

Annals of Medicine, 2013; 45: 182–193 © 2013 Informa UK, Ltd. ISSN 0785-3890 print/ISSN 1365-2060 online DOI: 10.3109/07853890.2011.645353



REVIEW ARTICLE

Human papillomavirus (HPV) vaccine policy and evidence-based medicine: Are they at odds?

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All drugs are associated with some risks of adverse reactions. Because vaccines represent a special category of drugs, generally given to healthy individuals, uncertain benefits mean that only a small level of risk for adverse reactions is acceptable. Further: more, medical ethics demand that vaccination should be carried out with the participant's full and informed consent. This necessitates an objective disclosure of the known or foreseeable vaccination benefits and risks. The way in which HPV vaccines are often promoted to women indicates that such disclosure is not always given from the basis of the best available knowledge. For example, while the world's leading medical authorities state that HPV vaccines are an important cervical cancer prevention tool, clinical trials show no evidence that HPV vaccination can protect against cervical cancer. Similarly, contrary to claims that cervical cancer is the second most common cancer in women worldwide, existing data show that this only applies to developing countries. In the Western world cervical cancer is a rare disease with mortality rates that are several times lower than the rate of reported serious adverse reactions (including deaths) from HPV vaccination. Future vaccination policies should adhere more rigorously to evidence-based medicine and ethical guidelines for informed consent.

Key words: Cervarix, cervical cancer, Gardasil, HPV vaccines, informed consent, vaccine adverse reactions

Introduction

In 2002 the US Food and Drug Administration (FDA) stated that vaccines represent a special category of drugs aimed mostly at healthy individuals and for prophylaxis against diseases to which an individual may never be exposed (1). This, according to the FDA, places significant emphasis on vaccine safety (1). In other words, contrary to conventional drug treatments aimed at management of existing, oftentimes severe and/or advanced disease conditions, in preventative vaccination a compromise in efficacy for the benefit of safety should not be seen as an unreasonable expectation. Furthermore, physicians are ethically obliged to

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- To date, the efficacy of HPV vaccines in preventing cervical cancer has not been demonstrated, while vaccine risks remain to be fully evaluated.
- Current worldwide HPV immunization practices with either of the two HPV vaccines appear to be neither justified by long-term health benefits nor economically viable, nor is there any evidence that HPV vaccination (even if proven effective against cervical cancer) would reduce the rate of cervical cancer beyond what Pap screening has already achieved.
- Cumulatively, the list of serious adverse reactions related to HPV vaccination worldwide includes deaths, convulsions, paraesthesia, paralysis, Guillain-Barré syndrome (GBS), transverse myelitis, facial palsy, chronic fatigue syndrome, anaphylaxis, autoimmune disorders, deep vein thrombosis, pulmonary embolisms, and cervical cancers.
- Because the HPV vaccination programme has global coverage, the long-term health of many women may be at risk against still unknown vaccine benefits.
- Physicians should adopt a more rigorous evidence-based medicine approach, in order to provide a balanced and objective evaluation of vaccine risks and benefits to their patients.

providean accurate explanation of vaccine risks and benefits to their patients and, where applicable, a description of alternative courses of treatment. This in turn enables patients to make a fully informed decision with regard to vaccination. For example, the Australian guidelines for vaccination emphasize that for a consent to be legally valid, the following element *must* be satisfied: 'it [consent] can *only* be given after the relevant vaccine (s) and their potential risks and benefits have been explained to the individual' (emphasis added) (2). Likewise, the United Kingdom (UK) guidelines pertaining to vaccination practices state that subjects must be given

adequate information on which to base their decision on whether to accept or refuse a vaccine (3). This includes having a clear explanation on vaccine risks and side-effects (3).

Surprisingly, in the United States (US), there are no governmental requirements for informed consent for vaccination (4). Such an omission leaves the door open to a failure to obtain informed consent. Nonetheless, there are regulatory agencies such as the US FDA which are empowered to assure that only demonstrably safe and effective vaccines reach the market. In addition, health authorities (i.e. US Centers for Disease Control and Prevention (CDC)) are expected to provide expert advice concerning the benefits and risks related to particular drugs, including vaccines. When these official bodies are not able to provide their normal regulatory oversight and/or if financial interests take precedence over public health, significant problems in true informed consent guidelines can occur.

What is known about the currently licensed human papillomavirus (HPV) vaccines? What are their benefits, and what are their risks? While medical authorities in a number of countries, including the US, strongly advocate their use, some members of the public have become increasingly sceptical for a variety of reasons. The key question posed by such sceptics is this: Is it possible that HPV vaccines have been promoted to women based on inaccurate information? The present article examines the evidence in order to answer this critical question.

Can the currently licensed HPV vaccines prevent cervical cancer?

Gardasil's manufacturer, Merck, states on their website that 'Gardasil does more than help prevent cervical cancer, it protects against other HPV diseases, too.' Merck further claims that 'Gardasil does not prevent all types of cervical cancer' (5). Similarly, the US CDC and the FDA claim that 'This [Gardasill vaccine is an important cervical cancer prevention tool that will potentially benefit the health of millions of women' (6) and 'Based on all of the information we have today, CDC recommends HPV vaccination for the prevention of most types of cervical cancer' (7). All four of these statements are at significant variance with the available evidence as they imply that Gardasil can indeed protect against some types of cervical

At present there are no significant data showing that either Gardasil or Cervarix (GlaxoSmithKline) can prevent any type of cervical cancer since the testing period employed was too short to evaluate long-term benefits of HPV vaccination. The longest follow-up data from phase II trials for Gardasil and Cervarix are 5 and 8.4 years, respectively (8-10), while invasive cervical cancer takes up to 20-40 years to develop from the time of acquisition of HPV infection (10-13). Both vaccines, however, are highly effective in preventing HPV-16/18 persistent infections and the associated cervical intraepithelial neoplasia (CIN) 2/3 lesions in young women who had no HPV infection at the time of first vaccination (13-15). Nonetheless, although cervical cancer may be caused by persistent exposure to 15 out of 100 extant HPVs through sexual contact (11), even persistent HPV infections caused by 'high-risk' HPVs will usually not lead to immediate precursor lesions, let alone in the longer term to cervical cancer. The reason for this is that as much as 90% HPV infections resolve spontaneously within 2 years and, of those that do not resolve, only a small proportion may progress to cancer over the subsequent 20-40 years (10,11,16-18). Moreover, research data show that even higher degrees of atypia (such as CIN 2/3) can either resolve or stabilize over time (19). Thus, in the absence of long-term

follow-up data, it is impossible to know whether HPV vaccines can indeed prevent some cervical cancers or merely postpone them. In addition, neither of the two vaccines is able to clear existing HPV-16/18 infections, nor can they prevent their progression to CIN 2/3 lesions (20,21). According to the FDA, 'It is believed that prevention of cervical precancerous lesions is highly likely to result in the prevention of those cancers' (emphasis added) (22). It would thus appear that even the FDA acknowledges that the long-term benefits of HPV vaccination rest on assumptions rather than solid research data.

Gardasil and Cervarix: do the benefits of vaccination outweigh the risks?

Currently, governmental health agencies worldwide state that HPV vaccines are 'safe and effective' and that the benefits of HPV vaccination outweigh the risks (6,23,24). Moreover, the US CDC maintains that Gardasil is 'an important cervical cancer prevention tool' and therefore 'recommends HPV vaccination for the prevention of most types of cervical cancer' (6.7). However, the rationale behind these statements is unclear given that the primary claim that HPV vaccination prevents cervical cancer remains unproven. Furthermore, in the US, the current age-standardized death rate from cervical cancer according to World Health Organization (WHO) data (1.7/100,000) (Table 1), is 2.5 times lower than the rate of serious adverse reactions (ADRs) from Gardasil reported to the Vaccine Adverse Event Reporting System (VAERS) (4.3/100,000 doses distributed) (Table II). In the Netherlands, the reported rate of serious ADRs from Cervarix per 100,000 doses administered (5.7) (Table II) is nearly 4-fold higher than the age-standardized death rate from cervical cancer (1.5/100,000) (Table I).

Although it may not be entirely appropriate to compare deaths alone from cervical cancer to serious ADRs from HPV vaccines, it should be re-emphasized that (in accordance with FDA guidelines) the margin of tolerance for serious ADRs for a vaccine with uncertain benefits needs to be very narrow, especially when such vaccine is administered to otherwise healthy individuals (1).HPV vaccination, even if proven effective as claimed, is targeting 9-12 year old girls to prevent approximately 70% of cervical cancers, some of which may cause death at a rate of 1.4-2.3/100,000 women in developed countries with effective Pap smear screening programmes (Table I). For a vaccine designed to prevent a disease with such a low death rate, the risk to those vaccinated should be minimal. Further, according to some estimates, HPV vaccination would do little to decrease the already low rate of cervical cancer in countries with regular Pap screening (10). Thus, any expected benefit from HPV vaccination will notably drop in the setting of routine Pap screening. Accordingly, the risk-to-benefit balance associated with HPV vaccination will then also become less favourable. On the other hand, in developing countries where cervical cancer deaths are much higher and Pap screening coverage low (Table I), the potential benefits of HPV vaccination are significantly hampered by high vaccine costs (25).

It should be noted that for any vaccine the number of doses that are eventually administered is lower than the number of doses that are distributed. Thus, calculations based on the latter tend to under-estimate the rate of vaccine-associated ADRs (Figure 1). Supporting this interpretation, we show in Table II and Figure 1 that for any of the two HPV vaccines, the reported rate of ADRs per 100,000 doses administered is very similar across different countries and approximately seven times higher than that

Table I. Key data on cervical cancer, HPV-16/18 prevalence, and cervical cancer prevention strategies in 22 countries. Data sourced from the World Health Organization (WHO)/Institut Catala d'Oncologia (ICO) Information Centre on HPV and cervical cancer (105).

	Încidence per	Mortality per	Mortality ranking		HPV-16/18 prevalence in women with low-/	
	100,000 women	100,000 women	among all cancers		high-grade lesions/	HPV vaccine
Country	(age-standardized)	(age-standardized)	(all ages)	Pap screening coverage (%)	cervical cancer (%)	introduced
Australia	4.9	1.4	17th	60.6 (All women aged 20–69 y screened every 2 y)	3.8/44.6/76.2	Yes
Netherlands	5.4	1.5	16th	59.0 (All women aged > 20 y screened every 5 y)	1.5/61.6/87.9	Yes
US	5.7	1.7	15th	83.3 (All women aged > 18 y screened every 3 y)	7.7/55/76.6	Yes
France	7.1	1.8	15th	74.9 (All women aged 20-69 y screened every 2 y	7.6/63.4/75.6	Yes
Canada	6.5	1.9	14th	72.8 (All women aged 18-69 y screened every 3 y; Annual if at high risk)	11.8/56.2/74.3	Yes
Spain	6.3	1.9	15th	75.6 (All women aged 18–65 y screened every 3 y	2.3/46.9/55.9	Yes
UK and Ireland	7.2	2	16th	80 (All women aged 25–64 y screened every 5 y)	2.4/61.9/79.1	Yes
Israei	5.6	2.1	14th	34.7 (All women aged 18–69 y screened every 3 y)	2.2/44,8/68.5	Yes
Germany	6. 9	2.3	13th	55.9 (Women aged 20–49 y screened every 5 y)	1.4/54.1/76.8	Yes
China	9.6	4.2	7th	16.8 (All women aged 18-69 y screened every 3 y)	2.3/45.7/71	No
Viet Nam	11.5	5.7	4th	4.9 (All women aged 18–69 y screened every 3 y)	2.1/33.3/72.6	Yes
Russia	13.3	5.9	7th	70.4 (All women aged 18–69 y screened every 3y)	9.3/56/74	Yes
Brazil	24.5	10.9	2nd	64.8 (All women aged 18-69 y screened every 3 y)	4.3/54/70.7	Yes
Thailand	24.5	12.8	2nd	37.7 (All women aged 15–44 y ever screened	4.1/33.3/73.8	Yes
Pakistan	19.5	12.9	2nd	1.9 (All women aged 18–69 y screened every 3 y)	6/59.3/96.7	Yes
South Africa	26.6	14.5	2nd	13.6 (All women aged 18–69 y screened every 3 y	3.6/58.4/62.8	Yes
India	27	15.2	Ist	2.6 (Ali women aged 18–69 y screened every 3 y)	6/56/82_5	Yes
Cambodia	27.4	16.2	lst	None	3.2/33.3/72.6	Yes
Nepal	32.4	17.6	lst	2.4 (All women aged 18–69y screened every 3 y	6/59.3/82.3	No
Nigeria	33	22.9	2nd	None	4.7/41.3/50	Yes
Ghana	39.5	27.6	lst	2.7 (All women aged 18–69 y screened every 3 y)	4.6/41.3/50	Yes
Uganda	47.5	34.9	I st	None	6.7/37.9/74.1	Yes

calculated from the number of distributed doses. The latter calculations also show a comparable range across several countries (Figure 1). Given that government-official vaccine surveillance programmes routinely rely on passive reporting (26), the rate of ADRs from HPV and other vaccines may be further under-estimated.

According to some estimates, only 1-10% of the ADRs in the US are reported to VAERS (27).

The lack of data on serious ADRs in countries where routine HPV vaccination for young women is recommended and strongly promoted (Table II) greatly hampers our understanding about the

Table II. Summary of adverse reactions (ADRs) from HPV vaccines Gardasil and Cervarix. Note that the US FDA Code of Federal Regulation defines a serious adverse drug event as 'any adverse drug experience occurring at any dose that results in any of the following outcomes: death, a life-threatening adverse drug experience, inpatient hospitalization or prolongation of existing hospitalization, a persistent or significant disability/incapacity, or a congenital anomaly/birth defect' (106).

Vaccine	Country	Total n ADRs (ref.)	Dosesn (ref.)	Total n ADRs/100,000 doses	Total n serious ADRs (ref.)	Total n serious ADRs/100,000 doses	
Gardasil	US	18,727 (7)	35,000,000 ^a (7)	54	1,498 (7)	4.3	
	France	1,700 (34)	4,000,000° (34)	43	na	_	
	Australia	1,534 (3 9)	6,000,000° (39)	26	91° (26,28,29)	1.5°	
	Ireland	314 (33)	90,000 ⁶ (33)	349	na		
Cervarix	Netherlands	575 (32)	192,000 ⁶ (32)	· 299	575 (32)	5.7	
	UK	8,798 (23)	3,500,000 ^b (23)	251	na	_	

na = not available.

^aDoses distributed.

^bDoses administered.

Excluding 2010 data (unavailable at the time of writing of this report).

Table V. Key cervical cancer statistics according to the 2010 World Health Organization (WHO)/Institut Catala d'Oncología (ICO) report on HPV and related cancers (107).

	World	Developing countries (% total)	Developed countries (% total)
Women at risk for cervical cancer (aged≥15 y) Annual number of new cases of cervical cancer Annual number of cervical cancer deaths Prevalence (%) of HPV-16 and/or HPV-18 among women with cervical cancer	2,336,986	1,811,867 (77.5)	525,120 (22.5)
	529,828	453,321 (85.6)	76,507 (14.4)
	275,128	241,969 (87.9)	33,159 (12.1)
	70.9	71.0	70.8

protect only these girls for a lifetime would cost US \$7.7 billion (96). If we were to estimate just the cost of initial vaccination excluding the booster shots for 11- and 12-year-old girls, in ten years the US would spend at least 15 billion of limited health care dollars on Gardasil alone (96). Who then reaps the benefit at no risk from making the HPV vaccine mandatory? The customer or the manufacturer?

Altogether the above observations do not support the claim made by the US CDC and the FDA, that is, "This [Gardasil] vaccine is an important cervical cancer prevention tool that will potentially benefit the health of millions of women' (6) and, instead, appear to suggest that current worldwide immunization campaigns (Table I) with either of the two HPV vaccines are neither justified by long-term health benefits nor economically viable.

How does HPV vaccine marketing and promotion line up with international ethical guidelines for informed consent?

The medical profession's ethical duty is to provide a full and accurate explanation of the benefits as well as the risks associated with a particular drug so that a patient is able to make an informed decision regarding a treatment. If a physician fails to do so and/or if financial interests take precedence over public health, breaches of informed consent guidelines may occur. For instance, presenting information in a way which promotes fear of a disease while undervaluing potential vaccine risks is likely to encourage patients to give consent to the treatment, even when the latter has no proven significant health benefit.

Both Gardasil and Cervarix were approved by the US FDA, which in 2006 was found to be '...not positioned to meet current or emerging regulatory responsibilities, because 'its scientific base has eroded and its scientific organizational structure is weak' (97). According to the Science and Mission at Risk Report prepared by the FDA Science Board in 2006 (97), the risks of an 'under-performing' FDA are far-reaching for two main reasons. First, 'The PDAs inability to keep up with scientific advances means that American lives are at risk, and second, 'The world looks to the FDA as a leader in medicine and science. Not only can the agency not lead, it can't even keep up with the advances in science' (97).

If the FDA's decisions to approve certain drugs could by its own admission be unreliable, then the only other gate-keeper for consumer safety is the expert advice provided by other health

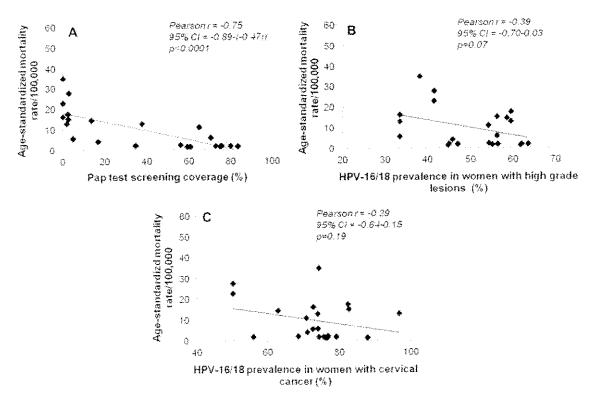


Figure 4. Correlation between cervical cancer mortality rates and A: Pap test screening coverage; B:HPV-16/18 prevalence in women with high-grade lesions (CIN 2/3, carcinoma in situ (CIS), and high-grade cervical squamous intraepithelial lesions (HSIL); C: HPV-16/18 prevalence in women with cervical cancer. Data were sourced for 22 countries from World Health Organization (WHO)/Institut Catala d'Oncologia (ICO) Information Centre on HPV and cervical cancer (Table I). The correlation analysis was carried out using GraphPad Prism statistical software to derive Pearson correlation coefficients (r). The level of significance was determined using a two-tailed test. The correlation was considered statistically significant at P < 0.05.

authorities. The history of how HPV vaccines came to market, however, indicates that such advice was not always given from the basis of the best available evidence. A 2009 Special Communication from JAMA by Rothman and Rothman (98) provides compelling evidence that Gardasil manufacturer Merck funded educational programmes by professional medical associations (PMAs) as a marketing strategy to promote the use of their vaccine. The marketing campaign proceeded 'flawlessly', according to Merck's chief executive officer, and in 2006 Gardasil was named the pharmaceutical 'brand of the year' for building 'a market out of thin air' (98). The reason why the marketing campaign for Gardasil was so successful was that 'By making this vaccine's target disease cervical cancer, the sexual transmission of HPV was minimized, the threat of cervical cancer to all adolescents maximized, and the subpopulations most at risk [women in developing countries] practically ignored' (98). That these arguments were delivered by the PMAs is cause for concern, since PMAs are obligated to provide members with evidence-based data so that they in turn are able to present relevant risks and benefits to their patients (98).

India's medical authorities have also been publicly condemned after a civil society-led investigation revealed that trials for HPV vaccines in the states of Andhra Pradesh and Gujarat violated established national and international ethical guidelines on clinical research as well as children's rights (99). These events apparently occurred as a result of 'aggressive' promotional practices of the drug companies and their uncritical endorsement by India's medical associations (99). Although proclaimed as a post-licensure observational study of HPV vaccination against cervical cancer, the project was in fact a clinical trial and, as such, should have adhered to protocols mandated by the Drugs and Cosmetics Act (DCA) and the Indian Council for Medical Research (ICMR) (100). Instead, the trial was found in serious breach of both the DCA's and the ICMR's guidelines for informed consent and was terminated in April 2010, following six post-HPV vaccination deaths (99). The report in the 2011 issue of Lancet Infectious Diseases further reveals that both ICMR and DCA subsequently denied information on the study protocols as a 'trade secret and commercial confidence of third party' (100). According to the authors, 'It remains unclear how information from a study done in collaboration with government health organisations can be regarded as a trade secret' (100). It is worth emphasizing that the termination of HPV vaccine trials in India occurred despite an annual cervical cancer mortality rate of 15.2/100,000 women, which is over 7-10 times greater than that in the developed world (Table I). Such an outcome indicates that even situations of unmet medical needs cannot be resolved at the expense of abandoning ethical requirements for informed consent.

Questionable HPV vaccine marketing strategies were also seen in France and were eventually stopped by the action of government health authorities who found the sponsorship of several Gardasil advertisements to be in direct violation of French public health codes (101). These violations included, but were not limited to: 1) Claiming longer efficacy than was actually proven (8.5 versus 4.5 years) and 2) Making false claims (the ads in question replaced the officially approved use of Gardasil for 'the prevention of low-grade lesions' with statements indicating Gardasil should be used for 'the prevention of pre-malignant genital lesions, cancers of the cervix and external genital warts').

In the US, Merck has been heavily criticized for the fact that it spent vast sums in lobbying to make the vaccine mandatory (12,98). According to an editorial from The American Journal of Bioethics, even those who strongly favoured the vaccine were 'stunned at the degree to which Merck has pushed its \$400 vaccine as a mandatory measure'(102). Nonetheless, what is more

disconcerting than the aggressive marketing strategies employed by the vaccine manufacturers is the practice by which the medical profession has presented partial information to the public, namely, in a way that generates fear, thus likely promoting vaccine uptake. For example, the US CDC and the FDA state that 'Worldwide, cervical cancer is the second most common cancer in women, causing an estimated 470,000 new cases and 233,000 deaths per year' (6). The Telethon Institute for Child Health Research in Australia made a similar statement in 2006 while recruiting volunteers for a HPV vaccine study. In the opening paragraph the point was also made that cervical cancer was one of the most common causes of cancer-related deaths in women worldwide (103). A crucial fact was omitted in both instances which is that while it is certainly true that approximately a quarter of a million of women die of cervical cancer each year, 88% of these deaths occur in the developing countries and certainly not in the US nor Australia (Table V), where cervical cancer is the 15th and 17th cause of cancer-related deaths, respectively. and where mortality rates from this disease are the lowest on the planet (1.4-1.7/100,000) (Table I). Finally, contrary to the information provided by the CDC and the FDA, there is no evidence that Gardasil is 'an important cervical cancer prevention tool' (6).

It thus appears that to this date, medical and regulatory entities worldwide continue to provide inaccurate information regarding cervical cancer risk and the usefulness of HPV vaccines, thereby making informed consent regarding vaccination impossible to achieve.

Concluding remarks

Regulatory authorities are responsible for ensuring that new vaccines go through proper scientific evaluation before they are approved. An equal fiduciary responsibility rests with the medical profession to only promote vaccinations with those vaccines whose safety and efficacy have been thoroughly demonstrated. The available evidence, however, indicates that health authorities in various countries may have failed to provide an evidence-based rationale for immunization with HPV vaccines and, in doing so, may have breached international ethical guidelines for informed consent. Contrary to the information from the US CDC, Health Canada, Australian TGA, and the UK MHRA, the efficacy of Gardasil and Cervarix in preventing cervical cancer has not been demonstrated, and the long-term risks of the vaccines remain to be fully evaluated.

Current worldwide HPV immunization practices with either of the two HPV vaccines appear to be neither justified by longterm health benefits nor economically viable, nor is there any evidence that HPV vaccination would reduce the rate of cervical cancer beyond what Pap screening has already achieved. Furthermore, the frequency, the severity, as well as the consistency of the patterns of ADRs reported to various governmental vaccine surveillance programmes for both Gardasil and Cervarix (Figures 2 and 3) raise significant concerns about the overall safety of HPV vaccination programmes. Because these programmes have global coverage (Table I), the long-term health of many women may be unnecessarily at risk against still unknown vaccine benefits. Altogether these observations suggest that a reduction in the burden of cervical cancer globally might be best achieved by targeting other risk factors for this disease (i.e. smoking, use of oral contraceptives, chronic inflammation) (85) in conjunction with regular Pap test screening. The latter strategy has already been proven successful in developed nations where the incidence of cervical cancer is very low (Table I).

According to the Helsinki Declaration and the International Code of Medical Ethics (104), the well-being of the individual must be a physician's top priority, taking precedence over all other interests. Although the Declaration is addressed primarily to physicians, the World Medical Association encourages other participants in medical research involving human subjects to adopt these same principles (104). Greater efforts should thus be made to minimize the undue commercial influences on academic institutions and medical research, given that these may impede unbiased scientific inquiry into important questions about vaccine science and policy.

The almost exclusive reliance on manufacturers' sponsored studies, often of questionable quality, as a base for vaccine policy-making should be discontinued. So should be the dismissal of serious ADRs as coincidental or 'psychogenic' in spite of independent research suggesting otherwise. It can hardly be disputed in view of all the evidence (i.e. case reports and vaccineADR surveillance in various countries) that HPV vaccines do trigger serious ADRs. What does remain debatable, however, is the true frequency of these events because all systems of monitoring for vaccineADRs currently in place rely on passive reporting Passive ADR surveillance should thus be replaced by active surveillance to better our understanding of true risks associated with particular vaccines (especially new vaccines). The presentation of partial and non-factual information regarding cervical cancer risks and the usefulness of HPV vaccines, as cited above, is, in our view, neither scientific nor ethical. None of these practices serve public health interests, nor are they likely to reduce the levels of cervical cancer. Independent evaluation of HPV vaccine safety is urgently needed and should be a priority for governmentsponsored research programmes. Any future vaccination policies should adhere more rigorously to evidence-based medicine as well as strictly follow ethical guidelines for informed consent.

Declaration of interest: This work was supported by the Dwoskin, Lotus and Katlyn Fox Family Foundations. L.T. and C.A.S. conducted a histological analysis of autopsy brain samples from a Gardasil-suspected death case. C.A.S. is a founder and shareholder of Neurodyn Corporation, Inc. The company investigates early-state neurological disease mechanisms and biomarkers. This work and any views expressed within it are solely those of the authors and not of any affiliated bodies or organizations.

A portion of this information was presented at the Vaccine Safety Conference, 3–8 January 2011 (www.vaccinesafetyconference.com).

References

- 1. Food and Drug Administration (FDA). Workshop on Non-clinical Safety Evaluation of Preventative Vaccines: Recent Advances and Regulatory Considerations. 2002 [cited 2011 May 30]. Available from: http://www.fda.gov/downloads/biologicsbloodvaccines/newsevents/ workshopsmeetingsconferences/transcriptsminutes/ucm054459.pdf
- 2. The Australian Immunisation Handbook, 9th edition, 1.3. Pre-vaccination Procedures. 1.3.3 Valid consent [cited 2011 September 15]. Available from: http://www.health.gov.au/internet/immunise/publishing.nsf/Content/handbook-consent
- 3. UK Guidance on Best Practice in Vaccine Administration. 2001 [cited 2011 September 15]. Available from: http://www.rcn.org.uk/__data/ assets/pdf_file/0016/78562/001981.pdf
- 4. Centers for Disease Control and Prevention. Vaccine Information Statements (VISs). Last modified December 6, 2010 [cited 2011 April 5]. Available from: http://www.cdc.gov/vaccines/pubs/vis/vis-faqs.htm
- 5. Merck&Co. Protection with Gardasil [cited 2011 July 20]. Available from:http://www.gardasil.com/what-is-gardasil/cervical-cancer-vac-
- 6. Centers for Disease Control and Prevention. Information from FDA and CDC on Gardasil and its Safety (Archived), 2008 [cited 2011 January 25]. Available from: http://www.cdc.gov/vaccinesafety/Vaccines/HPV/HPVArchived.html

- 7. Centers for Disease Control and Prevention (CDC). Reports of Health Concerns Following HPV Vaccination. Last updated: June 28, 2011[cited 2011 July 22]. Available from: http://www.cdc.gov/vaccinesafety/vaccines/hpv/gardasil.html
- 8. Villa LL, Costa RL, Petta CA, Andrade RP, Paavonen J, IversenOE, et al. High sustained efficacy of a prophylactic quadrivalent human papillomavirus types 6/11/16/18 L1 virus-like particle vaccine through 5 years of follow-up. Br J Cancer. 2006;95:1459-66.
- 9. De Carvalho N, Teixeira J, Roteli-Martins CM, Naud P, De Borba P, Zahaf T, et al. Sustained efficacy and immunogenicity of the HPV-16/18 ASO4-adjuvanted vaccine up to 7.3 years in young adult women. Vaccine, 2010:28:6247-55.
- 10. Harper DM, Williams KB. Prophylactic HPV vaccines: current knowledge of impact on gynecologic premalignancies. Discov Med. 2010;10:
- 11. Haug C. The risks and benefits of HPV vaccination. JAMA. 2009;302: 795-6
- 12. Flogging gardasil. Nat Biotechnol. 2007;25:261.
- 13. Markowitz LE, Dunne EF, Saraiya M, Lawson HW, Chesson H, Unger ER. Quadrivalenthuman papillomavirus vaccine: recommendations of the Advisory Committee on Immunization Practices (ACIP). MMWR Recomm Rep. 2007;56:1-24.
- 14. Paavonen J, Naud P, Salmeron J, Wheeler CM, Chow SN, Apter D, et al. Efficacy of human papillomavirus (HPV)-16/18 AS04-adjuvanted vaccine against cervical infection and precancer caused by oncogenic HPV types (PATRICIA): final analysis of a double-blind, randomised study in young women. Lancet. 2009;374:301-14.
- 15. The FUTURE II Study Group. Quadrivalent vaccine against human papillomavirus to prevent high-grade cervical lesions. Ñ Engl J Med. 2007:356:1915-27.
- 16. Franco EL, Villa LL, Sobrinho JP, Prado JM, Rousseau MC, Désy M, et al. Epidemiology of acquisition and clearance of cervical human papillomavirus infection in women from a high-risk area for cervical cancer. J Infect Dis. 1999;180:1415-23.
- 17. HoGY, Bierman R, Beardsley L, Chang CJ, Burk RD. Natural history of cervicovaginal papillomavirus infection in young women. N Engl I Med. 1998:338:423-8.
- 18. Moscicki AB, Shiboski S, Broering J, Powell K, Clayton L, Jay N, et al. The natural history of human papillomavirus infection as measured by repeated DNA testing in adolescent and young women. J Pediatr. 1998;132:277-84.
- 19. Ostor AG. Natural history of cervical intraepithelial neoplasia: a critical review. Int J Gynecol Pathol. 1993;12:186-92.
- 20. Garland SM, Hernandez-Avila M, Wheeler CM, Perez G, Harper DM, Leodolter S, et al.; FUTURE I Investigators.Quadrivalent vaccine against human papillomavirus to prevent anogenital diseases. N Engl I Med. 2007:356:1928-43.
- 21. Hildesheim A, Herrero R, Wacholder S, Rodriguez AC, Solomon D, Bratti MC, et al. Effect of human papillomavirus 16/18 L1viruslike particle vaccine among young women with preexisting infection: a randomized trial. JAMA. 2007;298:743-53.
- 22. Food and Drug Administration (FDA). Gardasil (Human Papillomavirus Vaccine) Questions and Answers, June 8, 2006 [cited 2011 September 27]. Available from: http://www.fda.gov/BiologicsBloodVaccines/ Vaccines/QuestionsaboutVaccines/ucm096052.htm
- 23. Medicines and Healthcare productsRegulatory Agency (MHRA). Paper provided by MHRA for Joint Committee on Vaccination and Immunisation June 2010: Vaccine associated suspected adverse reactions reported via the Yellow Card scheme during 2009 [cited 2011 July 17]. Available from: http://www.dh.gov.uk/prod_consum_dh/groups/dh_ digitalassets/@dh/@ab/documents/digitalasset/dh_118753.pdf
- 24. Irish Medicines Board (IMB). Update on national monitoring experience with Gardasil. 11th November 2010 [cited 2011 July 17]. Available from:http://www.imb.ie/images/uploaded/documents/IMB_Gardasil_ WebUpdate_11Nov2010.pdf
- 25. Campos NG, Kim JJ, Castle PE, Ortendahl JD, O'Shea M, Diaz M, et al. Health and economic impact of HPV 16/18 vaccination and cervical cancer screening in Eastern Africa. Int J Cancer. 2011 Jun 29. [Epub ahead of print]
- 26. Lawrence G, Gold MS, Hill R, Deeks S, Glasswell A, McIntyre PB. Annual report: Surveillance of adverse events following immunisation in Australia, 2007. Commun Dis Intell. 2008;32(4)371-87.
- 27. National Vaccine Information Center. An Analysis by the National Vaccine Information Center of Gardasil &Menactra Adverse Event Reports to the Vaccine Adverse Events Reporting System (VAERS). February 2009 [cited 2011 January 25]. Available from: http://www. nvic.org/Downloads/NVICGardasilvsMenactraVAERSReportFeb-2009u.aspx

- 28. Menzies R, Mahajan D, Gold MS, Roomiani I, McIntyre P, Lawrence G. Annual report: Surveillance of adverse events following immunisation in Australia, 2008. Commun Dis Intell. 2009;33:365-81. Available from: http://www.health.gov.au/internet/main/publishing.nsf/Content/ cdi3304
- 29. Mahajan D, Roomiani I, Gold MS, Lawrence GL, McIntyre PB, Menzies RI. Annual report: Surveillance of adverse events following immunisation in Australia, 2009. Comm Dis Intell. 2010;34:259-76. Available from: http://www.health.gov.au/internet/main/publishing.nsf/Content /cdi3403-1
- 30. Slade BA, Leidel L, Vellozzi C, Woo EJ, Hua W, Sutherland A, et al. Postlicensure safety surveillance for quadrivalent human papillomavirus recombinant vaccine. JAMA. 2009;302:750-7.
- 31. Medicines and Healthcare productsRegulatory Agency (MHRA). Paper provided by MHRA for Joint Committee on Vaccination and Immunisation June 2009: Vaccine associated suspected adverse reactions reported via the Yellow Card scheme during 2008 [cited 2011 July 17]. Available from: http://www.dh.gov.uk/pred_consum_dh/groups/dh_ digitalassets/@dh/@ab/documents/digitalasset/dh_119017.pdf
- 32. Database of the Netherlands Pharmacovigilance Centre Lareb. Overview adverse events following immunization in association with Cervarix.February 3, 2010 [cited 2011 July 24]. Available from: http:// www.lareb.nl/documents/kwb_2010_2_cerva.pdf
- 33. Irish Medicines Board (IMB). Update on national monitoring experience with Gardasil. 9th February 2011 [cited 2011 July 17]. Available from: http://www.imb.ie/images/uploaded/documents/IMB_Gardasil_ WebUpdate_09Feb2011.pdf
- 34. Agence Française de Securite Sanitaire des Produits de Sante (AFSSAPS). Vaccinscontre les infections dûes à certains papillomavirus humains (HPV). Gardasil*: Troisièmebilan du plan de gestion des risqueseuropéenet national (12/07/2011) [cited 2011 July 24]. Available from: http:// www.afssaps.fr/Dossiers-thematiques/Vaccins/Vaccins-contre-les-infections-dues-a-certains-papillomavirus-humains-HPV/%28offset%29/2
- 35. CDC WONDER VAERS Request [cited 2011 September 15]. Available from: http://wonder.cdc.gov/vaers.html
- 36. Chustecka Z. HPV Vaccine: Debate Over Benefits, Marketing, and New Adverse Event Data. Medscape Med News. 2009[cited 2011 January 25]. Available from: http://www.medscape.com/viewarticle/707634
- 37. Food and Drug Administration Vaccines and Related Biological Products Advisory Committee (VRBPAC) Background Document: Gardasīl™ HPV Quadrivalent Vaccine. May 18, 2006 VRBPAC Meeting [cited 2011 September 15]. Available from: http://www.fda.gov/ohrms/ dockets/ac/06/briefing/2006-4222B3.pdf
- 38. Health Canada. Human Papillomavirus (HPV). Updated August 2010 [cited 2011 April 4]. Available from: http://www.hc-sc.gc.ca/hl-vs/iyhvsv/diseases-maladies/hpv-vph-eng.php
- 39. Australian Government, Department of Health and Ageing, Therapeutic Goods Administration. Human papillomavirus vaccine (GARDASIL), Advice from the Therapeutic Goods Administration. Updated 24 June 2010 [cited 2011 July 24]. Available from: http://www.tga.gov.au/safety/ alerts-medicine-gardasil-070624.htm
- 40. Verstraeten T, Descamps D, David MP, Zahaf T, Hardt K, Izurieta P, et al. Analysis of adverse events of potential autoimmune actiology in a large integrated safety database of AS04 adjuvanted vaccines. Vaccine. 2008;26:6630-8.
- 41. Shoenfeld Y, Agmon-Levin N. 'ASIA' -- Autoimmune/inflammatory syndrome induced by adjuvants. J Autoimmun. 2011;36:4-8.
- 42. Israeli E, Agmon-Levin N, Blank M, Shoenfeld Y. Adjuvants and autoimmunity. Lupus. 2009;18:1217-25.
- 43. Cohen AD, Shoenfeld Y. Vaccine-induced autoimmunity, J Autoimmun. 1996;9:699-703.
- 44. Agmon-Levin N, Paz Z, Israeli E, Shoenfeld Y. Vaccines and autoimmunity. Nat Rev Rheumatol. 2009;5:648-52.
- 45. Gandey A. Report of Motor Neuron Disease After HPV Vaccine. Medscape Med News. 2009 [cited 2011 January 25]. Available from: http:// www.medscape.com/viewarticle/711461
- 46. Löwer J. Can we still recommend HPV vaccination? MMWFortschr Med. 2008;150:6.
- 47. Mendoza Plasencia Z, Gonzalez Lopez M, Fernandez Sanfiel ML, Muniz Montes JR. [Acute disseminated encephalomyelitis with tumefactive lesions after vaccination against human papillomavirus]. Neurologia, 2010;25:58-9.
- 48. Wildemann B, Jarius S, Hartmann M, RegulajU, Hametner C. Acute disseminated encephalomyelitis following vaccination against human papilloma virus. Neurology. 2009;72:2132-3.
- 49. Schaffer V, Wimmer S, Rotaru I, Topakian R, Haring HP, Aichner FT. HPV vaccine: a cornerstone of female health a possible cause of ADEM? J Neurol. 2008;255:1818-20.

- 50. Sutton I, Lahoria R, Tan IL, Clouston P, Barnett MH. CNS demyelination and quadrivalent HPV vaccination. Mult Scier. 2009;15:116-9.
- 51. Chang J, Campagnolo D, Vollmer TL, Bomprezzi R. Demyelinating disease and polyvalent human papilloma virus vaccination. J Neurol-Neurosurg Psychiatry. 2010:1-3.
- 52. Alvarez-Soria MJ, Hernandez-Gonzalez A, Carrasco-Garcia de Leon S, Del Real-Francia MA, Gallardo-AlcanizMJ, Lopez-Gomez JL. [Demyelinating disease and vaccination of the human papillomavirus]. Rev Neurol, 2011:52:472-6.
- 53. McCarthy JE, Filiano J. Opsoclonus Myoclonus after human papilloma virus vaccine in a pediatric patient. Parkinsonism Relat Disord. 2009;15: 792-4.
- 54. Mosnaim AD, Abiola R, Wolf ME, Perlmuter LC. Etiology and risk factors for developing orthostatic hypotension. Am J Ther. 2009;17:86-91.
- Debeer P, De Munter P, Bruyninckx F, Devlieger R. Brachial plexus neuritis following HPV vaccination. Vaccine. 2008;26:4417-9.
- 56. Cohen SM. Multiple evanescent white dot syndrome after vaccination for human papilloma virus and meningococcus. J Pediatr Ophthalmol Strabismus, 2009:1-3.
- 57. Das A, Chang D, Biankin AV, Merrett ND. Pancreatitis following human papillomavirus vaccination. Med J Aust. 2008;189:178.
- 58. Brotherton JM, Gold MS, Kemp AS, McIntyre PB, Burgess MA, Campbell-Lloyd S. Anaphylaxis following quadrivalent human papillomavirus vaccination. CMAJ. 2008;179:525-33.
- 59. Blitshteyn S. Postural tachycardia syndrome after vaccination with Gardasil [letter to the editor]. Eur J Neurol. 2010;17:e52.
- 60. Dale RC, Brilot F, Banwell B. Pediatric central nervous system inflammatory demyelination: acute disseminated encephalomyelitis, clinically isolated syndromes, neuromyelitisoptica, and multiple sclerosis. Curr Opin Neurol. 2009;22:233-40.
- 61. Low PA, Sandroni P, Joyner M, Shen WK. Postural tachycardia syndrome (POTS). J Cardiovasc Electrophysiol. 2009;20:352-8.
- 62. Medicines and Healthcare products Regulatory Agency (MHRA). Suspected adverse reactions received by the MHRA. Cervarix Human papillomavirus (HPV) vaccine (as of 29 July 2010) [cited 2011 July 24]. Available from: http://www.mhra.gov.uk/PrintPreview/DefaultSplashPP/ CON023340?ResultCount = 10&DynamicListQuery = &DynamicList-SortBy = xCreationDate&DynamicListSortOrder = Desc&Dynamic ListTitle = &PageNumber = 1 &Title = Human % 20 papillomavirus % 20%28HPV%29%20vaccine
- 63. Food and Drug Administration. Inside Clinical Trials: Testing Medical Products in People. Last updated May 2009 [cited 2011 April 4]. Available from: http://www.fda.gov/Drugs/ResourcesForYou/Consumers/ ucm143531.htm
- 64. Golomb BA, Erickson LC, Koperski S, Sack D, Enkin M, Howick J. What's in placebos: who knows? Analysis of randomized, controlled trials. Ann Intern Med. 2010;153:532-5.
- 65. Harper DM, Franco EL, Wheeler C, Ferris DG, Jenkins D, Schuind A, et al. Efficacy of a bivalent L1 virus-like particle vaccine in prevention of infection with human papillomavirus types 16 and 18 in young women: a randomised controlled trial. Lancet, 2004;364:1757-65.
- 66. Harper DM, Franco EL, Wheeler CM, Moscicki AB, Romanowski B, Roteli-Martins CM, et al. Sustained efficacy up to 4.5 years of a bivalent L1 virus-like particle vaccine against human papillomavirus types 16 and 18: follow-up from a randomised control trial. Lancet. 2006;367:
- 67. Villa LL, Costa RL, Petta CA, Andrade RP, Ault KA, Giuliano AR, et al. Prophylactic quadrivalent human papillomavirus (types 6, 11, 16, and 18) LI virus-like particle vaccine in young women: a randomised double-blind placebo-controlled multicentre phase II efficacy trial. Lancet Oncol. 2005;6:271-8.
- 68. Mao C, Koutsky LA, Ault KA, Wheeler CM, Brown DR, Wiley DJ, Alvarez et al. Efficacy of human papillomavirus-16 vaccine to prevent cervical intraepithelial neoplasia; a randomized controlled trial. Obstet Gynecol. 2006;107:18-27.
- 69. Munoz N, Manalastas R Jr, Pitisuttithum P, Tresukosol D, Monsonego J. Ault K, et al. Safety, immunogenicity, and efficacy of quadrivalent human papillomavirus (types 6, 11, 16, 18) recombinant vaccine in women aged 24-45 years: a randomised, double-blind trial. Lancet. 2009;373:1949-57.
- 70. Bishop NJ, Morley R, Day JP, Lucas A. Aluminum neurotoxicity in preterm infants receiving intravenous-feeding solutions. N Engl J Med. 1997;336:1557-61.
- 71. Walton JR. Functional impairment in aged rats chronically exposed to human range dietary aluminum equivalents. Neurotoxicology, 2009;30: 182 - 93.
- 72. Tomljenovic L. Aluminum and Alzheimer's disease: after a century of controversy, is there a plausible link? J Alzheimers Dis. 2011;23:567-98.

- 73. Couette M, Boisse MF, Maison P, Brugieres P, Cesaro P, Chevalier X, et al. Long-term persistence of vaccine-derived aluminum hydroxide is associated with chronic cognitive dysfunction. J Inorg Biochem. 2009;103:1571-8.
- 74. Authier FJ, Cherin P, Creange A, Bonnotte B, Ferrer X, Abdelmoumni A, et al. Central nervous system disease in patients with macrophagicmyofasciitis. Brain. 2001;124(Pt 5):974-83.
- 75. Exley C, Swarbrick L, GherardiRK, AuthierFJ. A role for the body burden of aluminium in vaccine-associated macrophagicmyofasciitis and chronic fatigue syndrome. Med Hypotheses, 2009;72:135-9.
- 76, Gherardi RK, Coquet M, Cherin P, Belec L, Moretto P, Dreyfus PA, Pellissier et al. Macrophagicmyofasciitis lesions assess long-term persistence of vaccine-derived aluminium hydroxide in muscle. Brain. 2001:124(Pt 9):1821-31.
- 77. Shaw CA, PetrikMS. Aluminum hydroxide injections lead to motor deficits and motor neuron degeneration. J Inorg Biochem. 2009;103:
- 78. Petrik MS, Wong MC, Tabata RC, Garry RF, Shaw CA. Aluminum adjuvant linked to Gulf War illness induces motor neuron death in mice, Neuromolecular Med. 2007;9:83-100.
- 79. Tomljenovic L, Shaw CA. Do aluminum vaccine adjuvants contribute to the rising prevalence of autism? J Inorg Biochem. 2011;105:1489-99.
- 80. Tomljenovic L, Shaw CA. Aluminum vaccine adjuvants: are they safe? Curr Med Chem. 2011;18:2630-7.
- 81. Exley C. Aluminium-based adjuvants should not be used as placebos in clinical trials. Vaccine. 2011;29:9289.
- 82. Merck&Co. Gardasil product sheet. Date of Approval 2006, p. 1-26 cited 2011 July 25]. Available from: http://www.tda.gov/downloads/ BiologicsBloodVaccines/Vaccines/ApprovedProducts/UCM111263.pdf
- 83. Lu B, Kumar A, Castellsague X, Ciuliano AR. Efficacy and safety of prophylactic vaccines against cervical HPV infection and diseases among women: a systematic review & meta-analysis. BMC Infect Dis. 2011:11:13.
- 84. Clifford GM, Smith JS, Plummer M, Munoz N, Franceschi S. Human papillomavirus types in invasive cervical cancer worldwide: a metaanalysis. Br J Cancer. 2003;88:63-73.
- 85. Castle PE. Beyond human papillomavirus: the cervix, exogenous secondary factors, and the development of cervical precancer and cancer. I Low Genit Tract Dis. 2004;8:224–30.
- 86. Harper DM, Nieminen P, Paavonen J, Lehtinen M. Cervical cancer incidence can increase despite HPV vaccination. Lancet Infect Dis. 2010;10:594-5; author reply 595.
- 87. Lippman A. Melnychuk R, Shimmin C, Boscoe M. Human papillomavirus, vaccines and women's health: questions and cautions. CMAJ. 2007:177:484-7.
- 88. Engeland A, Haldorsen T, Tretli S, Hakulinen T, Hörte LG, Luostarinen T, et al. Prediction of cancer mortality in the Nordic countries up to the years 2000 and 2010, on the basis of relative survival analysis. A collaborative study of the five Nordic Cancer Registries. APMIS Suppl. 1995;49:1-161.
- 89. Laukkanen P, Koskela P, Pukkala E, Dillner J, Läärä E, Knekt P, et al. Time trends in incidence and prevalence of human papillomavirus type 6, 11 and 16 infections in Finland. J Gen Virol 2003; \$4(Pt 8): 2105-9.
- 90. Fagot JP, Boutrelle A, Ricordeau P, Weill A, Allemand H. HPV vaccination in France: uptake, costs and issues for the National Health Insurance. Vaccine, 2011;29:3610-6.
- 91. Sharma M, Ortendahl J, van der Ham E, Sy S, Kim J. Cost-effectiveness of human papillomavirus vaccination and cervical cancer screening in Thailand, BJOG, 2011 Apr 12. [Epub ahead of print]

- 92. Kim JJ, Goldie SJ, Health and economic implications of HPV vaccination in the United States. N Engl J Med. 2008;359:821-32.
- Kim JJ, Goldie SJ. Cost effectiveness analysis of including boys in a human papillomavirus vaccination programme in the United States. BMI, 2009;339:b3884.
- 94. deKok IM, van Ballegooijen M, Habbema JD. Cost-effectiveness analvsis of human papillomavirus vaccination in the Netherlands. J Natl Cancer Inst. 2009;161:1083-92.
- 95. The New York Times, U.S. Approves Use of Vaccine for Cervical Cancer. June 9, 2006 [cited 2011 September 14]. Available from: http:// www.nytimes.com/2006/06/09/health/09vaccine.html?fta =
- 96. Judicial Watch Special Report, Examining the FDA's HPV Vaccine Records Detailing the Approval Process, Side-Effects, Safety Concerns and Marketing Practices of a Large-Scale Public Health Experiment. June 30, 2008 [cited 2011 September 14]. Available from: http://www.judicialwatch.org/documents/2008/JWReportFDAhpvVaccineRecords.pdf
- Food and Drug Administration (FDA). FDA Science and Mission at Risk, Report of the Subcommittee on Science and Technology 2007 cited 2010 December 12]. Available from: http://www.fda.gov/ohrms/ dockets/ac/07/briefing/2007-4329b_02_01_FDA%20Report%20 on%20Science%20and%20Technology.pdf
- 98. Rothman SM, Rothman DJ. Marketing HPV vaccine: implications for adolescent health and medical professionalism. JAMA. 2009;302:
- 99. Sarojini NB, Srinivasan S, Madhavi Y, Srinivasan S, Shenoi A. The HPV vaccine: science, ethics and regulation. EconomPolit Weekly. 2010;45:
- 100. Sengupta A, Shenoi A, Sarojini NB, Madhavi Y. Human papillomavirus vaccine trials in India. Lancet Infect Dis. 2011;377:719.
- 101. Legifrancegouv. Le Service Public De La Diffusion Du Droit. Décision du 31 août 2010 interdisantune publicité pour un médicamentmentionnée à l'article L. 5122-1, premier alinéa, du code de la santé publique destinée aux personneshabilitées à prescrireoudélivrercesmédicamentsou à les utiliserdansl'exercice de leur art [cited 2011 January 26]. Available from: http://www.legifrance.gouv.fr/affichTexte.dorjsessionid = ?cidTex te = JORFTEXT000022839429&dateTexte&oldAction = rechJO& categorieLien = id
- 102. McGee G, Johnson S. Has the spread of HPV vaccine marketing conveyed immunity to common sense? Am J Bioeth. 2007;7:1-2.
- 103. Telethon Institute for Child Health Research. Perth women needed for international cervical cancer study, 12 April, 2006 [cited 2011 July 26]. Available from: http://www.ichr.uwa.edu.au/media/478
- 104. World Medical Association (WMA) Declaration of Helsinki, Ethical Principles for Medical Research Involving Human Subjects [cited 2011 April 6]. Available from: http://www.wma.net/en/30publications/ 10policies/b3/
- 105. WHO/ICO Information Centre on Human Papilloma Virus and Cervical Cancer [cited 2011 July 20]. Available from: http://apps.who.int/ hpycentre/statistics/dynamic/ico/SummaryReportsSelect.cfm
- 106. Food and Drug Administration (FDA). CFR-Code of Federal Regulations Title 21 [cited 2011 September 19]. Available from: http:// www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm? fr = 314.80
- 107. WHO/ICO HPV Information Centre. Human papillomavirus and related cancers. Summary report update. November 15, 2010 [cited 2011 July 21]. Available from: http://apps.who.int/hpvcentre/statistics/ dynamic/ico/country_pdf/XWX.pdf?CFID = 5169709&CFTOKEN =