

From: [REDACTED]
To: [Human Tissue](#)
Subject: Feedback on Review of Human Tissue Laws
Date: Wednesday, 17 December 2025 8:00:18 AM
Attachments: [Outlook-ndhoc322.png](#)
[Outlook-l5ef5onn.png](#)

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Dear Australian Law Reform Commission,

I am writing to provide feedback relating to Question 7 of the Review of Human Tissue Laws, pertaining to the definition of human tissue in research. The legislation does not expressly exclude "cell lines" from its definition of "human tissue", and as such the consequence would be that using commercially available human cell lines would require human ethics approval. While I agree that the definition of "cell lines" should be better defined to improve clarity, creating regulatory burdens around the use of *all* human cell lines is not only unnecessary but is also not in line with other international jurisdictions that exempt cell lines from human tissue laws (e.g., the UK considers cells that have replicated outside the body to be 'manufactured' and therefore exempt), making it a regressive policy on the world stage.

To reduce administrative burden and align Australian legislation with international best practice without increasing the risk of harm to donors and their relatives, I recommend that research involving the use of established human somatic cell lines be made exempt from review provided that they meet the following criteria:

- The established cell lines are commercially available or can be obtained from established repositories (e.g., ATCC). and;
 - The cell lines are either de-identified and not linked to any personally identifiable information or are identified and available in the public domain, and unlikely to cause harm to the original donor or their relatives.
 - The researcher will comply with any consent terms attached to the use of the cell line.
 - The proposed research will not develop the cell lines as therapeutics.
 - The proposed research will not use human tissue to develop new cell lines.
 - The proposed research does not involve the use or derivation of embryonic stem cells.

If you require any further information from me, please reach out.

Kind regards,

[REDACTED]

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