

## Covid-19 Vaccine Status Certification Public Consultation:

### UK Medical Freedom Alliance Submission

The **UK Medical Freedom Alliance** (UKMFA) is an alliance of UK medical professionals, scientists, and lawyers, who are campaigning for Medical Freedom, Informed Consent and Bodily Autonomy to be preserved and protected. We have grave concerns over proposed Covid-19 Vaccine Status Certification (“Vaccine Passports”) from Government and/or private businesses, and set out our legal, ethical, and medical objections below.

#### Implications of introducing Covid-19 Vaccine Certification/Passports

The concept of issuing vaccine passports has **significant scientific, ethical, legal, social, economic, and political implications**.<sup>1</sup> The government has denied it will make Covid-19 vaccines mandatory, as that would breach human rights laws and would be disastrous for public relations. However, the introduction of an official Government Vaccine Passport would result in an indirect mandate, allowing pressure to be applied by private companies and other authorities, who will be able to demand a valid Vaccine Passport as a condition of service provision.

Under existing laws against discrimination<sup>2</sup>, the government may not be able to prevent businesses from requiring proof of vaccination and may only be able to issue a warning against it, which would have no legal standing. **Parliament must update the legislation as a matter of urgency.** International Health Regulations prohibit health measures that are discriminatory and impede international travel.<sup>3</sup> UK laws should provide the same protection for its citizens.

#### Medical/Scientific concerns around Covid-19 Vaccine Certification/Passports

##### **Effectiveness of currently available Covid-19 vaccines**

1. There is **no scientific evidence that Covid-19 vaccines prevent either infection with or transmission of Sars-CoV-2**, as the clinical trials were not designed to assess these endpoints.<sup>4</sup> Therefore, the Covid-19 vaccines have not been shown to have a wider public health benefit beyond the vaccinee.<sup>5</sup>
2. There is currently **no knowledge of the duration of any protective effect from vaccination beyond 3 months**, or whether subsequent booster doses may be required, and how frequently.<sup>6</sup>
3. There is evidence that **naturally acquired immunity from Covid-19 is long-lasting**<sup>7 8</sup>, yet Vaccine Passports are only proposed for vaccinated individuals and not for those who have had Covid-19 and have natural immunity. This is discriminatory.

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<sup>1</sup> [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(20\)31034-5/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(20)31034-5/fulltext)

<sup>2</sup> <https://www.legislation.gov.uk/ukpga/2010/15/contents/enacted>

<sup>3</sup> [https://apps.who.int/gb/ebwha/pdf\\_files/WHA58/WHA58\\_3-en.pdf](https://apps.who.int/gb/ebwha/pdf_files/WHA58/WHA58_3-en.pdf)

<sup>4</sup> <https://www.bmj.com/content/371/bmj.m4037>

<sup>5</sup> <https://www.bbc.com/future/article/20210203-why-vaccinated-people-may-still-be-able-to-spread-covid-19>

<sup>6</sup> <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/faq.html>

<sup>7</sup> <https://www.nature.com/articles/s41586-021-03207-w>

<sup>8</sup> <https://www.medscape.com/viewarticle/944086>

## Safety of currently available Covid-19 vaccines

4. **Covid-19 vaccines are still experimental** and under emergency-use authorisation. Clinical safety trials will not be completed until the beginning of 2023.
5. There is currently only **limited short-term safety data and NO long-term safety data** to rule out late onset side-effects such as autoimmune diseases, neurological conditions, infertility. or cancers, for any of the Covid-19 vaccines.
6. Many of the Covid-19 vaccines **are based on a completely novel technology (mRNA vaccines)** which has never previously been approved for use in humans so, again, long-term safety cannot be inferred.
7. Since the Covid-19 vaccine rollout began in December 2020, there already have been **hundreds of thousands of reports of serious adverse events and deaths** to the VAERS Database in the US<sup>9</sup>, the Eudravigilance Database in Europe<sup>10</sup> and the MHRA in the UK.<sup>11</sup>
8. Specifically, regarding the AstraZeneca vaccine, there have been reports of multiple cases of **cerebral venous thrombosis and thrombocytopenia** with fatal outcomes, leading to temporary suspension in 24 countries, and subsequent **advice to avoid this vaccine in younger age groups**.<sup>12</sup> The German Paul Ehrlich Institute justified their decision for suspension, indicating that seven such cases were reported, three of them fatal, when only one might have been expected to occur.<sup>13</sup> The following week, a report noted a total of sixteen such cases in Germany, four of them with fatal outcome, and all but one occurring in women aged between 20 and 63 years.<sup>14</sup>
9. In countries which have already started to vaccinate children and young adults there have been reports of serious injuries and deaths, including an **18-year-old girl in the US who developed brain clots following her Johnson & Johnson vaccine, and who is critically ill having undergone 3 brain surgeries**.<sup>15</sup> There is also a **report on VAERS of a 2-year-old girl's death following vaccination with the Pfizer vaccine**.<sup>16 17</sup>
10. The suspicion of a causal relationship between Covid-19 vaccines and blood clotting disorders is plausible, as there is evidence of direct activation of the alternative complement pathway by SARS-CoV-2 spike proteins,<sup>18</sup> as well as papers demonstrating the potential of spike proteins to cause cell to cell fusion, forming syncytia, which may lead to endothelial damage and clot formation.<sup>19</sup> **As the production of spike proteins is induced by the all the vaccines, this has the potential to be a class effect, affecting the Pfizer and Moderna mRNA vaccines too.**

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<sup>9</sup>[https://medalerts.org/vaersdb/findfield.php?TABLE=ON&GROUP1=AGE&EVENTS=ON&VAX=COVID19&DIED=Yes&fbclid=IwAR2g1T6xr\\_sOj6oi2EayTTkUalVmqPzHzmqyCkwNNzRzmKAm755cDZCM92w](https://medalerts.org/vaersdb/findfield.php?TABLE=ON&GROUP1=AGE&EVENTS=ON&VAX=COVID19&DIED=Yes&fbclid=IwAR2g1T6xr_sOj6oi2EayTTkUalVmqPzHzmqyCkwNNzRzmKAm755cDZCM92w)

<sup>10</sup><https://www.greenmedinfo.com/blog/7766-dead-330218-injuries-european-database-adverse-drug-reactions-covid-19-vacci>

<sup>11</sup><https://www.gov.uk/government/publications/coronavirus-covid-19-vaccine-adverse-reactions/>

<sup>12</sup><https://www.forbes.com/sites/niallmccarthy/2021/03/16/which-countries-have-stopped-using-the-astrazeneca-vaccine-infographic/?sh=3da07e985592>

<sup>13</sup><https://www.pei.de/SharedDocs/FAQs/EN/coronavirus/suspension-astrazeneca/1-coronavirus-astrazeneca-why-vaccination-suspended.html>

<sup>14</sup><https://www.aerzteblatt.de/nachrichten/122311/Mindestens-14-Faelle-von-Hirnvenenthrombosen-in-Deutschland-gemeldet>

<sup>15</sup>[childrenshealthdefense.org/defender/teen-surgeries-blood-clots-johnson-johnson-vaccine/](https://childrenshealthdefense.org/defender/teen-surgeries-blood-clots-johnson-johnson-vaccine/)

<sup>16</sup><https://www.medalerts.org/vaersdb/findfield.php?IDNUMBER=1074247>

<sup>17</sup><https://www.americasfrontlinedoctors.org/frontline-news/two-year-old-dies-after-being-subjected-to-pfizer-covid-19-vaccine>

<sup>18</sup><https://ashpublications.org/blood/article/136/18/2080/463611/Direct-activation-of-the-alternative-complement>

<sup>19</sup><https://www.sciencedirect.com/science/article/pii/S2589004221001383>

11. The European Medicines Agency (EMA) safety committee, after reviewing the data and declaring the AstraZeneca vaccine to be safe, while indicating that rare events cannot be ruled out, noted **“concerns about the reports involving younger patients”** with most cases affecting women.<sup>20</sup> They are also reviewing the reports of blood clots associated with the Johnson & Johnson Covid-19 vaccine that has led to the suspension of the vaccine in the US. The EMA’s Pharmacovigilance Risk Assessment Committee (PRAC) is continuing its assessment of reported cases, convening an expert group in the context of a “safety signal” that warrants further investigation.<sup>21</sup> The EU Commission have announced that they will not be renewing the AstraZeneca or Johnson & Johnson vaccines contracts and Denmark have stopped use of the AstraZeneca vaccine due to the safety concerns.<sup>22</sup>
12. Guidance on the AstraZeneca vaccine was revised very recently, and the situation and knowledge around Covid-19 vaccine safety is changing daily around the world. **The possibility of further, unexpected safety issues cannot be ruled out. In this climate, the precautionary principle must be invoked, and people must not be coerced to subject themselves to known and unknown risks** in order to access basic human freedoms and normal life.
13. This referenced article from America’s Frontline Doctors reviews some of the published evidence of possible mechanisms of injury that may be underlying the numerous and varied reported adverse effects from Covid-19 vaccines. They state:

*“There are two major neurological concerns related to the COVID vaccines.... spike proteins and the lipid nanoparticles which carry the mRNA into the cell. They are both capable of passing through the “blood-brain-barrier” which typically keeps the brain and spinal cord completely insulated from entrants into the body. There simply has not been enough time to know what brain problems and how often a brain problem will develop from that. There is concern amongst many scientists for prion disease (neurodegenerative brain disease). Traditional vaccines do not pass through the blood-brain barrier. Crossing the blood-brain barrier places patients at risk of chronic inflammation and thrombosis (clotting) in the neurological system, contributing to tremors, chronic lethargy, stroke, Bell’s Palsy and ALS-type symptoms. The lipid nanoparticles can potentially fuse with brain cells, resulting in delayed neuro-degenerative disease. And the mRNA-induced spike protein can bind to brain tissue 10 to 20 times stronger than the spike proteins that are (naturally) part of the original virus.”<sup>23</sup>*
14. Additional concerns that Covid-19 vaccines may cause antibody-dependent immune enhancement (ADE) have not been addressed in any clinical trials on humans or animals. **ADE causes an exaggerated immune response on exposure to coronaviruses following vaccination, leading to more severe illness<sup>24</sup>**. This possibility has not been ruled out and is a known and accepted risk to those who accept the vaccines.
15. **It is unethical and unlawful to bring in any measure that puts pressure on an individual to submit themselves to a medical intervention which is still experimental, which has evidence of significant and serious short term adverse events, and for which the long-term safety profile is unknown.**

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<sup>20</sup> <https://www.cidrap.umn.edu/news-perspective/2021/03/european-regulators-say-astrazeneca-vaccine-safe-cant-rule-out-rare-events>

<sup>21</sup> <https://www.ema.europa.eu/en/news/covid-19-vaccine-astrazeneca-update-ongoing-evaluation-blood-clot-cases>

<sup>22</sup> [https://www.business-standard.com/article/international/eu-not-to-renew-astrazeneca-j-j-covid-19-vaccine-contracts-on-expiry-121041500060\\_1.html](https://www.business-standard.com/article/international/eu-not-to-renew-astrazeneca-j-j-covid-19-vaccine-contracts-on-expiry-121041500060_1.html)

<sup>23</sup> <https://www.americasfrontlinedoctors.org/action-alerts/identifying-post-vaccination-complications-their-causes-an-analysis-of-covid-19-patient-data>

<sup>24</sup> <https://www.onlinelibrary.wiley.com/doi/10.1111/ijcp.13795>

## Discrimination caused by Covid-19 Vaccine Certification/Passports

1. People unable or unwilling to have Covid-19 tests or vaccines, will not be able to “prove” their health status, thus having their **basic freedoms de facto restricted**.
2. Vaccine/Immunity Passports risk enshrining such discrimination in law and **undermine the right to health, of individuals and the population**.<sup>25</sup>
3. Vaccine Passports would be amenable to both corruption and implicit bias. They may exacerbate the harm inflicted by Covid-19 on already vulnerable people, who may be more hesitant to seek medical care due to discriminatory access. Any large-scale deployment of Vaccine Passports could **disproportionately segment society and breach rights to equality and non-discrimination**.
4. Labelling people based on their Covid-19 immunity or vaccine status may fuel a societal stratification along lines of access to medical care, housing, education, public transport, cultural events, hospitality, travel, etc. This concern was raised by the Information Commissioner who stated that **issuing ‘freedom passports’ to people who have been vaccinated would risk creating “a two-tier society”**.<sup>26</sup>
5. Labelling people based on their Covid-19 immunity status **may exacerbate conflict between groups of citizens** with potential for violence and breakdown of society.
6. In workplaces, there is a serious risk that **social and financial inequalities may be amplified** under a system that disenfranchises unvaccinated employees. If a Vaccine Passport limits the duties that workers can take on, outcomes may be devastating for their livelihoods and lead to polarisation within society.

## Legal implications of Covid-19 Vaccine Certification/Passports

**Vaccine Passports will face legal challenges** under current human rights and equality laws.

The **International Health Regulations (IHR) 2005** prohibit health measures that are discriminatory and impede international travel.<sup>27</sup> However, the UK does not have laws to expressly address discrimination experienced by those without “immune privilege”. **The IHR (2005) and other international laws require states to respect human rights and avoid discrimination**. Under the IHR, states must comply with their obligations to report additional measures, to base measures on scientific principles and evidence, and to use the **least restrictive measures available**.<sup>28</sup>

The **Parliamentary Assembly of the Council of Europe** passed Resolution number 2361 on 27 January 2021<sup>29</sup>, in which it was stated that:

- Paragraph 7.3.1 - **ensure that citizens are informed that the vaccination is NOT mandatory and that no one is politically, socially, or otherwise pressured to get themselves vaccinated**, if they do not wish to do so themselves
- Paragraph 7.3.2 - **ensure that no one is discriminated against for not having been vaccinated**, due to possible health risks or not wanting to be vaccinated.

The **Universal Declaration on Bioethics and Human Rights** protects an individual’s bodily autonomy, the right to informed consent and the right to refuse medical interventions without penalty or restriction. It states that any preventive, diagnostic and therapeutic medical intervention must only to be carried out with the prior,

<sup>25</sup> <https://medicalxpress.com/news/2020-05-immunity-passports-vaccination-certificates-covid-.html>

<sup>26</sup> <https://www.independent.co.uk/news/uk/politics/covid-vaccine-passport-coronavirus-b1792752.html>

<sup>27</sup> <https://www.who.int/ihr/9789241596664/en/>

<sup>28</sup> <https://www.who.int/publications/i/item/9789241580410>

<sup>29</sup> <https://pace.coe.int/en/files/29004/html>

free, and informed consent of the person concerned, based on adequate information. The consent should, where appropriate, be express and may be withdrawn by the person concerned at any time and for any reason without disadvantage or prejudice.<sup>30</sup>

Tory MP Steve Baker recently raised the issue of “**implicit coercion**” in Parliament, saying:

*“Will [you] agree with me, it’s not enough for the government merely to refrain from coercing people, **the government’s also got to pay attention to implicit coercion**. That is, if the government turns a blind eye to allowing businesses like airlines and restaurants to refuse to let people in unless they’ve had the vaccination. The government’s got to decide whether it’s willing to allow people to discriminate on that basis.”<sup>31</sup>*

The **Nuremberg Code** established a new standard of ethical medical behaviour for the post World War II human rights era and aimed to prevent the atrocities of involuntary human experimentation from ever occurring again. It enunciates the requirement of voluntary informed consent of all human subjects, to protect the right of the individual to control his or her own body.<sup>32</sup> This 1997 article from the NEJM outlines the history behind, and the importance of the Nuremberg Code.<sup>33</sup>

As referenced above, all the Covid-19 vaccines are still experimental and, as such, their use is covered by the **Declaration of Helsinki**<sup>34</sup> which states that:

*“All medical research involving human subjects must be preceded by careful assessment of predictable risks and burdens to the individuals and groups involved in the research in comparison with foreseeable benefits to them and to other individuals or groups affected by the condition under investigation.”*

The **Medicines for Human Use (Clinical Trials) Regulations 2004**<sup>35</sup> enact the Declaration of Helsinki into UK law, which further provides that:

*“The rights, safety, and well-being of the trial subjects are the most important considerations and shall prevail over interests of science and society”.*

Given the significant risk to individual basic freedoms and division in society, it is urgent that the **UK government passes domestic legislation to make it illegal for businesses to discriminate** against those who have not been vaccinated and to **outlaw Vaccine Passports**.

## **Global context**

The **WHO released a statement** on 15 January 2021 saying that it was opposed “for the time being” to the introduction of “vaccine passports” against COVID-19 as a condition for allowing international travellers entry into other countries, stating, “**There are still too many fundamental unknowns in terms of the effectiveness of vaccines in reducing (virus) transmission and vaccines are still only available in limited quantities**”.<sup>36</sup>

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<sup>30</sup> [http://portal.unesco.org/en/ev.php-URL\\_ID=31058&URL\\_DO=DO\\_TOPIC&URL\\_SECTION=201.html](http://portal.unesco.org/en/ev.php-URL_ID=31058&URL_DO=DO_TOPIC&URL_SECTION=201.html)

<sup>31</sup> <https://www.msn.com/en-gb/news/other/tory-mp-tries-to-claim-not-letting-people-without-a-vaccine-into-a-pub-is-vaccinationism/ar-BB1byHrP>

<sup>32</sup> [https://media.tghn.org/medialibrary/2011/04/BMJ\\_No\\_7070\\_Volume\\_313\\_The\\_Nuremberg\\_Code.pdf](https://media.tghn.org/medialibrary/2011/04/BMJ_No_7070_Volume_313_The_Nuremberg_Code.pdf)

<sup>33</sup> <https://www.nejm.org/doi/full/10.1056/NEJM199711133372006>

<sup>34</sup> <https://www.wma.net/policies-post/wma-declaration-of-helsinki-ethical-principles-for-medical-research-involving-human-subjects/>

<sup>35</sup> <https://www.legislation.gov.uk/uksi/2004/1031/contents/made>

<sup>36</sup> <https://www.euronews.com/2021/01/15/coronavirus-who-against-vaccine-passports-as-a-condition-for-travel-for-the-time-being>

Despite the WHO's position, there appears to be a global push towards restriction on individual liberty using health and immunity passports. The highly influential **World Economic Forum** (WEF) has been promoting the idea of Covid-19 Passports for several months, as part of their "Great Reset" agenda<sup>37</sup>. The **new digital "Common Pass" health passport scheme**, backed by the WEF, was piloted for the first time in October, for passengers flying from the UK to the US.<sup>38</sup>

In November 2020, the Chinese leader Xi Jinping, in his address to other world leaders at the virtual G20 summit, promoted the Chinese model of QR access codes, based on health certificates, to re-enable international travel. Many non-governmental organisations and private corporations are lobbying governments for this technology to be adopted around the world, including the **Tony Blair Institute**<sup>39</sup>. This demand is not coming from the public and overrides the democratic process.

Private companies are also working on bringing in their own versions of Vaccine Passports such as **IATA and IAG, the parent company of British Airways and Iberia**. They have been working on a digital passport system to "manage, share and verify test data matched with traveller identities" to support the safe reopening of borders. **The IATA Travel Pass** comprises four key parts: a global registry of health requirements, a global registry of testing and vaccination centres, an app for labs and test centres to upload test and vaccination certificates, and an app for passengers to access these certificates, share them with airlines and authorities and to operate as a digital 'passport'.<sup>40</sup> This would constitute a gross intrusion into the private lives and medical information of individuals by a private company and governments.

Iceland and Denmark have also recently announced plans to adopt Vaccine Passports<sup>41 42</sup> and the EU is currently trying to introduce Covid-19 Digital Green Certificates.<sup>43</sup>

Israel has been the first nation to introduce a Covid-19 Vaccine Passport called the "Green Pass".<sup>44</sup> This has led to distressed citizens, including human rights campaign group Freedom Israel, reporting the creation of a "Medical Apartheid".<sup>45</sup> The Green Pass confers advantages to those who take the vaccine and limits the options of those who do not. People who do not wish to be vaccinated are currently barred under law from entering or attending: Gyms and studios; Swimming pools; Restaurants and cafes; Hotels; Stadiums, pitches, sporting events and venues; Theatres, cinemas, and cultural venues; Cultural events; Exhibitions (outside of museums); Event gardens; Attractions; and Mikvehs for men<sup>46</sup>. This is a horrific situation, which is completely unacceptable and untenable in a free country and has led to serious division in society and heated demonstrations against the Government.

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<sup>37</sup> <https://www.weforum.org/agenda/2021/01/what-is-a-vaccine-passport-and-will-you-need-one-the-next-time-you-travel/>

<sup>38</sup> <https://www.weforum.org/agenda/2020/07/covid-19-passport-app-health-travel-covidpass-quarantine-event/>

<sup>39</sup> <https://www.telegraph.co.uk/global-health/science-and-disease/exclusive-tony-blair-calls-boris-johnson-lead-drive-global-vaccine/>

<sup>40</sup> <https://www.businesstravelnewseurope.com/Air-Travel/IATA-announces-digital-health-passport-plan>

<sup>41</sup> <https://www.schengenvisa.info/news/iceland-becomes-first-schengen-country-to-grant-covid-19-vaccination-certificates/>

<sup>42</sup> <https://www.thetimes.co.uk/article/denmark-reveals-concrete-plans-for-a-digital-corona-passport-in-world-first-98jrjpt60>

<sup>43</sup> [https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/safe-covid-19-vaccines-europeans/covid-19-digital-green-certificates\\_en](https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/safe-covid-19-vaccines-europeans/covid-19-digital-green-certificates_en)

<sup>44</sup> <https://www.washingtontimes.com/news/2021/apr/5/israels-troubling-green-pass-post-coronavirus-syst/>

<sup>45</sup> <https://twitter.com/FreedomIsrael/status/1371729005330698241>

<sup>46</sup> <https://www.gov.il/en/Departments/General/corona-certificates>

## Conclusion

In the context of the much-hailed success of the UK Covid-19 vaccine rollout and the desperate public desire for a return to normal life and freedom, we urge you to have confidence in the reported achievement of herd immunity to SARS-CoV-2 (through pre-existing immunity, natural acquired immunity, and vaccination) announced by scientists at UCL recently<sup>47</sup>, and to allow a return to individual responsibility for our own health. All vulnerable groups will have been offered the opportunity to be fully vaccinated within the next few weeks, which is expected to reduce deaths and hospital admissions from Covid-19 by around 95%, and the rest of the population will have the opportunity to have the vaccine if they wish to.

After a difficult and damaging year of unprecedented and draconian restrictions, which have removed so many of our rights and freedoms in the name of Covid-19, it is disproportionate and unnecessary to go down the route of further restrictions and loss of freedoms that a Vaccine Passport would entail. It would **permanently increase state power over our lives and set a dangerous precedent**, which would effectively require the public to accept all vaccines and boosters that the Government or private businesses wish to add to the passport requirements in the future, to be able to enjoy basic human freedoms of movement and association.

**Vaccine Passports have no place in a democratic and free society and would be a profoundly illiberal, undemocratic, and un-British policy. We urge you not to pursue this dangerous path.**

Thank you for your consideration of our concerns.

UK Medical Freedom Alliance  
[www.ukmedfreedom.org](http://www.ukmedfreedom.org)

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<sup>47</sup> <https://www.dailymail.co.uk/news/article-9447591/Britain-pass-threshold-herd-immunity-MONDAY.html>