efsa European Food Safety Authority	**Standard Operating Procedure** **Selection of studies performed in compliance with Good Laboratory Practice for audit purposes**
Public	

Scope	To describe the procedure for EFSA to request on a yearly or ad-hoc basis the performance of GLP studies audits by the GLP Monitoring Authorities. To lay down criteria for the selection of the GLP studies for annual audits and the definition of the follow up actions to be taken by EFSA. This SOP applies to all GLP studies received by APDESK as part of a technical dossier of an application for regulated products and for which audits may be requested within EFSA.

Special Requirements	This procedure is a controlled document maintained by Quality Management. It may not be deleted without comparable controls.

Responsibilities	**General responsibilities:** - **EFSA** is responsible for the selection of the studies to be audited; - **GLP Monitoring Authorities** under whose responsibility the test facility falls is responsible for the study audits; - The **EFSA GLP coordinator** is responsible to store all related documents, including correspondence, under the DMS. **Specific responsibilities - Part I - EFSA Yearly GLP Studies Audit Programme:** 0.1. Selection of the studies for audit purpose – APDESK; 0.2. Preparation, proposal and approval of the EFSA Yearly GLP Study Audit Programme – APDESK; 0.3. Request for GLP study audits – HoD REPRO and APDESK; 0.4. Audits outcome and definition of follow-up actions – APDESK with the collaboration of the relevant REPRO Units; 0.5. Reporting – APDESK with the collaboration of the relevant REPRO Units. **Specific responsibilities – Part II – EFSA Ad-hoc GLP studies audit** 0.1. Proposal of the GLP studies for an ad-hoc audit – Relevant REPRO Units; 0.2. Approval of the GLP studies for an ad-hoc audit– HoD REPRO; 0.3. Preparation of the audit request – APDESK; 0.4. Audits report management and definition of follow-up actions -

	APDESK with the collaboration of the relevant REPRO Units; 0.5. Reporting – APDESK with the collaboration of the relevant REPRO Units.

Abbreviations and definitions

APDESK	Applications Desk Unit
Applicant	Applicant of an authorisation or approval
Area responsible	The APDESK responsible for an area of regulated products
Assessors	Scientific Committee/Panel/Working Group/Network/EFSA Staff/Rapporteur Member State
CIRCABC	Communication and Information Resource Centre for Administrations, Businesses and Citizens
DG GROWTH	DG Internal Market, Industry, Entrepreneurship and SMEs of the EC
DMS	Document Management System
EC	European Commission
EU	European Union
GLP	Good Laboratory Practice is a quality system concerned with the organisational process and the conditions under which non-clinical health and environmental safety studies are planned, performed, monitored, recorded, archived and reported
GLP coordinator	The APDESK scientific officer responsible for the coordination of the GLP activities
GLP Monitoring Authority (MA)	A body established within a Member State or an OECD Country with responsibility for monitoring the GLP compliance of test facilities within its territories.
GLP studies	Studies performed in compliance with the GLP principles
HoD-REPRO	Head of REPRO Department
HoU	Head of Unit
OECD	Organisation for Economic Co-operation and Development
QA	Quality assurance programme means a defined system, including personnel, which is independent of study conduct and is designed to assure test facility management of compliance with these principles of GLP
QM	Quality Manager
REPRO	Scientific Evaluation of Regulated Products
SO	Scientific Officer
SOP	Standard Operating Procedure
Study audit	On-site assessment of the compliance with the OECD GLP principles

	as adopted by the EU, performed by officials of GLP Monitoring Authorities or authorities found equivalent under a Mutual Recognition Agreement. In the context of this SOP, two types of study audits are distinguished: - **a surveillance study audit** is an audit that is part of a planned routine GLP inspection; - **a triggered study audit** is a special audit triggered by specific concerns identified upon submission of an application. The reasons why the triggered study audit has been requested shall be mentioned. In the exceptional case in which the test facility is not part of an EU monitoring programme, a general GLP Inspection covering general GLP compliance could be carried out in accordance with the OECD Environmental Health and Safety Publications (ENV/JM/MONO(2000)3). Series on Principles of Good Laboratory Practice and Compliance Monitoring. Requesting and Carrying Out Inspections and Study Audits in Another Country.
Study audit report	Report on the compliance of the audited studies with the EU GLP principles prepared by the official representing the GLP Monitoring Authority. The term Study audit report used in this SOP refers to the "Inspection report" as specified in Annex I, Part B of Directive 2004/9/EC.

Procedure Part I	**EFSA Yearly GLP Studies Audit Programme**
	Previous SOPs in the process: SOP_001_S Receiving a request
Step 1 APDESK	**1.0 Selection of the studies for audit purpose**
	1.1. By 30th April of each year, the GLP coordinator will propose the list of studies to be part of the EFSA Yearly GLP Studies Audit Programme. For the selected studies a surveillance study audit will be requested; 1.2. The GLP coordinator, in collaboration with the APDESK scientific officers, will select up to 20 studies to be part of EFSA Yearly GLP Studies Audit Programme. The selected studies shall comply at the same time with all three selection criteria: 1. The study is part of an application for regulated products for which EFSA has published an opinion/conclusion in the past year. 2. The study report includes a statement from the study director that

	the study was conducted in compliance to the GLP principles and a statement of Quality Assurance; 3. The study has been performed in a test facility for which the relevant GLP Monitoring Authority has scheduled an inspection according to the planning published on the European Commission portal (CIRCABC). 1.3. Studies from all REPRO Units are considered for inclusion in the Yearly GLP Studies Audit Programme, independently of the legal requirement of the sectorial legislations. If possible, at least one study for each scientific area for which EFSA has published an opinion/conclusion in the past year shall be selected.
Step 2 APDESK	**2.0 Preparation, proposal and approval of the EFSA Yearly GLP Studies Audit Programme**
	2.1. The GLP coordinator will draft the list of the GLP studies selected to be included into the EFSA Yearly GLP Studies Audit Programme; 2.2. APDESK HoU will send the final version of the EFSA Yearly GLP Studies Audit Programme to the HoD REPRO for approval. On approval of the programme, the audit will be launched. 2.3. The EFSA Yearly GLP Studies Audit Programme will be distributed for information, to the REPRO HoUs, EC DG GROWTH and EC DG SANTE.
Step 3 HoD REPRO APDESK	**3.0 Request for GLP Study Audits**
	3.1 The GLP coordinator will prepare all the letters to be sent to the responsible GLP Monitoring Authorities, for the HoD REPRO's signature; 3.2 The REPRO HoD will sign all letters; 3.3 The GLP coordinator will send the signed letters and the full study reports to the respective Monitoring Authorities with a copy to the EC DG GROWTH; 3.4 The yearly audit will be initiated.
Step 4 APDESK and the relevant REPRO Units	**4.0 Audits outcome and definition of follow up actions**

	4.1. Upon reception of the study audit reports, the GLP coordinator shall distribute the audit reports to the concerned REPRO Units; 4.2 Two types of non-compliances can be reported: a non-compliance of administrative nature and a non-compliance of scientific nature. In case the outcome of the study report reveals an administrative non-compliance, the relevant unit is informed but no further action is required. 4.3. If the GLP compliance is not a legal requirement of the relevant sectorial legislation, the outcome of the study audit report revealing a scientific non-compliance will be considered on a case-by-case basis; 4.4. If the GLP compliance is a legal requirement of the sectorial legislations, the REPRO Scientific Unit will judge on the impact of the study audit report revealing a scientific non-compliance on the outcome of the risk assessment; ➢ when the scientific non-compliance has no impact on the outcome of the risk assessment, an argumentation will be provided by the REPRO scientific Unit in a "Note to the file"; ➢ when the scientific non-compliance has a possible impact on the outcome of the risk assessment, an argumentation will be provided by the REPRO scientific Unit in a "Note to the file" and a formal request will be addressed to the responsible scientific panel/scientific staff to initiate a self-task to reopen the scientific output. 4.5. The REPRO Units will inform the GLP Coordinator about the follow-up actions in the case of scientific non-compliances. 4.6. The APDESK HoU will inform the applicant, the EC DG SANTE, the EC DG GROWTH and the Member States GLP Monitoring Authorities about the follow-up/corrective actions. 4.7. In case the study audit report mentions any findings impacting on the integrity of the study, the HoU-APDESK will inform the GLP Monitoring Authorities, EC DG GROWTH and EC DG SANTE of the way these findings have been taken into account during the evaluation.
Step 5 APDESK and the relevant REPRO Units	**5.0 Reporting**
	5.1. A yearly report will be developed by the GLP Coordinator including: the description of the procedure followed to implement the EFSA Yearly GLP Studies Audit Programme, the description of the studies considered, the outcome of the audit programme and the actions taken.

	5.2. The yearly report shall be finalised within one month after reception of all the audit reports and distributed to all REPRO HoUs with copy to the Quality Manager.

Procedure Part II	**EFSA Ad-hoc GLP studies audit**
Step 1 Relevant REPRO Units	**1.0 Proposal of the GLP studies for ad-hoc audit**
	1.1 In case of justifiable reason, a REPRO Unit managing applications for regulated products can request an ad-hoc GLP audit of a study received as part of an application and declared as GLP compliant by the applicant; 1.2 For the study selected for ad-hoc GLP audit, a triggered study audit will be requested; 1.3 The study report shall include a statement from the study director that the study was conducted according to the GLP principles and a statement of Quality Assurance; 1.4 Only studies that are part of an on-going risk assessment or assessment still to be started can be selected for an ad hoc GLP audit and the "clock stop" mechanism cannot be used having as reason awaiting the outcome of the audit report; 1.5 The HoU of the individual Units will send the proposed study for ad-hoc GLP audit to the GLP Coordinator, including the justifiable reason and the documentation.
Step 2 HoD REPRO	**2.0 Approval of the GLP studies ad-hoc audit**
	2.1. APDESK HoU will immediately send the proposal including the justifiable reason and the documentation to the HoD REPRO for approval. On approval of the request, the ad-hoc GLP study audit will be launched. 2.2. The GLP coordinator will inform the applicant that the study has been selected for an ad-hoc GLP audit.
Step 3 APDESK	**3.0 Preparation of the ad-hoc GLP study audit request**
	3.1 The GLP coordinator will prepare a letter indicating the justifiable reasons for requesting an ad-hoc GLP study audit to the responsible GLP Monitoring Authorities, with a copy to the EC DG GROWTH. The letter is to be signed by the HoD REPRO; 3.2 The GLP coordinator will send the signed letter along with the full

	study reports to the relevant Monitoring Authorities in order to initiate the audit.
Step 4 APDESK and the relevant RERPO Units	**4.0 Audits report management and definition of follow-up actions**
	4.1. Upon reception of the study audit reports, the GLP coordinator shall distribute the audit reports to the concerned REPRO Units; 4.2. If the outcome of the GLP study audit report is revealing a non-compliance, the relevant REPRO Unit shall decide on the implications for the risk assessment and take the appropriate measures during the risk assessment process; 4.3. The REPRO Units will inform the GLP Coordinator about the follow-up/corrective actions up to two months after the reception of the audit report. 4.4. APDESK HoU will inform the applicant, the EC DG GROWTH and the Member States GLP Monitoring Authorities about the follow-up/corrective actions. 4.5. In case the study audit report mentions any findings impacting on the integrity of the study, the HoU-APDESK will inform the GLP Monitoring Authorities, EC DG GROWTH and EC DG SANTE of the way these findings have been taken into account during the evaluation.
Step 5 APDESK and the relevant RERPO Units	**5.0 Reporting**
	5.1. A yearly report will be developed by the GLP Coordinator including: the description of the of the procedure followed to implement the EFSA Yearly GLP Studies Audit Programme, the description of the studies considered, the outcome of the audit programme and the actions taken; 5.2. The yearly report shall be finalised together with the report of the EFSA yearly GLP Audit Programme and be distributed to the REPRO HoUs with copy to Quality Manager.
	Following SOPs in the process: SOP_007_S Documenting the scientific risk assessment process