

Review of: "Responsible Governance of Genomics Data and Biospecimens in the Context of Broad Consent: Experiences of a Pioneering Access Committee in Africa"

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Potential competing interests: No potential competing interests to declare.

This manuscript contains a good description of the work of H3A-DBAC. This is an interesting descriptive contribution, given that H3A-DBAC was one of the first such committees in existence in Africa. It is great to see the amount of work the H3A-DBAC has accomplished since its inception and the specific challenges encountered. While generally on point, the discussion feels a bit superficial, and additional references could have been provided to support some of the content. For example, the article assumes that data access can only be regulated using three approaches (unrestricted, registered, and controlled access). This ignores a lot of other possibilities, regulatory considerations, and nuances such as federated access, data visitation, homomorphic encryption, etc. There are also no references to current discussions and pilot projects involving the use of AI and computing to automate the access administration process and diminish the role of human resource-intensive access committees. The CIOMS guidelines are quoted as stating that DACs "should have a representation from the original setting". While the quote is accurate, in its guidelines CIOMS was referring to the broader concept of 'governance structure' of repositories and not specifically to DACs, which are not discussed specifically in the guidelines. Finally, the adjudication process and presentation of the H3A-DBAC experience seem to have been inspired (for ex., use of the term 'conditional approval', presentation of requests per country, times to process, etc.) by a series of manuscripts I submitted on the experience of the ICGC DACO (PLoS Computational Biology, 2012, <https://doi.org/10.1371/journal.pcbi.1002549> ; Nature Genetics, 2016). A reference to either of these manuscripts would have been appreciated. To sum up, this article provides a good summary of the H3A-DBAC data sharing experience of the past few years, but if you are looking for in-depth discussions on data sharing processes and oversight, you may want to consider this only as a starting point or illustration of a very specific context.