



23 January 2026

Dear Sir/Madam,

I am writing in response to the Australian Law Reform Commission's Review of Human Tissue Laws, and in particular to Question 7 of the Discussion Paper, which addresses the governance of commercially available human cell lines.

I strongly support the exemption of research involving established, commercially available human somatic cell lines from the requirement for human research ethics committee (HREC) review, provided that appropriate conditions are met. Such an exemption would align Australian legislation with international best practice, including approaches taken in the United Kingdom, the United States, and Canada, without increasing the risk of harm to donors or their relatives.

At present, Australian human tissue legislation does not expressly exclude cell lines from its definition of "human tissue," resulting in a significant administrative burden for researchers using well-established, commercially available cell lines. These cell lines are already subject to rigorous governance, consent frameworks, and oversight through reputable commercial suppliers and recognised repositories. Requiring additional ethics approval for their routine use does not meaningfully enhance donor protection, but does impede research efficiency and international competitiveness.

I therefore recommend that research involving the use of established human somatic cell lines be exempt from ethics review, provided that the following criteria are met:

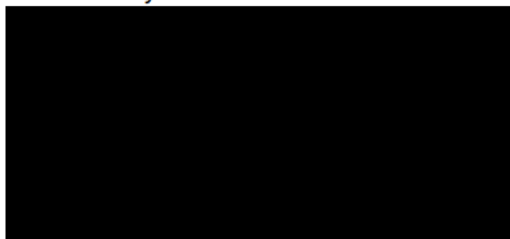
- The established cell lines are commercially available or obtained from recognised repositories (for example, ATCC); and
- The cell lines are de-identified and not linked to any personally identifiable information, or are identified but publicly available and unlikely to cause harm to the original donor or their relatives; and
- Researchers comply with any consent terms or usage conditions attached to the cell lines; and

- The proposed research does not involve developing the cell lines for therapeutic purposes; and
- The proposed research does not involve the use of human tissue to derive new cell lines; and
- The proposed research does not involve the use or derivation of embryonic stem cells.

Removing unnecessary regulatory barriers for the use of commercially available cell lines would bring Australian legislation into closer alignment with international standards, reduce administrative burden, and support high-quality biomedical research, while maintaining appropriate ethical safeguards.

Thank you for the opportunity to provide input into this important review.

Sincerely



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