

The following feedback represents the consensus of the University of California Biosafety Officers Workgroup. This UC systemwide workgroup consists of biosafety professionals from the 10 UC campuses, 5 Health Systems, and UC Agriculture & Natural Resources unit. The UC BSO Workgroup appreciates the opportunity to provide comments on the NIHs Strengthening and Modernizing Biosafety Oversight Initiative. The University of California would like to acknowledge and endorse the Council on Governmental Relations (COGR) comments provided on this matter in their November 17, 2025 submission.

The UC Biosafety Officers Workgroup requests the NIH to take the following into consideration as part of this initiative:

1. Empower the Institutional Biosafety Committee and ensure primary reliance on local biosafety review.

Institutional biosafety committees (IBC) should remain the main point of oversight, as they are best positioned to assess research specific risks and appropriate controls. IBCs should have the power and authority to mandate commensurate safety precautions, like an Institutional Review Board or the Institutional Animal Care and Use Committee.

2. Harmonize biosafety and biosecurity requirements across government agencies.

Biosafety and biosecurity regulations should be coordinated across federal agencies to reduce fragmentation and inconsistency, ideally through a documented and shared understanding or primary policy and regulation.

3. Reduce oversight and eliminate administrative burden for low-risk research activities.

Oversight should be tailored to the actual level of risk posed by specific materials and experiments, avoiding unnecessary administrative burdens that do not improve safety for low-risk, routine research.

4. Ensure biosafety requirements are based on documented and data-driven scientific evidence.

Biosafety requirements should be grounded in current scientific consensus and empirical evidence and developed with input from leading research and policy experts.