

Ms Lizzie Blandthorn MP, Chair
Scrutiny of Acts and Regulations Committee

2 October 2015

Dear Minister,

Re: Objection to Public Health and Wellbeing Amendment (No Jab, No Play) Bill 2015

I am writing to you to express my concerns around the recommendation to make eligibility for childcare, preschool and kinder conditional on full immunisation. It is my view that attaching an immunisation requirement (without exemptions) to enrolment, constitutes a de facto vaccination mandate, because for many families, these are essential services. As such I am stridently opposed to such a draconian requirement.

In the event the government chooses to implement the immunisation requirement, I submit that such a requirement be subject to the following exemptions:

- a) Medical contraindication to vaccination; and
- b) Objection to vaccination on the grounds of religious belief; and
- c) Objection to vaccination on moral or philosophical grounds.

These exemptions are uncontroversial, and historically, have been supported by both ALP and LNP governments alike.

The exclusion of unvaccinated children from childcare facilities was considered recently by the Queensland parliament. The Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013 was defeated after a parliamentary committee recommended the Bill not be passed. This recommendation followed extensive consultation with relevant stakeholders and members of the public via submissions. The committee recommended that any future Bill include provision for exemptions to the vaccination requirement (Recommendation 2).

... Any such legislation should include provision for medical exemption and informed conscientious objection (philosophical, religious or medical), with an emphasis on ensuring that parents are provided with education and information on immunisation.

<http://rti.cabinet.qld.gov.au/documents/2014/feb/pmb%20unvaccinated%20children/Attachments/Committee%20Report.pdf>

Unlike the US, Australia does not have a statutory scheme to compensate victims of vaccine injury (as recommended by the WHO). This results in the vaccine recipient bearing all the costs when a

serious injury follows vaccination, with very slim prospects of obtaining compensation via litigation. Without a compensation scheme, there should be no mandate.

Consent must be obtained for any medical procedure, and where there is coercion such as this, any consent obtained is simply not valid. I consider this a breach of human rights. Even if vaccines had a 100% safety and efficacy rate it would still be a breach of human rights to introduce mandatory compliance.

Experts such as the National Centre for Immunisation Research and Surveillance (NCIRS) and the Australian Medical Association (AMA) do not agree with such legislation being passed.

Australia has a high and stable rate of vaccination as shown in the tables at the following link: <http://www.health.gov.au/internet/main/publishing.nsf/Content/cda-cdi3603l.htm>. There is no crisis in vaccination rates. In fact, we have never had higher rates of vaccination. As such, there is absolutely zero imperative for a more coercive policy response requiring vaccination.

Dr Julie Leask, from The National Centre for Immunisation Research and Surveillance, is an outspoken critic of punitive, coercive vaccination policies, which she has claimed, are counter-productive. Vaccine acceptance/hesitancy and risk communication are her special areas of interest and expertise. She strongly favours positive policies to remove structural barriers to vaccination uptake, tailored communication strategies, and professional development and engagement of vaccination providers. We share the view that policy responses which have the aim of increasing vaccination rates should be positive and not coercive.

http://ses.library.usyd.edu.au/bitstream/2123/8960/2/Leask_Nature_accepted.pdf

My husband and I paid over \$60,000 in tax this past financial year. It seems unfair that my children will no longer be able to access these tax-payer funded early childhood services.

In a free and democratic country like Australia, with already high vaccination rates, there is no place for a coercive policy response such as this. If the government is intent on adopting an immunisation requirement for entry to childcare, I strongly urge you to provide for exemptions to this requirement as outlined above.

Yours faithfully

Keelie Reader

