



Friday, 23 January 2026

Australian Law Reform Commission
To whom it may concern,

I am a biomedical researcher and teaching academic at UNSW and an end user of a wide range of established human cell lines. My research uses such cells as tools for basic biomedical research, an essential part of identifying new strategies for improving the health and well being of Australians. I am submitting this letter in response to Question 7 of the Australian Law Reform Commission's review of human tissue laws, relating to the regulatory treatment of human cell lines.

In my opinion, research involving the use of established human somatic cell lines should be made **exempt** from review provided the following criteria are met:

- The established cell line is commercially available or can be obtained from an established repositories (e.g., ATCC). and;
- The cell line is either de-identified and not linked to any personally identifiable information or is 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.

Requiring Human Research Ethics Committee (HREC) approval for each commercially sourced cell line would result in destructive administrative burdens on both researchers and HRECs. For researchers like myself who use many different cell lines in order to conduct rigorous and impactful research, the cumulative time spent preparing separate HREC applications for dozens of routine, low-risk cell lines would result in a negative impact on research progress. For HRECs, routine review of well-documented, de-identified lines would consume committee capacity that is better directed to higher-risk, novel, or donor-identifiable research where review and approval is absolutely essential to ensure that best practice is maintained and that donors are protected. An exemption, constrained by the clearly defined criteria above, would preserve ethical oversight where it is most needed while removing unnecessary administrative burdens for low-risk, cell-based laboratory research.

Adopting the targeted exemption would support efficient, reproducible biomedical research, in line with international standards. It will also help preserve strong protections for donor autonomy, privacy, and ethical oversight where they are needed.

Yours sincerely,
Kathryn Poole
Head of Department, Physiology

UNSW SYDNEY NSW 2052 AUSTRALIA
[REDACTED] | ABN 57 195 873 179 | CRICOS Provider Code 00098G

