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Ref: Docket: CDC-2012-0010
Influenza Viruses Containing the
Hemagglutinin from the Goose/
Guangdong/1/96 Lineage

**A submission to the
Centers for Disease Control and Prevention (CDC),
Department of Health and Human Services (HHS)
re Opposition to Lab-engineering of Potentially Lethal Pathogens**

cc: Paul Keim and Michael Osterholm, NSABB
Anthony Fauci, National Institute of Allergy and Infectious Diseases,
National Institutes of Health
Ron Fouchier and Ab Osterhaus, Erasmus MC
Yoshihiro Kawaoka, University of Wisconsin-Madison
Peter Palese, Mount Sinai School of Medicine
Tom Jefferson, Cochrane Vaccines Field
Philip Campbell, Nature
Bruce Alberts and Caroline Ash, Science
Fiona Godlee and Deborah Cohen, British Medical Journal

I take this opportunity to register my opposition to lab-engineering of potentially lethal pathogens.

This research pushes the limits of legitimate scientific enquiry and risks global public safety. For example, it is pertinent to note that there were [395 biosafety breaches](#) in the United States between 2003 and 2009 – including seven laboratory-acquired infections – that risked accidental release of dangerous pathogens from high-containment labs.¹

In regards to this matter, please refer to my open letter dated 31 January 2012 re the political and ethical implications of lethal virus development, addressed to Paul Keim of the National Science Advisory Board for Biosecurity (NSABB). The letter is accessible on the internet via this link: <http://bit.ly/AfyAtQ>

On the subject of H5N1, the US National Institutes of Health should be brought to account for funding research into making H5N1 more transmissible. As I ask in [my letter to the NSABB](#), noted above, is the US breaching the [Biological Weapons Convention](#)² by sponsoring the development of a potentially lethal flu virus?

Likewise I question the behaviour of the scientist, Ron Fouchier, who “mutated the hell out of H5N1” and admitted he did something “[really, really stupid](#)” when the mutated H5N1 was put into the nose of one ferret, and then transferred to others.³

When Fouchier did something “really, really stupid”, did he pause and think about the ethics of the situation? Did he fully consider the possible consequences of the dual-use research he was undertaking? Did he think about “[the social responsibility of science and scientists](#)”⁴? I suspect not.

At the European Scientific Working group on Influenza meeting in Malta in September 2011, Fouchier beat up the results of his research, saying “[this is a very dangerous virus](#)”.⁵ Subsequent to the furore surrounding his controversial research, Fouchier did a 180 degree turnaround on his claims about the lethality of his lab-engineered virus. Apparently the virus he created was neither as contagious nor as dangerous as people had been led to believe.^{6 7 8 9 10}

It seems to me there is much fear-mongering in the flu vaccine industry, a matter I touch upon in my [letter to the NSABB](#) mentioned above. There are also potential conflicts of interest.

There are forces working very hard to set up a massive international vaccines market in developed and developing countries, and I am not convinced all these vaccine products are justifiable.¹¹ Relationships between the pharmaceutical industry and organisations such as the World Health Organisation, Centers for Disease Control and Prevention, National Institutes of Health and others, plus governments, should be subjected to scrutiny.

For example, I am sceptical about the World Health Organisation’s Pandemic Influenza Preparedness (PIP) Framework¹² and [Novartis Vaccines and Diagnostics’ option](#) to “produce enough vaccines to protect the 7 billion people on our planet”.¹³ Given the experience of the 2009 influenza A/H1N1 pandemic which proved to be such a “[damp squib](#)”¹⁴ it appears to be very questionable to be investing enormous sums in flu vaccines.

Who can we trust to objectively investigate this matter and protect the best interests of the public?

Elizabeth Hart

References:

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<http://www.nature.com/news/fears-grow-over-lab-bred-flu-1.9692>

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<http://www.armscontrol.org/treaties/bwc>

³ Katherine Harmon. What Really Happened in Malta This September When Contagious Bird Flu Was First Announced. Scientific American. December 30 2011: <http://blogs.scientificamerican.com/observations/2011/12/30/what-really-happened-in-malta-this-september-when-contagious-bird-flu-was-first-announced/>

⁴ Stanley Falkow. The Lessons of Asilomar and the H5N1 “Affair”. mBio. September/October 2012. Vol. 3 Issue 5 e00354-12: <http://mbio.asm.org/content/3/5/e00354-12>

⁵ *Ibid.*

⁶ Robert Roos. With new data, NSABB may revisit H5N1 studies. CIDRAP News, February 29, 2012:

<http://www.cidrap.umn.edu/cidrap/content/influenza/panflu/news/feb2912forum.html>

⁷ Editorial. The Truth About the Doomsday Virus? The New York Times, March 3, 2012:

http://www.nytimes.com/2012/03/04/opinion/sunday/the-truth-about-the-doomsday-virus.html?_r=0

⁸ Denise Grady. Genetically Altered Bird Flu Virus Not as Dangerous as Believed, Its Maker Asserts. The New York Times, February 29, 2012:

<http://www.nytimes.com/2012/03/01/science/maker-says-bird-flu-virus-not-as-dangerous-as-thought.html>

⁹ Jason Tetro. The Hyperbole That Caused Global H5N1 Hysteria. The Huffington Post, Canada. Posted: 06/22/2012:

http://www.huffingtonpost.ca/jason-tetro/h5n1-virus_b_1616055.html

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¹¹ For example “Is universal HPV vaccination necessary?”

http://users.on.net/~peter.hart/Is_universal_HPV_vaccination_necessary.pdf

¹² WHO Pandemic Influenza Preparedness (PIP) Framework: <http://www.who.int/influenza/pip/en/>

¹³ Rino Rappuoli and Philip R. Dormitzer. Influenza: Options to Improve Pandemic Preparation. Science. Vol. 336. No. 6088 pp. 1531-1533: <http://www.sciencemag.org/content/336/6088/1531.full.pdf>

¹⁴ Fiona Godlee, Editor in Chief. Editorial. Conflicts of interest and pandemic flu. British Medical Journal. 2010;340:c2947: <http://www.bmj.com/content/340/bmj.c2947>