

FLORIDA CONFERENCE OF CATHOLIC BISHOPS

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MICHAEL B. SHEEDY
EXECUTIVE DIRECTOR



September 6, 2016

Office of Science Policy
National Institutes of Health
6705 Rockledge Drive, Suite 705
Bethesda, MD 20892

Re: Proposed Changes to the NIH Guidelines for Human Stem Cell Research and the Proposed Scope of an NIH Steering Committee's Consideration of Certain Human-Animal Chimera Research

Dear Sir or Madam:

On behalf of the Florida Conference of Catholic Bishops (FCCB) I submit the following comments on the proposal by the National Institutes of Health ("NIH") to authorize federally funded human/animal chimera research, published at 81 Fed. Reg. 51921 (Aug. 5, 2016).

The FCCB is an agency of the Catholic bishops of Florida. It speaks for the Church in matters of public policy and serves as liaison to the executive, legislative and judicial branches of government. The archbishop and bishops of the seven dioceses in Florida comprise its board of directors.

The FCCB strongly objects to this proposed change in federal policy for several reasons:

1. Raises significant ethical concerns – grossly unethical research possibilities

Research to create a part-human – part-animal being with ambiguous species membership raises serious questions with related ethical concerns regarding at least the following:

- at what stage of development and to what extent will the human embryonic cells contribute to the final organism?
- will chimeras be produced to have partially or substantially human brains?
- will chimeras with human sperm and eggs be used for breeding experiments?
- who will sort out / partition the moral obligations to the resultant organisms having varying degrees of human and animal characteristics?
- will a resultant chimera with significant contribution of human cells be considered "human" with Constitutionally-protected rights?

2. Objection to human embryonic stem cell research

Our ethical objections to research involving the destruction of human life at an early stage of development is well known. Considering human embryonic stem cells as a "raw material" in these human/animal hybrid research projects is a gross violation of human dignity and should be prohibited.

3. Moratorium on human-animal research was established for good reasons

In 1994 the NIH Human Embryo Research Panel "unanimously opposed, on ethical and scientific grounds the creation of heterologous, or human–nonhuman chimeras." In

establishing the current moratorium the NIH, in September 2015, "pledged to review the state of the science in this area, the ethical issues that should be considered, and the relevant animal welfare concerns with these types of studies. To date there have been no discussions of the ethical issues. Hence, the moratorium should be preserved.

4. Wholly inappropriate use of federal tax dollars

In clear violation of federal statutes, the lifting of the NIH moratorium will make federal tax dollars available for research grants for the creation and manipulation of new beings that are part-human and part-animal.

For these reasons, the FCCB strenuously opposes changes to permit this research and its public funding.

Sincerely,



Michael J. McQuone
Associate Director for Health

cc: Most Rev. Thomas G. Wenski, President
Most Rev. Felipe J. Estevez, Episcopal Moderator for Respect Life
Michael B. Sheedy, Executive Director