



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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Compliance and Inspection

Triggers for audits of good laboratory practice (GLP) studies

Adopted by the GLP Inspectors Working Group	08 October 2014
Adopted by the Safety Working Party	12 February 2015
Adopted by the Committee for Medicinal Products for Human Use	26 February 2015
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Good laboratory practice checklist

The following checklist is designed to be used by assessors when reviewing non-clinical safety studies and environmental risk assessment studies which form part of a centralised marketing application. It should be used in association with the GLP information provided by the applicant in the annexes to the cover letter (please refer to [Q&A: Presubmission guidance – Question 37. Which information do I need to provide in my marketing authorisation application regarding GCP inspections and GLP compliance? New March 2015](#)).

Any missing documentation required in the annexes to the covering letter should be discussed with the applicant. Non-clinical assessors in association with their national GLP compliance monitoring authority (CMA) may verify if a test facility or test site is part of its national GLP monitoring programme. Information on the GLP status of test facilities can also be found on the CIRCABC web site ([CIRCABC](#)). In the case of facilities located in the USA where there is no routine programme of inspections it may be necessary to determine if the facility has been subject to an inspection by the Food and Drug Administration (FDA) or Environmental Protection Agency (EPA).

If triggers are identified after the completion of the checklist, which may have an impact on the quality of the data or result in a potential risk to public health, the assessor is advised to discuss the issues with their GLP CMA to determine if a study audit would be appropriate.

How to complete the checklist

For each GLP study, score each answer Yes, No or Not known. If a **Yes** is recorded for question **1** it may not be necessary to complete questions 2-4 of the questionnaire. If a **“No”** or **“Not known”** is recorded for questions **2** or **3** or a **Yes** recorded for question **4**, the issue should be discussed with the national CMA to determine if a study audit is required.

It is recommended that even when an applicant has indicated that a study was conducted in a GLP compliant test facility which is a member of a recognised compliance monitoring programme (OECD) their claims can be verified on a sampling basis. This can be done through the national CMA or by reviewing the information available on CIRCABC. It is suggested that verification of claims of GLP compliance are focused on pivotal toxicology studies which produce data that cannot be determined during the clinical development phase, such as carcinogenicity, reproductive toxicology and genotoxicity studies etc.

Additional information

Additional issues that may trigger a request for a study audit include general concerns about the quality or validity of the reported study:

- study data too clean/too messy;
- implausibility/inconsistency of data provided;
- conflicting results between studies regarding toxicology parameters or overall intra-test system variability;
- results contradict published/known data.

GLP checklist:

Question	Answer	Comment
1. Has the study been superseded by more relevant data in another preclinical or clinical study	<input type="checkbox"/> Yes <input type="checkbox"/> No	If the answer to question one is yes it may not be necessary to complete questions 2-4 of the questionnaire.
2. Is the country where the study has been conducted a signatory to the OECD mutual acceptance of data (MAD) agreement.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not known	A no or not known in question 2 should automatically trigger a request for information and advice to the assessor's national GLP compliance monitoring authority (CMA) or a review of the information available on CIRCABC.
3. Is the facility that conducted the study a member of its national GLP compliance programme at the time the study was conducted?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not known	A no or not known in question 3 should automatically trigger a request for information and advice to the assessor's national GLP CMA or a review of the information available on CIRCABC.
4. Are there any GLP exemptions recorded in the study director's statement of compliance or described in the study report which are considered to be key to the interpretation or reliability of study data?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Key issues will include but are not limited to the use of a non GLP compliant laboratory to perform parts of the study, lack of information on the identification and characterisation of test item, or other serious departures from the principles of GLP.