

I oppose the introduction of COVID-status certification on the basis that such a document is illegal and in contradiction to the Medical Ethics outlined in the Nuremberg Code. Such a document will also be in breach of our inalienable human rights. While the stated intent of the certification is to facilitate travel during the so called COVID-19 pandemic, I fear it will do the exact opposite: it will stifle travel and human interaction.

I am extremely concerned about the how the proposed certification will affect all travel to any destination in the world, for UK citizens and others alike, requiring individuals to prove receipt of an experimental vaccine or submission to experimental testing.

The proposal's premise is that it will prevent transmission of SARS-Cov-2 but it is on shaky scientific and legal ground and requires in-depth debate for the reasons listed below.

1. There is No Proof that Vaccination Blocks Transmission of SARS-CoV-2.

The European Medicines Agency ([EMA](#)) has repeatedly stated that there is [no data proving](#) that [COVID-19 vaccines block transmission of the coronavirus](#). For this reason, vaccinated individuals must continue to maintain social distancing and mask wearing.

While the EMA hopes vaccines will reduce COVID, the reverse may occur; mass vaccination may increase disease spread. This was the case with the Dengvaxia vaccine in the Philippines, as the World Health Organization (WHO) [Vaccine Safety Summit detailed in 2019](#). Independent scientists assessing results in Israel and the United Kingdom question the success of [mass vaccination](#). As coronaviruses are constantly mutating, the effectiveness of these novel vaccines against new variants is doubtful.

2. PCR Tests Are Unreliable Public Health Measures.

While PCR tests may be able to diagnose a sick person in a short time window, they have almost no relevance for those who show no symptoms of illness. Positive PCR tests do not confirm illness or contagiousness and many result in 'false positive cases'.

A recent review in the medical journal *The Lancet* estimated that isolation of false positive cases is "a net loss to the health, social and economic wellbeing of communities" and concluded that "[PCR testing is therefore not the appropriate gold standard for evaluating a SARS-CoV-2 public health test.](#)"

In January 2021, the WHO released [new guidance on PCR tests](#), also warning of the danger of false positive results: "as disease prevalence decreases, the risk of false positive increases."

The UK should stop testing healthy people and use those resources for treatment.

3. The Status Certification is Legally Disproportionate.

The proposed certification infringes fundamental human rights, including rights to travel, assembly, privacy, conscience and free and informed consent. Recent scientific studies cast [serious doubt on the effectiveness of draconian measures](#) to limit disease spread, including travel restrictions and lockdown measures.

Implementing the proposed certification will require massive resources without a well-founded expectation of success. Investment in hospitals and protections for those at risk would be more effective and economical. At the very least, a cost–benefit analysis and debate are absolutely necessary.

4. The Government Must Apply the Precautionary Principle.

COVID-19 vaccines have received only conditional approval; clinical trials will not be complete for months or years. Demanding that UK citizens and visitors be subject to experimental medical products to exercise fundamental rights violates the precautionary principle enshrined in Article 191 of the [Treaty of Functioning of the European Union](#). I believe that the UK government has not rescinded support for the Treaty.

How these vaccines will affect people in coming months or years is unknown. The risk of Antibody Dependent Enhancement (ADE) is real, i.e. that vaccinated individuals exposed to new viral strains may be at *increased risk* compared to those who have not been vaccinated. This potentially lethal risk is well-known to vaccine experts and is one of the main reasons why vaccine manufacturers refuse to accept liability for future injuries and deaths.

Several COVID-19 vaccines are based on a novel gene technology never used in healthy individuals before. Manufacturers side-lined the risks in modifying the human genome and triggering autoimmune diseases in the headlong rush to release the vaccines. On July 15, 2020, the European Parliament voted to waive the [risk assessment](#) for these vaccines under the [Genetically Modified Organism \(GMO\) Regulation](#). Prominent scientists and doctors recently addressed these concerns in an [open letter to the EMA](#). Further study on the impact of these gene therapies is required before making them compulsory.

5. Vaccine Manufacturers Fail to Warrant Effectiveness or Safety.

[Esteemed Belgium lawyers](#) recently concluded that European governments granted invalid liability and warranty exemptions to COVID-19 vaccine manufacturers. Given the lack of evidence of safety or effectiveness, manufacturers unsurprisingly refuse to guarantee either. The United Kingdom, and ultimately the electorate, will bear the burden of compensating and caring for victims of vaccine injury.

6. Inadequate Guarantee of Data Privacy.

Although the proposed regulation states that the government will protect medical data, there is little to guarantee this protection. These medical data may be used to discriminate against individuals in violation of fundamental rights and freedoms.

7. Risk of Type Replacement and Viral Mutation.

Mass vaccination with imperfect vaccines – and none of the available vaccines is perfect – may lead to type replacement and viral mutation. It may well be vaccinated individuals, not unvaccinated ones, that pose the greatest risk of new, more virulent types of coronavirus infection. The classic example of this kind of type replacement occurred with widespread use of the pertussis vaccine, which led to new viral mutations that [the existing vaccine did not block](#). In other words, it is unclear that mass vaccination will lead to an end to the coronavirus crisis.

8. Risk that Certification Becomes Permanent Without Due Consideration.

While the Parliament considers the proposed certification as a temporary measure, it is unlikely to be so. Such restrictions usually become permanent, making the need for robust debate the more important. Could more vaccines be required under the proposed certification at a later date? Why should the Director-General of the World Health Organization have the power to make decisions about them? The long-term implications of the proposed certification require deliberation.

9. The UK Government Must Uphold Democratic Values.

Too often since the beginning of the coronavirus health emergency, numbers have ruled instead of the rule of law. Small coteries of experts interpreting numbers have set policy instead of democratic legislatures and civil society. Numbers and studies are too often tailored to serve those who produce them. The UK cannot thrive if it relies on mathematical models to the exclusion of human models. The Parliament is entrusted to uphold democratic values.

Please take these points above into consideration and require open debate and analysis before you take further action on the proposed certification.

The citizens of the UK and the world are watching you — our liberty and security are in your hands. Do not let us down! Do not put the future of the United Kingdom in jeopardy by desecrating one of its most fundamental principles: free movement within the Schengen Area and throughout the world.

Yours sincerely,

Fergal Kearney
Company Director
InSite Tours Ireland