



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. 2

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
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Dear

This is in reply to your October 26, 1989 letter to David L. Dull as a follow-up to an October 2 meeting at EPA. Your letter was referred to my office for reply. In your letter you listed several points regarding the interpretation of the Good Laboratory Practice standards (GLPs). I have listed the four points presented in your letter and followed each with a response.

1. Basic exploratory studies are those involved in method development, such as the development and validation of analytical methods.

Response: The term "exploratory studies" does not have the regulatory meaning as suggested. Certain method development and validation studies could be exploratory, but others may be required in support of registrations. Also, some exploratory studies may have nothing to do with method development. Basically, studies being performed for submission to EPA should be regarded as being subject to the GLPs, while studies performed entirely for internal use would not require compliance.

2. Master schedule sheets are maintained by the quality assurance units of the testing facilities as a record of all studies conducted at the facilities. The main purpose of these sheets is to facilitate audits by EPA or FDA.

Response: Master schedule sheets are required by the regulations as described. However, we do not believe that your statement is accurate in describing the main purpose of the master schedule as facilitating audits by the Agency. EPA uses the master schedule to determine the adequacy of the testing facility, i.e., whether the facility is of sufficient size and has sufficient personnel to perform the studies that are listed. Finally, the master schedule is presumed to be necessary to the testing facility itself, e.g., for use by the QAU to assist in tracking of studies and scheduling of internal audits.

3. Retention of records and samples is largely dictated by the study protocol. In metabolism studies only the major metabolites need be retained as reference sample. Samples analyzed during stability studies need not be retained.

Response: Retention of records and samples is required by the regulations, which cannot be superseded by the protocol. The protocol will largely determine what records and samples are generated during the course of the study, and all such raw data must be retained. The GLPs do allow that certain samples need not be retained longer than they afford evaluation, and that certain specimens need not be retained after quality assurance verification (sections 160.195(c) and 792.195(c)). These provisions are made to allow the discarding of certain samples or specimens whose retention would not provide useful data integrity assurance.

4. GLPs do not apply to routine manufacture or to starting materials used.

Response: This is true where such processes are not performed as studies intended for submission to EPA. Should the submission of such data be required by EPA, it would be subject to the regulations.

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

Sincerely yours,

/s/Gerald B. Stubbs, Acting Director
Policy and Grants Division
Office of Compliance Monitoring

cc: David L. Dull