



Comment on NIH Request for Information on Reducing Reliance on Human Embryonic Stem Cells in NIH-Supported Research
Notice Number: NOT-OD-26-031
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The American Association of Pro-Life Obstetricians and Gynecologists (AAPLOG) is a medical professional organization that represents approximately 8,000 women's healthcare professionals across the country. We are passionate about providing excellent, evidence-based healthcare to ALL our patients. We were founded to represent the vast majority of OB/GYNs who do not perform induced abortion, which intends the death of our fetal patients. We recognize based on the medical evidence that this practice is not healthcare, and we are passionate about providing excellent, evidence-based healthcare to ALL our patients.

AAPLOG appreciates the National Institutes of Health's (NIH) thoughtful reassessment of the scientific utility and ethical implications of human embryonic stem cell (hESC) research. We strongly support NIH's efforts to reduce and ultimately eliminate reliance on human embryonic stem cells in federally funded research.

AAPLOG affirms that human embryos are distinct living human organisms from the earliest stages of development and therefore deserve the dignity and ethical protections owed to all human beings.¹ Scientific evidence demonstrates that each human being begins life as a human embryo and develops continuously from that embryonic stage.

Because hESC research necessarily depends upon the destruction of human embryos, such research raises profound ethical concerns incompatible with the medical profession's longstanding obligation and commitment to "do no harm." Deliberate destruction of embryos by any means is unethical. Experimentation on human embryos that may lead to their death or destruction, and without their consent, violates core principles of medical ethics and human subject protections.

Importantly, NIH itself recognizes that the biomedical research landscape has evolved substantially, with newer technologies such as induced pluripotent stem cells (iPSCs) and adult/somatic stem cells increasingly supplementing or replacing hESC use. These emerging technologies offer robust scientific alternatives without requiring the destruction of embryonic human life.

AAPLOG respectfully urges NIH to:

- 1) **Require that any proposed research on embryos conform to the international consensus guidelines on human subject research**, including requirements that the study design ensures that human embryos are not the subject of destructive, harmful, or deforming research;

- 2) **Permanently discontinue the use of human hESC in federally funded research**, incorporating development of a strategic framework to phase out federal dependence on hESC-based research;
- 3) **Prioritize funding and expansion of ethically derived alternatives** such as induced pluripotent stem cells and adult stem cells; and
- 4) **Increase investment in validation studies** that establish non-embryonic stem cell platforms as replacements for hESCs in areas where hESCs have historically been used.

Scientific advancement need not come at the expense of vulnerable human life. Ethical and innovative biomedical research can and should proceed using methods that respect the inherent dignity of every human being, including human embryos.

AAPLOG commends NIH for opening this important review and encourages the agency to modernize its policies in a manner that reflects both current scientific capabilities and enduring ethical obligations.

Respectfully submitted,

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ⁱ “Ethical Treatment of Human Embryos” available at: <https://aaplog.org/wp-content/uploads/2024/11/2024.11.19-WEBSITE-CO-12-Ethical-Treatment-of-Human-Embryos-final.pdf>