Reviewer’s report

Title: Engaging Research Ethics Committees to develop an Ethics and Governance Framework for Best Practices in Genomic Research and Biobanking in Africa: The H3Africa Model

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Reviewer: Edward Dove

Reviewer's report:

Dear authors,

I enjoyed reading this short manuscript that describes your engagement approach with key stakeholders, and lessons learned, in the development of an ethics and governance framework for genomics research and biobanking in Africa. It is not a ground-breaking paper, but it describes useful work conducted in the H3Africa Consortium and so I think the manuscript is worthy of publication. This said, some revisions are required in order to make it acceptable for publication. In many places, the writing is not strong and needs a careful proof-reading by all the co-authors (I'm not sure this was done in the first round of submission, despite the number of co-authors and claim made in the Authors Contributions section). My comments and questions are a mix of major and minor importance, though in this case they mostly fall within the latter category. The following comments are not arranged in order of importance.

General

* The title of the manuscript is somewhat confusing: the official title of the Framework, from what I see, is: Ethics and Governance Framework for Best Practice in Genomic Research and Biobanking in Africa. This should be accurately recorded in the title.

* There is inconsistency throughout the manuscript regarding the names of the two H3Africa working groups. The correct names, from what I can see from the official website, are the Working Group on Community Engagement (or alternatively called the H3Africa Community Engagement Working Group) and the Working Group on Ethics and Regulatory Issues (or alternatively called the Ethics and Regulatory Issues Working Group). Different names for these two working groups are used throughout the manuscript. This will need to be corrected.
There is also inconsistency regarding RECs and research ethics committees. I suggest you write 'research ethics committees (RECs)' the first time the word appears and then use RECs thereafter.

You use 'genomics research' and 'genomic research' interchangeably throughout. I suggest using one only for consistency.

Sometimes 'Biobanking' is capitalized in the manuscript - it shouldn't be; (lower-case) 'biobanks' and 'biobanking' are standard.

The manuscript focuses much less on RECs than the title leads one to believe. Indeed, the manuscript seems to describe the approach used to engage with a variety of stakeholders. I suggest the manuscript focus more on RECs or the title be amended to clarify that you discuss stakeholders other than just RECs.

Abstract

In the Abstract, in the last sentence, you refer to 'we'. It will be unclear to the readership who the 'we' refers to you; are you writing on behalf of H3Africa or specific working groups within it? Or does the 'we' reflect your collective capacity as authors?

Background

On p. 3, line 32 (Background), it should be 'participants' privacy' (apostrophe is missing).

In the Background you write that 'a key ethical challenge in the conduct of genomic research and biobanking in Africa is the limited ethics and regulatory guidance to inform the design, review and conduct of these studies.' To play devil's advocate: why not consult other guidance, e.g. international guidance from WHO or other organizations? If these issues are not per se unique to Africa, why the need for Africa-specific guidance?

In the Background, you write that 'questions' were raised about the appropriateness of broad consent in the African research context. Can you elaborate what these questions were?

At the bottom of p. 3 in the Background, you write that the H3Africa working groups support 'empirical studies addressing the [ELSI] of genomic research and biobanking'. Are these empirical studies in Africa only or also elsewhere?


* On p. 4 (Background), you write that the working groups 'deemed it necessary to develop a framework'. This is good strategic use of the passive voice, but it should be spelled out more clearly why it was deemed necessary for a framework. Please explain the rationale.

* On p. 4, line 20, I would add a comma between 'stakeholders' and 'including'.

* At the end of the Background, nothing is mentioned about RECs as the focus of your manuscript. As per above comments, if you want the focus to be on RECs, you should discuss this in the last paragraph of the Background.

**Main text**

* On p. 4, line 52 (Main Text), you say that RECs have a gatekeeper role and as such have 'power to delay or otherwise obstruct research'. Undoubtedly true, but it gives the impression that the power is one-way. It might be more balanced to add that RECs also have the power to approve and facilitate research (and indeed they often do).

* On p. 5, line 7, you say that RECs are 'the most visible entity protecting the values of the institutions…'. Are the RECs in Africa all institution-based? None are region-based? If so, this statement is sensible. If not, it suggests region-based RECs are beholden to certain institutions, and that can be a very controversial claim.

* In describe the 1st consultation meeting, I would add the month in 2014 to be consistent with your description of the other two consultation meetings.

* On p. 5, line 36, I would add a comma between 'projects' and 'including'.

* On p. 6, line 14 (2nd consultation meeting description), I would change it to 'discussions on what would constitute best practices…' as you are describing something that occurred in the past.

* I don't think it's necessary to specify the exact date of the second and third consultation meetings (you don't do this for the first one). Month and year is sufficient.

* In describing the second consultation meeting, you write that the meeting 'called for clear guidelines and regulations across the African continent and the need to ensure that there is harmonisation'. You don't make the case for why this is necessary, though. Why is harmonisation so important here? What does this mean for local context and values?
* Lines 46-47 on p. 6 are redundant as you already state that the meeting 'affirmed' your view.

* No need for the comma after 'meetings' at line 59 on p. 6.

* No need for the hyphen at line 18 on p. 7.

* There is an extra space between 'country' and 'specific' at line 28 on p. 7.

* No need for the comma after 'internationally' at line 33 on p. 7.

* In the discussion of the third consultation meeting, you mention only 'institutional ethics committees'. Again, does this mean no regional RECs were present?

* On p. 8, lines 15-16, I would replace 'may' with 'might' and 'can' with 'could', to signify this event took place in the past.

* Typo on p. 8, line 25: it is 'African Academy of Sciences', not Africa Academy of Science.

* In your section on 'other matters arising and next steps', you mention that feedback of individual genetic findings 'emerged' as a pertinent ethical challenge. But earlier in the manuscript you wrote that after the first consultation meeting, there was a shift from identifying ethical issues to exploring how the identified issues should be addressed in practice. This seems inconsistent.

* In the section on 'Lessons learned', I think it's better to replace 'we would like to highlight here' with simply '…lessons that can guide future engagement…'.'

* The last paragraph before the Conclusion is somewhat awkwardly phrased ('Evidence of the success…') - I suggest simplifying it. Also, more importantly, I'm not sure that acceptance of editorials in scientific/medical journals is a marker of success of a framework, much less success of the approach of engaging stakeholders. It signals there is interest in the work done by a consortium, but not necessarily that the framework or approach - (i.e. several consultation meetings in different parts of Africa) are a 'success'. I would think success would be demonstrated more by uptake of the framework by RECs and other stakeholders and demonstration that the engagement approach is something that can be usefully replicated in future projects.

* Is there a source for the claim that the interviews are being conducted (and are they led by H3Africa?), or have been conducted, with REC members in different African countries (Ghana, Uganda and Zambia)?
Conclusion

* I would hyphenate 'bottom up'.

* Typo in the Conclusion paragraph ('research and ethics committees') - again, better here to just say REC members.

* I think it's an overreach to say that 'the voices' of REC members were incorporated into the guidelines - all of the voices? I'm sure some REC members expressed viewpoints that ultimately were not taken up in the framework…

* Note typos in last sentence: it is the 'African Union' and 'African Academy of Sciences'.

* Do you have anything to say about efforts to increase communication amongst/between RECs in Africa and encourage harmonization or mutual recognition of their processes/decisions? Some conceptual and early empirical work has been done by some members of the Global Alliance for Genomics and Health on this. Might this be a fruitful or promising next step in the work of H3Africa that builds on the engagement initiative for the framework?

Funding

* In the Funding section, I would replace the semi-colon with a colon, i.e. 'H3Africa Consortium: US National Institutes of Health (NIH) and the Wellcome Trust.' Note that I've added a period and corrected the typo for 'Institutes'.

Acknowledgement

* Note here, as elsewhere, there is a different name used for the H3Africa Ethics and Regulatory Issues Working Group (here it's simply and bizarrely referred to as 'members of the Ethics and Regulatory issues of the H3A Consortium').

* On line 49, there is a comma missing between Clement Adebamowo and Michele Ramsay.

* On line 56, 'colleagues' is capitalized for some reason (it should be lower case).

I hope you find these comments beneficial.
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Please indicate the quality of language in the manuscript:

Acceptable

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