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THE FOUNDATION FOR BIOETHICS IN TECHNOLOGY

The Foundation for Bioethics in Technology
Rhode Island, USA 02818
<https://bioethics.tech>

Date: February 2, 2026

To: Members of the House Committee
Rhode Island General Assembly

Re: Written Testimony in Opposition to H7337
Biotechnology Regulatory Sandbox Act

Dear Honorable Members of the Committee,

The Foundation for Bioethics in Technology respectfully submits this written-only testimony regarding H7337, the Biotechnology Regulatory Sandbox Act.

The Foundation supports scientific research and responsible innovation. However, experimentation involving biological systems, human subjects, or sensitive biological data must be governed first and foremost by **human rights, informed consent, and public health protections**, not by regulatory convenience.

As drafted, H7337 prioritizes administrative flexibility and market development while failing to clearly codify protections for bodily autonomy, data sovereignty, and ethical accountability. A regulatory sandbox does not remove risk. It concentrates it.

H7337 relies heavily on disclosure and acknowledgment requirements. Disclosure alone is not informed consent.

Informed consent requires:

- the meaningful ability to refuse participation,
- the right to withdraw without penalty,
- clear limits on data use, retention, and secondary transfer,
- and independent ethical oversight.

Absent these protections, disclosure becomes a liability shield rather than a safeguard for human dignity.

Biotechnology experimentation does not occur in a vacuum. It occurs within biological, neurological, and environmental systems. When research involves human biological material, genetic information, biometric identifiers, neural data, or experimental interventions, it creates the potential for **biological and informational pollution**.

Pollution is defined by externalized impact, not intent.

Failing to acknowledge this reality does not prevent harm. It prevents accountability.

By granting time-limited exemptions and regulatory flexibility, H7337 creates an asymmetry between innovators and participants. Innovators receive relief from compliance burdens, while participants are left without clearly articulated statutory rights.

This imbalance predictably shifts risk away from developers and onto individuals and communities. Such structures invite ethical failure even in the absence of bad faith.

H7337 places significant discretion within administrative agencies tasked simultaneously with promoting innovation and overseeing experimentation. When development incentives and ethical oversight coexist within the same governance structure, a **structural conflict of interest** arises.

Ethical review must be independent, explicit, and enforceable. Anything less is aspirational, not protective.

Recommended Rights-First Amendments

The Foundation urges the General Assembly to adopt the following safeguards:

Informed Consent Defined in Statute

Explicitly define and require informed, opt-in consent for all human-affecting experimentation, separate from consumer disclosures.

Limits on Data Use and Secondary Transfer

Prohibit the sale, transfer, or secondary use of biological, genetic, biometric, or neural data without separate affirmative consent.

Right to Withdraw and Data Deletion

Guarantee participants the right to withdraw at any time, with clear requirements for data deletion or return where feasible.

Independent Ethical Oversight

Require independent ethics review, adverse event reporting, and public accountability mechanisms.

Clear Remedy for Harm

Provide defined pathways for complaint, enforcement, and remedy when harm occurs.

Innovation must not advance by treating human bodies as test environments and communities as acceptable exposure zones. A sandbox without ethical boundaries becomes a testing ground for vulnerability.

Rhode Island can lead by ensuring biotechnology innovation proceeds only within clearly defined protections for consent, dignity, and public health.

Thank you for your consideration of this testimony.

Respectfully submitted,

Rachael L. McIntosh

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STAY HUMAN EVERYONE!



The Foundation for Bioethics in Technology is a non-political, non-profit 501(c)(3) organization proudly headquartered in Rhode Island.

Our mission is to ensure the next generation inherits not just convenience, but dignity and freedom. Join us in shaping the future of technology ethically because innovation without ethics is catastrophe.

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