

Elizabeth Hart
Adelaide, South Australia
elizmhart@gmail.com

For the attention of:

21 January 2015

The Hon. Tony Abbott, MP
Prime Minister of Australia

Dear Prime Minister

RE: Vaccination policy and practice in Australia – lack of transparency and accountability

The recent controversy about the proposed visit of US vaccine activist Sherri Tenpenny¹ raises important questions about vaccination policy and practice in Australia, and the freedom of citizens to question vaccination mandates for healthy people.

It has been my experience that it is very difficult to question vaccination policy and practice in Australia due to the hostile climate created by avidly 'pro' and 'anti' vaccination factions.²

The Australian media, particularly News Corp Australia publications, has fostered the spiteful battle between these warring factions, producing a vitriolic discourse which is polarised and not conducive to thoughtful discussion.³ Objective critical analysis of complex vaccination and immunisation issues is seriously lacking in Australia.

It's time for the Australian Government to seriously consider citizens' concerns about vaccination policy and practice in Australia, and the lack of transparency and accountability in this area.

In this regard, I request that you urgently address the problem of potential conflicts of interest and lack of disclosure by people influencing vaccination policy.

Various committees and groups provide advice to the Australian Federal Government on vaccine products which can result in the addition of new vaccine products to the national vaccination schedule.

These groups wield enormous power. The members of these groups are part of a process that results in effectively mandating medical interventions (i.e. vaccinations) for healthy people. The decisions these people make affect not only children and adults in Australia, but can also impact internationally as the ripple effect of their decisions spreads around the world.⁴

The powerful influence of these groups raises serious political and ethical questions about their impact on the bodily integrity of citizens, particularly 'pre-citizens', i.e. children.

As the decisions of these committees can result in the imposition of medical interventions for healthy people, and massive sales of lucrative vaccine products for pharmaceutical companies, it is vital that the process of adding vaccine products to the national vaccination schedule is open and transparent, and that any potential conflicts of interest of the members of these groups are accessible for public perusal.

For example, a register providing the history of any relationships with the vaccine industry, e.g. detailing research grants, consultancies, honorariums, committee memberships, plus any shareholdings in vaccine companies, royalties received, directorships etc, must be publicly accessible. If a member indicates they have no potential conflicts of interest, this must be clearly recorded.

At this time, publicly accessible information on potential conflicts of interest for members of vaccination committees and groups is severely lacking in Australia. I suggest this lack of transparency contravenes *The Australian Code for the Responsible Conduct of Research*, in particular sections 4.9 "Disclose research support accurately" and 7. "Conflicts of interest".⁵

For example, since December 2012⁶, I have asked Professor Suzanne Cory, then President of the Australian Academy of Science, for public access to disclosure statements for members of the Working Group and Oversight Committee for *The Science of Immunisation: Questions and Answers* publication, which was funded by the Australian Federal Government's Department of Health and Ageing.⁷ Despite promises that this matter is being addressed, as at 21 January 2015, disclosure information is still not provided on the Academy's *The Science of Immunisation: Questions and Answers* webpage.⁸

Similarly, on 26 November 2011 I asked then Federal Health Minister Nicola Roxon for details of membership of the Australian Technical Advisory Group on Immunisation (ATAGI), including their professional affiliations, and including any links with the pharmaceutical industry. While names of members of ATAGI and their affiliations are now published on the Immunise Australia website⁹, there is still no disclosure information about potential conflicts of interest.¹⁰ I also raised this subject with Professor Terry Nolan, then Chair of ATAGI, but he failed to address the matter.¹¹

There is also a lack of transparency about other committees involved with vaccine products. For instance the Therapeutic Goods Administration (TGA)'s webpage for the Advisory Committee on the Safety of Vaccines (ACSOV) provides a list of members and affiliations, but there is no clarity re potential conflicts of interest of these people.¹²

In fact, it is very surprising to discover that this advisory committee on the safety of vaccines is chaired by Dr Nicole Gilroy who, during the period 2005 to 2014, was also a member of ATAGI.¹³ **Is it appropriate to have a person involved with the appraisal of vaccine products for the national schedule also to be in a position to evaluate post-marketing safety issues? I suggest that this is inappropriate and that there is a potential for conflict of interest.**

Another example of lack of transparency is the Pharmaceutical Benefits Advisory Committee (PBAC) webpage¹⁴, which lists members of the PBAC and their affiliations, but again provides no clarity re potential conflicts of interest of these people.

Then there is the Australian Influenza Vaccine Committee (AVIC), which recommends influenza viruses to be used in the composition of influenza vaccines. Until recently there were no details of membership of this committee provided on the AVIC webpage on the TGA website, let alone disclosure of potential conflicts of interest. In March 2014 I requested that the TGA provide publicly accessible information about the membership of this committee on the TGA website. While there is now a list of members and affiliations, there is no information re potential conflicts of interest.¹⁵

These examples indicate there is a serious problem with a lack of disclosure of potential conflicts of interest that needs to be addressed. Inter-relationships between these groups should also be investigated. Historical information re previous members of these groups should also be publicly accessible on the relevant webpages.

Prime Minister, vaccination/immunisation is an important ethical and political issue. We are on a slippery slope when potentially conflicted advisers to the Australian Government on vaccination policy dictate lucrative medical interventions, i.e. vaccinations, without adequate transparency of the process.

I request that you take urgent action to ensure the transparency and accountability of the Australian Government's vaccination bureaucracy.

I look forward to your response on this matter.

Yours faithfully
Elizabeth Hart
<http://over-vaccination.net/>

*Letter submitted to the Prime Minister's office via internet contact form on 21 January 2015.

References: (All links accessible as at 21 January 2015.)

¹ **Controversial anti-vaccination campaigner to visit Australia.** ABC PM, 6 January 2015: <http://www.abc.net.au/pm/content/2014/s4158300.htm> Dr Binoy Kampmark provides an interesting perspective in his article: **"Say No Vaccination" Crusade: Sherri Tenpenny Heads to Australia. Big Pharma and Media Backlash:** <http://www.globalresearch.ca/say-no-vaccination-crusade-sherri-tenpenny-heads-to-australia-big-pharma-and-media-backlash/5422922>

² Brian Martin, Professor of Social Sciences at Wollongong University, provides background on the vaccination debate in Australia, see for example **Debating vaccination: understanding the attack on the Australian Vaccination Network:** <http://www.bmartin.cc/pubs/11LivingWisdom.html> and **What SAVN doesn't want you to read:** <http://www.bmartin.cc/pubs/14savn/>

³ See for example this crude and emotional article published in *The Daily Telegraph* on 8 January 2015: **Lives of our kids at risk until anti-jab myth dies:** <http://www.dailytelegraph.com.au/news/opinion/lives-of-our-kids-at-risk-until-anti-jab-myth-dies/story-fni0cw15-1227177555988> Other News Corp Australia media articles written by journalists Sue Dunlevy, Jane Hansen, Laura Chalmers etc also fail to critically consider the variety of vaccinations and repeat vaccinations on the

Australian National Immunisation Program Schedule:

<http://www.immunise.health.gov.au/internet/immunise/publishing.nsf/Content/nips-ctn>

⁴ For example Australia has been a leader in implementing HPV vaccination for boys and girls. HPV vaccination is now being implemented around the world. See my webpage questioning HPV vaccination for further background: <http://over-vaccination.net/questionable-vaccines/hpv-vax/>

⁵ *Australian Code for the Responsible Conduct of Research*. Jointly issued by the National Health and Medical Research Council, the Australian Research Council and Universities Australia. 2007: <https://www.nhmrc.gov.au/guidelines/publications/r39>

⁶ My webpage on the Australian Academy of Science provides background on my experience in seeking disclosure statements for members of the Working Group and Oversight Committee for *The Science of Immunisation: Questions and Answers* publication: <http://over-vaccination.net/the-experts/australian-academy-of-science/>

⁷ The foreword of *The Science of Immunisation: Questions and Answers* publication produced by the Australian Academy of Science notes: "The Academy also thanks the Department of Health and Ageing for providing financial support to prepare this document." <https://www.science.org.au/immunisation> A link to this publication is also currently provided on the Immunise Australia Program webpage: <http://www.immunise.health.gov.au/>

⁸ *The Science of Immunisation: Questions and Answers*. Australian Academy of Science: <https://www.science.org.au/immunisation> Neither the webpage nor the booklet provides information re potential conflicts of interest of members of the Working Group or Oversight Committee.

⁹ Australian Technical Advisory Group on Immunisation (ATAGI): <http://www.immunise.health.gov.au/internet/immunise/publishing.nsf/Content/advisory-bodies>

¹⁰ I also raised this matter with then Federal Health Minister Tanya Plibersek in an email dated 23 January 2012.

¹¹ In an email query regarding the second MMR vaccine dose addressed to Professor Terry Nolan, Chair of ATAGI, I also raised questions about 'declarations of interest' for ATAGI members:

http://users.on.net/~peter.hart/Email_to_Prof_Terry_Nolan_ATAGI_MMR_11_March_2013.pdf

¹² Advisory Committee on the Safety of Vaccines (ACSOV): http://www.tga.gov.au/about/committees-acsov.htm#.U0y3_PmSz-t

¹³ The Advisory Committee on the Safety of Vaccines (ACSOV) webpage notes that Dr Nicole Gilroy was a member of the Australian Technical Advisory Group on Immunisation (ATAGI) from 2005 to 2014:

https://www.tga.gov.au/committee/advisory-committee-safety-vaccines-acsov#.U0y3_PmSz-t

¹⁴ Pharmaceutical Benefits Advisory Committee (PBAC): <http://www.pbs.gov.au/info/industry/listing/participants/pbac>

¹⁵ Australian Influenza Vaccine Committee (AIVC): <https://www.tga.gov.au/committee/australian-influenza-vaccine-committee-aivc#.U00mevmSz-t>