

10 May 2007

Project Officer
ART Guidelines
Research Ethics Section
NHMRC
GPO Box 1421
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Draft ethical guidelines on the use of Assisted Reproductive Technology in Clinical Practice and Research, revised 2007.

ASMR welcomes the opportunity to comment on the above draft document.

The Australian Society for Medical Research (ASMR) is the peak body representing health and medical researchers. In addition to direct membership, ASMR represents the sector through 42 affiliated professional societies and medical Colleges, representing some 15,000 people actively involved in health and medical research in Australia. Our corporate and disease related foundation memberships bring a further 100,000 Australians with an interest in health and medical research into association with ASMR. Our mission is to foster excellence in Australian health and medical research and to promote community understanding and support through public, political and scientific advocacy.

The ASMR has consistently stated that it considers stem cell research of significant potential benefit for Australia and Australians and that these benefits should not be blocked by legislation to prevent approved research into the use of human cells derived from existing human embryonic stem (ES), cloning techniques, or the derivation from primordial germ cells. The use of these cells in cellular and developmental biology research activities provides significant promise for the development of new medical treatments for serious conditions including heart disease, diabetes, spinal cord injury, Parkinson's disease and cancer. However, the ASMR considers it unethical and unsafe to use reproductive cloning to produce human fetuses.

In August 2005 the ASMR made a submission to the Legislative Review Committee legislation review of Australia's Prohibition of Human Cloning Act 2002 and Research Involving Human Embryos act 2002, that supported (i) A continuation of the 2002 legislation authorising the destruction of embryos including derivation and studies of embryonic stem cells, (ii) Accurately defining and prohibiting reproductive cloning, (iii) Allowing research into improved clinical care and human health, and (iv) The decision by the Commonwealth and State Governments to allow the use (with the appropriate consent and ethical approval) of excess assisted reproductive technology (ART) embryos. More recently, in September 2006, ASMR responded to the *Prohibition of Human Cloning for Reproduction and the Regulation*

of *Human Embryo Research Amendment Bill 2006*, and stated that the ASMR agreed with the committee's recommendation of a continuation of a national legislation imposing prohibitions on human reproductive cloning and some specific ART practices, and supported a number of proposed amendments to the *Prohibition of Human Cloning Act 2002 and Research Involving Human Embryos act 2002*; including (i) Enable certain types of research involving embryos to be permitted provided that the research is approved by the NHMRC Licensing Committee and that the activity is undertaken in accordance with a license issued by the committee, and (ii) Retain existing prohibitions on activities.

The ASMR supports the revisions in the draft document "Ethical Guidelines on the use of Assisted Reproductive Technology in Clinical Practice and Research" by NHMRC's AHEC to take into account the new activities that are licensable in response to the Amendment Act 2006. In the view of ASMR, the document has been amended appropriately to provide suitable ethical guidelines for all relevant parties for both clinical practice and research involving ART. Under the ART guidelines, researchers will be able to undertake an increased range of activities after application to the NHMRC for licences having obtained approval from an appropriate Human Ethics Research Committee. This rigorous licensing procedure is in accordance with the stated position of ASMR in the use of ART in research.

In making these comments it should be noted that the ASMR position is that of the majority of members; we acknowledge and respect the differing views of some members.

Thank you for seeking the input of ASMR and we hope that these comments are useful. Should any further input or clarification of our comments be required, please do not hesitate to contact ASMR through our Senior Executive Officer Ms Catherine West.

Yours sincerely,



A/Prof Maria Kavallaris
ASMR President



Dr Mark Hulett, Ph.D
ASMR President-elect