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Attention of	Rt Hon Mark Drakeford AM First Minister of Wales
Department	
Address	Welsh Government 5th Floor Ty Hywel Cardiff Bay CF99 1NA
Your Reference	
My Reference	FOI/WG/WJ/01
Date	29 May 2020
Subject	Covid-19 Death Recording Process

Dear First Minister

I refer to the above subject and enclose, as Annex 01 below, abstracts from "*International Guidance for Certification and Classification [Coding] of Covid-19 as cause of death.*" The document, dated 16 April 2020, was prepared and circulated by World Health Organisation [WHO]. Welsh Government policy and process is driven by the guidance contained within the document. Having examined the document in detail I offer the following observations.

A specific test for Covid-19 virus has not been developed. It has not, to date, been identified or isolated. The test conducted is the quantitative Reverse Transcription Polymerase Chain Reaction, or qRT-PCR. It does not detect antigen but viral RNA. The method used does not conform to the gold standard for identifying a virus, which is called Koch's postulates. The way the test is conducted is by amplifying the RNA collected from lung fluid or a swab. The mixture is filtered and amplified. What is looked for is the Ribonucleic acid (RNA) – a polymeric molecule essential in various biological roles in coding. If RNA from a corona-virus is detected, the test is considered a positive for Covid-19. There are many thousands of corona-viruses of which Covid-19 is a strain. Large sections of the population have been exposed to some corona-virus in their lives: the common cold is a strain of corona-virus as is the seasonal flu.

I have serious concerns that a positive qRT-PCR test is considered justification for recording death from Covid-19 virus. The manufacturer of "*SARS-CoV-2 Corona-virus Multiplex qRT-PCR kit*" has advised that it should only be used for research purposes and not for diagnostic applications as it has not yet been clinically validated.

I would be grateful if you could seek urgent clarification from your officials and scientific advisors so that we can establish why a test that should not be used for diagnostic applications is being used to confirm death from Covid-19 virus, with recorded deaths driving Welsh Government **policy** and **process** and the lock-down of the economy in Wales.

I look forward to receiving clarification at your earliest convenience.

Yours sincerely

W Jones

Annex 01

Abstract from International Guidance for Certification and Classification [Coding] of Covid-19 as cause of death.

Document, dated 16 April 2020, prepared and circulated by World Health Organisation [WHO]

2. DEFINITION FOR DEATHS DUE TO COVID-19

A death due to COVID-19 is defined for surveillance purposes as a death resulting from a clinically compatible illness, in a probable or confirmed COVID-19 case, unless there is a clear alternative cause of death that cannot be related to COVID disease (e.g. trauma). There should be no period of complete recovery from COVID-19 between illness and death.

A- RECORDING COVID-19 ON THE MEDICAL CERTIFICATE OF CAUSE OF DEATH

COVID-19 should be recorded on the medical certificate of cause of death for ALL decedents where the disease caused, or is assumed to have caused, or contributed to death.

B- TERMINOLOGY

The use of official terminology, **COVID-19**, should be used for all certification of this cause of death.

As there are many types of coronaviruses, it is recommended not to use “coronavirus” in place of COVID-19. This helps to reduce uncertainty for the classification or coding and to correctly monitor these deaths.

Here, on the International Form of Medical Certificate of Cause of Death, is an example of how to certify this chain of events for deaths due to **COVID-19** in Part 1:

Frame A: Medical data: Part 1 and 2

1 Report disease or condition directly leading to death on line a Report chain of events in due to order (if applicable) State the underlying cause on the lowest used line		Cause of death	Time interval from onset to death
	a	Acute respiratory distress syndrome	2 days
	b	Due to: Pneumonia	10 days
	c	Due to: COVID-19 (test positive)	14 days
	d	Due to:	
2 Other significant conditions contributing to death (time intervals can be included in brackets after the condition)		Underlying cause of death	
Manner of death:			
<input type="checkbox"/> Disease	<input type="checkbox"/> Assault	<input type="checkbox"/> Could not be determined	
<input type="checkbox"/> Accident	<input type="checkbox"/> Legal intervention	<input type="checkbox"/> Pending investigation	
<input type="checkbox"/> Intentional self harm	<input type="checkbox"/> War	<input type="checkbox"/> Unknown	

Note: This is a typical course with a certificate that has been filled in correctly. Please remember to indicate whether the virus causing COVID-19 had been identified in the defunct.