



21 December 2021

The Hon Greg Hunt
Minister for Health and Aged Care
PO Box 6022
House of Representatives, Parliament House
CANBERRA ACT 2600

By email: Minister.Hunt@health.gov.au

Dear Minister,

RE: Improving booster uptake and reporting of 'fully vaccinated' status

I write with regard to the current uptake of COVID-19 boosters immunisations, particularly in light of the emerging and highly transmissible Omicron variant.

Catholic Health Australia believes there would be value in the Federal Government:

- continuing to push for the earliest possible uptake of booster immunisations; reducing the eligibility window for booster immunisation to four months at most after an individuals' second COVID-19 immunisation; and
- improving awareness of community protection by updating the definition of fully vaccinated and its corresponding statistics.

As you're aware, the R (or reproduction) number of COVID-19 is rising in a number of states and territories - in NSW over the past week it has been as high as 1.5. Some Australian experts have calculated the current R number as even higher at 1.8.¹

The Prime Minister has called on Australians to exercise personal responsibility for their COVID-19 safety going forward. In order to allow Australian's to properly manage their own risk and to incentivise booster uptake, it is important that public reporting on vaccination rates remains accurate.

Vaccination statistics

While some states have a headline 'fully vaccinated' rate approaching 95%, Catholic Health Australia notes this will become an increasingly poor descriptor of the protection vaccines are providing our community. This figure assumes substantial protection is still present in those residents that were vaccinated first. We now know that COVID-19 vaccinations are losing effectiveness as soon as a few months after the second dose is received. Early evidence suggests that this is particularly true of the Omicron variant, with some studies

¹ <https://twitter.com/profesterman/status/1470996793575940099>



suggesting a third booster can significantly increase protection.^{2 3} Currently, a significant proportion of those eligible for a booster shot, even from 5 months, have not received a booster. This means they can no longer be considered fully vaccinated.⁴ A significant proportion of Australians under 16 are not vaccinated, due to either ineligibility, hesitancy, or lack of opportunity. While the prevalence of serious disease among young children is thankfully low, they are still able to carry and transmit COVID-19. In short, Catholic Health Australia believes the effective vaccination rate may now be below the reported headline rate. Catholic Health Australia is concerned that faced with a lower effective vaccination rate, and a highly transmissible new variant, our hospital systems may come under more strain than they can manage, reducing the availability of timely care to the public in a manner that risks lives.

After a difficult year, we are acutely aware of the importance, for many residents, of celebrating Christmas with family and friends. With that in mind, maximising uptake of boosters and improving awareness of the risk COVID-19 presents through more appropriate vaccination rate statistics will help ensure Christmas can be celebrated more safely by families across the country.

In addition to providing clearer and more accurate information to the public, Catholic Health Australia asks that you seek urgent advice from the Australian Technical Advisory Group on Immunisations (ATAGI) on reducing the window after a second COVID-19 vaccination for an individual to qualify for a booster. I note that other developed nations have already responded to the available evidence that a booster is required for protection against Omicron, reducing their eligibility window to as little as 3 months after a second COVID-19 dose.

The Federal Government is to be commended on its world-leading response to the COVID-19 pandemic thus far. Catholic Health Australia urges you to maintain this outstanding record, by taking all necessary measures to promote booster shots and increasing the accuracy and relevance of vaccination rate reporting. Please contact Alex Lynch, Health Policy Manager at alexl@cha.org.au or on 0411 841 071 should you wish to discuss this issue further.

Yours sincerely,

Pat Garcia
Chief Executive Officer
Catholic Health Australia

² Improved neutralization of the SARS-CoV-2 Omicron variant after Pfizer-BioNTech BNT162b2 COVID-19 vaccine boosting | bioRxiv

³ Third BNT162b2 vaccination neutralization of SARS-CoV-2 Omicron infection | medRxiv

⁴ <https://www.theage.com.au/national/nsw/rapidly-changing-space-no-change-to-booster-times-as-uptake-soars-20211215-p59hvu.html>