UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

August 3, 1993

MEMORANDUM

SUBJECT: Interpretation of the Good Laboratory Practice (GLP) Regulation

GLP Regulations Advisory No. 64

FROM: David L. Dull, Director
Laboratory Data Integrity Assurance Division

TO: GLP Inspectors

Please find attached an interpretation of the GLP regulations as issued by the Policy & Grants Division of the Office of Compliance Monitoring. This interpretation is official policy in the GLP program and should be followed by all GLP inspectors.

For further information, please contact Francisca E. Liem at FTS-398-8265 or (703) 308-8265.

Attachment

cc: M. Stahl
C. Musgrove

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Dear

This is in reply to your letter of February 24, 1993, in which you requested clarification regarding certain requirements under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Good Laboratory Practice Standards (GLPS). Specifically, you requested clarification regarding characterization requirements under 40 CFR 160.105 for radioelabeled test substances. You stated that your request came as a result of past inspection findings and a desire to ensure that your current practices are in compliance with GLPS.

Briefly summarized, you posed the following specific questions in your letter:

1) May characterizations be performed as separate studies from the multiple studies in which the characterized substances will be used

2) If such a characterization study is performed, must all provisions of GLP be complied with, including the characterization which is the goal of the study?

3) Would the exceptions at 40 CFR 160.135 (b) apply to such characterization studies?

The characterization requirements at 40 CFR 160.105(a) must be met for each batch of test, reference, or control substance prior to its use in a study. It is acceptable for data to be collected in characterization studies and used to support subsequent multiple studies as asked in your first question.

In reply to your second and third questions, the GLPs provide flexibility which prevent the quandary of needing to fully characterize a substance before it can be used in a study designed to collect that characterization data. First, if a study 15 performed to determine the characteristics required under 40 CFR 160.105(a) it qualifies as partially exempt from the GLPS as provided at 40 CFR 160.135. As such, it does not need to comply with the requirements of §160.31(d) and 161.105(a) through (d). Alternatively, if a study is performed to determine the characteristics required under 40 CFR 160.105(b), i.e., solubility and stability, it is not exempt under 40 CFR 160.135. In this case, the requirements of 40 CFR 160.105(b) provide sufficient

flexibility to avoid the need for redundant testing. Solubility characterization need only be performed if "relevant to the conduct of the study," which is clearly not the case for a study conducted expressly to determine solubility. On the other hand, stability characterization is allowed to be met concomitantly through periodic analysis of each batch. This, by definition, is performed in the course of a study designed to determine the stability of a batch of test substance.

In summary, it is permissible to perform characterization studies as you described and in certain cases partially exempt the work from GLP compliance as provided at 40 CFR 160.135. It is not necessary to perform redundant characterizations of the tested parameters.

If you have any questions concerning this response, please contact Steve Howie of my staff at (703) 308-8290.

Sincerely yours,

/s/John J. Neylan III, Director,
Policy and Grants Division
Office of Compliance Monitoring (EN-342)

cc: David L. Dull
GLP File