “responsible for the care and control” of livestock, unless the purpose of the visit was to provide health or other services for the animal(s). Casual visitors to farms should be prevented from coming into direct physical contact with the saliva of livestock that have not been vaccinated against rabies.

17. Would those with Powers of Entry (e.g. a surveyor), or rights to entry due to an easement (e.g. a Hydro-One employee accessing a hydro pole located in a pasture) be deemed to be “responsible for the care and control” of the unvaccinated livestock that they had access to?

While individuals with Powers of Entry or rights of entry due to easement would not be deemed to be “responsible for the care and control” of livestock on the pasture, nor would these individuals be expected to come into direct contact with the saliva of livestock on the farm.

18. Would potential livestock buyers attending a farm, a public auction barn, or any other location, be considered “responsible for the care and control” of livestock offered for sale even if those potential buyers do not end up purchasing the livestock?

Potential livestock buyers attending a farm, public auction barn or any other location, would be considered “responsible for the care and control” of an animal they are inspecting or examining for the purposes of potentially purchasing the animal. However, care should be taken to prevent biting incidents or other exposures involving saliva from the animal from occurring during the inspection or examination process.

Certificate Completion Requirements:

Regulation 567, states the certificate of immunization shall contain certain information, including the name of the animal and markings, if any, on the animal.

19. What if the animal in question has no name?

The amendments to O. Reg. 567 with respect to the information required on rabies immunization certificates are intended to provide for multiple means of definitively identifying an individual animal. For animals which may not have a name, the rabies certificate must include a physical description of the animal, as well as any permanent means of identification for the animal (e.g. microchip, tattoo, brand, ear tag, etc.)

20. Is the veterinarian required to draw a picture of each animal noting all markings?

No, the veterinarian is not required to draw a picture of each animal noting all markings. Markings may be briefly described verbally on the certificate, and information about any permanent means of identifying the animal (microchip, tattoo, brand, ear tag, etc.) must also be included on the certificate.

Enforcement and Implementation:

21. Regulation 567, states that a copy of the certificate of immunization shall be provided to a medical officer of health or a public health inspector upon request.

How much time does the farmer have to provide a requested certificate?

Copies of rabies immunization certificates for animals that are accessible to the general public should be onsite with the animal at the petting zoo, event, etc. The amount of time given to an animal owner to produce a rabies immunization certificate is up to the discretion of the local public health unit.

22. If a certificate cannot be provided immediately, will people access to the livestock be restricted until the certificate is provided?

No. If a certificate cannot be provided immediately, people's access to the livestock would not be restricted until the certificate is provided.

23. How will a medical officer of health or a public health inspector ensure the certificate provided is for the animal in question?

The identifying information for the animal on a given rabies immunization certificate (including permanent means of identification such as tattoos, brands, ear tags, etc.) is intended to allow a Medical Officer of Health or public health inspector to ensure that the certificate corresponds to the animal in question. In case of any doubts, the health unit may follow up with the veterinarian issuing the rabies vaccination certificate for verification and/or clarification.

24. What is the consequence if an animal, which is subject to the rabies immunization requirement, is not vaccinated?

A failure to immunize (or re-immunize as required by a previous certificate) an animal which is subject to the rabies immunization requirement constitutes an offence under the Provincial Offences Act, and animal owners found not to be in compliance with O. Reg. 567 are subject to a fine, as set out in Schedule 40.1 under the Provincial Offences Act.

25. Does the regulation give fair/event organizers the authority to make rabies immunization a requirement for exhibiting livestock to mitigate any potential liability?

O. Reg. 567 does not give authority to fair or event organizers to ensure that animals are vaccinated. Fair or event organizers should advise individuals having care and custody of an animal of the rabies vaccination requirement but it is up to those individuals to immunize that animal or otherwise comply with the regulation.