## TCPS 2 Public Consultation - St. Thomas University Submitted 4 October 2021

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Thank you for the opportunity to provide comments on the circulated documents. As St. Thomas University is an exclusively liberal arts university, we do not have faculty members or students conducting research on human cell lines or totipotent stem cells. For that reason, I am restricting my comments to the documents concerning multi-jurisdictional research and broad consent.

Ethics Review of Multijurisdictional Research: The proposed revised guidance set out in this document is well-developed, clear, and sensible. Harmonized ethics review of multijurisdictional minimal risk research will support researchers by recognizing that all eligible institutions are bound by the TCPS and its principles, and therefore a single lead REB ought to be able to provide ethics review. It is appropriate that all other local REBs will have an opportunity to raise any oversights or other issues with the REB of record. The process set out in the document is clear. I do not anticipate any problems with implementing this guidance at St. Thomas University.

Proposed Guidance Regarding Broad Consent for the Storage and Use of Data and Human Biological Materials: As a liberal arts university, St. Thomas University faculty members do not conduct research involving human biological materials. However, some social sciences and humanities research could certainly involve other kinds of data storage. The principles set out in the document clarify the nature of broad consent, the responsibilities of researchers and repositories, and the rights of research participants. I do not anticipate any problems with implementing this guidance at St. Thomas University.

Thank you for the opportunity to participate in this opportunity to participate in public consultation on these documents. St. Thomas University continues to be committed to the principles and practices outlined in TCPS 2 (2018).