

May 12, 2020

**SENT VIA U.S. MAIL AND EMAIL:
commissioner@fda.gov**

Stephen M. Hahn, M.D.
Commissioner Food and Drug
Administration 10903 New
Hampshire Avenue Silver
Spring, MD 20993-0002

Re: Keep religious politics out of vaccine research

Dear Commissioner Hahn:

We are writing to object to the U.S. Catholic Conference of Bishops, Religious Right groups, and various anti-abortion advocates irresponsibly calling upon the Food and Drug Administration (FDA) to arbitrarily restrict COVID-19 vaccine research. **We urge the FDA to reject the unscientific assertions of the bishops and to ensure that Americans will have access to the highest quality vaccines that untrammled research can produce.**

In their letter of April 17, 2020, they have called on the FDA to “incentivize pharmaceutical companies” not to use embryonic stem cells in developing a vaccine.

We object to the inflammatory rhetoric employed by the groups, which deceptively expresses concern about “cells of aborted babies” being used to develop a hypothetical COVID-19 vaccine. “Aborted babies” is an oxymoron, as abortion termination involves zygotes, embryos and fetuses, not “babies.”

We strenuously disagree that it is “ethical” to restrict vaccine research to cell lines not derived from embryos. Using embryonic stem cells is ethical. As a June 24, 2019, [Lancet editorial](#) presciently put it: “Fetal tissue research, in fact, holds the potential to save lives through the development of new treatments and vaccines. Politicizing scientific research [by deceptively conflating the use of fetal tissue with killing human babies] means denying hope to millions of patients with life-limiting diseases.”

In addition, we remind the FDA that *Roe v. Wade* is the law of the land. Abortion procedures are legal. Embryonic or fetal tissue from abortions would otherwise be discarded.

We also object to the bishops’ assertion that “cell lines or processes that do not involve cells from abortions are available” as though these cell lines are of equal value for vaccine development. As the Lancet editorial noted:
“Opponents of using embryonic stem cells and fetal tissue argue that there are alternative animal

models, umbilical cord stem cells, or adult stem cells that have been used with some success in certain areas of research. . . . substantial numbers are required for therapeutic effects. The cells also have a shorter replicative lifespan. . . . Although research into fetal tissue alternatives is worthwhile, it will take time and until then, the use of fetal tissue is essential so that research efforts . . . are not severely hampered.”

The American Thoracic Society issued a statement following the Trump administration’s decision last June to impose restrictions on governmental funding for research with fetal tissue from elective abortions:

“Scientific research with fetal tissue is vital for the development of new treatments for many deadly diseases and conditions . . . There are no alternative research models that can replace all fetal tissue research.”

Over 70 major medical organizations and institutions, including the Association of American Medical Colleges and many major universities, signed a letter to President Trump on December 21, 2018, stating: “Fetal tissue research improves human health and saves lives.” They noted that “rigorous legal and ethical oversight of fetal tissue research has been in place for decades,” with bipartisan support in the U.S. Congress and funded by the National Institutes of Health.

“Numerous federal panels and reviews, conducted under both Republican and Democratic congressional majorities and presidential administrations, have evaluated human fetal tissue research and have concluded it is critical for lifesaving biomedical research,” the letter said. “This research has long been viewed as good public policy to improve human health and has proceeded with public support.” According to the most recent Gallup poll in 2019, 64 percent of respondents support embryonic stem cell research.

As the development of vaccines for COVID-19 and other preventable diseases is imperative to the health and well-being of Americans, we ask the FDA not to allow unscientific religious ideology to interfere with open scientific inquiry into all available lines of relevant research.

Sincerely,

American Atheists
American Humanist Association
Center for Inquiry
The Freedom From Religion Foundation
Secular Coalition for America