

April 12, 2025

The Secretariat

The Council on Human Reproductive Technology
Boards and Councils Office, Department of Health
Room 58, 17/F, Wu Chung House, 213 Queen's Road East,
Wan Chai, Hong Kong

Dear Council Secretariat:

RE: Proposed amendments to the Code of Practice on Reproductive Technology & Embryo Research

I am writing to you as CEO of The Women's Foundation, Hong Kong's leading NGO dedicated to improving the lives of women and girls in Hong Kong.

Boosting low fertility rates in Hong Kong requires sustained commitment from all sectors of society to create more supportive conditions in which women and couples may choose to have children. This includes policymakers, employers, healthcare providers and community leaders all working together to build a more supportive and inclusive future for family planning in Hong Kong. We commend the Council's proactive steps in this regard.

We appreciate the Council's proposed amendments to remove the legal limited on the storage period for gametes and embryos for someone's own use, which will provide women with more flexibility for family planning.

Whilst we agree with requiring patients to go through counselling to inform them of the medical risks around egg retrieval procedures, declining fertility / pregnancy rate of women as they age and the risks of advanced maternal age, we would urge the reconsideration of the requirement to receive counselling on the social impacts of delayed childbearing. Healthcare accessibility, career development opportunities, and societal expectations significantly influence reproductive choices across diverse demographic groups. These factors, combined with economic considerations, shape an individual's timing on family planning decisions. Supporting a woman in her choice to freeze her eggs to such time when conditions are such that she will be able to provide the most optimal environment to raise her child, has far-reaching benefits for society in terms of happier families and less potential use of government resources.

In addition to the proposed amendments, we would also ask the Council to consider giving women of all backgrounds support in their reproductive choices, including fertility treatments. Currently, Hong Kong law is outdated and discriminatory and should be updated to allow a woman to have access to use of her stored eggs, regardless of whether she is in a partnership with someone of the same or different sex, or identifies as single or otherwise. Embracing diverse family structures would



greatly contribute to enabling more women to be able to be parents on their own terms, contributing to boosting low birth rates and sustainable development in Hong Kong.

If of interest, we would welcome the opportunity to further discuss any of the above feedback, please contact my colleague, Lisa Moore, Senior Director of Research and Advocacy, at Lisa.Moore@twfhk.org or via +852 2592 8265.

Sincerely

Signed.

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