

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**  
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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 19<sup>1</sup>. 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?

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<sup>1</sup> (<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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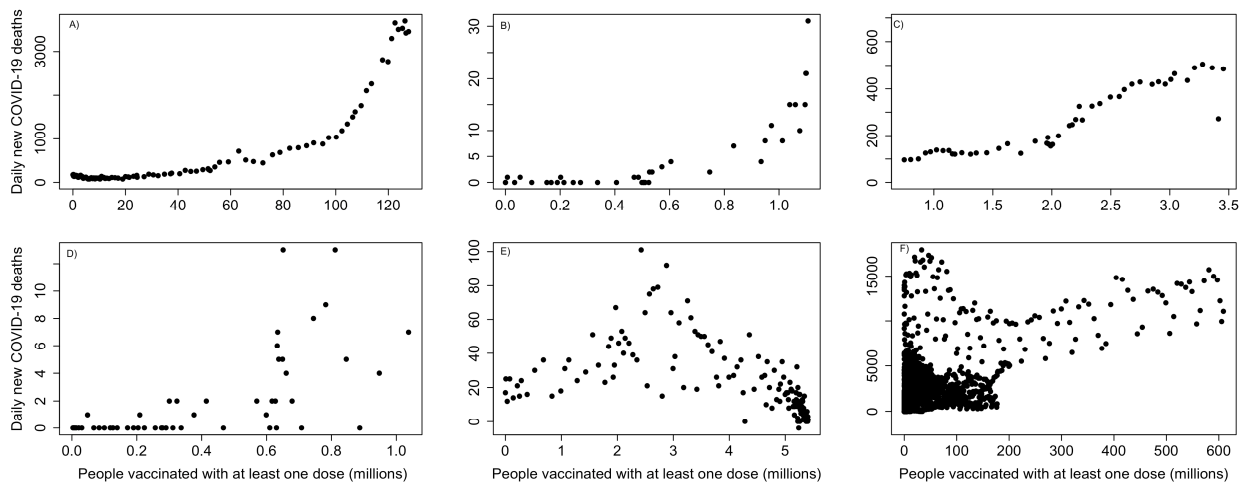
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 382 Figure 1. Number of new COVID-19 deaths in relation to number of people that have received at  
 383 least one vaccine dose for selected countries. Graph shows data from the start of vaccination to  
 384 May 3<sup>rd</sup>, 2021. A) India (9.25% 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>.