



PETITION TO ESTABLISH A RATIONAL QUARANTINE PROTOCOL FOR VACCINATED EXOTIC PETS IN FLORIDA

Subject: Request for Statutory and Administrative Reform to Recognize Discretionary Rabies Quarantine Holds for Exotic Companion Species (Specifically Raccoons and Other Procyonidae)

To: Florida Department of Health

Florida Fish and Wildlife Conservation Commission (FWC)

Florida Legislature: House Agriculture & Natural Resources Subcommittee

Florida State Surgeon General

Governor of Florida

INTRODUCTION AND PURPOSE

We, the undersigned citizens of Florida and stakeholders in public health, wildlife care, veterinary medicine, and exotic animal ownership, hereby petition for a legally sanctioned, evidence-based rabies control protocol for vaccinated exotic pets in the State of Florida.

Specifically, we seek the establishment of a quarantine protocol for legally owned and vaccinated exotic mammals—recognized as Captive Wildlife under Florida law—including but not limited to members of the **Procyonidae** family, such as raccoons (*Procyon lotor*), kinkajous (*Potos flavus*), and coatis (*Nasua spp.*). These animals are kept under Class III Wildlife Licenses as companion animals and education ambassadors by responsible and licensed individuals throughout the State of Florida.

Current Florida statutes, notably Florida Statutes § 828.30 and Florida Administrative Code 64D-3.040, recognize rabies vaccinations as valid only for dogs, cats, and ferrets. Consequently, animals such as pet raccoons and other Procyonids, even when vaccinated off-label under veterinary supervision using USDA-approved killed rabies vaccines (e.g., **Imrab 3**), are not considered legally immunized. As a result, these animals are typically subject to mandatory euthanasia and post-mortem testing in the event of a bite incident or potential rabies exposure, regardless of vaccination history or clinical presentation.

This policy is outdated, inconsistent with other states, and harmful to both responsible animal owners and the animals in their care. We propose amendments authorizing the Florida Department of Health or designated veterinary public health officials to allow rabies quarantine holds for vaccinated exotic pets of the Procyonidae family who meet certain criteria, aligning Florida's policy with modern zoonotic risk standards while promoting humane treatment without sacrificing public safety.

I. CURRENT LEGAL FRAMEWORK IN FLORIDA

Under current Florida law:

- **Florida Statute § 828.30** mandates that dogs, cats, and ferrets be vaccinated for rabies by a licensed veterinarian using an approved vaccine.
- The **Florida Administrative Code (64D-3.040)** establishes reporting and control procedures for rabies but is silent on quarantine procedures for exotic species, including Procyonids.
- The **Florida Department of Health** relies on CDC guidance and National Association of State Public Health Veterinarians (NASPHV) Compendium protocols, which only specify validated rabies response protocols for dogs, cats, and ferrets.
- Exotic species and hybrids (such as raccoons, kinkajous, coatis, foxes, skunks) are viewed as unvaccinated by default—even if legally kept and vaccinated under veterinary care.

Lack of recognition leads to Procyonid species being automatically euthanized for rabies testing after a bite, scratch, or suspected exposure—regardless of medical history, vaccination, or context. This approach fails to distinguish between wild animals and those kept under intensive human care.

II. COMPARATIVE STATE LAW: THE TENNESSEE MODEL

Florida's policy stands in stark contrast to that of several other states that afford more flexibility in rabies response for exotic animals:

- **Tennessee Code Annotated § 68-8-109** gives the state health commissioner or local health departments discretion to order quarantine or observation of *any* animal suspected of rabies infection or involved in a bite incident. It does not categorically require euthanasia of non-traditional species.
- In Tennessee, if a vaccinated exotic pet such as a raccoon is asymptomatic and the exposure or bite is low-risk, a health officer may order **home quarantine, veterinary supervision, or confinement in lieu of euthanasia**.

This model allows public health officials to assess risk based on:

- Clinical behavior and neurological signs
- Known vaccination history (even off-label)
- Circumstances of the exposure
- Species-specific shedding data

Several other jurisdictions also recognize the value of granting discretionary authority to veterinarians and public health agencies when handling vaccinated exotic animals involved in potential rabies incidents.

III. SCIENTIFIC AND ETHICAL BASIS FOR POLICY MODERNIZATION

1. Off-Label Use of Rabies Vaccines in Procyonidae

- USDA-licensed killed vaccines such as **Imrab 3** have been demonstrated to elicit an immune response in a variety of exotic species, including raccoons and other Procyonids.
- Although the vaccine is not labeled for such use, **many states and private practitioners permit its use for preventive care** in exotic pets.
- While no vaccine can guarantee 100% protection, the risk mitigation achieved through off-label vaccination in Procyonids is comparable to that in domestic species prior to licensure.

2. Differentiating Wildlife from Companion Procyonids

- Procyonidae raised from infancy in human households under legal licensure (e.g., Class III Wildlife Permits) exhibit **tame, domestic behavior and reduced zoonotic risk** compared to wild conspecifics.
- These animals are subject to regular veterinary care, dietary regulation, and environmental controls that significantly reduce rabies exposure risk.

3. Harm Caused by the Current Policy

- Mandated euthanasia of vaccinated, healthy Procyonids causes **emotional trauma**, legal confusion, and discourages exotic pet owners from **reporting bites or seeking proper veterinary care**, undermining public health.
- Florida's current approach **disincentivizes proactive vaccination** and encourages concealment.

4. Public Health and Risk Assessment Perspective

- Rabies control policy should reflect **risk-based assessment**, not blanket assumptions about species.
- The NASPHV Compendium already allows exceptions under "special circumstances"; Florida should codify those exceptions as part of its formal protocol, especially for Procyonid species that are legally owned and vaccinated.

Modernization of Florida's rabies policy is both a scientific necessity and an ethical obligation. A framework that acknowledges the protective value of off-label vaccination, recognizes the distinction between wild and companion Procyonids, and evaluates actual risk rather than species identity would strengthen—not weaken—public health.

IV. PROPOSED STATUTORY LANGUAGE ADDITION

We propose the following language to be added to Florida Statutes § 828.30 or related administrative code:

"In the case of animals not listed in subsection (1) which are legally possessed under a valid Florida wildlife license—specifically including Procyonidae such as raccoons (*Procyon lotor*), kinkajous (*Potos flavus*), and coatis (*Nasua spp.*)—and for which a rabies vaccine has been administered by a licensed veterinarian using an approved inactivated rabies vaccine, the Florida Department of Health may authorize a discretionary rabies quarantine or observation period, to be carried out in accordance with veterinary oversight and subject to risk assessment."

This would:

- Empower public health officials to **evaluate Procyonid cases individually**
- Encourage responsible vaccination practices among exotic pet owners
- Align Florida with **science-driven public health practices**

V. CONCLUSION

We urge the State of Florida to modernize its rabies policy by:

- Recognizing the **preventive value of off-label vaccination** in exotic species, particularly Procyonidae
- Authorizing **discretionary quarantine** as an alternative to euthanasia
- Affirming that **public health, humane treatment, and science-based risk management** are not mutually exclusive

By implementing the requested reform, Florida will demonstrate bold leadership in science-based, balanced zoonotic disease control—setting a national example that prioritizes both public safety and fair treatment of responsible wildlife ownership. This commonsense policy will encourage greater owner compliance, reduce unnecessary euthanasia of healthy Procyonids, and affirm Florida’s commitment to liberty and life for all legal animal companions.

While states like California continue to outlaw and overregulate, Florida has an opportunity to lead with practical, freedom-forward legislation that works. With this reform, Florida doesn’t just catch up—we surpass the overreach and become the gold standard for humane, effective animal policy in the United States.

Respectfully,

Wildlife License and Permit Holders of the State of Florida

Every Wildlife & The Soucy Farm

Along with the undersigned