

NVIC Public Comment
National Vaccine Advisory Committee – Sept 21, 2023
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My name is Theresa Wrangham, and I'm the Executive Director of the National Vaccine Information Center. Our mission is to prevent vaccine injury and death through public education and to defend the informed consent ethic and U.S. vaccine laws and policies. Our co-founders worked with Congress at their invitation to draft and pass the National Childhood Vaccine Injury Act of 1986.

In viewing today's recommendations from the vaccine safety report passed today, it seems notable that the report appears to have the expectation for the public to comply with recommendations without participation in the framing of the report from a consumer perspective. The agenda of vaccine compliance appears to undermine the human and informed consent right to decline vaccines without coercion and penalty.

NVAC also has concerns about the lack of diversity and voices with respect to vaccination presentations today. Where are the healthcare professionals and advocacy groups speaking on behalf of the growing section of the population who have legitimate vaccination concerns?

The answer is they've been censored, canceled, and ignored. The vaccine concerns voices now go far beyond a parent base to include many mainstream healthcare professionals and academics who, previous to COVID-19, were your trusted messengers. They now hold many of the concerns that our organization expressed early in our 40-year history.

Additionally, claims of responsiveness ring a bit hollow when considering that today's presentations do not appear to be responsive to the IOM 2005 report on public trust and VSD studies. The IOM found in 2005 that the public had legitimate concerns about VSD studies and made recommendations that the data-sharing program needed to be improved and datasets opened up to independent researchers to either confirm CDC MDSD partner findings with the ability to audit and pose alternative hypotheses to maintain public trust.

Other systems, such as CISA that are also used in a similar fashion as VSD for making vaccine safety statements, should also be subject to the same scientific rigor by independent researchers.

But the big question with regard to responsiveness to public concerns would be which white paper studies have followed the IOM 2005 recommendations and undergone the independent scientific rigor recommended by the IOM? Have these recommendations been similarly applied to other vaccine safety monitoring systems?

While this committee doesn't answer questions from public comments, certainly answering these questions with respect to your charge is necessary.

Without a diversity of viewpoints in these meetings, independent research, and actual work to build back trust with the public, today's proudly pro-vax presentation and the building confidence presentation equate to little more than one hand clapping in a pro-vax echo chamber.

NVIC has advocated for increased vaccine safety and high-quality independent vaccine safety studies. NVIC has been a voice of legitimate vaccine safety concerns for over 40 years and has a history of working with the government and has sat on these committees to achieve these goals, while also advocating for vaccine policies and laws to incorporate informed consent principles.

The informed consent ethic has guided the ethical practice of modern medicine born from unethical medical experimentation conducted during World War II. Informed consent protections must be incorporated into all recommendations by the NVAC or we turn away from the ethical practice of medicine and the ethical requirement for consent to be strictly voluntary, and without coercion and penalty. Vaccination is not an exception to foundational medical ethic.

While NVIC supports access to vaccines, trust will not be earned through the silencing of those with concerns, or coercion and mandates to accomplish compliance in violation of the informed consent ethic.

Thank you for the opportunity to provide public comment today.