

The Association of Politically Active Christians

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June 13, 2008

Judy Doesschate, J.D.
Director of Board Operations
Wadsworth Center
New York State Department of Health
Empire State Plaza, Box 509
Albany, NY 12208-0509

Re: Comments on Empire State Stem Cell Board Draft Strategic Plan

Dear Ms. Doesschate:

The Association of Politically Active Christians (APAC) is a grassroots organization in New York State's Capital Region. APAC offers a Christian perspective to government officials on an array of issues, including stem cell research. We respectfully submit this correspondence in response to the ESSCB's invitation of public comments regarding the draft Strategic Plan that appears at www.stemcell.ny.gov.

While many aspects of the Plan concern us, our core concern is that the draft Strategic Plan allows New York State funding to be used for the creation of new human embryonic stem cell lines via somatic cell nuclear transfer – a form of research that fails to respect human life. Our many concerns regarding embryonic stem cell research can be summarized as follows:

- **Embryonic stem cell research is a violation of the human rights of developing human beings.** Human embryos should not be used and destroyed for state-financed research purposes based on the possibility of scientific or financial gain.
- **Embryonic stem cell research via somatic cell nuclear transfer is illegal.** Provisions of the draft Plan allow funding for research that involves somatic cell nuclear transfer. Somatic cell nuclear transfer, by definition, involves reproduction of a human embryo. Thus, these provisions of the draft Plan would appear to violate statutory provisions that ban funding for human reproductive cloning.
- **Embryonic stem cell research via somatic cell nuclear transfer is anti-woman.** If state funding continues to be utilized for this type of research, that funding will encourage large-scale harvesting of human eggs for research purposes. This type of harvesting treats women's bodies as objects to be exploited, and is harmful to women's health. As the draft Strategic Plan notes, such harvesting could also lead to women being paid for their eggs; this practice could, in turn, leave economically

disadvantaged women at an increased risk for the medical problems that can result from egg harvesting.

- **Embryonic stem cell research has proven ineffective and inefficient in treating human illness.** To date, embryonic stem cell research has failed to result in even one effective medical treatment or advance. Adult stem cell research, on the other hand, has resulted in a wide array of medical advances.
- **Embryonic stem cell research is unnecessary.** In light of recent stem-cell research advances related to the “reprogramming” of adult body cells so that such cells have pluripotent qualities, it appears that pluripotent stem cells may be made available for research purposes without the destruction of living human embryos.
- **Embryonic stem cell research opens the door to research on embryos and fetuses at later stages of development.** If New York State continues to provide funding for the use of developing human life for research purposes, there will be no logical place to draw the line regarding possible expansions of that research. Shockingly, the draft Strategic Plan even appears to leave the door open for state funding of research involving the creation of human-animal hybrids known as “chimeras.” These possibilities, in addition to being grisly, open a Pandora’s box that will be difficult or impossible for the State of New York to shut.
- **Embryonic stem cell research is a misuse of taxpayer funds.** Given that the State of New York is already billions of dollars in debt and is facing a dire fiscal outlook, it would be wasteful and imprudent for the state to invest taxpayer dollars on a form of research that is ethically questionable and has no proven track record of effectiveness.

Therefore, APAC respectfully calls upon the ESSCB to remove all provisions from the Strategic Plan that would provide funding for embryo-destructive research and/or for infrastructure, facilities and resources dedicated to that purpose.

APAC is also concerned about the draft Strategic Plan’s lack of appropriate ethical guidelines regarding the allocation of grant monies. The draft Plan states that “stem cell research...is expected to conform to the highest possible standards of public accountability” and that research will be conducted under the “highest standards of medical ethics.” However, in the absence of clear ethical guidelines and in-depth, public dialogue on the ethical dimensions of embryonic stem cell research, this language is no more than lip service. APAC is very concerned about the ESSCB Funding Committee’s decision to completely ignore its Ethics Committee’s unanimous recommendation of a six-month moratorium on funding embryonic stem cell research to facilitate dialogue and debate on the ethics of such research. While APAC is pleased that the Funding Committee has – on an interim basis – determined that “most” (not all) embryonic stem cell research funded by the Board must be reviewed and approved by an institutional Embryonic Stem Cell Research Oversight (ESCRO) committee and must comply with various guidelines, we believe that these interim provisions are insufficient to ensure appropriate ethical safeguards. Accordingly, APAC

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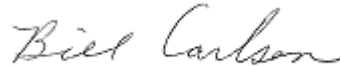
respectfully offers the following recommendations regarding ethics that could be inserted into the Plan:

- The scheduling of multiple public hearings at diverse geographic locations throughout New York State soliciting dialogue and comment on appropriate ethical standards to be utilized by the Funding Committee.
- The adoption by the ESSCB of ethical standards, pursuant to recommendations made by the Ethics Committee of the ESSCB, that are binding upon the Funding Committee and that apply to all (not most) funding decisions made by the Committee.
- The adoption by the ESSCB of a requirement that all Funding Committee decisions regarding embryonic stem cell research be subject to Ethics Committee approval.
- The adoption of the moratorium on human embryonic stem cell research funding that was recommended by the Ethics Committee in 2007.

Thank you for your kind consideration of the foregoing comments.

Respectfully submitted,

**THE ASSOCIATION OF
POLITICALLY ACTIVE CHRISTIANS**



William F. Carlson

cc: Senator Serphin R. Maltese
Senator Martin J. Golden
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