

**LETTERHEAD OF THE UNIVERSITY OF HONG KONG  
DEPARTMENT OF OBSTETRICS & GYNAECOLOGY**

22 October 1998

Ms Doris Chan  
Bill Committee on Human Reproductive Technology Bill  
Legislative Council  
Hong Kong Special Administrative Region  
P.R.C.

Dear Ms. Chan,

**RE: Human Reproduction Technology Bill**

Thank you for your fax to Professor P.C. Ho dated 15 October 1998. Colleagues in my Department have studied and discussed the bill. On behalf of my colleagues, I would like to raise our concerns on the following 2 issues.

A. Membership of Council on Human Reproductive Technology

It is stated in Part (3)(ii) that the Chief Executive shall not appoint the person responsible under license or the licensee to be a member of the Council. This will deprive the Council of input from experts practicing in the field. Human reproduction technology is complicated and advancing rapidly. It is important to have members with expertise in the Council. There should be clinicians and scientists with experience in this field as members in the Council.

B. Prohibition of creation of embryo for research.

1. Fertilization and embryogenesis are important and interrelated areas of intensive research in reproduction. The knowledge in this area is useful in our effort to improve the treatment to the infertile patients. The knowledge will also be useful for the study of genetic diseases and fertility regulation. All these will benefit mankind.
2. Comparing to other mammalian species, our knowledge on the development of human embryo is relatively limited due to shortage of donated oocyte/embryo for research. However, it is well known that knowledge of other species cannot be extrapolated to human. The studies of human fertilization and embryogenesis eventually require the use of human material.

3. The prohibition of creation of embryo for research as suggested by the bill is a major setback on the advancement of our knowledge on human fertilization and embryogenesis, which subsequently will hinder the future development of infertility treatment and other related areas. The Committee should note that creation of embryo for research is allowed in many other countries e.g. United Kingdom. In the document “Donated ovarian tissue in embryo research and assisted conception” published by the Human Fertilization and Embryology Authority of United Kingdom in July 1994, it was stated that “In the case of embryo research, the Authority has concluded that, again balancing benefits against the risk of harm, the use of ovarian tissue from all three sources to produce embryos is acceptable.” (The 3 sources refer to live donors, cadavers and fetuses).
  
4. We agree that irresponsible creation of embryos for research is ethically unacceptable. However, for the best interest of mankind, we should not prohibit entirely the creation of embryo for research. To avoid unnecessary creation of embryo, we propose the establishment of a committee that will regulate and monitor the use of gametes and embryos for research.

We agree with the other points suggested by the bill. We will not have representative appearing before the Bills Committee to give oral representation unless the Committee feels that it is necessary.

Yours truly,

Dr. W.S.B. Yeung  
Scientist-in-charge  
Assisted Reproduction Programme