**UK Government Covid Status Certification Public Consultation – deadline Monday 29th March**

**Website for details of Consultation:** [**https://www.gov.uk/government/consultations/covid-status-certification-review-call-for-evidence**](https://www.gov.uk/government/consultations/covid-status-certification-review-call-for-evidence)

**Please send your response to: certification.cfe@cabinetoffice.gov.uk**

The UKMFA has put together a list of some of the medical, ethical, legal, and societal issues that relate to Covid Status Certification – Covid-19 vaccine status and/or test status. Please personalise your email and use the suggestions below to help you write your response. Please express your concerns and the effect that Covid Status Certificates would have on your life. It does not have to be a long email.

**Covid Status Certification – Medical Concerns**

**WHO statement** 15 January 2021 - WHO is opposed to the introduction of "vaccine passports" against COVID-19 as a condition for international travel, 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"** [[1]](#footnote-1).

**Questions over effectiveness of currently available Covid-19 vaccines**

* Currently **no peer-reviewed 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[[2]](#footnote-2). Therefore, the Covid-19 vaccines have not been shown to have a wider public health benefit beyond the vaccinee[[3]](#footnote-3).
* 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[[4]](#footnote-4).
* There is evidence that **naturally acquired immunity from Covid-19 is long-lasting**[[5]](#footnote-5) [[6]](#footnote-6), yet ‘Immunity Passports’ are only proposed for vaccinated individuals and not those who have had Covid-19 and have natural immunity. This is discriminatory and absurd.

**Safety of currently available Covid-19 vaccines**

* **Covid-19 vaccines are still experimental** and under emergency-use authorisation. Clinical safety trials will not be completed until the beginning of 2023.
* 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.
* 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.
* Since Covid-19 vaccine rollout began in December 2020, there already have been **thousands of reports of serious adverse events and deaths** to the VAERS Database in the US[[7]](#footnote-7), the Eudravigilance Database in Europe[[8]](#footnote-8) and the MHRA in the UK[[9]](#footnote-9).
* 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**[[10]](#footnote-10). This possibility has not been ruled out and is a known and accepted risk to those who accept the vaccines.
* 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 and for which the long-term safety profile is unknown.

**Unlawful treatment and Discrimination Issues**

* People unable or unwilling to have Covid-19 tests or vaccines, which are both medical procedures/interventions requiring fully informed consent, will not be able to “prove” their health status, thus having their **basic freedoms de facto restricted**. Further, many people may be unable to have the Covid-19 vaccines for reasons that would be covered by the Equality Act 2010 and would thus suffer both direct and indirect discrimination.
* Covid Status Certification risks enshrining such discrimination and unlawful treatment in law and **undermines the right to health, of individuals and the population**[[11]](#footnote-11).
* Covid Status Certification vulnerable to corruption and implicit bias. It 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 this measure could **disproportionately segment society and breach rights to equality and non-discrimination**.
* 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**”[[12]](#footnote-12).
* Labelling people based on their Covid-19 immunity status **may exacerbate conflict between groups of citizens** with potential for violence and breakdown of society.
* In workplaces, there is a serious risk that **social and financial inequalities may be amplified** under a system that disenfranchises unvaccinated employees. If a Covid Certification Status requirement 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 Status Certification**

* The International Health Regulations (IHR) 2005 prohibit health measures that are discriminatory and impede international travel[[13]](#footnote-13). **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**[[14]](#footnote-14).
* The **Parliamentary Assembly of the Council of Europe** passed Resolution number 2361 of 2021 on 27 January 2021[[15]](#footnote-15), 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, 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[[16]](#footnote-16).
* Covid Status Certification will lead to “**implicit coercion**” to medical treatment. 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 any form of Covid Status Certification**.

**Conclusions**

* Urge the Government to have confidence in the Covid-19 vaccines’ ability to protect the vulnerable (which was the stated Government policy and plan), and to now allow a return to individual responsibility for one’s own health.
* All vulnerable groups will have been offered the opportunity to be fully vaccinated within the next few weeks, which the Government states will reduce deaths and hospital admissions from Covid-19 by 95%, and the rest of the population will have the opportunity to have the vaccine if they wish to.
* It must remain the right of the individual to determine whether they wish to have the Covid-19 vaccine, thus following the requirement of informed consent which is enshrined in English Law and as recommended by the European Council.
* It is disproportionate and unnecessary to go down the route of further draconian restrictions and loss of freedoms that any sort of formal Covid Status Certification 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 requirements in the future, to be able to enjoy basic human freedoms of movement and association.
* Covid Status Certification has no place in a democratic and free society and would be a profoundly illiberal, undemocratic, unlawful, and un-British policy and a step down the path towards totalitarianism.

1. [https://www.euronews.com/2021/01/15/coronavirus-who-against-vaccine-passports-as-a-condition-for-travel-for-the-time-being](about:blank) [↑](#footnote-ref-1)
2. [https://www.bmj.com/content/371/bmj.m4037](about:blank) [↑](#footnote-ref-2)
3. [https://www.bbc.com/future/article/20210203-why-vaccinated-people-may-still-be-able-to-spread-covid-19](about:blank) [↑](#footnote-ref-3)
4. [https://www.cdc.gov/coronavirus/2019-ncov/vaccines/faq.html](about:blank) [↑](#footnote-ref-4)
5. [https://www.nature.com/articles/s41586-021-03207-w](about:blank) [↑](#footnote-ref-5)
6. [https://www.medscape.com/viewarticle/944086](about:blank) [↑](#footnote-ref-6)
7. [https://medalerts.org/vaersdb/findfield.php?TABLE=ON&GROUP1=AGE&EVENTS=ON&VAX=COVID19&DIED=Yes&fbclid=IwAR2g1T6xr\_sOj6oi2EayTTkUalVmqPzHzmqyCkwNNzRzmKAm755cDZCM92w](about:blank) [↑](#footnote-ref-7)
8. [https://reseauinternational.net/la-base-de-donnees-europeenne-des-rapports-deffets-indesirables-indique-que-le-vaccin-pfizer-pourrait-avoir-cause-438-deces-a-ce-jour-en-europe/](about:blank) [↑](#footnote-ref-8)
9. [https://www.gov.uk/government/publications/coronavirus-covid-19-vaccine-adverse-reactions](about:blank) [↑](#footnote-ref-9)
10. [https://www.onlinelibrary.wiley.com/doi/10.1111/ijcp.13795](about:blank) [↑](#footnote-ref-10)
11. [https://medicalxpress.com/news/2020-05-immunity-passports-vaccination-certificates-covid-.html](about:blank) [↑](#footnote-ref-11)
12. [https://www.independent.co.uk/news/uk/politics/covid-vaccine-passport-coronavirus-b1792752.html](about:blank) [↑](#footnote-ref-12)
13. [https://www.who.int/ihr/9789241596664/en/](about:blank) [↑](#footnote-ref-13)
14. [https://www.who.int/publications/i/item/9789241580410](about:blank) [↑](#footnote-ref-14)
15. [https://pace.coe.int/en/files/29004/html](about:blank) [↑](#footnote-ref-15)
16. [http://portal.unesco.org/en/ev.php-URL\_ID=31058&URL\_DO=DO\_TOPIC&URL\_SECTION=201.html](about:blank) [↑](#footnote-ref-16)