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From: Hall, Wendy

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To: secretariat (SRCR/SCRR)

Subject: Comments on suggested revisions to TCPS2

Sensitivity: Normal

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To Whom It May Concern,

I am submitting my comments to you in my capacity as a researcher. My main discipline is health sciences. My affiliation and province are in my signature for this email.

I am impressed with the changes you are recommending for multi-jurisdictional research. The changes not only simplify the process for researchers but also would help clarify for local ethics boards the areas they should consider in requesting changes to the original ethics submission and review by the ERB associated with the principal investigator. I support them in their whole.

In terms of your recommended changes for broad consent, I was surprised to see no mention of the new requirement by many journals to make data available to other researchers in a supplementary file when submitting a paper for publication. In some situations, it is a major impediment if the researcher indicates that the data are not available. In the event, that lack of availability must be justified by the researcher. Your point about jurisdictions that are not subject to the TCPS is important. If data are provided in a format that makes them available to any individual with access to the journal it is impossible to say what ethics requirements are operating for those researchers who wish to use the data for their own purposes. While many journals require specific evidence that an ethics review has been conducted, I would suggest that predatory journals are less scrupulous. At any rate, it seems important to me that the area of data sharing is acknowledged in your revised statement.

Kind regards, Wendy Hall

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