UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

December 20, 1989

MEMORANDUM

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

GLP Regulations Advisory No. 8

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-475-9864.

Attachment

cc: C. Musgrove

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

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Dear

This is in response to your letter of March 15, 1990, in which you requested clarification of several points regarding the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Good Laboratory Practice standards (GLPs). Specifically, you stated that you believed that technical work performed at separate laboratories constitute separate studies which should each have their own protocol, final report, and study director. You stated that this is important to assure proper oversight of study activities.

This approach does not meet the GLP requirements. The term "study," as defined at 40 CFR 160.3, is an experiment "In which a test substance is studied in a test system ... to determine or help predict its effects ..." The coverage of portions of studies (analytical phases or field application phases) as complete and separate studies under this definition is problematic.

The term study director is defined as the individual responsible for the overall conduct of the study. At 40 CFR 160.33, it is further explained that the study director is the single point in study control and is responsible for the interpretation, analysis, documentation and reporting of results. This clearly indicates a need for an individual who has overall responsibilities that would encompass all technical aspects of a study. When a study is submitted to EPA, there must be one study director responsible for the overall conduct of the study.

In addition some technical difficulties arise from the breaking of studies into component parts identified separately as studies. For example, there could be difficulty in assessing who has responsibility during certain critical phases of studies such as the transfer of sample material from application sites for analysis and the archiving of data. The study directors of each unit of such a subdivided study would also have the authority to account for protocol changes as provided in 40 CFR 160.120(b). This would be expedient, but there would be a loss of assurance that such changes conform to the overall purpose of the study.

Subdividing a study could also increase the overall burden associated with performing the study. It would be necessary to address the entire GLP standard from the viewpoint of each subunit

that is described as a study. For example, cooperators involved in application of agricultural chemicals would have to address test substance characterization as required at 40 CFR 160.105 if the application work is a separate study. Each time that a subunit exceeds 4 weeks duration, the affected contracting testing facility would also be responsible for assuring that a reserve sample of the test substance is retained. Reporting requirements at 40 CFR 160.185 would have to be met for each unit. Since 40 CFR 160.35(b)(3) requires a QAU Inspection of each study each subdivision would require at least one QAU Inspection.

It is possible to accommodate entire field residue or environmental fate experiments as single studies under GLPs. The testing facility that is involved in such studies would encompass all organizational entitles involved in conducting the actual work. Testing facility management duties may be predominantly assumed by the sponsor facility or by a lead contracting laboratory depending on needs and capabilities. Certain overall responsibilities such as that of the study director to assure that the study Is conducted according to GLPs must be centralized and cannot be delegated. However the study could be divided into units based on practical considerations with many technical details and the responsibility of monitoring these details delegated as is seen fit by management. Thus project directors or other appropriately identified individuals may be responsible for assuring that day-to-day operations are carried out.

Please note that the testing facility management is responsible for designating the study director and making the appropriate assurances as specified at 40 CFR 160.31 (e.g. that there is a QAU etc.). The regulations do not state that the testing facility management actually performs the duties it is providing assurances for under this section; consequently there is considerable flexibility for contracted persons to provide their own standard operating procedures, QAUs or other requirements provided that the overall testing facility management (e.g. at the sponsor or perhaps at the prime contractor) can provide assurance that compliance with GLPs occurred.

If you have any questions concerning this response please contact Steve Howie of my staff at (202) 475-7786.

Sincerely yours;

/s/ John J. Neylan III, Director
Policy and Grants Division
Office of Compliance Monitoring

cc: David L. Dull
GLP File