

15 January 2026

RE: Review of Human Laws Discussion Paper – Exemption of commercially available human cell lines

Dear Australian Law Reform Commission,

I am writing in response to the call for comments on the recently released Human Tissue Discussion Paper.

I want to respond specifically to the regulation of the use of commercially available cell lines (pages 29-38).

I propose that the regulatory burdens be removed so that Australian legislation will be in line with international best practice, based on UK, US and Canadian polices, without increasing the risk of harm to donors and their relatives.

In keeping with international best practice, 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.

Best regards,



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