

Judy Wilyman's Response to the article in the Vaccine Journal 2019:

PhD thesis opposing immunisation: Failure of academic rigour

By Wiley, Leask, Burgess and McIntyre

Summary of the Content of my PhD Thesis

My PhD makes four main critical points in relation to Australian government vaccination policy:

1. Deaths and illnesses from infectious diseases had dramatically declined in Australia before the introduction of most vaccines suggesting that vaccination is not the only factor in controlling these diseases.
2. Australian vaccination policies were adopted from a one-size-fits-all set of global recommendations, without consideration of the diversity of genetics in the population or the special ecological conditions in Australia. For example, the levels of sanitation and nutrition, and the incidence and severity of infectious diseases.
3. Nearly all research on vaccination used by government regulators and advisory boards is carried out or sponsored by pharmaceutical companies with a vested interest in selling vaccines; the conflicts of interest involved in vaccine research and on vaccine advisory boards can lead to bias in the research design and conclusions drawn.
4. There are important areas of research relevant to vaccination policy that have not been pursued, but should have been; a plausible reason for this 'undone science' is that the findings might turn out to be unwelcome to vaccination promoters and governments.

1) The Title of the Paper by Wiley *et al* in the Vaccine Journal

The authors of this critique have used a title that does not reflect the investigation that I undertook and it is designed to influence public opinion before people read the review of my research. My thesis does not oppose immunisation and this was not discussed or concluded in my paper.

The title of the critique clearly shows that the authors did not write this paper in an attempt to debate the findings but in an attempt to denigrate this public health research and to suppress its evidence and arguments. This has been done by claiming there was a 'failure of academic rigour'. If this was indeed the case then UOW would have retracted this thesis. Instead the University has replied that they are 'standing by the examination of this thesis' and my supervisor has been awarded the title of Emeritus Professor.

My thesis was an investigation of the historical decline of infectious diseases in Australia – a public health issue not a medical issue - and an assessment of the government’s reasons for expanding the vaccination schedule in the 1990’s and then mandating sixteen vaccines in government policies in 2016.

The authors have misused the term ‘immunisation’ and my research does not oppose immunisation nor is it discussed in my thesis in this way. My thesis was an investigation of the contribution that *vaccines* have played in reducing the deaths and illnesses to infectious diseases in Australia and whether using multiple vaccines is beneficial or harmful to the community. Vaccination is not immunisation and my conclusions were not about immunisation.

My thesis provides evidence that vaccines are not safe for all children and that children’s health in Australia has significantly declined since the vaccination program expanded in 1990. The thesis demonstrates that the chemicals in vaccines are a plausible cause of this rise in illnesses/disability and deaths in children and this needs to be considered in a debate about how many vaccines are necessary to use in children.

These are the arguments that *Wiley et al* are suppressing by purposely denigrating my research with false information in the title of the paper and in their comments. This prevents the reader from making an objective assessment of my aims, arguments and conclusions in the PhD thesis.

2) The Motive for my Research

In several places in this paper the authors have asserted that ‘I started from a pre-determined position’ about vaccination and they have implied that this was a position opposing immunisation. There is no evidence for this assertion as I started this research after *vaccinating my children* and I do not have any vaccine damaged children. What motive would I have for finding this was not the best intervention for my children?

There is also no evidence presented in my thesis that supports this assertion as I have provided an objective assessment of the historical literature using a systematic methodology that is discussed in Section 1.2 and 1.3 of the thesis – contrary to the authors assertions that there was ‘no systematic literature review’. The authors have not addressed the specifics of my methodology described in the thesis they have merely presented their *personal opinion* that there was no systematic literature assessment. This does not make it true and it needs debating before a personal opinion is provided.

3) The Authors Conflict of Interest in Critiquing My PhD

A key theme in my thesis is the importance of considering conflicts of interest (COI) in the making of vaccination policy. It is therefore appropriate to consider COI of these authors in critiquing my PhD thesis.

Two of the four authors have been involved in the recommendations for Australia's vaccination policies for over 20 years and they have a significant interest in defending their policy decisions. These authors include Margaret Burgess and Peter McIntyre who are the founding directors of the government's *National Centre for Immunisation Research and Surveillance (NCIRS)*.

Margaret Burgess was the founding director from 1997 – 2005 and Peter McIntyre was the deputy-director during this time and he became the director from 2005 – 2018. These authors have been involved in designing the Australian government's vaccination policies for the last 21 years – the period over which the national program expanded - and it is clear that they have not set out to debate the arguments in my thesis but to denigrate the research.

Julie Leask and Kerrie Wiley are also based at the University of Sydney with the NCIRS. Julie Leask did research from 2015 – 2019 that was *specifically designed to be used in this article*. She surveyed the population to assess the reasons why parents are hesitating to vaccinate and the authors have used her research as the premise for their critique of my PhD research.

In other words, instead of addressing my thesis as valid academic research and publicly debating the arguments I have presented, they have started from the premise that my academic research is flawed and is influencing people's decisions on vaccination without justification. Hence they have chosen to provide this review with false information about my research to suppress it instead of debating it in public forums where there government's information can be challenged.

Peter McIntyre's reluctance to publicly debate the evidence for mandatory vaccination policies in Australia was observed when he declined to attend a public forum at the University of Technology in Sydney (October 2015) to discuss the evidence for implementing mandatory vaccination policies in Australia in 2016.

This reluctance was observed again in September 2018. At this time he was drafted into a Queensland court case, out of proceedings, to respond to my affidavit regarding the vaccination of four children. The government's team supporting leaked my affidavit to the *Sydney Morning Herald*. This is a federal crime that has been reported to the Australian Federal Police. This criminal offence by the government's team prevented the case from being heard and debated in the Federal Circuit court.

Wiley et al have referred to this incident in their critique (p4) and have referenced this incident with a newspaper article that provides false information about my research [1].

This is further evidence that these authors are participating in the suppression of academic research and valid scientific arguments regarding vaccination. There is a lack of transparency and accountability in Australia's public health policy and I will provide below the false information that *Wiley et al* have provided in their critique of my PhD thesis and I will provide my refutation of their claims in bold:

The False Claims Provided in the *Wiley et al* Critique (My comments are in bold)

1. The assertion that 'the *Vaccine* article by Durrheim and Jones in 2016 provided evidence that questioned the quality of the supervision and examination of my thesis.'

Durrheim and Jones based their discussion for this assertions on false information provided in a newspaper article. No evidence was provided for this assertion and when the UOW was asked by lobby group activists to retract my thesis in 2016 the University responded by stating that it stands by the quality of the supervision and the examination. Brian Martin, my supervisor has subsequently been awarded the title of UOW Emeritus Professor.

2. My PhD thesis was a '*non-systematic descriptive review of the literature with reference to the Australian national vaccine program*'

This is a complete misrepresentation of the focus of my thesis and its methodology. The focus of my thesis and the methodology used has been described in sections 1 and 2 above.

3. 'The thesis used no primary research and it mostly used the HPV vaccine and the H1N1 2009 influenza vaccine to illustrate its three main claims.'

The thesis has used primary sources where it was possible to do so particularly for the historical data on the decline of infectious diseases in Australia. With respect to the governments vaccination program I could only use the government data that was publicly available because any requests for other government documents regarding vaccine safety and efficacy (the material that *Wiley et al* are calling 'grey matter') was declined by the government. Responses to these email requests resulted in standard letters stating that 'vaccines are safe and rigorously tested for safety'. Hence my thesis is a critique of the publicly available information on vaccine safety and efficacy.

The claim that the HPV and Flu vaccines were used as evidence for the three main claims in my thesis are false and indicate that they are purposely misrepresenting my research.

4. *Wiley et al* have stated that the first of my three main overarching claims is that ‘vaccines are unnecessary’.

This claim has not been made in my thesis. I have stated that the government has not provided transparent evidence for the role that vaccines have played in the decline of infectious diseases in Australia. I state that vaccines *may have played a role* but the government has not demonstrated this with Australian evidence. I also provided evidence that the majority of this decline occurred before most of the 16 vaccines were developed.

5. *Wiley et al* have used Stanley 2001 to claim that vaccines have contributed to the reduction of infant deaths.

Stanley et al actually stated: ‘*Infectious deaths fell before widespread vaccination was implemented*’ (Stanley, 2001) and she made other comments to this effect. This is an important fact to acknowledge yet the authors have ignored this fact. Vaccines may have contributed to the decline in infant deaths but if so it is a very small contribution that Stanley did not quantify. The risk of death and illness had been reduced *for the majority* of Australians by 1950/60 as stated by Stanley and other public health officials.

In Australia measles, whooping cough and influenza were removed from the National Notifiable Disease list in 1950 because they were no longer considered diseases of serious concern. The cases of these diseases were not monitored from 1950 – 1988 because the majority of cases were non-serious and resulted in long-term immunity and good community protection. There was no measles vaccine in Australia until 1970. Today the government is reporting on every non-serious case of these diseases and using this information in fear campaigns in the Australian media to influence the uptake of all the recommended vaccines – most of which were not developed by 1950.

***Wiley et al* have used a reference from 2016 to make a claim about the reduction of deaths due to vaccines. This analysis was not available in 2015 when my thesis was published and the 2016 paper could have been written from a pre-determined position.**

6. The comment that ‘the Australian schedule is set according to best evidence as assessed by ATAGI, not according to WHO directives.’

In Chapter 3 of my thesis (3.4 p56) I provide the evidence to show that the ATAGI advisory boards are set up in all WHO countries and they receive advice from the GAVI alliance through the WHO. They are referred to as National Immunisation and Technical Advisory Groups (NTIAG). This indicates the *Wiley et al* are critiquing my thesis without addressing the evidence. The examiner of my PhD was an expert in global health policies and my thesis could not be passed until I had included a section on Australia's participation in global health policies.

7. The comment that 'Data used in assessment of risk is Australian *where possible*, if not, data from other comparable populations is used.'

This comment is false. The evidence in government policy documents and in the Australian mainstream media of the deaths rates for infectious diseases are generally the death rates from developing countries – completely *unrepresentative* of the Australian situation, a developed country. The comment states 'where possible' - Why is there any situation where the government cannot support its vaccination program with death and disease incident rates from the Australian situation?

8. 'Risk/benefit analysis is done for each vaccine included in the Australian schedule, often using population-specific data'.

There is no evidence for this. The government is unable to provide transparent risk/benefit analysis for any Australian vaccine to demonstrate that it is using Australian specific data. This data has been requested but never provided to the public. The government uses mathematical models and non-transparent data for the cost-effectiveness assessment of vaccines and the criteria and assumptions of risk/benefit used in these models are not transparent to the public.

9. 'There is a wide range of evidence used for various vaccines including RCT's which tested the vaccines for biologically sound and ethically and technically feasible end-points.'

This is false. I studied the clinical trials for many different vaccines and a standard feature of the RCT's was the lack of an inert placebo in the unvaccinated group and a lack of follow up for long-term health effects. Many trials only use days or weeks of follow up yet the researchers know there can be a latent period of years before many chronic illnesses will develop. This is due to the latency period of the chemical response in the human body. The TGA cannot provide safety studies that use inert placebos over a period of 1- 5 or more years.

10. 'Active safety surveillance is in place in a number of sentinel institutions for an increasing number of vaccines. More recently there is a PAED's.'

In 2015 when my thesis was published both the TGA and the CDC had admitted that they did not have a surveillance system that could determine causal links to the vaccines. Consequently there are 158 known AE's that have been *associated by the pharmaceutical companies* with the vaccines *for decades* yet the government and doctors are being permitted to claim that these a just 'a coincidence' after vaccines are administered.

The government has not made any attempt to design inert placebo controlled RCT's that can prove a causal link with the vaccines for six decades. Nor are doctors and governments (including the TGA) required to mention the deaths and serious illnesses associated with the vaccines before they implement legislation or give vaccines to patients. The suggestion that active surveillance is now 'in some institutions for an increasing number of vaccines' does not dispute my conclusions. It suggests that the government has started to do something about this *undone science* because the public has become aware that governments *do not have the scientific evidence* to claim that all vaccines are safe or that the combined schedule is safe in the infant or human body.

11. 'The quality of writing and the presentation of the thesis are such that many of its arguments seem plausible to an examiner without specific content knowledge.'

***Wiley et al* are implying that the examiners for my thesis did not have expert knowledge in the field of Public Health or Science and Technology Studies – the two specialty areas of my research. This is false and evidenced by the fact that the UOW would not retract the thesis when lobby groups pressured it do so in 2016 (as stated above).**

12. 'A critical analysis should consider the merits and faults of an issue and be conducted in such a way that it is not designed to find only evidence for the writer's pre-determined conclusions.'

Firstly, I have not come from a pre-determined conclusion. I vaccinated my children I do not have any vaccine damaged children so my position would be to support this decision. My thesis provides evidence that the government has used only pharmaceutically funded research that supports the position to vaccinate. This is presented on the Immunise Australia Program (IAP) website without the peer-reviewed research that is demonstrating the serious risks of vaccines. The government is also actively censoring this academic debate by prohibiting my research from being presented in public forums and in the mainstream media. It is the government that is not assessing the merits and faults of vaccines in a manner that will produce a contrary outcome to its pre-determined position to use vaccines.

13. 'This thesis does not include methods for assessing the literature, does not discuss aspects of the identified studies or attempt to establish the quality of relevant studies.'

The methodology and objective for my thesis are set out in Chapter 1.2 and 1.3. This claim by the authors shows that their opinions were formed without reading the objectives or description of how the literature was chosen. The authors have formed their opinion of my literature review without addressing these issues. They have also misrepresented the purpose of my investigation and this means they cannot provide a credible opinion of the literature that I presented to support the conclusions.

14. 'There is a failure to include or address the majority of HPV vaccine safety and efficacy studies and reviews which contradict the arguments of the thesis.'

The authors have supported this claim with a systematic review of HPV vaccine that was published *in 2015*. This review was not available when my thesis was published in 2015. There have also been many controversial reviews of the safety of the HPV vaccine since 2015 and simply citing this review, without any assessment of the studies it included, does not in itself provide contrary evidence to the conclusions about safety that I have provided in my thesis.

15. 'The thesis asserts that vaccines are unnecessary.'

This is not an accurate representation of my conclusions. I have provided definitive evidence that children's health has declined since the introduction of many recent vaccines and hence the current vaccination program cannot be described as a 'protective health program'. I have also provided definitive evidence that the majority of Australian children were not at serious risk of death or illness due to infectious diseases *before* the vaccines were introduced. Hence I have suggested that *some* vaccines are unnecessary and that no vaccine has ever created herd immunity in a community by being used with an uptake rate of 95% to reduce deaths and illnesses to any infectious disease. This means there is no justification to mandate any vaccine in government policies in Australia.

***Wiley et al* use a study from the Netherlands (2016) to support their claim that vaccines significantly reduced infant mortality from 1950 onwards. However this study is not relevant to my conclusions because most of the vaccines that have been mandated in Australia were not developed in 1950. Further, the Netherlands paper was not published until 2016 – after my thesis was published so it could not have been included in my discussion. The other study that the authors have used to support their claim that 16**

vaccines are necessary in Australia is a study from Gambia in 2005 of the *pneumococcal vaccine*. This paper doesn't provide evidence to support the claim that 16 vaccines are necessary for community health in Australia.

16. 'HPV vaccine significantly reduced high-grade cervical pre-cancer lesions and had an excellent safety profile but these reviews and the literature they discuss are not referred to in the thesis.'

This claim is false. When my HPV research was published in the *Infectious Agents and Cancer Journal* (2013) the editors ensured that another article written by Hawkes et al (Members of the industry lobby group SAVN) was published at exactly the same time. This paper refuted the evidence-based arguments in my article but the authors did not provide any supportive evidence for their conclusions.

I have provided an analysis of the Hawkes et al paper in Appendix 5 of my thesis and this includes addressing the claim that HPV vaccines reduced high-grade lesions and that HPV vaccines are safe.

17. 'The thesis fails to present a full account of the technical information used to evaluate vaccines for inclusion on the Australian national schedule.'

I wrote many letters to the Health Department, the Human Rights Commissioner, the Chief Medical Officer and the Health Ministers requesting the evidence that they have used for a systematic risk assessment of vaccines. On all occasions this resulted in a standard letter of response stating 'vaccines are safe and effective'. Many of these letters are published on my website. Further, Peter McIntyre and Julie Leask declined to present this information when asked to attend a Q and A at a public forum at the University of Technology Sydney (UTS) in October 2015. Hence the suggestion by *Wiley et al* that I should have interviewed ATAGI representatives to get this information is of note because it shouldn't have been necessary – the information should have been provided to me on request. Interviewing government bodies involves applying for ethics approval and this is time consuming and often denied when governments do not want to provide the evidence to the public. I consulted with several public health experts, epidemiologists and HPV researchers before my thesis was submitted for examination.

18. 'The author of the thesis has put herself forward as an expert witness in legal proceedings where parents are in dispute over the need for their children's immunisation by positioning her status as a PhD graduate to assert expert status.'

***Wiley et al* have used a newspaper article that provides false information about my qualifications to support this claim. In addition, Peter McIntyre, one of the authors of**

this critique, was involved in the court case mentioned in the article and he is quoted in the article providing false information about my qualifications and research [1]. This newspaper article was based on the leaking of my confidential affidavit that was still due to be heard in the Federal Circuit Court. This is a federal crime and it was the government's team in this court case that leaked the document to the media with false information to prevent the evidence from being debated in the courts.

19. 'Those looking for balanced information about immunisation deserve a balanced critique of this thesis to aid them in their decision-making. We believe our critique serves as an accessible, objective and fair appraisal of the thesis, allowing valid assessment of its author.'

This claim is written by prominent members of the NCIRS who are defending their decisions for Australia's vaccination policy over the last two decades. They have provided false information about the aims and objectives of my research and misrepresented the main arguments in their critique and title for the paper. They have also made unsupported allegations about the rigour of the thesis and suggested that they have provided a 'valid' and 'objective' assessment of the quality of the thesis even though my research has been approved by a highly respected university and examined by international experts in Social Sciences with expertise in the design of global health policies.

It is the NCIRS that should have provided the technical information that they claim is missing from my PhD and it is in their interest to denigrate my research because they could not provide the evidence that supports the mandating of 16 vaccines in social services policy. For many Australians this policy means that using 16 vaccines is not a choice because they cannot earn a living without childcare services or support their families without government welfare benefits.

Peter McIntyre, the former director of the NCIRS and one of the authors of this critique of my PhD thesis has not provided the following evidence to support mandatory vaccination with 16 vaccines:

Five essential questions that the Australian government has not answered: -

1) What are the statistics of **vaccinated** and **unvaccinated** children in Australia per year i) getting each of the 16 infectious diseases and ii) dying of these 16 infectious diseases?

2) Which communities have used these 16 vaccines with a 95% uptake rate to control these diseases?

3) What statistics can you provide that show that the overall health of Australian children (chronic illness and other diseases) has improved since 1990 when the vaccination program expanded?

4) i) Are politicians and doctors informed of the ingredients of the 16 vaccines and the serious adverse-events that the pharmaceutical companies have associated with vaccines for six decades? (coincidence is not an *evidence-based response*).

ii) Do politicians and doctors provide this information to the public and patients in a transparent manner before they recommend vaccines to the community?

5) i) What percentage of Australian children will **die** or **be harmed by** this policy because of the known side-effects of the chemicals in the vaccine and the hidden effects that occur in individuals due to their genetic make-up?

ii) What AE's have you included in this risk assessment and how did you arrive at this risk assessment?

Until this evidence is provided there is no justification to mandate any vaccine in the Australian community and these questions provide a very good motive for Peter McIntyre to want to denigrate my independent research on government vaccination policies.

Reference:

1. Newsletter 211 A Lack of Integrity in Australian Journalism and Government Vaccination Policies