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1 **SARS-CoV-2 mass vaccination: Urgent questions on vaccine safety that**
2 **demand answers from international health agencies, regulatory**
3 **authorities, governments and vaccine developers**
4

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47 **Abstract**

48 Since the start of the COVID-19 outbreak, the race for testing new platforms designed to confer
49 immunity against SARS-CoV-2, has been rampant and unprecedented, leading to conditional
50 emergency authorization of various vaccines. Despite progress on early multidrug therapy for
51 COVID-19 patients, the current mandate is to immunize the world population as quickly as
52 possible. The lack of thorough testing in animals prior to clinical trials, and authorization based
53 on safety data generated during trials that lasted less than 3.5 months, raise questions regarding
54 vaccine safety. The recently identified role of SARS-CoV-2 Spike glycoprotein for inducing
55 endothelial damage characteristic of COVID-19, even in absence of infection, is extremely
56 relevant given that most of the authorized vaccines induce endogenous production of Spike.
57 Given the high rate of occurrence of adverse effects that have been reported to date, as well as
58 the potential for vaccine-driven disease enhancement, Th2-immunopathology, autoimmunity,
59 and immune evasion, there is a need for a better understanding of the benefits and risks of mass
60 vaccination, particularly in groups excluded from clinical trials. Despite calls for caution, the
61 risks of SARS-CoV-2 vaccination have been minimized or ignored by health organizations and
62 government authorities. As for any investigational biomedical program, data safety monitoring
63 boards (DSMB) and event adjudication committees (EAC), should be enacting risk mitigation. If
64 DSMBs and EACs do not do so, we will call for a pause in mass vaccination. If DSMBs and
65 EACs do not exist, then vaccination should be halted immediately, in particular for demographic
66 groups at highest risk of vaccine-associated death or serious adverse effects, during such time as
67 it takes to assemble these boards and commence critical and independent assessments. We urge
68 for pluralistic dialogue in the context of health policies, emphasizing critical questions that
69 require urgent answers, particularly if we wish to avoid a global erosion of public confidence in
70 science and public health.

71

72 **Introduction**

73

74 Since COVID-19 was declared a pandemic in March 2020, over 150 million cases and 3 million
75 cases of deaths from or with SARS-CoV-2 have been reported worldwide. Despite progress on
76 early ambulatory, multidrug-therapy for high-risk patients, resulting in 85% reductions in
77 COVID-19 hospitalization and death [1], the current paradigm for control is mass-vaccination.
78 While we recognize the effort involved in development, production and emergency authorization
79 of SARS-CoV-2 vaccines, we are concerned that risks have been minimized or ignored by health
80 organizations and government authorities, despite calls for caution [2-8].

81

82 Vaccines for other coronaviruses have never been approved for humans, and data generated in
83 the development of coronavirus vaccines designed to elicit neutralizing antibodies show that they
84 may worsen COVID-19 disease via antibody-dependent enhancement (ADE) and Th2
85 immunopathology, regardless of the vaccine platform and delivery method [9-11]. Vaccine-
86 driven disease enhancement in animals vaccinated against SARS-CoV and MERS-CoV is known
87 to occur following viral challenge, and has been attributed to immune complexes and Fc-
88 mediated viral capture by macrophages, which augment T-cell activation and inflammation [11-
89 13].

90

91 In March 2020, vaccine immunologists and coronavirus experts assessed SARS-CoV-2 vaccine
92 risks based on SARS-CoV-vaccine trials in animal models. The expert group concluded that

93 ADE and immunopathology were a real concern, but stated that their risk was insufficient to
94 delay clinical trials, although continued monitoring would be necessary [14]. While there is no
95 clear evidence of the occurrence of ADE and vaccine-related immunopathology in volunteers
96 immunized with SARS-CoV-2 vaccines [15], safety trials to date have not specifically addressed
97 these serious adverse effects (SAE). Given that the follow-up of volunteers did not exceed 2-3.5
98 months after the second dose [16-19], it is unlikely such SAE would have been observed.
99 Despite errors in reporting, it cannot be ignored that even accounting for the number of vaccines
100 administered, according to the US Vaccine Adverse Effect Reporting System (VAERS), the
101 number of deaths per million vaccine doses administered has increased more than 10-fold. We
102 believe there is an urgent need for open scientific dialogue on vaccine safety in the context of
103 large-scale immunization. In this paper, we describe some of the risks of mass vaccination in the
104 context of phase 3 trial exclusion criteria and discuss the SAE reported in national and regional
105 adverse effect registration systems. We highlight unanswered questions and draw attention to the
106 need for a more cautious approach to mass vaccination.

107

108 **SARS-CoV-2 phase 3 trial exclusion criteria**

109

110 With few exceptions, SARS-CoV-2 vaccine trials excluded the elderly [16-19], making it
111 impossible to identify the occurrence of post-vaccination eosinophilia and enhanced
112 inflammation in elderly people. Studies of SARS-CoV vaccines showed that immunized elderly
113 mice were at particularly high risk of life-threatening Th2 immunopathology [9,20]. Despite this
114 evidence and the extremely limited data on safety and efficacy of SARS-CoV-2 vaccines in the
115 elderly, mass-vaccination campaigns have focused on this age group from the start. Most trials
116 also excluded pregnant and lactating volunteers, as well as those with chronic and serious
117 conditions such as tuberculosis, hepatitis C, autoimmunity, coagulopathies, cancer, and immune
118 suppression [16-29], although these recipients are now being offered the vaccine under the
119 premise of safety.

120

121 Another criterion for exclusion from nearly all trials was prior exposure to SARS-CoV-2. This is
122 unfortunate as it denied the opportunity of obtaining extremely relevant information concerning
123 post-vaccination ADE in people that already have anti-SARS-Cov-2 antibodies. To the best of
124 our knowledge, ADE is not being monitored systematically for any age or medical condition
125 group currently being administered the vaccine. Moreover, despite a substantial proportion of the
126 population already having antibodies [21], tests to determine SARS-CoV-2-antibody status prior
127 to administration of the vaccine are not conducted routinely.

128

129 **Will serious adverse effects from the SARS-CoV-2 vaccines go unnoticed?**

130

131 COVID-19 encompasses a wide clinical spectrum, ranging from very mild to severe pulmonary
132 pathology and fatal multi-organ disease with inflammatory, cardiovascular, and blood
133 coagulation dysregulation [22-24]. In this sense, cases of vaccine-related ADE or
134 immunopathology would be clinically-indistinguishable from severe COVID-19 [25].
135 Furthermore, even in the absence of SARS-CoV-2 virus, Spike glycoprotein alone causes
136 endothelial damage and hypertension *in vitro* and *in vivo* in Syrian hamsters by down-regulating
137 angiotensin-converting enzyme 2 (ACE2) and impairing mitochondrial function [26]. Although
138 these findings need to be confirmed in humans, the implications of this finding are staggering, as

139 all vaccines authorized for emergency use are based on the delivery or induction of Spike
140 glycoprotein synthesis. In the case of mRNA vaccines and adenovirus-vectorized vaccines, not a
141 single study has examined the duration of Spike production in humans following vaccination.
142 Under the cautionary principle, it is parsimonious to consider vaccine-induced Spike synthesis
143 could cause clinical signs of severe COVID-19, and erroneously be counted as new cases of
144 SARS-CoV-2 infections. If so, the true adverse effects of the current global vaccination strategy
145 may never be recognized unless studies specifically examine this question. There is already non-
146 causal evidence of temporary or sustained increases in COVID-19 deaths following vaccination
147 in some countries (Fig. 1) and in light of Spike's pathogenicity, these deaths must be studied in
148 depth to determine whether they are related to vaccination.
149

150 **Unanticipated adverse reactions to SARS-CoV-2 vaccines**

151
152 Another critical issue to consider given the global scale of SARS-CoV-2 vaccination is
153 autoimmunity. SARS-CoV-2 has numerous immunogenic proteins, and all but one of its
154 immunogenic epitopes have similarities to human proteins [27]. These may act as a source of
155 antigens, leading to autoimmunity [28]. While it is true that the same effects could be observed
156 during natural infection with SARS-CoV-2, vaccination is intended for most of the world
157 population, while it is estimated that only 10% of the world population has been infected by
158 SARS-CoV-2, according to Dr. Michael Ryan, head of emergencies at the World Health
159 Organization. We have been unable to find evidence that any of the currently authorized
160 vaccines screened and excluded homologous immunogenic epitopes to avoid potential
161 autoimmunity due to pathogenic priming.
162

163 Some adverse reactions, including blood-clotting disorders, have already been reported in
164 healthy and young vaccinated people. These cases led to the suspension or cancellation of the use
165 of adenoviral vectorized ChAdOx1-nCov-19 and Janssen vaccines in some countries. It has now
166 been proposed that vaccination with ChAdOx1-nCov-19 can result in immune thrombotic
167 thrombocytopenia (VITT) mediated by platelet-activating antibodies against Platelet factor-4,
168 which clinically mimics autoimmune heparin-induced thrombocytopenia [29]. Unfortunately, the
169 risk was overlooked when authorizing these vaccines, although adenovirus-induced
170 thrombocytopenia has been known for more than a decade, and has been a consistent event with
171 adenoviral vectors [30]. The risk of VITT would presumably be higher in those already at risk of
172 blood clots, including women who use oral contraceptives [31], making it imperative for
173 clinicians to advise their patients accordingly.
174

175 At the population level, there could also be vaccine-related impacts. SARS-CoV-2 is a fast-
176 evolving RNA virus that has so far produced more than 40,000 variants [32,33] some of which
177 affect the antigenic domain of Spike glycoprotein [34,35]. Given the high mutation rates,
178 vaccine-induced synthesis of high levels of anti-SARS-CoV-2-Spike antibodies could
179 theoretically lead to suboptimal responses against subsequent infections by other variants in
180 vaccinated individuals [36], a phenomenon known as "original antigenic sin" [37] or antigenic
181 priming [38]. It is unknown to what extent mutations that affect SARS-CoV-2 antigenicity will
182 become fixed during viral evolution [39], but vaccines could plausibly act as selective forces
183 driving variants with higher infectivity or transmissibility. Considering the high similarity
184 between known SARS-CoV-2 variants, this scenario is unlikely [32,34] but if future variants

185 were to differ more in key epitopes, the global vaccination strategy might have helped shape an
186 even more dangerous virus. This risk has recently been brought to the attention of the WHO as
187 an open letter [40].
188

189 **Discussion**

190

191 The risks outlined here are a major obstacle to continuing global SARS-CoV-2 vaccination.
192 Evidence on the safety of all SARS-CoV-2 vaccines is needed before exposing more people to
193 the risk of these experiments, since releasing a candidate vaccine without time to fully
194 understand the resulting impact on health could lead to an exacerbation of the current global
195 crisis [41]. Risk-stratification of vaccine recipients is essential. According to the UK
196 government, people below 60 years of age have an extremely low risk of dying from COVID-
197 19¹. However, according to Eudravigillance, most of the serious adverse effects following
198 SARS-CoV-2 vaccination occur in people aged 18-64. Of particular concern is the planned
199 vaccination schedule for children aged 6 years and older in the United States and the UK. Dr.
200 Anthony Fauci recently anticipated that teenagers across the country will be vaccinated in the
201 autumn and younger children in early 2022, and the UK is awaiting trial results to commence
202 vaccination of 11 million children under 18. There is a lack of scientific justification for
203 subjecting healthy children to experimental vaccines, given that the Centers for Disease Control
204 and Prevention estimates that they have a 99.997% survival rate if infected with SARS-CoV-2.
205 Not only is COVID-19 irrelevant as a threat to this age group, but there is no reliable evidence to
206 support vaccine efficacy or effectiveness in this population or to rule out harmful side effects of
207 these experimental vaccines. In this sense, when physicians advise patients on the elective
208 administration of COVID-19 vaccination, there is a great need to better understand the benefits
209 and risk of administration, particularly in understudied groups.
210

211 In conclusion, in the context of the rushed emergency-use-authorization of SARS-CoV-2
212 vaccines, and the current gaps in our understanding of their safety, the following questions must
213 be raised:
214

- 215 • Is it known whether cross-reactive antibodies from previous coronavirus infections or
216 vaccine-induced antibodies may influence the risk of unintended pathogenesis following
217 vaccination with COVID-19?
218
- 219 • Has the specific risk of ADE, immunopathology, autoimmunity, and serious adverse
220 reactions been clearly disclosed to vaccine recipients to meet the medical ethics standard of
221 patient understanding for informed consent? If not, what are the reasons, and how could it be
222 implemented?
223
- 224 • What is the rationale for administering the vaccine to every individual when the risk of dying
225 from COVID-19 is not equal across age groups and clinical conditions and when the phase 3
226 trials excluded the elderly, children and frequent specific conditions?

¹ (<https://www.gov.uk/government/publications/covid-19-reported-sars-cov-2-deaths-in-england/covid-19-confirmed-deaths-in-england-report>)

227
228 • What are the legal rights of patients if they are harmed by a SARS-CoV-2 vaccine? Who will
229 cover the costs of medical treatment? If claims were to be settled with public money, has the
230 public been made aware that the vaccine manufacturers have been granted immunity, and
231 their responsibility to compensate those harmed by the vaccine has been transferred to the
232 tax-payers?
233

234 If vaccination programs worldwide do not institute independent data safety monitoring boards
235 (DSMB), event adjudication committees (EAC), and enact risk mitigation, we will call for a
236 pause in the mass vaccination program. If DSMBs and EACs do not exist currently, as would be
237 imperative for any investigational biomedical program, then vaccination should be immediately
238 halted for those demographic groups at highest risk of vaccine-associated death or serious
239 adverse effects, during the time it takes to assemble these boards and committees and commence
240 their assessments.
241

242 In the context of these concerns, we propose opening an urgent pluralistic, critical, and
243 scientifically-based dialogue on SARS-CoV-2 vaccination among scientists, medical doctors,
244 international health agencies, regulatory authorities, governments, and vaccine developers. This
245 is the only way to bridge the current gap between scientific evidence and public health policy
246 regarding the SARS-CoV-2 vaccines. We are convinced that humanity deserves a deeper
247 understanding of the risks than what is currently touted as the official position. An open
248 scientific dialogue is urgent and indispensable to avoid erosion of public confidence in science
249 and public health and to ensure that the WHO and national health authorities protect the interests
250 of humanity during the current pandemic. Returning public health policy to evidence-based
251 medicine, relying on a careful evaluation of the relevant scientific research, is urgent. It is
252 imperative to follow the science.
253
254

255 **Conflict of Interest Statement**

256 The authors declare that the research was conducted in the absence of any commercial or
257 financial relationships that could be construed as a potential conflict of interest.
258

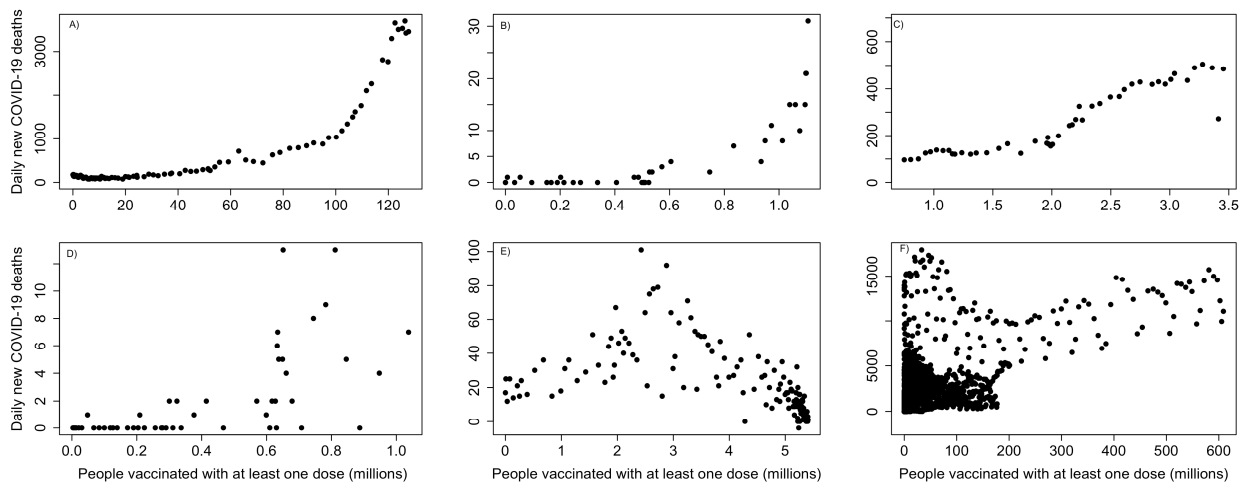
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 382 Figure 1. Number of new COVID-19 deaths in relation to number of people that have received at
 383 least one vaccine dose for selected countries. Graph shows data from the start of vaccination to
 384 May 3rd, 2021. A) India (9.25% of population vaccinated), B) Thailand (1.58% of population
 385 vaccinated), C) Colombia (6.79% of population vaccinated), D) Mongolia (31.65% of population
 386 vaccinated), E) Israel (62.47% of population vaccinated), F) Entire world (7.81% of population
 387 vaccinated). Graphs were built using data from Our World in Data (accessed 4 May 2021)
 388 <https://github.com/owid/covid-19-data/tree/master/public/data/vaccinations>.