



Friday, 23 January 2026

Australian Law Reform Commission

Dear Commissioner,

As a medical researcher and educator who routinely works with human cell lines in preclinical studies, I welcome the Australian Law Reform Commission's review of human tissue legislation. I am writing in response to Question 7 regarding the regulation of human cell lines.

I recommend that research using established human somatic cell lines be exempt from HREC review when the following conditions are met:

- 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

Requiring HREC approval for each commercially sourced, low-risk cell line creates unnecessary administrative load for both researchers and committees. Preparing multiple applications for routine, well-characterised cell lines diverts time from scientific work, while obliging HRECs to review such applications reduces their capacity to focus on higher-risk or donor-identifiable research activities.

A targeted exemption, limited to the criteria above, would streamline low-risk laboratory research, reduce duplication, and allow HRECs to prioritise matters where ethical oversight is most critical—while maintaining strong protections for donor autonomy, privacy, and responsible research conduct. Thank you for considering this submission.

Kind Regards,



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