

October 25, 2005

As religious organizations committed to protecting women's health, we are dissatisfied with the Food and Drug Administration's continued tactics to delay approving the emergency contraceptive Plan B as an over-the-counter medication. We believe that the FDA has an obligation to make decisions that promote public health and are based on sound science. FDA's drug center, the Center for Drug Evaluation and Research (CDER) reviewed the application for Plan B and concluded that "the available scientific data are sufficient to support the safe use of Plan B as an over the counter product, but only for women who are 17 years of age or older." By over-ruling the Agency's own scientific panels, the FDA leadership has both compromised its mission and raised serious questions about inappropriate political influence. The current 60-day comment period regarding packaging and marketing issues sidesteps the FDA's mission to promote public health. Suitable packaging and proper distribution of the product will best be determined by Plan B's manufacturers, Barr Laboratories, and appropriate FDA officials.

Access to emergency contraception is critical to the health and wellbeing of all women. Many faith groups consider using birth control and bringing children into the world with planning and preparation to be morally responsible. For example, the Presbyterian Church (USA) states, "Unintended pregnancies lead to higher rates of infant mortality, low birth weight, and maternal morbidity and threaten the economic viability of families." The United Methodist Church's Resolution on Responsible Parenthood declares that in order to "support the sacred dimensions of personhood, all possible efforts should be made by parents and the community to ensure that each child enters the world with a healthy body, and is born into an environment conducive to realization of his or her potential." The Episcopal Church teaches that human life "should be initiated only advisedly and in full accord with this understanding of the power to conceive and give birth that is bestowed by God." The Unitarian Universalist Association believes that "the inherent worth and dignity of every person, the right of individual conscience, and respect for human life are inalienable rights due every person; and that the personal right to choose in regard to contraception... is an important aspect of these rights." The Reform Jewish movement has long advocated that women receive "coverage of all reproductive medical needs."

While we acknowledge concerns about minors' use of emergency contraception, we are convinced these are best addressed by education about proper use. The current delays on the over-the-counter application—namely that increased access to contraception will result in increased sexual activity—are based on unfounded assumptions about teen behavior that reflect the influence of a narrow, religious worldview. Numerous studies have shown that increased access to emergency contraception does not increase promiscuity in teenagers.

Women must have better access to this medication. Improved availability of Plan B will decrease the number of unplanned pregnancies and therefore reduce the number of abortions – a goal shared by many religious organizations. We ask that the FDA commit

itself to bettering the health of women and approve Plan B as an over-the-counter medication.

Catholics for a Free Choice

NA'AMAT USA

Presbyterian Church (USA), Washington Office

Religious Coalition for Reproductive Choice

Union of Reform Judaism

Unitarian Universalist Association of Congregations

United Church of Christ, Justice and Witness Ministries

United Methodist Church, General Board of Church & Society