

1 **Senior Editor**

2 Mabel Leow

3

4 **Proofreader**

5 Ivy Jiang Trung

6 Tran.

7

8 **Senior Proofreader**

9 Emily Feng-Gu

10

11 Date of submission: 20 November 2021

12 Date of acceptance: 21 December 2021

13 Date of online publication: 22 December 2021

14

15 Feature Article (essay)

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

17 Dr Alannah Paparo

18 Doctor of Medicine (MD)

19 4th year

20 University of Western Australia (UWA)

21 Student

22 *Alannah Paparo is a final-year medical student graduating from the University of*  
23 *Western Australia in 2021. She has degrees in physiology and law, and her research*  
24 *interests are in bioethics and medical education. Alannah was born and raised in*  
25 *Western Australia, and looks forward to completing her internship in 2022 at Sir*  
26 *Charles Gairdner Hospital in Perth.*

27 **Corresponding author**

28 Dr Alannah Paparo

29 Postal address: Sir Charles Gairdner Hospital, Hospital Avenue, Nedlands WA 6009

30 Email: [alannahpaparo@gmail.com](mailto:alannahpaparo@gmail.com)

31 Mob: +61410234445

32 **Source of submission:** Written for AMSJ.

33 **Summary of Article:** For now, human challenge trials are inferior to phase III trials in  
34 COVID-19 vaccine development.

35 **Keywords:** bioethics, COVID-19, clinical trials, medical ethics, public health

36 **Number of tables: 0 Number of figures: 0 Word count:** 1564 words

37 **Abstract**

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

46 **Learning Points**

- 47 1. COVID-19 is a global health emergency for which vaccines are a key solution.
- 48 2. The risks of human challenge trials for COVID-19 outweigh their benefits in terms of
- 49 the bioethical principles of autonomy, beneficence, non-maleficence, and justice.

- 50 3. Since traditional phase III trials have generated COVID-19 vaccines at unprecedented  
51 speed, there is currently negligible role for human challenge trials for COVID-19.

## 52 **Introduction**

53 A human challenge trial (HCT) is a method of studying vaccine efficacy where healthy  
54 volunteers receive a vaccine or placebo before being deliberately exposed to an infectious  
55 agent [1]. Participants are quarantined in a clinical trials unit while researchers monitor their  
56 immune response and symptoms. In contrast, traditional phase III trials involve several  
57 thousand participants receiving a vaccine and being observed long-term to determine its  
58 efficacy [2]. HCTs began in the 1960s at the United Kingdom Common Cold Unit to  
59 investigate and cure low-virulence coronaviruses, and have contributed most of today's  
60 knowledge about these coronaviruses [3,4]. During the COVID-19 pandemic, nearly 40 000  
61 people from 166 countries have volunteered to participate in HCTs through the organisation  
62 1Day Sooner to help fast-track vaccine development [5]. In fact, a HCT called UK COVID  
63 Challenge led by hVIVO is now underway in the United Kingdom [6]. In theory, HCTs can  
64 accelerate vaccine development to save millions of lives. However, SARS-CoV-2 is a highly  
65 virulent coronavirus, unlike those studied previously, with the potential to cause severe  
66 disease and death with no current rescue therapy. Furthermore, phase III trials with  
67 well-established, less ethically contentious designs have already produced vaccines at  
68 unprecedented speed. This essay argues that HCTs for COVID-19 are not only redundant, but  
69 would challenge the bioethical principles of autonomy, beneficence, non-maleficence, and  
70 justice central to medical practice and research [7]. Therefore, despite ongoing public interest,  
71 HCTs are currently not scientifically or ethically justified for COVID-19 vaccine  
72 development.

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

## 86 **Discussion**

87 A study respects participants' autonomy, their right to determine their own course, if they can  
88 give valid consent, where they are informed of the study's purpose, procedures, and potential  
89 benefits versus harms, given sufficient opportunity to ask questions, and have their  
90 understanding tested and documented [11]. However, it is challenging to fully inform  
91 participants when there are many unknowns surrounding COVID-19 and its long-term  
92 effects, particularly as new strains emerge [1]. Severe population risks posed by a pandemic  
93 may limit participants' ability to give uncoerced consent, and emergency circumstances risk  
94 deprioritising ethics as researchers rush or abbreviate consent procedures [12-14]. Offering  
95 monetary compensation, even in line with unskilled labour with comparable risk, becomes  
96 potentially exploitative if people participate out of a need for the money. This is especially  
97 true if HCTs are conducted in countries with higher background transmission rates which

98 tend to be poorer. Whilst advocates argue deliberate infection is more ethically acceptable in  
99 countries with already high natural transmission [1], participants from these countries are  
100 more likely to accept lower sums than in wealthier countries [15]. Whilst HCTs have the  
101 potential to generate important knowledge, this cannot take priority over the autonomy of  
102 participants and communities.

103 The main way HCTs achieve their proposed benefit of advancing vaccine development faster  
104 than phase III trials is in settings of low transmission, where natural infection rates are too  
105 low for larger trials to progress [11]. However, with the widespread transmission of  
106 COVID19, phase III trials have successfully generated several vaccines at record speed,  
107 which has rendered HCTs redundant in the COVID-19 vaccine development effort. It is  
108 unclear whether organisations such as the United States Food and Drug Administration would  
109 even consider HCT data in licensing decisions, with policies mandating late phase clinical  
110 trials involving thousands of participants including those who are elderly and have  
111 comorbidities [16]. Researchers also need up to two years to agree on an HCT model,  
112 develop and manufacture a challenge strain, gain approval for human use, and conduct dose-  
113 escalation studies to determine the target dose to elicit the minimum level of illness required  
114 to determine primary outcomes. This process may be too slow for a global health emergency  
115 [16]. To be ethically acceptable, low risk challenge strains must be used in healthy young  
116 adults to have the lowest possible risk of severe complications [8], but this could produce  
117 results less applicable to higher risk groups infected with higher risk strains [1]. There are no  
118 guaranteed direct benefits to participants apart from a vaccine possibly being effective. So  
119 far, vaccines have mainly been effective in preventing severe symptoms rather than  
120 transmission [17], although volunteers may overestimate benefits due to the “preventative  
121 misconception” that infection will confer some immunity regardless [18]. HCTs ultimately  
122 offer marginal benefits compared to phase III trials but pose substantial risks.

123 HCTs pose several unique harms compared to traditional trials. In their defence, HCTs  
124 incorporate harm-minimising measures such as only infecting 10-50 participants compared to  
125 several thousand in phase III trials, and only recruiting healthy young adults more likely to  
126 develop self-limiting disease but who would be monitored, isolated, treated, and compensated  
127 [18]. Despite this, participants would still incur several risks without direct benefit such as  
128 invasive procedures, frequent bodily fluid sampling, and extended quarantine. Furthermore,  
129 participants may still develop severe disease (particularly with emerging strains [18]) or  
130 longterm consequences such as stroke [19], respiratory deficits [1], and “long COVID” [20].  
131 There have not yet been any human deaths in HCTs, thanks to the availability of rescue  
132 therapies, so COVID-related deaths in HCTs without reliable rescue therapies could erode  
133 public trust in vaccine research. Although HCTs have previously been conducted on  
134 influenza, which lacks rescue therapy, COVID-19 is 10 times as lethal [21]. Supporters have  
135 argued that healthy young adults should be able to consent to HCTs as they can for kidney  
136 donation, since COVID-19 infection carries the same mortality of 0.01% [13,22,23].  
137 However, a well-understood procedure which has been performed for decades with a high  
138 success rate is not readily comparable to deliberate infection with a poorly understood virus.  
139 HCTs are also unique in putting third parties at risk of unintentional transmission from  
140 participants, which could trigger man-made outbreaks [1]. Even if HCTs were conducted,  
141 larger trials would still be needed because adverse effects, such as cerebral venous sinus  
142 thrombosis and immune thrombocytopenic purpura linked to the Vaxzevria (AstraZeneca,  
143 University of Oxford, UK) vaccine, may only emerge once thousands have been vaccinated  
144 [18]. HCTs offer limited social and scientific benefits despite substantial risks compared with

145 alternative trial designs, and their benefits are further diminished by the time and resources  
146 required to mitigate their risks.

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

### 169 **Conclusion**

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

183 **References**

- 184 [1] Jamrozik E, Selgelid MJ. COVID-19 human challenge studies: ethical issues. *Lancet*  
185 *Infect Dis.* 2020;20(8):e198-e203.
- 186 [2] Eyal N, Lipsitch M, Smith PG. Human challenge studies to accelerate coronavirus  
187 vaccine licensure. *J Infect Dis.* 2020;221(11):1752-6.
- 188 [3] Callow KA, Parry HF, Sergeant M, Tyrrell DAJ. The time course of the immune  
189 response to experimental coronavirus infection of man. *Epidemiol Infect.* 1990;105(2):435-  
190 46. [4] Higgins PG, Phillpotts RJ, Scott GM, Wallace J, Bernhardt LL, Tyrrell DA. Intranasal  
191 interferon as protection against experimental respiratory coronavirus infection in volunteers.  
192 *Antimicrob Agents Chemother.* 1983;24(5):713-5.
- 193 [5] 1Daysooner. COVID-19 human challenge trials. [Internet]. 2020. Available from:  
194 <https://1daysooner.org>.
- 195 [6] hVIVO Services Limited. UK COVID Challenge United Kingdom: hVIVO Services  
196 Limited. [Internet]. 2020. Available from: [https://ukcovidchallenge.com/covid-19-](https://ukcovidchallenge.com/covid-19-volunteertrials/)  
197 [volunteertrials/](https://ukcovidchallenge.com/covid-19-volunteertrials/).
- 198 [7] Beauchamp TL, Childress JF. Principles of biomedical ethics. 6th ed. NY: Oxford  
199 University Press; 2009.
- 200 [8] World Health Organization. Key criteria for the ethical acceptability of COVID-19  
201 human challenge studies. [Internet]. 2020. Available from:  
202 [https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-](https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-19humanchallenge/en/)  
203 [19humanchallenge/en/](https://www.who.int/ethics/publications/key-criteria-ethical-acceptability-of-covid-19humanchallenge/en/).
- 204 [9] Sinnott-Armstrong W. Consequentialism. In: Edward N. Zalta, editors. *The Stanford*  
205 *Encyclopedia of Philosophy.* Summer 2019 ed. Stanford (CA): Stanford University;  
206 2019.
- 207 [10] Kant I. *Groundwork of the metaphysics of morals: a German-English edition.*  
208 Cambridge (UK): Cambridge University Press; 2012.
- 209 [11] Bamberg B, Selgelid M, Weijer C, Savulescu J, Pollard AJ. Ethical criteria for human  
210 challenge studies in infectious diseases. *Public health ethics.* 2016;9(1):92-103.
- 211 [12] Singer P, Chappell R. Pandemic ethics: the case for experiments on human volunteers.  
212 DC: Washington Post. 2020.
- 213 [13] Chappell RY, Singer P. Pandemic ethics: the case for risky research. *Res. Ethics.*  
214 2020;16(3-4):1-8.
- 215 [14] Smith M, Emanuel E, Thomé B, Upshur R. Ethical conditions for accelerating  
216 COVID19 vaccine research [version 1; peer review: 1 approved, 1 approved with  
217 reservations].  
218 *Wellcome Open Res.* 2020;5(249).
- 219 [15] Lamkin M, Elliott C. Avoiding exploitation in phase I clinical trials: more than (un)just  
220 compensation. *J Law Med Ethics.* 2018;46(1):52-63.
- 221 [16] Deming ME, Michael NL, Robb M, Cohen MS, Neuzil KM. Accelerating development  
222 of SARS-CoV-2 vaccines — the role for controlled human infection models. *N Engl J*  
223 *Med.*  
224 2020;383(10):e63-e.
- 225 [17] Brown CM, Vostok J, Johnson H, Burns M, Gharpure R, Sami S, et al. Outbreak of  
226 SARS-CoV-2 infections, including COVID-19 vaccine breakthrough infections,  
227 associated with large public gatherings - Barnstable County, Massachusetts, July 2021.  
228 *MMWR Morb Mortal Wkly Rep.* 2021;70(31):1059-62.

- 229 [18] Kahn JP, Henry LM, Mastroianni AC, Chen WH, Macklin R. For now, it's unethical to  
230 use human challenge studies for SARS-CoV-2 vaccine development. *Proc Natl Acad Sci*  
231 *U S A.* 2020;117(46):28538-42.
- 232 [19] Fifi JT, Mocco J. COVID-19 related stroke in young individuals. *Lancet Neurol.*  
233 2020;19(9):713-5.
- 234 [20] Greenhalgh T, Knight M, A'Court C, Buxton M, Husain L. Management of post-acute  
235 COVID-19 in primary care. *BMJ.* 2020;370:m3026-m.
- 236 [21] McPartlin SON, Morrison J, Rohrig A, Weijer C. COVID-19 vaccines: should we allow  
237 human challenge studies to infect healthy volunteers with SARS-CoV-2? *BMJ.*  
238 2020;371:m4258-m.
- 239 [22] Jayaram A, Sparks J, Callies D. Justifying the risks of COVID-19 challenge trials: the  
240 analogy with organ donation. *Bioethics.* 2021;10.1111/bioe.12889.
- 241 [23] Kortram K, Ijzermans JN, Dor FJ. Perioperative events and complications in minimally  
242 invasive live donor nephrectomy: a systematic review and meta-analysis.  
243 *Transplantation.* 2016;100(11):2264-75.
- 244 [24] Wibawa T. COVID-19 vaccine research and development: ethical issues. *Trop Med Int*  
245 *Health.* 2021;26(1):14-9.

246