

3 July 2025

Advisory Committee
Review of Human Tissue Laws
Australian Law Reform Commission

Dear Committee Members,

PlusLife is Western Australia's only bone and tissue bank and one of a small number of tissue banks in Australia. PlusLife has operated continuously as a not-for-profit service since 1992.

At PlusLife, we screen, collect, process, store and distribute donated human bone and tissue allografts. We pride ourselves on exclusively retrieving 100% Australian donated bone and tissue to produce the highest quality allografts in our facility located in Midland, Western Australia.

As a Therapeutic Goods Administration licensed tissue bank, we are committed to providing medical professionals with safe and effective allografts for use in surgical procedures to treat patients with conditions such as spinal deformities, arthritic joint disease, bone cancers, sports injuries; and facial and dental reconstructive surgeries.

We exist to enhance Australian lives through the precious gift of human bone and tissue donation. We are a not-for-profit service delivering on our commitment which is centred around the needs of each recipient, supported by uncompromising respect for every donation.

PlusLife has two donor programs, a living program and a cadaveric program.

To provide this valuable service to the community PlusLife works within a network of services. These services work together to ensure the wishes of the donors and their next-of-kin are respected and the safety and quality of the donated tissue is of the highest standard.

This network comprises of:

- DonateLife WA
- Lions Eye Bank
- Coroner/State Mortuary/Police
- Public Hospitals
- Private Hospitals
- General Practitioners
- PathWest, Western Diagnostics and other Pathology Clinics
- Specialist Clinics



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- National Research Laboratories (NRL)
- Surgeons
- Interstate Musculoskeletal Tissue Banks
- Courier Services

In context of the above background PlusLife provides the following responses to the questions raised in the issues paper.

The review's aims and principles are well described as guidance for reform of the priority areas listed. The following aim could be improved with the inclusion of a reference to ethics in sourcing activities as follows –

Reform should support increased access to ethically sourced human tissue in Australia.

This change would be in alignment with the National Eye and Tissue Sector Framework published in 2022.

The priority reform areas are appropriate.

PlusLife would like to highlight several points. While raised in the issues paper they do not appear to have been given sufficient weight in the considerations discussed in the paper.

1. Emphasis on the coronial system appears inadequate. With 50% of tissue donors sourced outside of the hospital system it is appropriate that consideration be given to improving the capacity of the Coroner to support donation in a way that is consistent with the aims, principles and objectives outlined in the paper.
2. Regulation of competition and operating models for cost recovery. With legislation having varying forms of prohibition on trade in tissue and cost recovery guidance, it should follow that free market competition in tissue supply does not exist. This is not the case. With the existence of for-profit operators in the sector, there is incentive for donation tourism to source donated tissue from lower cost locations rather than building donation services across Australia to meet the local need. Promotion of access to donation services should consider how services might improve with alternate operating models for cost recovery to support donation in a way that is consistent with aims, principles and objectives outlined in the paper.
3. Informed decision making for the donor/patient and or the next of kin. This should be equally applicable across living donation both regenerative and non-regenerative tissue and deceased donation or tissue removal regardless of setting or purpose for the removal.
4. With respect to the preceding point, consent processes for tissue donation varies between jurisdictions, tissue types and the reason for the tissue being removed. Variance in which healthcare role is authorised to facilitate informed decision making and consent is a significant influence on the success



- of donation programs. More active donation programs have the ability to specialise screening and consenting activity to dedicated teams.
5. Advertising for human tissue donation is contextual and should be treated differently between regenerative and non-regenerative tissue inclusive of tissue being removed for the medical benefit of the donor.
 6. The Designated Officer is an important safeguard within the existing legislation. Removal of the role should not be considered. The issues paper at point 69 incorrectly states the function of the designated officer through an inappropriate comparison to the American system. Enhancement of the designated officer role to better support donation in a way that is consistent with aims, principles and objectives outlined in the paper is encouraged.
 7. 95% to 98% of tissue transplantation in Australia every year is not organ transplantation. The issues paper raises the question of how donated tissue should be allocated and only references an organ allocation standard operating procedure. Broader consideration of tissue allocation systems or frameworks inclusive of allocation or transfer of donated tissue between donation agencies, tissue banks, Hospitals and to research entities would support the aims, principles and objectives outlined in the paper.
 8. Presently there is a high volume of interjurisdictional and international supply of tissue into and across Australia. It is therefore appropriate and timely for the review to consider the inconsistencies between the various pieces of legislation towards establishing a transparent, ethically driven operating environment for tissue donation, banking, transplantation and research in Australia. PlusLife would be supportive of recommendations for improvement to the current situation inclusive of transparent national reporting and movement towards more centralised systems of regulation and management.

Thank you for your attention to this submission and we look forward to the committee's discussion paper later this year.

Yours sincerely,



Hal Boronovskis
Chief Executive Officer