

16 March 2018



The Program Manager
Dr Maureen Harris
Reproductive Technology Unit
Patient Safety and Clinical Quality
Clinical Excellence Division
Western Australian Department of Health 189 Royal Street
EAST PERTH WA 6004

JOONDALUP CAMPUS

270 Joondalup Drive, Joondalup
Western Australia 6027
☎ 134 328

www.ecu.edu.au

ABN 54 361 485 361 CRICOS IPC 00279E

Dear Dr Harris,

Re: Edith Cowan University submission to the Review of the Human Reproductive Technology Act 1991 and the Surrogacy Act 2008.

Thank you for the invitation to our Vice-Chancellor, Professor Steve Chapman CBE, to contribute to the Western Australian Government's review of the Human Reproductive Technology Act 1991 and the Surrogacy Act 2008. Professor Chapman forwarded the invitation onto our Deputy Vice-Chancellor (Research), Professor John Finlay-Jones, who requested that I respond on his behalf.

Edith Cowan University (ECU) has a history of conducting high quality research into the area of Assisted Reproductive Technology (ART), in collaboration with various ART clinics across Perth as well as providing postgraduate research opportunities in this area. Additionally we now offer postgraduate coursework programs, particularly our Master of Science degree in Assisted Reproductive Technology, training the next generation of workers and researchers in this rapidly expanding area.

Therefore, our response to this Review is framed by our multiple roles as providers of professional-entry ART workers, postgraduate research degree providers and active researchers in the area of ART. Consequently, and as indicated in your invitation, our response will focus on the following three aspects of the Terms of Reference:

- Research and experimentation on gametes, eggs in the process of fertilisation and embryos. In particular, consider the current disparity between the HRT Act and relevant Commonwealth legislation and need to adopt nationally consistent legislation regarding excess assisted-reproductive technology (ART) embryo research and prohibited practices.
- Genetic testing of embryos, saviour siblings, mitochondrial donation and gene editing technology.
- Management of information/the Reproductive Technology Registers, including;
 - Confidentiality of information,
 - Use of data for research,
 - Use of data for purposes of national data collection and;
 - Access to information about donation, genetic parentage and donor conception.
 - The Voluntary Register (donor-assisted conception).

Firstly, ECU would support consistency at a national level for all facets of gamete and embryo research, including oocytes undergoing fertilisation procedures. This would entail licensing of a body such as the National Health and Medical Research Council to allow overarching assessment and monitoring of research on excess ART embryos and prohibited practices, including those in WA. Obviously this would mean necessary amendments to the WA HRT Act (1991) being undertaken.

With regard to our second point, genetic testing of embryos and tissue matching foraviour siblings are beyond the scope of our current remit. However, new and emerging technologies including research into mitochondrial donation/replacement and gene editing technologies would benefit from alignment as described in point one (above), where the WA HRT Act (1991) and Commonwealth legislation would allow research in these areas under NH&MRC licensing.

Our final point relates to an aspect of the third point (above), information management and the Reproductive Technology registers. As a research active university it is considered imperative that data retained within the registers be available as and when needed, to assist with the advancement of knowledge. This retained data also needs to be maintained correctly to ensure that the information is both valid and trusted.

Therefore, we would recommend:

1. That the HRT Act (1991) be amended to allow the NH&MRC to both license and monitor research on excess embryos created from ART procedures as well as prohibited practices, in Western Australia.
2. Similar to point 1 (above), the HRT Act (1991) and Commonwealth legislation allow the licensing of research into new and emerging technologies under the auspices of the NH&MRC.
3. That the Reproductive Technology registers remain current, well maintained and available to all researchers seeking to advance knowledge in the field of ART.

Thank you again for the opportunity to contribute to the Review. I look forward to the Review outcomes.

Yours sincerely,



Professor Moira Sim
Executive Dean