

# Responsibilities of test facility management and sponsor in a GLP environment

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**Summary.** Compliance with the Organisation for Economic Co-operation and Development (OECD) principles of good laboratory practice (GLP) is discussed in particular as regards the responsibility of the management of a test facility (TF) when performing a monosite study as compared to the responsibility in a multisite study. Other issues of interest in this context are dealt with, such as the qualification and training for professionals and technicians, the meaning of validity of standard operating procedures (SOP), the relation between management and quality assurance (QA), the role played by study plans, test and reference items, archives, master schedule, communication lines, validation of methods and calibration, and related activities. Furthermore, the consequences for the TF management and sponsors during multisite studies are discussed, with particular regard to the existence of other responsibilities set forward by health authorities in countries with not negligible differences in the applicable regulations. Hence, the major question on the floor is whether one global set of GLP principles can be agreed upon which in turn can lead to one global submission file. It is firmly hoped that health authorities and industry, hand in hand, can actually optimize their interaction to the overall benefit of human health.

*Key words:* good laboratory practice, differences in regulations, compliance monitoring.

**Riassunto** (*Responsabilità delle direzioni del Centro di Saggio e del committente nel contesto BPL*). Viene discussa la questione della conformità ai principi di buona pratica di laboratorio (BPL), in particolare per quel che concerne le responsabilità della direzione del centro di saggio (CdS) nell'esecuzione di studi monosite rispetto alle responsabilità che derivano dalla conduzione di studi multisito. Sono trattati anche altri argomenti di interesse in questo contesto, come la qualificazione e l'addestramento di ricercatori e tecnici, il significato della validità delle procedure operative standard (POS), la relazione tra direzione e assicurazione di qualità (AQ), la funzione del piano di studio, le sostanze di saggio e di riferimento, gli archivi, l'elenco degli studi, le linee di comunicazione, la convalida e la calibrazione dei metodi e le attività collegate. Sono esaminate, inoltre, le implicazioni degli studi multisito per la direzione del CdS e per il committente, con particolare riferimento all'esistenza di altre responsabilità stabilite dalle autorità sanitarie in paesi dove esistono differenze non trascurabili nei provvedimenti relativi. Pertanto, il principale interrogativo sul tappeto è se sia possibile trovare consenso su un insieme globale di principi di BPL che a loro volta possano portare ad un unico fascicolo di registrazione. È vivamente sperabile che le autorità sanitarie unitamente all'industria possano effettivamente ottimizzare la loro interazione a completo beneficio della salute umana.

*Parole chiave:* buona pratica di laboratorio, difformità nei provvedimenti, verifica della conformità.

## INTRODUCTION

The responsibilities of test facility (TF) management and sponsor in a good laboratory practice (GLP) environment as described in the Organisation for Economic Co-operation and Development (OECD) principles of GLP are overviewed [1, 2]. The TF management means the person(s) who has (have) the authority and formal responsibility for the organization and functioning of the TF according to the GLP principles. This requires the identification of management and the need of a job description. The organization has to describe in an *ad hoc* document the way the TF is structured. The TF management must ensure the availability of a master schedule, appropriate facilities, equipment and materials for the timely and proper conduct of

the study. A statement has to be in place which identifies the individual(s) within the TF by whom the responsibilities of management are fulfilled.

## DUTIES AND TASKS

According to the GLP principles, the TF management must ensure that for each study an individual with the appropriate qualifications, training and experience is designated by management as the study director (SD) before the study is initiated. Replacement of the SD has to be documented.

In the event of a multisite study, and if needed, a principal investigator (PI) has to be designated by the TF manage-

ment [3]. This person – appropriately trained and qualified – has the responsibility to supervise the delegated phase(s) of the study. Replacement has to be done according to established procedures and documented.

As regards records of the qualifications, training and experience, the TF management must ensure that personnel clearly understand the functions they are to perform and, where necessary, provide a development plan and on-going training for these functions.

The TF management must ensure that there is a quality assurance (QA) Programme with designated personnel and assure that the QA responsibility is being performed in accordance with the principles of GLP. In practice, this means that the programme must be independent and that the QA personnel must have access to an up-to-date copy of the master schedule. QA personnel must maintain copies of all approved study plans and standard operating procedures (SOP) in use at the TF. After inspections conducted during in-life phase of a study and after inspections of the final reports, QA personnel must promptly report any outcome in writing to the management and to the SD.

The TF management must ensure that supplies meet requirements appropriate to their use in a study. reagents, materials, animals, food, and equipment are derived as much as possible from ISO certified companies. Equipment used in a study has to be periodically inspected, cleaned, maintained, and calibrated according to the relevant SOP.

Test and reference items must be appropriately characterized by at least the batch number, purity, stability, and storage conditions or other applicable characteristics. This information, described in a certificate of analysis, has to be made available before the start of the study. Some parameters can be determined concomitantly during the conduct of the study.

The TF management has to establish procedures to ensure that computerised systems are suitable for their intended purpose and are validated, operated, and maintained in accordance with the principles of GLP. The validation approach has to be described in a policy and the relevant SOP. Computerised systems must have a validation file and all defined change controls must be documented. The management has also to ensure that appropriate and technically valid SOP are established and followed and a historical file has to be maintained with documented evidence that all original and revised SOP had

been duly approved. A process must be established to ensure that the study plan is approved by the SD and made available to the QA personnel. In case of multi-site studies the TF management has to ensure that clear lines of communication exist between the SD, PI(s), the QA programme(s), and the study personnel.

It is also a duty of the TF management to ensure that an individual is identified as responsible for the management of the archive(s) [4]. Records and materials should be archived for the period specified by the appropriate authorities. If a TF goes out of business and has no legal successor, the archive should be transferred to the archive(s) of the sponsor. In this context, sponsor means an entity which commissions, supports and/or submits a non-clinical health and environmental safety study. The sponsor must ensure that the TF is able to conduct the study in compliance with the principles of GLP and that there is full awareness that the study is to be performed in compliance with the GLP principles.

While the sponsor submits the data to the regulatory authorities (RA), the SD is responsible for the scientific validity of the data. The sponsor makes the final decision based on the outcome of the study.

In some cases the sponsor is responsible for the characterization of the test item. The sponsor must ensure that materials and records are retained and maintained under conditions that ensure their integrity and continued access. If records and materials are transferred to the sponsor, storage has to be done in GLP compliant archives.

## CONCLUSIONS

The interpretation and implementation of the principles of GLP may be slightly different from country to country. This is a great opportunity to step up together – industry and health monitoring authorities – to come up with one global set of GLP principles which in turn can lead to one global submission file. It is firmly hoped that health authorities and industry can actually cooperate to optimise their interaction to the overall benefit of human health.

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## References

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