

Compiled Public Comments on
NIH Virtual Stakeholder
Engagement Meeting on USG
Policies for the Oversight of Life
Sciences Dual Use Research of
Concern

June 22, 2022 – July 8, 2022

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Submission Date: 6/22/22

Name: Phil Rice

Name of Organization: Not Applicable

Comment:

As a minimum requirement, the funding agencies around the world should engage only with countries which have democratically elected governments.

Submission Date: 6/24/22

Name: Heather Douglas

Name of Organization: Michigan State University

Comment:

As a philosopher of science who as long followed DURC issues and policies, and written about moral responsibilities in science, I have some general comments on the issue that may be of assistance.

1) Select agent lists are ineffective for regulating DURC research. DURC research can arise at any point, in any field of science. <https://issues.org/dual-use-research-biosecurity-social-context-science-evans/>

While agent lists may be helpful for regulating biosafety levels, they don't address well DURC concerns.

2) Because DURC can arise at any time in any field, oversight is not the appropriate regulatory approach. Without radically giving up autonomy to make research choices, scientists must bear the primary responsibility to think about these issues and steer their research accordingly. Providing training to think about the possibility of DURC and what to do in research ethics training is crucial, and cannot be accomplished within a checklist framework of RCR.

3) Regulatory measures can take the form of the following (rather than general oversight):

A. Requiring research ethics consultation/advice bodies at all research institutions so that researchers have places to go for help when thinking about these issues

B. Requiring DURC oversight committees as all journals publishing work funded by the NIH

C. Requiring substantive DURC review for NIH grants

Meeting the responsibility requirements for DURC is not easy, but with the right combination of oversight (at key points in the research process, e.g. grant funding, publication) and assistance (for scientists who realize there is a DURC issue and want help addressing it), responsibilities can be met.

Submission Date: 6/29/22

Name: Robin Broussard

Name of Organization: University of Louisiana at Lafayette

Comment:

In the stakeholders meeting today, someone suggested that it would be a good idea to note in GenBank submissions when something has the potential to be human infectious. This is a very bad idea. This is an open invitation for our enemies to download the sequence and use it to devise another biological weapon. We should consider having limited access to human infectious sequences. People are granted access based on references from known scientists in the field who vouch for their integrity and the person's publication record and a restricted party screening.

Open science is great until it creates world wide pandemics and weapons of mass destruction. Please take some lessons from the export controls people.

Submission Date: 6/29/22

Name: Richard H. Ebright

Name of Organization: Rutgers University

Comment:

Through this message, I am submitting written public comments at the June 29th Virtual DURC Stakeholder Engagement Meeting,

Additional Comment (attachment):

Submission Date: 6/29/22

Names: Barry R. Bloom; Jesse Bloom; John Brownstein; Donald Burke; Anita Cicero; Dan Correa; Carlos del Rio; James Diggans; Kevin Esvelt; Nicholas Evans; Sam Weiss Evans; Michael A. Fisher; Claire Fraser; Erica Goldman; Kendall Hoyt; Tom Inglesby; Lynn Klotz; James Le Duc; Marc Lipsitch; Stephen Luby; Stephen Morrison; Michael Osterholm; Megan J. Palmer; Jaspreet Pannu; Christine Parthemore; George Perkovich; Stanley Plotkin; George Poste; David Relman; Steven Salzberg; Lone Simonsen; Tim Stearns; Hon. Andrew C. Weber; Jaime Yassif

Name of Organization: Assorted (refer to attachment)

Comment:

Thank you all for the very important work you are doing to review US government ePPP and DURC policies. We would like to submit to you the attached recommendations as you consider changes that are needed to strengthen these policies.

We are also sending these recommendations to NSABB members today.

Additional Comment (attachment):

Submission Date: 7/4/22

Name: Jacob Eliosoff

Name of Organization: Not Applicable

Comment:

I'm just a concerned member of the public, but I'm frustrated by the lack of transparency about covid-related research. The scale of the pandemic justifies complete unveiling of EcoHealth's and Baric's emails and research proposals (approved or rejected). Best to open them up to the public, but at a minimum, a reputable government body or news publication should be given full access and summarize their implications.

On a specific technical point, quoting [Dr Robert Garry](#): "Except for the RBD the S proteins are essentially identical at the amino acid level - well all but the perfect insertion of 12 nucleotides that adds the furin site. S2 is over its whole length essentially identical. I really can't think of a plausible natural scenario where you get from the bat virus or one very similar to it to nCoV where you insert exactly 4 amino acids 12 nucleotide that all have to be added at the exact same time to gain this function - that and you don't change any other amino acid in S2? I just can't figure out how this gets accomplished in nature."

This insertion happened, somehow, naturally or artificially. I'd like to see top experts in the field explain, publicly, their best hypotheses as to how it could have happened. Too much of the public debate has been ill-informed and sensationalistic, but too much of the expert debate has been behind closed doors. Make the experts explain key questions like this so that reasonably educated but non-expert readers, like me, at least know what they believe.

Future generations will judge us less by the mistakes that led up to the pandemic, and more by our evasions that made a proper postmortem take so long. Or maybe even our own generation, in a few years, upon the next pandemic.

Submission Date: 7/8/22

Name: Harish Seshadri

Name of Organization: Indian Institute of Science

Comment:

I have attached my written comment for the meeting. Please let me know if you need further details.

Additional Comment (attachment):