TO: Mayor and Members Board of Health

COMMITTEE DATE: May 13, 2019

SUBJECT/REPORT NO: Mandatory Rabies Immunization (BOH19018) (City Wide)

WARD(S) AFFECTED: City Wide

PREPARED BY: Carolyn Bannon (905) 546-2424 Ext. 3183
Connie DeBenedet (905) 546-2424 Ext. 3576

SUBMITTED BY: Kevin McDonald
Director, Healthy Environments Division
Public Health Services

SIGNATURE: Kevin McDonald
Director, Healthy Environments Division
Public Health Services

RECOMMENDATION(S)

(a) That Hamilton Animal Services assume the enforcement of mandatory rabies immunization pursuant to Regulation 567 under the Health Protection and Promotion Act;

(b) Revenue generated via charges be directed towards improvement and enhancements within Hamilton Animal Services’ overall rabies response program through responsible pet ownership.

EXECUTIVE SUMMARY

The Rabies Prevention and Control Protocol, 2018, under the Ministry of Health and Long-Term Care (MOHLTC), has been developed to provide direction to Boards of Health in the implementation of specific requirements for rabies prevention and control.

The purpose of this protocol is to prevent a fatal human case of rabies by standardizing animal rabies surveillance and the management of suspect human rabies exposures. The Board of Health shall ensure that - upon a bite, scratch or other exposure - the dog, cat or ferret requires a ten day observation period, the animal is confined and isolated from all animals and persons (except those caring for said animal for at least ten days
from the date of exposure (Day 0) pursuant to Regulation 557 under the Health Protection and Promotion Act (HPPA).

Furthermore, the Board of Health must verify the rabies vaccine status of any animal involved in a human rabies incident; this includes ensuring that animals identified as not being up-to-date on their rabies vaccination status are vaccinated for rabies after the observation period is completed. Animals (cats, dogs and ferrets) over three months of age should be brought up to date on their rabies vaccinations within fourteen days of the completion of the observation period, pursuant to Regulation 567/90 under the HPPA.

Currently, Hamilton Animal Services enforces the Responsible Animal Ownership By-Law which is for the health and safety of residents, property protections, and prevention of public issues. It has rules about: dog licencing, animals at large, cleaning up after your animals – to name a few. Enforcement through set-fine ticketing is in place for non-compliance.

Hamilton Animal Services is in full support of assuming the enforcement of the mandatory rabies immunization. See Appendix "A" to Report BOH19018: Schedule 40 – Rabies Fees, for set-fine amount and short-form wording pursuant to Regulation 567 under the HPPA.

Alternatives for Consideration – See Page 5

FINANCIAL – STAFFING – LEGAL IMPLICATIONS

Financial: Increased revenue to Hamilton Animal Services due to charges resulting in fines.

Staffing: No staffing implications.

Legal: Legal requirement is pursuant to Regulation 5567 under the HPPA.

HISTORICAL BACKGROUND

Three years into the largest raccoon rabies outbreak in Canadian history, Hamilton remains the focal point of the outbreak within the Province of Ontario with the highest number of positive animals: 208 raccoons, 101 skunks, one (1) fox and two (2) cats which equates to approximately 70% of the total number of Provincial rabies cases as of February 28, 2019.
In December 2015, following confirmation of the first case of raccoon rabies in Hamilton, Public Health Services activated a raccoon rabies response based on the MOHLTC raccoon rabies contingency plan and revised its rabies risk assessment tool to reflect the change in local epidemiology (e.g., a local rabid raccoon). This was followed by updating case management algorithms for potential human exposures and alerting local health care providers to incorporate local epidemiology into post exposure management.

In order to bring an end to this rabies outbreak, it is critical for proper management of this widespread urban outbreak – which continues to include: raccoons baiting with vaccine for wildlife (hand and aerial conducted by Ministry of Natural Resources and Forestry), enhanced human and animal-to-animal case management, responsible pet ownership - under the mandate of Hamilton Animal Services, focusing on the prevention of animals at large and pet vaccination – as it is widely accepted that pet immunization assists with the eventual containment of the outbreak and reduction of risk for human exposures. Time management of this component aligns itself well with Hamilton Animal Services as their officers are actively involved in enforcement through their varied By-law mandate as well as their public profile within our community as animal health and safety advocates.

**Investigation Results:**
Representatives from local, provincial and federal agencies collectively activated a raccoon rabies response that involved policy updates, enhanced surveillance, a public education campaign and mass vaccination of wildlife and domestic animals. Between December 2015 and November 2018, 446 animals tested positive for raccoon rabies in Ontario; as previously stated, with Hamilton registering approximately 70% of these cases.

Suspected rabies case management conducted by Hamilton Public Health Services is aimed at ensuring residents do not acquire the fatal virus. Within the first year of the raccoon rabies outbreak, significant increases were noted in not just the number of suspect rabies reports but also in the risk and subsequent case management. The following table helps illustrate the increased work load burden with respect to managing routine rabies case.

**Table 1** - PHS Increased Workload, Hamilton Rabies Interagency Meeting, April 2018

<table>
<thead>
<tr>
<th>Before Raccoon Rabies</th>
<th>After/During Raccoon Rabies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rabies Investigations = 1305</td>
<td>Rabies Investigations = 1629 (324 more cases)</td>
</tr>
<tr>
<td>Cases requiring PEP = 84</td>
<td>Cases requiring PEP = 137 (53 more people getting PEP)</td>
</tr>
</tbody>
</table>
POLICY IMPLICATIONS AND LEGISLATED REQUIREMENTS

Not applicable.

RELEVANT CONSULTATION

The collaborative approach between the various interdisciplinary agencies: (1) at the federal level (i.e., Canadian Food Inspection Agency); (2) at the provincial level (i.e., MOHLTC, Ontario Ministry of Agriculture, Food and Rural Affairs and Ministry of Natural Resources and Forestry); and, (3) at the local level (i.e., public health units, local animal control and private veterinary professionals), have been instrumental in addressing this raccoon rabies outbreak. Continued collaboration and diligence is necessary to again eliminate raccoon rabies from Ontario.

Hamilton Public Health Services and Hamilton Animal Services continue to work together closely. Hamilton Animal Services is supportive of this enforcement transition and believes the added generated revenue will help to support the responsible pet ownership practices that work in conjunction with other efforts to manage and control the ongoing rabies outbreak.

ANALYSIS AND RATIONALE FOR RECOMMENDATION(S)

Pursuant to Regulation 567/90 under the HPPA, Boards of Heath must check the vaccine status of any animal involved in a human rabies incident; this includes ensuring that animals identified as not being up to date on their rabies vaccination status are vaccinated for rabies after the observation period is completed – within fourteen days after said completion.
Currently, based on 2018 stats:
- The percentage of cats and dogs vaccinated at the time of incident is 46%; and,
- The percentage of cats and dogs vaccinated after confinement is 55%, whereby owners boosted/vaccinated their pet post confinement.

The added burden of the raccoon rabies outbreak has made time management for this component challenging. The number of vaccinated dogs and cats could increase to almost full compliance with the proper time and resource allocation.

**ALTERNATIVES FOR CONSIDERATION**

Public Health Services continues with no change and risk not reaching full compliance with post confinement immunization amongst negligent dog, cat and ferret owners. A status quo approach will place the residents of Hamilton at an increased risk of human rabies exposure.

That only high-risk cases i.e., dogs, cats, and ferrets that are likely to be involved in future bite incidents are sent to Hamilton Animal Services for their enforcement of the mandated mandatory rabies immunization.

**Conclusion:**
The current outbreak of raccoon rabies is by far the largest to have occurred in Canada and the first raccoon rabies outbreak documented in a densely populated urban area. This is also the first time this rabies virus variant has been identified in a domestic animal in Canada. While the large-scale Provincial intra-agency collaboration and internal efforts have seen the numbers of positive rabies cases decrease since its peak in 2016, it has come with an internal workload burden within the Health Hazards and Vector Borne Disease Program.

**ALIGNMENT TO THE 2016 – 2025 STRATEGIC PLAN**

**Healthy and Safe Communities**
Hamilton is a safe and supportive City where people are active, healthy, and have a high quality of life.

**Our People and Performance**
Hamiltonians have a high level of trust and confidence in their City government.

**APPENDICES AND SCHEDULES ATTACHED**

Appendix "A" to Report BOH19018: Schedule 40 – Rabies Fees