Australian Association for Humane Research Inc.

23 March 2006

Project Officer
Deceased Organ Donation
NHMRC (MDP 24)
GPO Box 9848
Canberra
ACT 2601

Dear Sir,

Organ and Tissue Donation after Death: Ethical Guidelines for Health Professionals.

The Australian Association for Humane Research Inc. is a non-profit organization that challenges the use of animals in medical research on both ethical and scientific grounds. We maintain that real medical progress can only be made through studying our own species and not artificially-induced diseases and conditions in animals.

While it is not within the scope of our organisation to discuss most of the aspects raised in your draft document, we would like to express our support of organ and tissue donation for the following reasons:

Greater availability of human tissues and organs reduces the need to push for xenotransplantation.

As highlighted by the NHMRC public consultation in 2003/2004, there is great concern in transplanting cells, tissue and organs from one species to another.

The uncertainty of the risk of disease transmission, particularly across the species barrier, has been widely acknowledged by researchers. AIDS is already believed to have been contracted from chimpanzees. BSE and Ebola viruses originated from cross-species contamination. Some of the major flu epidemics from the start of last century were believed to have originated from pigs, and the current Asian bird flu outbreak has passed to humans who have been in contact with ill birds. Porcine Endogenous Retrovirus (PERV) has already been discovered in the animals intended to be used as a source for organ donors. With continued emergence of new zoonoses from unexpected sources, the inability to diagnose potential xenozoonotic viruses with current tests and their unknown pathogenic behaviour, the chances of cross-species infection seems to be unacceptably high. Even if detected, these viruses are largely untreatable.

The availability of human tissue for medical research provides more credible data than that obtained from non-human animals.

There is agreement within the scientific community that research data obtained from human tissue is preferred to the use of non-human tissue. Species differences mean that research data cannot be extrapolated from non-human animals to humans with any degree of accuracy. This has created a vast amount of erroneous data throughout history, resulting in delays in medical progress (use of penicillin, blood transfusions, digitalis, iron sorbitol), and disastrous consequences for human health (thalidomide, clioquinol, eraldin, Vioxx and most recently, the TGN 1412 trials in the UK).

It's therefore essential that research into human diseases and conditions be conducted on human material rather than on a different species. The provision of human tissue for this purpose would certainly accelerate medical progress.

AAHR appreciates and commends the efforts being made to address the shortage of available organs and tissue in Australia. However we do urge that more emphasis be placed on provision of organs and tissue for medical research as well as for transplantation. Such procurement would certainly be of great benefit to the overall health of Australians – both by fulfilling the need of donor shortage, as well as advancing our knowledge of human disease and treatment.

Yours sincerely,

Helen Rosser
Chief Executive Officer