



# Knights

of the Southern Cross (NSW) Inc.

Christianity

and Service

Founded 1919

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Committee Secretary  
Community Affairs Committee  
Department of the Senate  
Parliament House  
CANBERRA ACT 2600

Dear Sir/Madam

**Inquiry Submission - Therapeutic Goods Amendment (Repeal of Ministerial Responsibility for Approval of RU 486) Bill 2005.**

This is a submission on behalf of the Knights of the Southern Cross (NSW) Incorporated ('KSC'). The KSC is a Canonical association of Catholic Laymen instituted under the auspice of the Canon Law of the Catholic Church. Founded in 1919, the Knights are a chivalrous order established by the Australian Catholic Bishops, who have among their objectives:

- To promote the advancement of Australia and to become actively involved in the secular affairs of the Nation.
- To foster the Christian way of life throughout Australia.
- To conduct and support educational, charitable, religious and social welfare work.

The work of the KSC has included establishing a network of retirement villages and facilities across the country (Southern Cross Care), as well as supporting numerous charitable and religious organisations. Individual Knights are actively engaged in literally hundreds of different social welfare projects around the State in a volunteer capacity.

The KSC is a foundation member of the International Alliance of Catholic Knights, a Vatican endorsed lay organisation whose members are established in sovereign states around the world including Austria, Canada, Ghana, Great Britain, Ireland, New Zealand, Nigeria, Pakistan, Philippines, South Africa, United States of America and the United Nations.

While it should be noted that the Federal Drug Authority and Centre for Disease Control in the U.S.A. are to hold a conference regarding the fatalities associated with RU486 in the new year ("New York Times" 23/11/05). Debate about whether or not the drug RU486 and medical abortion should be permitted in Australia cannot be restricted to claims about the safety or relative merits of medical abortion over surgical abortion.

Abortion is not an 'ethically neutral' medical event. Abortion involves the intentional destruction of a human embryo or fetus. The Catholic Church's opposition to abortion is well known and grounded in the belief in the dignity and inviolability of human life which is shared by all of the great religious traditions and cultures of the world. Reason, as well as faith, gives rise to an attitude of reverence and respect for human life; reason and justice require that this is extended to every living human being, irrespective of age or ability.

There is deep unease within the Australian community about the high incidence of abortion in Australia. A recent comprehensive investigation of Australian's attitudes to abortion undertaken by the Southern Cross Bioethics Institute revealed that, although supportive of legal access to abortion, Australians are deeply ambivalent about the morality of abortion and that apart from 'hard cases' involving danger to the mother's health or foetal disability, fewer than 1 in 4 thinks abortion is morally justified. Furthermore, 63% of Australians either oppose or are not strongly supportive of abortion on demand.<sup>1</sup>

This Bill endeavours to strip abortion of its inherent meaning, override public concern about the high incidence of abortion in Australia, reinforce a culture of 'abortion on demand' and remove appropriate political accountability for decisions of deep social concern and consequence.

We thereby submit the following points with respect to the Bill:

1. RU486 and other drugs intended for use in women as abortifacients are not 'therapeutic goods'. Abortifacient drugs are not 'therapies'; they are not administered with the intention of treating or curing disease. Abortifacient drugs are administered with the intention of terminating a pregnancy by killing a human embryo/fetus.

In light of this distinction, *medicines (including progesterone antagonists and vaccines against human chorionic gonadotrophin) intended for use in women as abortifacients should continue to be regarded as 'restricted goods'*.

2. The Therapeutic Goods Administration (TGA) is specifically charged with identifying, assessing and evaluating the risks posed by therapeutic goods that come into Australia, applying any measures necessary for treating the risks posed, and monitoring and reviewing the risks over time.

While the TGA would have the expertise to assess the risks posed by abortifacients that come into Australia, this is properly restricted to assessment of medical and public health risk. RU486 presents a unique ethical and social challenge and its fate should be decided by those elected to judge on such matters of public concern – not by faceless unaccountable bureaucrats dealing only with sterile technical matters of safety and efficacy.

The TGA does not have the expertise or a mandate from the community to assess the potential ethical and social impact of abortifacients in Australia. An elected member of parliament should retain responsibility and accountability for social policy issues like medical abortion

Accordingly, it is our submission that the current arrangement whereby 'restricted goods' cannot be evaluated, registered, listed or imported without the written approval of the Minister for Health & Ageing should remain in place.

**Chairman  
Knights of the Southern Cross NSW Inc.**

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<sup>1</sup> Fleming J I, Ewing S. *Give Women Choice: Australia Speaks on Abortion*, Southern Cross Bioethics Institute, 26 April 2005