

Advice from the OGTR, ECU Biosafety Officer and RBHSC during COVID-19

An important message from ECU's Biosafety Officer – Doreen Mackie and the Radiation, Biosafety and Hazardous Substances Committee (RBHSC) following advice from the OGTR.

On the Wednesday, 1 April 2020, ECU received advice from the Office of the Gene Technology Regulator (OGTR) on managing certified facilities and licences during the COVID-19 restrictions.

The OGTR acknowledged that we have entered uncertain and challenging times and that health and safety of people and the environment remains the priority. The OGTR has received several requests for advice about how organisations can continue to comply with certification guidelines and licence conditions in an environment where key staff may no longer be in their physical workplace and some common laboratory consumables may be in limited supply. The OGTR has provided some information which has been summarised below and this is also available on [the OGTR website](#).

In summary:

RBHSC (which includes the IBC) functions:

ECU's Institutional Biosafety Committee (IBC) known as the Radiation, Biosafety and Hazardous Substances Committee (RBHSC) continues to function as normal with the collective technical and scientific expertise and at least one independent member, the only difference to date will be that the next meeting on April 16, 2020 will be held via Teams online not face to face.

OGTR Certified facilities

ECU continues to support and service these facilities. The RBHSC encourages you to proactively identify any potential hazards/incidents regarding certified facilities by reporting them in ECU's Riskware system [Riskware Logon](#) as soon as possible. The following guide explains [how to report a hazard](#) and [how to report an incident](#) in Riskware. As well logging the hazard/incident in Riskware you must verbally reporting it to your direct line manager or supervisor and the ECU Biosafety Officer – Doreen Mackie on 6304 5556.

Annual facility inspections are considered to be a critical risk-management tool for certified facilities and will likely be conducted earlier than usual.

Please consider the following options when reviewing project/teaching activity health and safety risk assessments as they may introduce some flexibility during the COVID-19 pandemic:

- Prioritise projects and conserve resources to mitigate the hazards and risks.
- Limit non-essential work if you anticipate an inability to comply with the relevant guidelines.
- Aggregate GM work to selected facilities and suspend certified facilities where no dealings with GMOs are being conducted. Please let the RBHSC know if these options are selected via email to RBHSC@ads.ecu.edu.au

To conserve resources whilst maintaining safety, we also encourage a review of work practices and the hazards and risks posed by any given situation. For example:

- Plan work to reduce the number of times the facility is entered or exited to conserve personal protective equipment (PPE).
- Revise local practices such as universal use of face masks in animal facilities to a risk-based approach.
- Remind staff that 1 full pump of hand wash is a measured dose and is sufficient to wash up to the wrist.

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Shortages of standard decontaminant solutions and Inability to test/calibrate decontamination or containment equipment

- Please be aware that work should not proceed where you cannot provide a decontaminant that is effective against the GMO being used in the lab.
- The Physical Containment (PC) Guidelines stipulate annual maintenance on a set of equipment to ensure it is functioning effectively.
- Please contact the RBHSC@ads.ecu.edu.au as soon as possible to either discuss possible decontaminant alternative or if annual maintenance cannot be achieved.

Licence conditions

ECU and the OGTR appreciates that important work is being conducted under licences and that licence holders wish to continue this work. Licence conditions must be complied with even in these difficult times.

ECU reminds you of the General principles for licences:

- The priority is to ensure that GMOs or viable GM material are not dispersed and that the work is being conducted safely.
- Consider alternative approaches to your standard work practices that still ensure that you meet licence conditions.
- You must update health and safety hazard risk assessments and SOPs to ensure that licence conditions will continue to be met and hazards and risks are managed under a variety of circumstances. These include:
 - effectiveness of current containment requirements
 - impact of reduced workforce availability
 - impact of restrictions on travel/transport of GMOs
 - impact of travel restrictions on conducting inspections
 - complying with reporting obligations.
- Consider stopping or limiting non-essential work.
- Reconsider initiating new work.

Plant Dealings involving intentional release (DIR) and Clinical Trial licences

Please contact the RBHSC@ads.ecu.edu.au if conducting any work with Plant DIR or Clinical Trial Licences.

If you have any concerns regarding your capacity to comply with licence conditions, please contact the RBHSC@ads.ecu.edu.au as soon as possible, so that ECU can address these issues with the OGTR.

The priority remains the protection of the health and safety of people and the environment. ECU strongly encourages GMO/viable GM material users to acknowledge and capture the hazards and risks that may arise from any possible COVID-19 restrictions such as reduced staffing, lack of decontamination options and reduced supplies of PPE in health and safe risk assessments in ECU's Riskware system – specifically the WHS risk register module. You can find more information on the Riskware - WHS risk register module on the [Health and Safety webpage](#). To log on to ECU's Riskware system click the following link [Riskware Logon](#).

We are happy to assist with specific queries via the RBHSC@ads.ecu.edu.au. Please continue to be proactive in protection of human health and safety and the environment.