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Lessons from the Peruvian *"Vacunagate"* Case: *Limits of regulation in research integrity*

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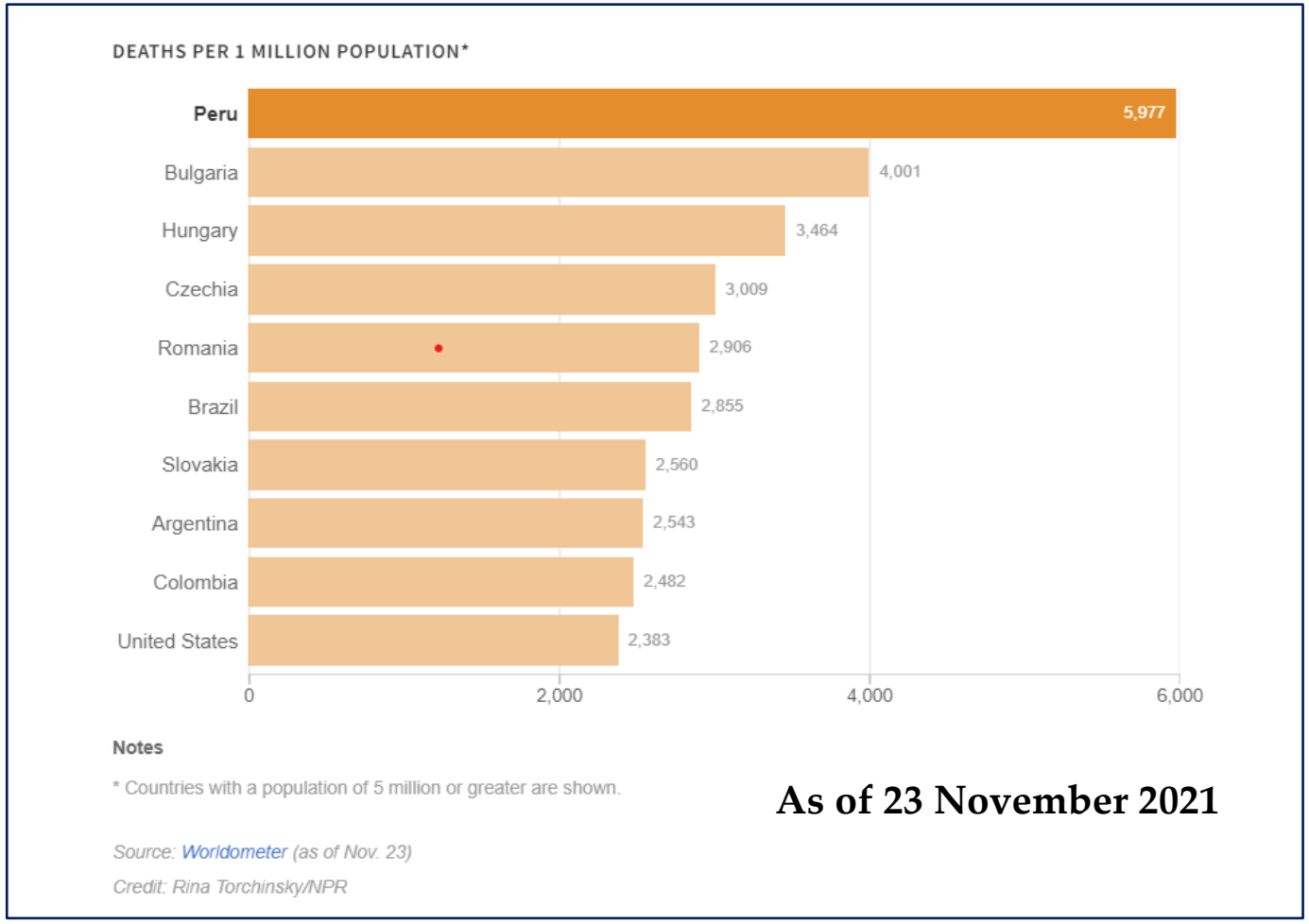
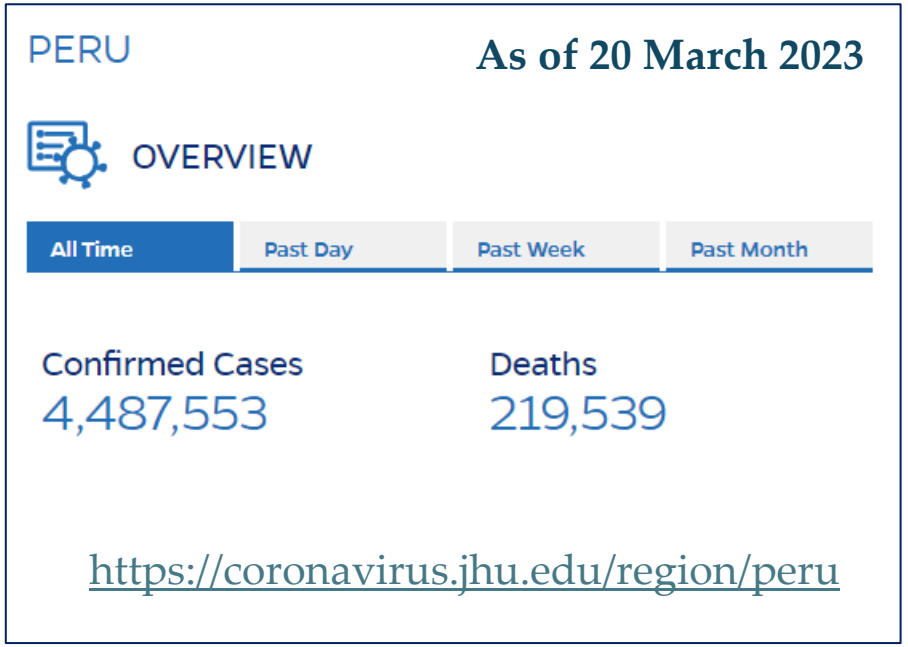
The opinions expressed here are exclusively those of the presenters and do not necessarily reflect the positions or opinions of the University of Texas Southwestern, the University of Miami, or the US National Institutes of Health.

Peru suffered one of the world's highest rates of COVID-19 and related deaths.



As of 23 November 2021

https://www.npr.org/sections/goatsandsoda/2021/11/27/1057387896/peru-has-the-worlds-highest-covid-death-rate-heres-why



https://coronavirus.jhu.edu/region/peru

Peru = ~32 Million pop (2021)

In 2021, Peru faced worldwide scandal over vaccine researchers' off-study administration of the experimental Sinopharm vaccine to family, friends, and officials, compounding public outcry over its high death rate.

THE AMERICAS

The Washington Post
Democracy Dies in Darkness

Fury in Peru after officials secretly received vaccine before health workers

By Simeon Tegel

February 17, 2021 at 4:14 p.m. EST

Peru Vaccine Scandal: 487, Including Government Officials, Were Secretly Vaccinated Ahead Of Healthcare Workers

Feb 16, 2021, 06:27pm EST

Forbes

Nature | Vol 592 | 8 April 2021

OUTRAGE OVER VACCINE-TRIAL SCANDAL AT PERUVIAN UNIVERSITIES

Researchers gave shots to politicians and family members, violating trial regulations.

Before the pandemic, Peru had a regulatory framework of standards and oversight in research ethics and research integrity.

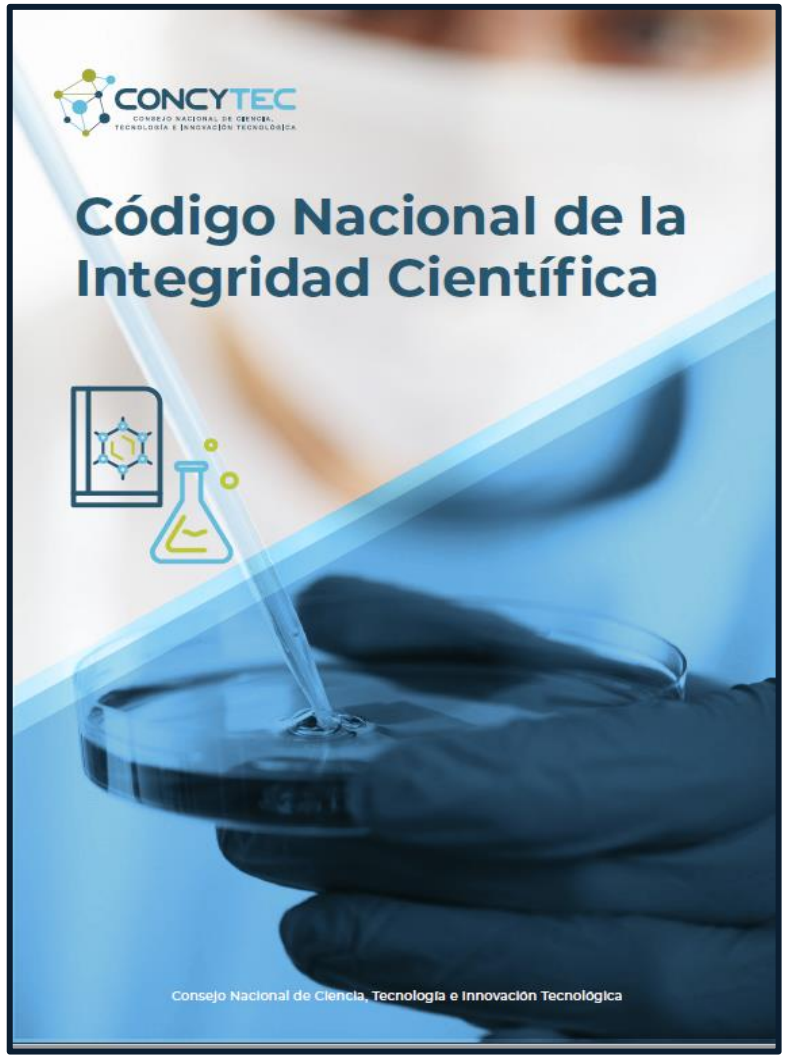
2015 Peruvian Ministry of Education's *Peruvian Institutional Licensing Model* required universities to have research integrity policies as a Basic Quality Condition for licensure and operation

2019 Peruvian National Council on Science, Technology & Technological Innovation(CONCYTEC) issued the comprehensive *National Code of Research Integrity*

2020 Peruvian Ministry of Health issued the technical document "*Ethical Considerations for Health Research with Human Beings,*" intended to:

- Adopt international standards of research ethics
- Set minimum standards for research ethics committees
- Promote scientific integrity in health research

Peruvian National Code of Research Integrity 2019



"Scientific integrity results from adherence to values and good practices … when formulating, proposing and conducting scientific research, the communication of results, and cooperative and mentoring relationships. All phases of scientific activity should be conducted based on the following principles:

a) *Integrity in scientific research and management*

b) *Intellectual honesty in all aspects of scientific research*

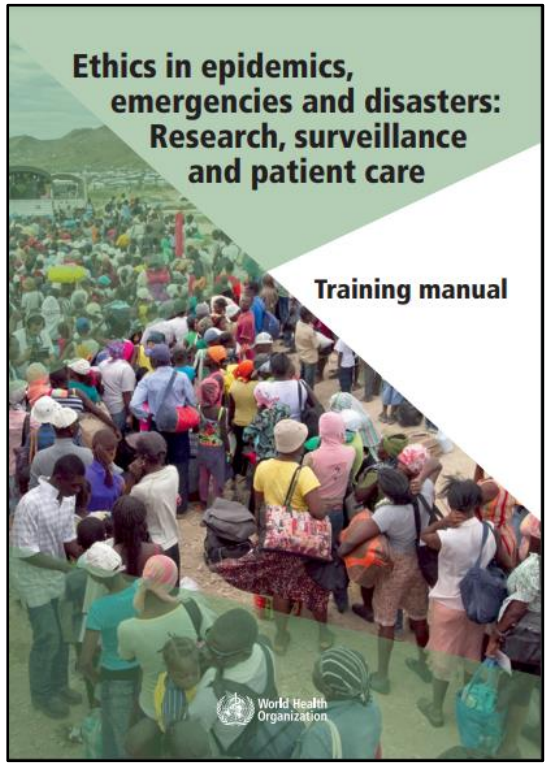
c) *Objectivity and impartiality in labor and professional relations*

d) *Truthfulness, fairness and responsibility in the implementation and dissemination of research results.*

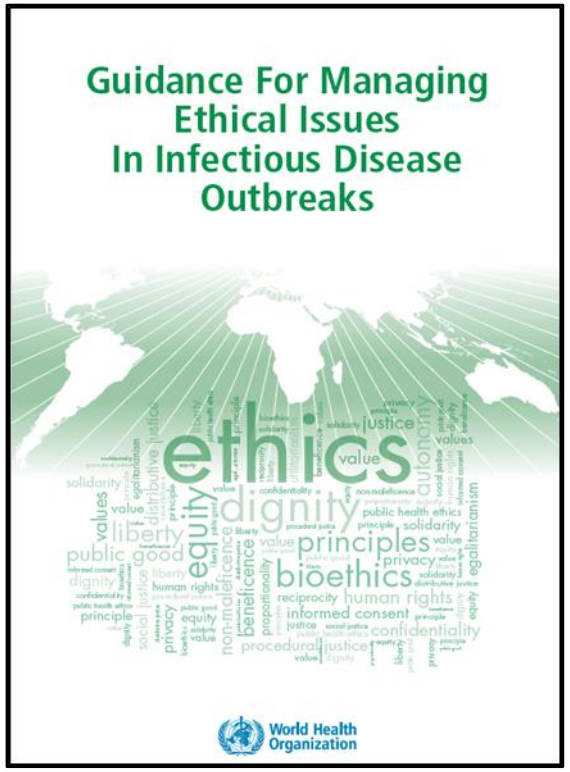
e) *Transparency, acting without conflict of interest, declaring and managing conflict, be it economic or otherwise*

Chapter II Scientific Integrity, 2.1 Principles of Scientific Integrity, CONCYTEC 2019
Translated from Spanish by the presenters

Beyond Peru's own national standards, after the Ebola outbreaks of 2013-14, the WHO issued international ethical standards and training guides for use of unapproved and experimental drugs and vaccines in an emergency.



January 2015
https://www.who.int/publications/i/item/9789241549349



2016
https://www.who.int/publications/i/item/9789241549837

ICH Guideline for Good Clinical Practice
https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf

The 2016 Good Clinical Practice standards from the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use *also apply to emergency drug and vaccine research.*

Under ICH E6 – GCP, ICH specifies the responsibilities of investigators, research institutions, study monitors, and sponsors to ensure:

5.18.4(ii) "**That the investigational product(s) are supplied only to subjects who are eligible to receive it and at the protocol specified dose(s)**."

ICH Guideline for Good Clinical Practice, November 2016
https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf

Three Peruvian agencies had oversight of SARS CoV-2 clinical trials

- The National Institute of Health's (INS) *General Office for Research and Technological Transfer* ***(OGITT)*** was responsible for evaluation, approval, and monitoring of all clinical trials conducted across the country.
- The General Office of Medicines, Supplies and Drugs **(DIGEMID**) was responsible for licensing the importation of study drugs and vaccines.
- In April 2020, in response to the COVID pandemic, the INS established the *National Transitional Research Ethics Committee* ***(CNTEI)*** to facilitate clinical SARS CoV-2 clinical trials.

Several SARS CoV-2 clinical trials were authorized in 2020

- Convalescent plasma (local laboratories)
- CureVac (Germany)
- Astra Zeneca (UK-Switzerland)
- Janssen (Belgium)

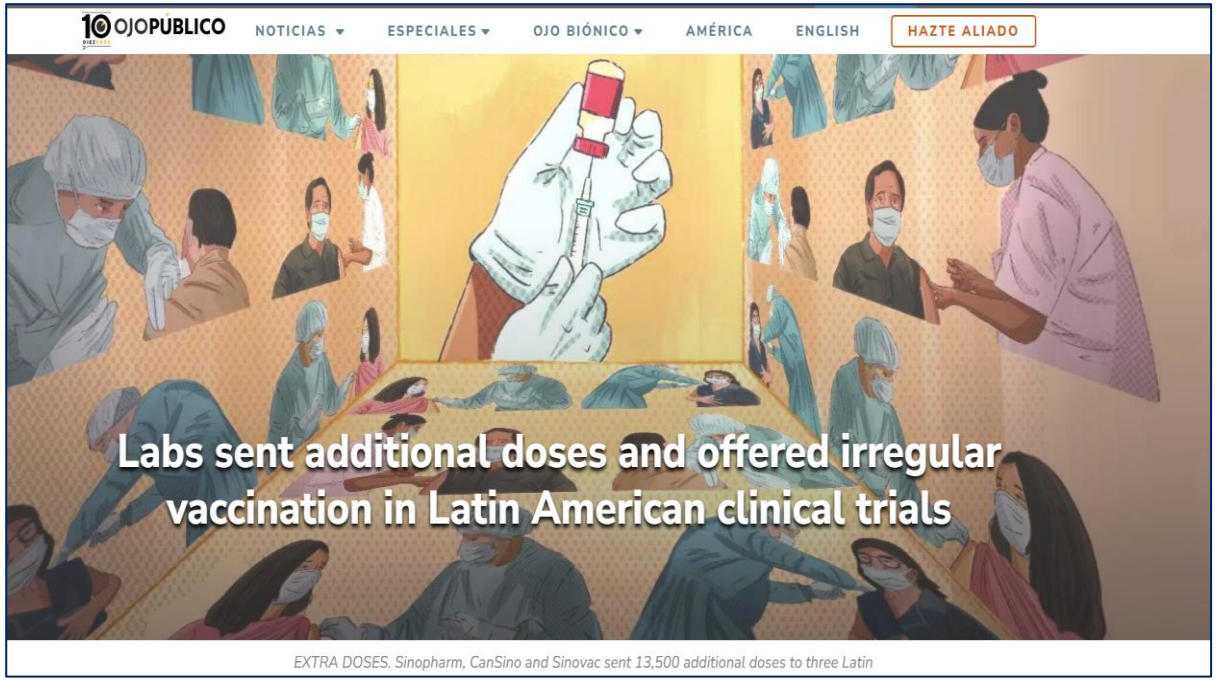
- Sinopharm - China National Biotec Group Co., Ltd. (China)
  - Inactivated virus vaccine
  - 1200 participants
  - 2 clinical trial sites in Lima – Universidad Peruana Cayetano Heredia and Universidad San Marcos
  - Approved August 18th, 2020

The Sinopharm protocol approved by the CNTEI included measures aimed at preventing contagion and saturation of the health system, such as the possible vaccination of the *research team and related personnel*, once the trial had established the experimental vaccine's efficacy.

Cabezas C. Integridad científica: el grito del silencio en medio del embate de la pandemia por la COVID-19. Anales de la Facultad de medicina. 2021;82(2):103- 5. https://doi.org/10.15381/anales. v82i2.21027

OGITT and DIGEMID authorized importation of 27,800 doses of the Sinopharm vaccine:

- 24,600 doses for trial participants
- **3,200 extra doses to immunize the research team and related personnel**



Decenio de la Igualdad de Oportunidades para mujeres y hombres
"Año de la Universalización de la Salud"

El Comercio

16/02/2021 07H01 - ACTUALIZADO A 16/02/2021 07H30

R.D. Nº 7388 -2020-DIGEMID/DPF/AESC/MINSA

RESOLUCION DIRECTORAL

Nº	Nombre del Producto o Código correspondiente	Nombre del ingrediente farmacéutico Activo (IFA)	Forma farmacéutica y vía de administración	Concentración	Nombre del Fabricante	Nombre del Exportador	Cantidad	Número de loteo Sistema de codificación*
1	Inactivated SARS-CoV-2 vaccine (Vero cell)	Inactivated SARS-CoV-2 vaccine (Vero cell)	Solution for parenteral injection (intramuscular)	200VU /dose for per human use, 0.5 mL/ dose	Wuhan Institute of Biological Products Co., Ltd.	China National Biotec Group Company Limited	8200 Syringes	202006011
2	Inactivated SARS-CoV-2 vaccine (Vero cell)	Inactivated SARS-CoV-2 vaccine (Vero cell)	Solution for parenteral injection (intramuscular)	4µg/dose for per human use, 0.5 mL/ dose	Beijing Institute of Biological Products Co., Ltd.	China National Biotec Group Company Limited	11400 Syringes	202007S026
3	Placebo/Aluminum Adjuvant of Inactivated SARS-CoV-2 vaccine	Placebo/Aluminum Adjuvant of Inactivated SARS-CoV-2 vaccine	Solution for parenteral injection (intramuscular)	0.5 mL/ dose, 0.5mL for per human use	Wuhan Institute of Biological Products Co., Ltd.	China National Biotec Group Company Limited	8200 syringes	202006002

'Vacunagate': Comptroller's Office reveals invalid records in the list of beneficiaries with the Sinopharm dose

Comptroller Nelson Shack indicated that 26 family groups have been detected, of which 75% are public officials. He specified that these must be sanctioned.

According to the criteria of The Trust Project

El Comercio

February 18, 2021

https://elcomercio.pe/lima/sucesos/vacunagate-contraloria-revela-registros-invalidos-en-la-lista-de-beneficiados-con-la-dosis-de-sinopharm-vacunas-sinopharm-peru-contraloria-noticia/

Vaccine Recipients Outside the Sinopharm Trial per the Comptroller's Report

- Data is inconsistent due to poor record keeping
- Approximately 950 doses were administered outside the trial
- Approximately 487 identified recipients
  - 26.8% of recipients had no data recorded
- Recipients included personnel conducting or supporting the trial
- According to available records, recipients included :
  - 26 family groups
    - 19 public officials and their relatives
  - Only 15.2% were over 60 years old, although the national distribution plan prioritized those over 65 years old (65% were under 45, 18% between 46-59)
- Some recipients received multiple doses (>3 in several cases), although the study protocol stipulated 2 doses, 21 days apart

https://ojo-publico.com/2493/vacunas-secretas-dosis-fantasmas-y-violaciones-al-protocolo

Los Angeles Times

WORLD & NATION

‘Vaccine-gate’ roils Peru: Politicians, families and friends secretly got COVID shots

By Patrick J. McDonnell and Adriana León

Feb. 18, 2021 5:52 PM PT

“The commission [*Peruvian Government Investigative Commission*] determined that, in principle, the 3,200 vaccines should never have arrived in the country because it is not customary to reserve vaccines outside of the clinical trial.

It was also determined that 1,200 vaccines were delivered to the Chinese Embassy in Peru, and their final destination is unknown.

Of the remaining 2,000 vaccines, 803 are being held at the Universidad Peruana Cayetano Heredia (UPCH) and 58 at the Universidad Nacional Mayor de San Marcos (UNMSM). Of the remaining 1,139 vaccines, 235 were used on individuals who had received a placebo during the clinical trial, **706 on the research team, and 198 on the close associates of the researchers**”.

Global Investigative Journalism Network

Insider Access to Chinese Vaccines: A Case Study in Pandemic Corruption from Peru

by Rowan Philp · August 4, 2021

gob.pe | Plataforma digital única del Estado Peruano

INFORME DE LA COMISIÓN SECTORIAL INVESTIGADORA

DE LA APLICACIÓN DE LA VACUNA CANDIDATA CONTRA LA COVID – 19

ÍNDICE

https://www.scribd.com/document/496037083/INFORME-DE-LA-COMISION-SECTORIAL-INVESTIGADORA-DE-LA-APLICACION-DE-LA-VACUNA-CANDIDATA-CONTRA-LA-COVID-19#from_embed

Conclusions of the Commission

- The researchers from Cayetano Heredia should not have included in the Protocol that the research team and personnel related to the study would be vaccinated.
- The INS should not have authorized a Protocol that included 3,200 additional doses beyond those needed for the study or text foreign to that permitted by Clinical Trial Regulations.
- The members of the CNTEI *"failed to evaluate the methodological, ethical, and legal aspects of clinical trial protocols for the prevention, diagnosis, and treatment of COVID-19."*

Recommendations of the Commission

- Consider withdrawing confidence from 13 named officials still in their positions
- Refer 35 named central administrative staff in the Ministry of Health, 75 named staff in agencies of the Ministry of Health, and all INS staff who participated directly in the case to the Technical Secretary for Disciplinary Procedures
- Refer 9 named investigators to the Office of Public Contracting and their relevant Professional Societies
- Refer the 4 principal investigators to their Universities and relevant Professional Societies
- Refer the former Minister of Health to the Attorney General to evaluate her possible violation of the Constitution
- Refer this report to the CONCYTEC to address responsible conduct of research and compliance with the National Code on Research Integrity.

https://www.scribd.com/document/496037083/INFORME-DE-LA-COMISION-SECTORIAL-INVESTIGADORA-DE-LA-APLICACION-DE-LA-VACUNA-CANDIDATA-CONTRA-LA-COVID-19#from_embed

Letras vol.93 no.138 Lima jul./dic. 2022 Epub 22-Dic-2022

http://dx.doi.org/10.30920/letras.93.138.12

Vacunagate: ¿era posible justificar moralmente el caso peruano?

Vacunagate: Was it possible to morally justify the Peruvian case?

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Newsdesk

Vacuna-gate escalates in Peru

The COVID-19 vaccine scandal in Peru reflects systemic corruption in the country that damages the health of the country's poorest.

Georgina Kenyon reports.

Kenyon G. Vacuna-gate escalates in Peru. Lancet Infect Dis. 2021 Apr;21(4):463. doi: 10.1016/S1473-3099(21)00157-2

Lessons, Reminders, and Unresolved Questions from Vacunagate

- Fear and panic are powerful motivators that can overwhelm careful planning, logic, and formal rules that most people might otherwise uphold.
- Personal benefit is easily cloaked in language of social benefit and service to others; self-interest may be hidden behind claims of the common good.
- When multiple people benefit from bending or ignoring clearly stated regulations, the result may be corruption, especially in small communities.
- The integrity of academic science remains subject to other political goals and forms of power, even as governments promote international ethical standards.
- Research misconduct during public health emergencies erodes trust in science and authorities and endangers lives.
- Can we prepare successfully to maintain research integrity in the next public health crisis?

Thank you!

Questions?

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