Complaint to the HRC about Australian HPV Vaccination Programs

(9 September 2014)

In 2007 the Australian health department introduced the HPV vaccine into school vaccination programs and this vaccine was promoted to the Australian public as a vaccine 'to prevent cervical cancer.' The public was not informed that this vaccine is not called a 'cervical cancer vaccine' because it has not been demonstrated to prevent any cervical cancer. It is called the 'HPV vaccine'. The public was also not informed that cervical cancer in Australia was a very low risk in 2007 when this vaccine was introduced (1.9 deaths per 100,000 women annually) and that Pap screening is considered the safest and most effective method of preventing cervical cancer (WHO).

Here is a summary of the information that was not provided to the Australian public when this vaccine was introduced in 2007:

- The vaccine was not proven to be safe, effective or necessary in preventing cervical cancer before it was introduced.
- Cervical cancer was a low risk to all Australian women in 2007 and Pap screening was (and still is) considered to be the most effective method of preventing cervical cancer (WHO).
- The vaccine costs \$430 to vaccinate one individual and yet all vaccinated women will still need Pap screening the government has not provided evidence that this program is cost-effective. Approximately 30% of cervical cancer is not covered by the vaccine (13+ high-risk HPV strains not covered in the vaccine) so vaccinated women are still at risk of cervical cancer.
- The vaccine was only tested for pre-cursor lesions (CIN 2/3) in 15-26 year old women for 4 years prior to its introduction yet scientists knew that high-grade lesions in this age-group rarely progress to cervical cancer later in life (NHMRC 2005). This is why the WHO does not recommend that women have Pap screening until after 26 years of age.
- Globally there have been many serious adverse events to this vaccine including death but the Australian TGA is not acknowledging or investigating these reports.
 These have been documented on the CDC VAERS database and on the SANE VAX website www.sanevax.org
- Dr. Julie Brotherton claimed on ABC radio (1 September 2014) that: '..there's actually no good evidence that screening is the best way to prevent cancers

occurring in very young women' and she used this comment to suggest that '...those cancers (in very young women) tend to be fast growing and really the best strategy for those is vaccination.'

This statement is false because young women do not get cervical cancer. It is very rare to non-existent in this age-group. High-grade lesions (CIN2/3) mostly do not progress to cancer in young women and this is why the WHO does not recommend Pap screening under the age of 26. Screening does not *prevent* cervical cancer it detects early signs of abnormalities but abnormalities in young women (even CIN 3) are known to regress in the majority of cases and are not an indicator of cancer later in life. Starting Pap screening less than 26 years of age results in many false-positives because CIN 3 is not a predictor of cancer in this age-group.

 Australian women were also not informed that the vaccine only protects against 2 of 15 high-risk strains of HPV that are associated with causing cervical cancer but do not cause cervical cancer without other 'risk' factors (co-factors) also being present. This is why cervical cancer is a low risk in Australia yet it is a high risk in many developing countries where the risk factors are more prevalent and where they don't have Pap screening.

The Australian community has been misinformed about this vaccine by the Australian Health Department and this vaccination program should be suspended until the vaccine is proven safe, effective and necessary. Japan and India have suspended the use of this vaccine in their national programs and France and Spain are considering similar action. This information has been provided to Commissioners Tim Wilson and Elizabeth Broderick who were copied into the complaint I made to the Australian Minister of Health and other government ministers on 25 July 2014. I will forward this exchange to you so the HRC can investigate the global concerns about this vaccine. The Australian media is not presenting this information to the public and the Australian government must act before more adolescents are damaged.

The Health Minister and Shadow Health Minister have not acknowledged or replied to my letter (25 July 2014) and this is demonstrating a lack of accountability by the Australian health authorities. I would like you to investigate this issue for the concerned Australian public because a lack of informed consent about a medical procedure is a breach of our human rights.

Yours sincerely,

Judy Wilyman