

**Email Submission: James Lynch**

Dear OGTR,

I wish to submit the following comments on the proposed amendments to the regulations.

- Option 3 is the preferred option. It feels like the best balance of the risk mitigation vs. regulatory burden
- Schedule 3 clarification and linking of part 1, 2 and 3 should make this much clearer for when I need to provide advice on applications.
- The clarification that IBC's much consider facility suitability during assessment is good but something the university IBC's I am involved with were already doing.
- Reviewing the exposure draft is difficult as you need to reference back to the regulation a lot, it would be much clearer if a 'track changes' style document could be made available
- Costs to our organisation would likely be limited to internal staff time in digesting the new regulatory changes and helping to relay that information to our researchers.

Regards,

**James Lynch**