

[Skip to content](#)

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Health Care Complaints Commission



HomeHearings & decisionsPublic statements and warnings

Public statement – warning about the Australian Vaccination-skeptics Network, Inc. ('AVN'), formerly known as Australian Vaccination Network Inc.

30 Apr 2014

The NSW Health Care Complaints Commission has completed an investigation into the Australian Vaccination-skeptics Network, Inc. ('AVN'), formerly known as Australian Vaccination Network Inc and under section 94A(1) of the *Health Care Complaints Act* has decided to make the following public statement and warning.

AVN was established in 1994 in New South Wales by a group of people concerned about the lack of scientifically-based information cautioning against vaccination. AVN states on its website that the government and the medical community, in general, “exaggerate the safety and benefit profiles of vaccinations whilst downplaying their risks.” AVN states it was formed with the purpose of:

- providing medically-referenced information on vaccine safety and effectiveness
- lobbying to ensure that vaccinations are never made compulsory for Australian children
- supporting those who have chosen not to vaccinate or to vaccinate selectively.

AVN disseminates information to the public via a variety of mediums. These include its website, www.avn.org.au, the magazine entitled 'Living Wisdom' (which ceased publication in January 2013), its Facebook page, Twitter account and YouTube. Meryl Dorey, the former President, has also held a number of radio interviews.

The Commission investigated whether information published and disseminated by AVN may be misleading or inaccurate. The investigation focussed on information provided on AVN's website and some information disseminated on AVN's Facebook page.

The investigation found that AVN provides information on vaccination that is misleading to the average reader because it is either incorrect, inaccurately represented or because it has been taken out of context. Specifically:

- AVN makes specific assertions about the efficacy of the Gardasil vaccine used to prevent cervical cancer caused by the Human Papillomavirus (HPV). It states that:
 - the connection between HPV and cervical cancer is tenuous at best and incomprehensive at worst
 - the vaccine contains only four of the 100 strains of HPV and therefore its use is a “shot in the dark”
 - it is an experimental vaccine with no proven record of safety or effectiveness.
- AVN does not qualify that:
 - Gardasil contains the four strains of HPV that have the greatest potential to cause cancer
 - the link between HPV and cervical cancer has been established beyond reasonable doubt
 - significant research went into assessing the probable safety and efficacy of Gardasil before it was ever used in humans

- since its use, extensive worldwide data on its safety and efficacy has been collected supporting its safety.
- AVN asserts that the pertussis vaccine used to prevent whooping cough cannot protect against a new strain of pertussis, and that 84% of cases in the community are caused by this new strain. Further, AVN claims that the administration of the new acellular vaccine sometimes requires surgery at the injection site and attributes this as the reason for the change in the vaccination schedule with the removal of the 18-month booster. It is incorrect to state that the vaccine cannot offer any protection against the new strain; and there is no evidence of severe local reactions to the administration of the acellular vaccine that requires surgical intervention at the injection site. Further, the removal of the 18-month booster dose from the vaccination schedule was based on a study that evidenced protection from pertussis was maintained until six years of age when the primary vaccine course is given at two, four and six months of age.
- In relation to Diphtheria-Tetanus-Pertussis (DTP) vaccines AVN asserts that “all whole cell DTP vaccines contain mercury in the form of thiomersal” and that it is one of the most toxic substances known to man and has been linked with autism. In the past, the whole cell DTP vaccine used in Australia did contain thiomersal, however even if the maximum possible number of doses were given, it is unlikely that the World Health Organisation’s (WHO) recommended limit of exposure per kilogram of body weight would have been exceeded. In 2012, the WHO’s Global Advisory Committee on Vaccine Safety reviewed available information on the safety of thiomersal and concluded that the levels of thiomersal attained in the body from cumulative doses of vaccines do not reach toxic levels, making a causal association between thiomersal in vaccines and autism implausible. Further, thiomersal is not present in any of the vaccines on the current National Immunisation Program for young children.
- AVN states that many of the Anti-D injections recommended for pregnant women with a negative blood group who have babies with a positive blood group, and that prevent the mother’s immune system from making antibodies to the baby’s positive cells thus preventing harm to the baby, contain thiomersal. They also state that late cord clamping and lotus birth minimises or completely eliminates the exchange of blood after birth. The Anti-D injections used in Australia are made from Australian plasma and are free from thiomersal. Further, late cord clamping and lotus birth do not completely eliminate the exchange of blood after birth; there can still be contamination of the maternal system by foetal blood. There is also an increased risk of post-partum haemorrhage and foetal jaundice.
- AVN provides links on its website to 68 journal studies that AVN states support the alleged vaccine/autism causation. However, the studies mostly describe an association between autism or other neurological disorders with vaccines or other environmental exposures, but they make no claim of causality. The subject of any link between vaccines and autism has been examined by a number of expert professional groups, including the Institute of Medicine, none of which have substantiated any link. A study carried out by the Institute of Medicine in 2011 rejects a causal relationship between the measles, mumps and rubella (MMR) vaccine and autism.
- AVN states that “vaccine ingredients” and “vaccines” have never been tested, either individually or in combination. This statement is incorrect as all vaccines available in Australia must pass stringent safety testing before being approved for use by the Therapeutic Goods Administration (TGA). This testing is required by law and is usually done over many years during the vaccine’s development. There is also ongoing review of both vaccine safety and efficacy through post-marketing clinical trials and surveillance of disease and vaccine adverse events. This includes multivalent vaccines and the administration of more than one vaccine at a time. Further, much of the understanding of the safety of vaccine components comes from the use of the components and their lack of association over many years with reported significant adverse events. For components such as mercury and aluminium, conservative safety limits at most ages have been published by a number of reputable agencies, including the Environmental Protection Agency (USA) and the WHO.
- AVN uses data from the United States Vaccine Adverse Event Reporting System (VAERS) on its website, without qualifying that no cause-and-effect relationship has been established. This is because

VAERS collects data on any adverse event following vaccination and it is specifically stated that any report of an adverse event to VAERS is not a causal link that a vaccine caused the event.

- On the AVN website there is the headline 'Nurses don't trust vaccines', under which an article from the Vaccine journal about a study conducted into the low rates of vaccinations among nurses who treat infants is referenced. AVN summarised the study conducted as conveying that a large number of nurses are saying no to vaccination because they don't trust the way in which vaccines have been promoted. The study was performed on a small group of 25 nurses in Israel. Due to the small sample size and unique context under which the study was conducted, the results cannot be generalised without caution. The authors of the article "suggest" that low rates of vaccinations among nurses in Israel who treat infants are "embedded deep in the mistrust nurses have towards health authorities and the nurses' desire for autonomy".

Warning

The Commission has established that AVN does not provide reliable information in relation to certain vaccines and vaccination more generally. The Commission considers that AVN's dissemination of misleading, misrepresented and incorrect information about vaccination engenders fear and alarm and is likely to detrimentally affect the clinical management or care of its readers.

Given the issues identified with the information disseminated by AVN, the Commission urges general caution is exercised when using AVN's website or Facebook page to research vaccination and to consult other reliable sources, including speaking to a medical practitioner, to make an informed decision.

The Commission has recommended that AVN amend its published information with regard to the above issues and the Commission will monitor the implementation of these recommendations.

Further Information

Read the related [media release](#).

For further information, contact the the Health Care Complaints Commission on 9219 7444 or send an email to media@hccc.nsw.gov.au.

The information in this media release is correct at the time of publication. Orders may change; for example, conditions may no longer apply. For current information, please [contact the Commission](#).

Footnotes:

1. WHO is the directing and coordinating authority for health within the United Nations system. It is responsible for providing leadership on global health matters, shaping the health research agenda, setting norms and standards, articulating evidence-based policy options, providing technical support to countries and monitoring and assessing health trends.
2. GACVS was established in 1999 by the World Health Organisation to respond promptly, efficiently, and with scientific rigour to vaccine safety issues of potential global importance. Its members are acknowledged experts from around the world in the fields of epidemiology, statistics, paediatrics, internal medicine, pharmacology and toxicology, infectious diseases, public health, immunology and autoimmunity, drug regulation and safety.
3. The United States Institute of Medicine is an independent, non-profit organisation that works outside of government to provide unbiased and authoritative advice to decision-makers and the public. It was established in 1970 and it is the health arm of the National Academy of Sciences.
4. Baron-Epel et al. (2012). What lies behind the low rates of vaccinations among nurses who treat infants? *Vaccine*, 30, 3151-3154.