

National Institutes of Health
Health Research Institute
National Bioethics Committee for Research (NBC-R)

No. 4-87/NBC-HBM-Compliance/2026/267

Dated: 19 August 2026

CIRCULAR

To:

All Logistics, Courier and Freight-Forwarding Companies engaged in the collection, packaging, transportation and shipment (domestic and international) of Human Biological Material (HBM) / Human Biological Samples in Pakistan

Subject: IMPLEMENTATION OF THE NATIONAL GUIDELINES FOR COLLECTION, USAGE, STORAGE AND EXPORT OF HUMAN BIOLOGICAL MATERIALS (2020).

Dear Sir/Madam,

1. This is with reference to the earlier memoranda/circulars issued by the Pakistan Health Research Council (PHRC), now the Health Research Institute on the subject of collection, handling, storage, transportation and export of Human Biological Material (HBM) — vide PHRC/PMRC. Ref No. 4—87/NBC/16-2660 dated Jan 31, 2017 and NIH/HRI Memo No. 4-87/NBCR-Vol-34/23/1094 dated January 3, 2024 whereby all concerned stakeholders, including logistics and courier service providers, were sensitized regarding the regulatory requirements governing the shipment of HBM in Pakistan available at nbcPakistan.org; <https://nbcPakistan.org.pk/assets/national-guidelines-for-collection%2c-usage%2c-storage-and-export-of-human-biological-materials-20202.pdf>.
2. The National Guidelines for Collection, Usage, Storage and Export of Human Biological Materials, 2020, jointly developed and launched by the National Institutes of Health (NIH) and the Ministry of Foreign Affairs on 17 July 2020, lay down the mandatory regulatory framework governing the collection, use, storage, transportation and export of human biological samples originating in Pakistan. The Guidelines require, inter alia, (i) prior approval of the National Bioethics Committee of NIH for the collection and/or export of HBM, and (ii) an export/transit/transshipment license or No-Objection Certificate from the Strategic Export Control Division (SECDIV), Ministry of Foreign Affairs, (for pathogens in controlled list) before any human biological material, pathogen, toxin or genetically modified organism is shipped out of the country.
3. It has been observed that, despite the aforementioned Guidelines and earlier communications on the subject, certain logistics, courier and freight-forwarding companies continue to accept, process and ship consignments declared or suspected to contain Human Biological Material without verifying the requisite regulatory clearances. Such practices are in violation of the National Guidelines and expose the shipping companies, the sending/receiving institutions, and the country's biosafety and biosecurity interests to serious risk.
4. All logistics, courier and freight-forwarding companies engaged in the shipment of HBM are, therefore, once again directed to implement the National Guidelines in true letter and spirit, with immediate effect. In particular, the following shall be strictly observed:
 - Do not accept any consignment declared, labelled, or suspected to contain Human Biological Material/samples for shipment (domestic or international) unless accompanied by valid documentary evidence of (a) National Bioethics Committee (NBC) approval, and (b) an export/transit license or NOC from SECDIV, Ministry of Foreign Affairs, where applicable to international shipments.



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- Verify that the sending institution/individual is duly authorized and that the shipment is supported by a valid Material Transfer Agreement (MTA) reference, where applicable, together with the relevant approval/reference numbers of NBC-HRI NIH.
 - Ensure that packaging, labelling and handling of HBM consignments strictly conform to the IATA Dangerous Goods Regulations and WHO Guidance on Regulations for the Transport of Infectious Substances, including correct classification (UN 2814/UN 3373, Category A or Category B Biological Substances, as applicable) and the triple packaging system.
 - Maintain a proper chain-of-custody record/manifest for every HBM shipment including sender and consignee details, nature and quantity of material, and reference numbers of all regulatory approvals and retain such records for audit and verification purposes.
 - Designate a compliance focal person at the head office and at each major shipping/handling point to coordinate with HRI-NIH for HBM-related consignments.
 - Immediately report to HRI-NIH any consignment presented for shipment that is declared, suspected, or discovered to contain Human Biological Material without the requisite approvals/documentation, and decline to process such consignment pending regulatory clearance.
5. Non-compliance with the National Guidelines shall be viewed seriously and may attract action under the applicable laws/regulations besides referral to the concerned regulatory and law-enforcement authorities, and may also result in the company concerned being blacklisted/debarred from handling HBM consignments in future.
6. All logistics and courier companies are requested to ensure strict compliance with the above and to circulate the contents of this Circular to all concerned branch offices, staff and operational personnel with immediate effect. An acknowledgment of receipt and compliance may kindly be furnished to this Institute within fifteen (15) days of the date of issuance of this Circular.
7. For any clarification or guidance regarding the regulatory requirements for the shipment of Human Biological Material, the undersigned/HRI-NIH's NBC focal person may be contacted at <https://nbcPakistan.org.pk/assets/national-guidelines-for-collection%2c-usage%2c-storage-and-export-of-human-biological-materials-20202.pdf>.

This issues with the approval of the Competent Authority.

Dr. Faiza Bashir
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National Focal Person
National Bioethics Committee (NBC)
Health Research Institute-NIH
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Copy for information and necessary action to:

- SECP for wider circulation to companies
- Director General, Strategic Export Control Division (SECDIV), Ministry of Foreign Affairs, Islamabad
- Secretary, Ministry of National Health Services, Regulations & Coordination, Islamabad
- Chairman, Federal Board of Revenue (Pakistan Customs) for information and necessary action at points of exit
- Director General, Civil Aviation Authority of Pakistan
- Master file