

23 February 2022

s 9(2)(a)

By email: **s 9(2)(a)**
Ref: H202117273

Tēnā koe **s 9(2)(a)**

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health (the Ministry) on 7 December 2021 for:

“On 26 Nov 2021 Radio New Zealand reported the view of University of Otago's Emeritus Professor Warren Tate that:

For those with CFS/ME, their physiology is profoundly disrupted and at the core of their disease is a dysfunctional immune system, making inoculation with the (COVID-19 Pfizer) vaccine potentially dangerous.

He wants the government to take those risks into consideration when judging whether people should be given an exemption from the vaccine or not.

In response to this, Radio NZ reported that a Ministry of Health spokesperson said it was better for people with ME/CFS to get the vaccine than not get it.

“We completely understand the concerns of people with long-term conditions such as ME/CFS around vaccination. For these people the benefits of vaccination outweigh the risks of the effects of catching Covid-19 infection.”

I am writing under the OIA to request the evidence that MoH holds that supports the spokesperson's reported claim above

When referring to people with long term conditions, in the comment quoted by Radio NZ, the Ministry spokesperson was broadly referring to people with long term conditions, not just those with ME/CFS. We have included key information on long term conditions in our response.

Furthermore, there are a number of publicly accessible information sources that provide advice on vaccination to people with long term conditions, including ME/CFS. These are summarised below and many reference the evidence that support their advice.

Information about getting the COVID-19 vaccine for people with underlying or long term health conditions is available here: www.covid19.govt.nz/covid-19-vaccines/get-the-facts-about-covid-19-vaccination/vaccine-advice-if-you-have-a-health-condition/

The Immunisation Handbook 2020 provides clinical guidelines for health professionals on the safest and most effective use of vaccines in their practice. These guidelines are based on the best scientific evidence available at the time of publication, from published and unpublished literature. The COVID-19 chapter of the Immunisation Handbook 2020 is available here: www.health.govt.nz/our-work/immunisation-handbook-2020/5-coronavirus-disease-covid-19#keyinfo23

It is important to note, that if infected with SARS-CoV2, people with ME/CFS have been shown to have a significant exacerbation or relapse of their ME/CFS symptoms post infection, in addition to the risk of severe COVID-19 illness and death. The Associated New Zealand ME Society (ANZMES) support group encourages people with ME/CFS to complete two doses of Pfizer/BioTech (Comirnaty) COVID-19 vaccine at the recommended dose: www.anzmes.org.nz/experts-talk-covid-19-vaccine-for-people-with-me-cfs/).

The Comirnaty vaccine that is being administered in New Zealand is well studied and provides a high degree of protection. However, as with any vaccine some people with ME/CFS have an exacerbation of symptoms which overlap with the commonly reported side effects of the COVID-19 vaccines. Serious reactions to COVID-19 vaccines can happen but are extremely rare. Medsafe continues to monitor the use of Comirnaty in New Zealand, including analysing reports of potential side effects in people with ME/CFS. Regularly updated summaries of any adverse effects from the vaccine can found be here: www.medsafe.govt.nz/COVID-19/vaccine-report-overview.asp.

The Medsafe data sheet for Comirnaty outlines the conditions which someone should not receive the vaccine (contraindications) as well as conditions where extra precaution should be taken. ME/CFS is not listed as a contraindication or a condition where precaution should be taken. The data sheet is available here: www.medsafe.govt.nz/profs/Datasheet/c/comirnatyinj.pdf

You may also be interested to know the Ministry of Health continues to monitor emerging international evidence on the effects of vaccination on people with ME/CFS, including receiving advice from the COVID-19 Technical Advisory Group (CV TAG). CV TAG is considering the impact of vaccination on people with ME/CFS and whether there is evidence for specific approaches to vaccination for this group. In this regard CV TAG has been in discussion with the Immunisation Advisory Centre (IMAC) and researchers at the University of Auckland.

A draft paper entitled "*Proposal to allow lower dose formulation in some people with ME*", considered by CV TAG on 1 February 2022, is attached to this letter. The relevant excerpt of the meeting minutes is attached below. It should be noted that no decisions have been made about this matter at this time.

3.0 **Proposal to allow the lower dose (Paediatric) formulation in some people with ME**

A brief overview was provided on the proposal. There is a significant number of people with ME in NZ, many of whom have chosen not to vaccinate. International data shows that up to 20% have reported severe adverse events, mostly severe relapse. The proposal outlined giving paediatric doses by prescription to ME patients on the basis of Pfizer's initial dose finding studies showing less reactogenicity with a 10µg dose than a 30µg dose, and reasonable immunogenicity.

CV TAG discussed the proposal and there was general support. However, it was noted that there is no guarantee that this will meet eligibility criteria for a vaccine certificate under the current legislation and legal review of the proposal would be beneficial.

A formal proposal and request for endorsement will be sent by the applicant to the Chair for consideration.

I trust this information fulfils your request. Under section 28(3) of the Act you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Ministry website at: www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'Rachel Lorimer', written over a faint circular stamp.

Rachel Lorimer
Acting Director
National Immunisation Programme

