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1 Feature Article (essay)

2 **A bioethical case against using human challenge trials for COVID-19**

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1 **Abstract**

2 COVID-19 is a global health emergency for which vaccines are a key solution. A human
3 challenge trial (HCT) is a way of studying vaccine efficacy where healthy volunteers are
4 deliberately infected, in contrast to traditional phase III trials. Nearly 40 000 people
5 worldwide have expressed willingness to participate in COVID-19 HCTs in hopes of
6 accelerating vaccine development. This essay argues that HCTs may not only fail to deliver
7 on this aim, but violate the bioethical principles of autonomy, beneficence, non-maleficence,
8 and justice. For now, in the case of COVID-19, HCTs are inferior to tried-and-true phase III
9 trials, which have already generated several vaccines at unprecedented speed.

10 **Learning Points**

- 11 1. COVID-19 is a global health emergency for which vaccines are a key solution.
- 12 2. The risks of human challenge trials for COVID-19 outweigh their benefits in terms of
13 the bioethical principles of autonomy, beneficence, non-maleficence, and justice.
- 14 3. Since traditional phase III trials have generated COVID-19 vaccines at unprecedented
15 speed, there is currently negligible role for human challenge trials for COVID-19.

16

1 **Introduction**

2 A human challenge trial (HCT) is a method of studying vaccine efficacy where healthy
3 volunteers receive a vaccine or placebo before being deliberately exposed to an infectious
4 agent [1]. Participants are quarantined in a clinical trials unit while researchers monitor their
5 immune response and symptoms. In contrast, traditional phase III trials involve several
6 thousand participants receiving a vaccine and being observed long-term to determine its
7 efficacy [2]. HCTs began in the 1960s at the United Kingdom Common Cold Unit to
8 investigate and cure low-virulence coronaviruses, and have contributed most of today's
9 knowledge about these coronaviruses [3,4]. During the COVID-19 pandemic, nearly 40 000
10 people from 166 countries have volunteered to participate in HCTs through the organisation
11 1Day Sooner to help fast-track vaccine development [5]. In fact, a HCT called UK COVID
12 Challenge led by hVIVO is now underway in the United Kingdom [6]. In theory, HCTs can
13 accelerate vaccine development to save millions of lives. However, SARS-CoV-2 is a highly
14 virulent coronavirus, unlike those studied previously, with the potential to cause severe
15 disease and death with no current rescue therapy. Furthermore, phase III trials with well-
16 established, less ethically contentious designs have already produced vaccines at
17 unprecedented speed. This essay argues that HCTs for COVID-19 are not only redundant, but
18 would challenge the bioethical principles of autonomy, beneficence, non-maleficence, and
19 justice central to medical practice and research [7]. Therefore, despite ongoing public
20 interest, HCTs are currently not scientifically or ethically justified for COVID-19 vaccine
21 development.

22 Medical ethics deals with moral dilemmas arising due to conflicts between clinicians' duties
23 towards their patients and their outcomes. Two main frameworks underlying medical ethics
24 are utilitarianism and deontology. Utilitarianism is a branch of consequentialism which
25 argues that an act is morally "good" if it leads to good consequences for the greatest number
26 of people, or that "the end justifies the means" [9]. Conversely, deontology argues that people
27 are not means but ends in themselves [10], so clinicians have a duty to respect patients'
28 intrinsic rights. These duties and rights were elaborated by Beauchamp and Childress in 1979
29 as bioethical principles of autonomy, beneficence, non-maleficence, and justice [7].
30 Beneficence is a duty to promote wellbeing, non-maleficence is a duty to avoid causing harm,
31 autonomy is a person's right to determine their own course, and justice refers to "fair,
32 equitable, and appropriate treatment" according to patients' needs [7]. This essay will discuss
33 how HCTs may breach these principles, and why the extensive planning required to make
34 them ethically acceptable makes them less desirable than established phase III trials.

35

1 Discussion

2 A study respects participants' autonomy, their right to determine their own course, if they can
3 give valid consent, where they are informed of the study's purpose, procedures, and potential
4 benefits versus harms, given sufficient opportunity to ask questions, and have their
5 understanding tested and documented [11]. However, it is challenging to fully inform
6 participants when there are many unknowns surrounding COVID-19 and its long-term
7 effects, particularly as new strains emerge [1]. Severe population risks posed by a pandemic
8 may limit participants' ability to give uncoerced consent, and emergency circumstances risk
9 deprioritising ethics as researchers rush or abbreviate consent procedures [12-14]. Offering
10 monetary compensation, even in line with unskilled labour with comparable risk, becomes
11 potentially exploitative if people participate out of a need for the money. This is especially
12 true if HCTs are conducted in countries with higher background transmission rates which
13 tend to be poorer. Whilst advocates argue deliberate infection is more ethically acceptable in
14 countries with already high natural transmission [1], participants from these countries are
15 more likely to accept lower sums than in wealthier countries [15]. Whilst HCTs have the
16 potential to generate important knowledge, this cannot take priority over the autonomy of
17 participants and communities.

18 The main way HCTs achieve their proposed benefit of advancing vaccine development faster
19 than phase III trials is in settings of low transmission, where natural infection rates are too
20 low for larger trials to progress [11]. However, with the widespread transmission of COVID-
21 19, phase III trials have successfully generated several vaccines at record speed, which has
22 rendered HCTs redundant in the COVID-19 vaccine development effort. It is unclear whether
23 organisations such as the United States Food and Drug Administration would even consider
24 HCT data in licensing decisions, with policies mandating late phase clinical trials involving
25 thousands of participants including those who are elderly and have comorbidities [16].
26 Researchers also need up to two years to agree on an HCT model, develop and manufacture a
27 challenge strain, gain approval for human use, and conduct dose-escalation studies to
28 determine the target dose to elicit the minimum level of illness required to determine primary
29 outcomes. This process may be too slow for a global health emergency [16]. To be ethically
30 acceptable, low risk challenge strains must be used in healthy young adults to have the lowest
31 possible risk of severe complications [8], but this could produce results less applicable to
32 higher risk groups infected with higher risk strains [1]. There are no guaranteed direct
33 benefits to participants apart from a vaccine possibly being effective. So far, vaccines have
34 mainly been effective in preventing severe symptoms rather than transmission [17], although
35 volunteers may overestimate benefits due to the "preventative misconception" that infection
36 will confer some immunity regardless [18]. HCTs ultimately offer marginal benefits
37 compared to phase III trials but pose substantial risks.

38 HCTs pose several unique harms compared to traditional trials. In their defence, HCTs
39 incorporate harm-minimising measures such as only infecting 10-50 participants compared to
40 several thousand in phase III trials, and only recruiting healthy young adults more likely to
41 develop self-limiting disease but who would be monitored, isolated, treated, and compensated
42 [18]. Despite this, participants would still incur several risks without direct benefit such as
43 invasive procedures, frequent bodily fluid sampling, and extended quarantine. Furthermore,
44 participants may still develop severe disease (particularly with emerging strains [18]) or long-
45 term consequences such as stroke [19], respiratory deficits [1], and "long COVID" [20].
46 There have not yet been any human deaths in HCTs, thanks to the availability of rescue
47 therapies, so COVID-related deaths in HCTs without reliable rescue therapies could erode
48 public trust in vaccine research. Although HCTs have previously been conducted on

1 influenza, which lacks rescue therapy, COVID-19 is 10 times as lethal [21]. Supporters have
2 argued that healthy young adults should be able to consent to HCTs as they can for kidney
3 donation, since COVID-19 infection carries the same mortality of 0.01% [13,22,23].
4 However, a well-understood procedure which has been performed for decades with a high
5 success rate is not readily comparable to deliberate infection with a poorly understood virus.
6 HCTs are also unique in putting third parties at risk of unintentional transmission from
7 participants, which could trigger man-made outbreaks [1]. Even if HCTs were conducted,
8 larger trials would still be needed because adverse effects, such as cerebral venous sinus
9 thrombosis and immune thrombocytopenic purpura linked to the Vaxzevria (AstraZeneca,
10 University of Oxford, UK) vaccine, may only emerge once thousands have been vaccinated
11 [18]. HCTs offer limited social and scientific benefits despite substantial risks compared with
12 alternative trial designs, and their benefits are further diminished by the time and resources
13 required to mitigate their risks.

14 Vaccination helps achieve justice by protecting whole populations from disease and reversing
15 negative social and economic impacts. HCTs indeed have the potential to rapidly evaluate
16 several hundred vaccines and weed out less promising candidates before investing in larger
17 trials. However, HCTs are logistically difficult, time-consuming, and expensive to conduct
18 ethically and justly. Years of planning is required to develop a challenge strain, address
19 ethical concerns, then rigorously justify the need for HCTs in protocols, trial registers, and
20 articles [16]. Extensive dialogue needs to occur between all stakeholders (for example,
21 scientists, ethicists, prospective participants, community representatives, other countries)
22 regarding design, standards for data collection and dissemination, community acceptance,
23 and how results will affect future research, practice, vaccine licensure, and manufacturing [1].
24 Shortcutting these procedures risks eroding public trust and fuelling hesitancy if vaccine
25 development is considered too hasty [18]. Once approved, HCTs themselves would require
26 enormous resources including suitable sites, trained staff, personal protective equipment,
27 emergency medical services, regular staff testing, and purpose-built facilities to contain the
28 virus in an enclosed environment with single negative pressure, filtered, externally vented
29 rooms with separate wastewater systems. Countries with high background transmission
30 where HCTs would be conducted tend to have strained health systems, so HCTs may divert
31 scarce resources away from their pandemic response [24]. Furthermore, these communities
32 may face higher transmission risk due to systemic injustices (for example, increased
33 incarceration, overcrowding, limited access to medical care) [24], which HCTs could be seen
34 as exploiting. Whilst HCTs are well-intentioned, the practical reality of conducting them may
35 undermine the pursuit of justice in the COVID-19 pandemic.

36

1 **Conclusion**

2 COVID-19 is a global health emergency for which vaccines are a key part of the solution.
3 Governments and communities have placed high urgency and expectations on vaccine
4 development, perhaps with the erroneous belief that “anything is better than nothing”, which
5 risks deprioritising human safety and wellbeing in research [24]. HCTs are a way of
6 evaluating vaccine safety and efficacy by deliberately infecting a small number of
7 participants with a low-virulence challenge strain of SARS-CoV-2. Despite ongoing public
8 interest in HCTs, they have a limited role to play in the COVID-19 pandemic considering
9 traditional phase III trials have already generated several effective vaccines. Furthermore,
10 when examined against the four principles underlying contemporary medical ethics –
11 autonomy, beneficence, non-maleficence, and justice – the ethical risks of HCTs would
12 arguably outweigh their benefits for the COVID-19 pandemic. HCTs would not be
13 impossible to conduct ethically, but the time it would take, considering that we already have
14 several vaccines, means they have been left in the dust.

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1 **References**

- 2 [1] Jamrozik E, Selgelid MJ. COVID-19 human challenge studies: ethical issues. *Lancet*
3 *Infect Dis.* 2020;20(8):e198-e203.
- 4 [2] Eyal N, Lipsitch M, Smith PG. Human challenge studies to accelerate coronavirus
5 vaccine licensure. *J Infect Dis.* 2020;221(11):1752-6.
- 6 [3] Callow KA, Parry HF, Sergeant M, Tyrrell DAJ. The time course of the immune response
7 to experimental coronavirus infection of man. *Epidemiol Infect.* 1990;105(2):435-46.
- 8 [4] Higgins PG, Phillpotts RJ, Scott GM, Wallace J, Bernhardt LL, Tyrrell DA. Intranasal
9 interferon as protection against experimental respiratory coronavirus infection in volunteers.
10 *Antimicrob Agents Chemother.* 1983;24(5):713-5.
- 11 [5] 1Daysooner. COVID-19 human challenge trials. [Internet]. 2020. Available from:
12 <https://1daysooner.org>.
- 13 [6] hVIVO Services Limited. UK COVID Challenge United Kingdom: hVIVO Services
14 Limited. [Internet]. 2020. Available from: [https://ukcovidchallenge.com/covid-19-volunteer-](https://ukcovidchallenge.com/covid-19-volunteer-trials/)
15 [trials/](https://ukcovidchallenge.com/covid-19-volunteer-trials/).
- 16 [7] Beauchamp TL, Childress JF. Principles of biomedical ethics. 6th ed. NY: Oxford
17 University Press; 2009.
- 18 [8] World Health Organization. Key criteria for the ethical acceptability of COVID-19 human
19 challenge studies. [Internet]. 2020. Available from:
20 [https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-19-](https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-19-humanchallenge/en/)
21 [humanchallenge/en/](https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-19-humanchallenge/en/).
- 22 [9] Sinnott-Armstrong W. Consequentialism. In: Edward N. Zalta, editors. *The Stanford*
23 *Encyclopedia of Philosophy.* Summer 2019 ed. Stanford (CA): Stanford University; 2019.
- 24 [10] Kant I. *Groundwork of the metaphysics of morals: a German-English edition.*
25 Cambridge (UK): Cambridge University Press; 2012.
- 26 [11] Bambery B, Selgelid M, Weijer C, Savulescu J, Pollard AJ. Ethical criteria for human
27 challenge studies in infectious diseases. *Public health ethics.* 2016;9(1):92-103.
- 28 [12] Singer P, Chappell R. Pandemic ethics: the case for experiments on human volunteers.
29 DC: Washington Post. 2020.
- 30 [13] Chappell RY, Singer P. Pandemic ethics: the case for risky research. *Res. Ethics.*
31 2020;16(3-4):1-8.
- 32 [14] Smith M, Emanuel E, Thomé B, Upshur R. Ethical conditions for accelerating COVID-
33 19 vaccine research [version 1; peer review: 1 approved, 1 approved with reservations].
34 *Wellcome Open Res.* 2020;5(249).
- 35 [15] Lamkin M, Elliott C. Avoiding exploitation in phase I clinical trials: more than (un)just
36 compensation. *J Law Med Ethics.* 2018;46(1):52-63.
- 37 [16] Deming ME, Michael NL, Robb M, Cohen MS, Neuzil KM. Accelerating development
38 of SARS-CoV-2 vaccines — the role for controlled human infection models. *N Engl J Med.*
39 2020;383(10):e63-e.
- 40 [17] Brown CM, Vostok J, Johnson H, Burns M, Gharpure R, Sami S, et al. Outbreak of
41 SARS-CoV-2 infections, including COVID-19 vaccine breakthrough infections, associated
42 with large public gatherings - Barnstable County, Massachusetts, July 2021. *MMWR Morb*
43 *Mortal Wkly Rep.* 2021;70(31):1059-62.
- 44 [18] Kahn JP, Henry LM, Mastroianni AC, Chen WH, Macklin R. For now, it's unethical to
45 use human challenge studies for SARS-CoV-2 vaccine development. *Proc Natl Acad Sci U S*
46 *A.* 2020;117(46):28538-42.
- 47 [19] Fifi JT, Mocco J. COVID-19 related stroke in young individuals. *Lancet Neurol.*
48 2020;19(9):713-5.

- 1 [20] Greenhalgh T, Knight M, A'Court C, Buxton M, Husain L. Management of post-acute
2 COVID-19 in primary care. *BMJ*. 2020;370:m3026-m.
- 3 [21] McPartlin SON, Morrison J, Rohrig A, Weijer C. COVID-19 vaccines: should we allow
4 human challenge studies to infect healthy volunteers with SARS-CoV-2? *BMJ*.
5 2020;371:m4258-m.
- 6 [22] Jayaram A, Sparks J, Callies D. Justifying the risks of COVID-19 challenge trials: the
7 analogy with organ donation. *Bioethics*. 2021;10.1111/bioe.12889.
- 8 [23] Kortram K, Ijzermans JN, Dor FJ. Perioperative events and complications in minimally
9 invasive live donor nephrectomy: a systematic review and meta-analysis. *Transplantation*.
10 2016;100(11):2264-75.
- 11 [24] Wibawa T. COVID-19 vaccine research and development: ethical issues. *Trop Med Int*
12 *Health*. 2021;26(1):14-9.

13