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2 **Draft GUIDANCE DOCUMENT ON GOOD *IN VITRO* METHOD PRACTICES (GIVIMP)**  
3 **FOR THE DEVELOPMENT AND IMPLEMENTATION OF *IN VITRO* METHODS FOR**  
4 **REGULATORY USE IN HUMAN SAFETY ASSESSMENT**

5  
6 **FOREWORD**  
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8 A guidance document on Good *In Vitro* Method Practices (GIVIMP) for the development and  
9 implementation of *in vitro* methods for regulatory use in human safety assessment was  
10 identified as a high priority requirement. The aim is to reduce the uncertainties in cell and  
11 tissue-based *in vitro* method derived predictions by applying all necessary good scientific,  
12 technical and quality practices from *in vitro* method development to *in vitro* method  
13 implementation for regulatory use.

14 The draft guidance is coordinated by the European validation body EURL ECVAM and has  
15 been accepted on the work plan of the OECD test guideline programme since April 2015 as a  
16 joint activity between the Working Group on Good Laboratory Practice (GLP) and the  
17 Working Group of the National Coordinators of the Test Guidelines Programme (WNT).

18 The draft document prepared by the principal co-authors has been sent in September 2016 to  
19 all 37 members of the European Union Network of Laboratories for the Validation of  
20 Alternative Methods (EU-NETVAL<sup>1</sup>) and has been subsequently discussed at the EU-  
21 NETVAL meeting on the 10th of October 2016.

22 By November/December 2016 the comments of the OECD Working Group on GLP and  
23 nominated experts of the OECD WNT will be forwarded to EURL ECVAM who will  
24 incorporate these and prepare an updated version. A second round of commenting shall be  
25 concluded in the beginning of 2017. EURL ECVAM shall then prepare the final GIVIMP  
26 version, which will be submitted to OECD for proposed adoption at the OECD Joint Meeting  
27 in April 2017.

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<sup>1</sup> <https://eurl-ecvam.jrc.ec.europa.eu/eu-netval>

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## Glossary of important terms used in the Guidance Document<sup>2</sup>

131	<b>Acceptance criteria</b>	Criteria for when study results can be accepted, i.e. a set of well-defined parameters describing aspects of the <i>in vitro</i> method such as control and reference item output, acceptable range for positive and negative controls, etc. These should primarily be established based on information from existing data on the finalised <i>in vitro</i> method or described in relevant bibliographic data. However, relevant development data obtained on a version of the <i>in vitro</i> method equal to the one used for generating the study results, as well as historical data, may need to be taken into account where available.
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140	<b>Adverse outcome pathway (AOP)</b>	An AOP represents the existing knowledge concerning the causal linkages between the Molecular Initiating Events (MIEs) and the cascade of intermediate or key events at subcellular, cellular, tissue, organ, whole animal, and population levels that lead to a specific adverse outcome.
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145	<b>Apoptosis</b>	Process of programmed cell death generally characterised by distinct morphological characteristics and energy-dependent biochemical mechanisms. Apoptosis is considered a vital component of various processes including normal cell turnover, proper development and functioning of the immune system, hormone-dependent atrophy, embryonic development and chemical-induced cell death.
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152	<b>Archive</b>	A designated area or facility (e.g. cabinet, room, building or computerised system) for the secure storage and long term, permanent retention of raw data, completed data and relevant metadata in its final form and records for the purposes of reconstruction of the activity or study. It also enables audits.
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157	<b>Assay</b>	A defined laboratory procedure that produces results. Also known as testing method. An assay can be considered as a technical operation that consists of determination of one or more characteristics of a given product, process or service according to a specified procedure. Often an assay is part of an experiment. The testing result can be qualitative (yes/no), categorical, or quantitative (a measured value). It can be a personal observation or the output of a precision measuring instrument. Usually the testing result is the dependent variable, the measured response based on the particular conditions of the testing method or the level of the independent variable. Some testing methods, however, involve changing the independent variable to determine the level at which a certain response occurs: in this case, the testing result is the independent variable.
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169	<b>Batch</b>	A specific quantity or lot of a test item or reference item, test system, assay reagent or other consumable, produced during a defined cycle of manufacture in such a way that it could be expected to be of a uniform character and should be designated as such.
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175	<b>Benchmark dose (BMD) or concentration (BMC)</b>	A point of reference by which something can be measured. The benchmark dose/concentration approach was developed as an alternative to the use of No Observed Adverse Effect Level (NOAEL) and Lowest Observed Adverse Effect Level (LOAEL).
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181	<b>Best practice</b>	A method or technique that has consistently shown results superior to those achieved with other means, and that is used as a benchmark. The term is also used to describe the process of developing and following a standard way of doing things that multiple organisations can use.
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187	<b>Between-laboratory assessment</b>	Phase in which different operators from different laboratories perform (or run) the <i>in vitro</i> method independently to establish whether or not an <i>in vitro</i> method can be successfully established in different laboratories.
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<sup>2</sup> All terms and their descriptions should be considered as working definitions for the purpose of this Guidance Document only.

191	<b>Biokinetics</b>	Time-course of a chemical (substance and mixture) and its metabolites in a living organism, i.e., increase or decrease of substance concentration at the site of measurement due to transport or due to formation or breakdown. The term "toxicokinetics" is also often used synonymously.
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196	<b>Biological pathway</b>	A number of biochemical steps, linked together in a certain order, with a start and an end. Some typical types of biological pathways are metabolic pathways and signalling pathways.
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200	<b>Blank control/untreated control</b>	Separate untreated part of a test system that is kept under the original culture conditions; the untreated control provides baseline data of the test system under the conditions of the <i>in vitro</i> method. It provides the background response from the test system, obtained by treatment with only the buffer or media used for the administration of test, control and reference items. The primary purpose of a blank or untreated control is to trace sources of artificially introduced variation on the <i>in vitro</i> method results.
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208	<b>Bovine spongiform encephalopathy (BSE)</b>	Bovine spongiform encephalopathy, commonly known as mad cow disease, is a fatal neurodegenerative disease (encephalopathy) in cattle that causes a spongy degeneration of the brain and spinal cord.
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213	<b>Carcinogenicity</b>	The property of any agent (chemical, physical or biological agent) directly involved in causing cancer (carcinogen). Carcinogenicity results in an increased incidence of tumours, increased proportion of malignant tumours or a reduction in the time to appearance of tumours, compared with concurrent control groups. The process of carcinogenesis involves the transition of normal cells into cancer cells via a sequence of stages that entail both genetic alterations (i.e. mutations) and non-genetic events.
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221	<b>Coefficient of variation (CV)</b>	A measure of spread that describes the amount of variability relative to the mean. Because the coefficient of variation is per definition unrelated to the magnitude of the mean and also unitless, it can be used instead of the standard deviation to compare the spread of data sets that have different units or different means.
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226	<b>Comparative genomic hybridisation analysis (aCGH)</b>	A molecular cytogenetic method for analysing copy number variations relative to ploidy level in the DNA of a test sample compared to a reference sample, without the need for culturing cells. The aim of this technique is to quickly and efficiently compare two genomic DNA samples arising from two sources, which are most often closely related, because it is suspected that they contain differences in terms of either gains or losses of either whole chromosomes or subchromosomal regions (a portion of a whole chromosome).
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235	<b>Computerised systems</b>	A group of hardware components and associated software designed and assembled to perform a specific function or group of functions.
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238	<b>Cytotoxicity</b>	General cytotoxicity (or basal cytotoxicity) is the result of toxic effects on structures and functions common to all cells of the body, such as DNA, chromosomes, mitochondria, the cytoskeleton and various membranes. A large number of general (basal) cytotoxicity tests have been developed for a wide range of purposes. Tissue-specific cytotoxicity involves adverse effects on particular types of differentiated cells, in terms of either their tissue-type specific properties (e.g. hormone production, conductivity, contractility) or their modulation of general cytotoxic effects (e.g. via the metabolic activation or detoxification of xenobiotics). For this purpose target organ(system)toxicity tests have been developed.
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250	<b>Data</b>	Information derived or obtained from raw data (e.g. a reported analytical result)
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252	<b>Data Governance</b>	The total sum of arrangements to ensure that data, irrespective of the format in which it is generated, is recorded, processed, retained and used to ensure a complete, consistent and accurate record throughout the data lifecycle
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256	<b>Data Integrity</b>	The extent to which all data are complete, consistent and accurate throughout the data lifecycle.
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259	<b>Data Lifecycle</b>	All phases in the life of the data (including raw data) from initial generation and recording through processing (including transformation or migration), use, data retention, archive / retrieval and destruction.
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263	<b>Design qualification (DQ), installation qualification (IQ), operational qualification (OQ), performance qualification (PQ)</b>	Verification of <i>in vitro</i> method equipment usually consists of design qualification installation qualification, operational qualification and performance qualification. When acquiring a new piece of equipment in an <i>in vitro</i> environment, design specifications are needed for the intended use of the equipment. Installation qualification is the first step in the process to ensure that the equipment will live up to its expectations. Operational qualification verifies that the equipment is achieving its operational requirements. For the performance qualification, the last phase, the equipment will run several times under normal operating conditions and its functions will be challenged.
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274	<b>ECVAM DataBase service on ALternative Methods (DB-ALM)</b>	A database aimed at implementing the communication and dissemination strategy of the Joint Research Centre on animal alternatives, as requested by the European Commission and the European Parliament.
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279	<b>Effective concentration 50 (EC<sub>50</sub>) and Inhibition concentration 50 (IC<sub>50</sub>)</b>	For <i>in vitro</i> cell and tissue culture work the terms effective concentration 50 (EC <sub>50</sub> ) and inhibition concentration 50 (IC <sub>50</sub> ) are used, in analogy to median effective dose (ED <sub>50</sub> ) and median lethal dose (LD <sub>50</sub> ) used in animal experiments. IC <sub>50</sub> is used in case of an <i>in vitro</i> method where there is a decline in read-out. IC <sub>50</sub> is therefore the test item concentration causing 50% inhibition of the desired activity. EC <sub>50</sub> is used for read-outs that increase with concentration. EC <sub>50</sub> is therefore the concentration causing 50% of maximum effect for any measured biological effect of interest.
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289	<b>Emulsion</b>	A stable dispersion of liquid droplets in another liquid, where the two are immiscible.
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292	<b>Engelbreth-Holm-Swarm (EHS)</b>	A mouse sarcoma which is a rich source of both individual basement membrane components and Matrigel often used in cell and tissue culture work.
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295	<b>European Chemicals Agency (ECHA)</b>	Agency of the European Union (EU) that manages technical, scientific and administrative aspects of EU chemicals legislation, notably the regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
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299	<b>European Directorate for the Quality of Medicines &amp; HealthCare (EDQM)</b>	Organisation that is responsible for the European Pharmacopoeia and the European biological standardisation programme.
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304	<b>European Food Safety Authority (EFSA)</b>	Agency of the European Union that provides independent scientific advice in the fields of food and feed safety, animal health and welfare, plant protection and plant health and communicates on existing and emerging risks associated with the food chain.
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310	<b>European Medicines Agency (EMA)</b>	Agency of the European Union that is responsible for the protection of public and animal health through the scientific evaluation and supervision of medicines.
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313	<b>European Union Network of Laboratories for the Validation of Alternative Methods (EU-NETVAL)</b>	A network of highly qualified laboratories to (1) respond to some of the provisions of Directive 2010/63/EU, (2) generate <i>in vitro</i> method information that is reliable, relevant and based on current best quality and scientific practices, (3) increase the European Commission's validation capacity of <i>in vitro</i> methods and (4) provide a laboratory network knowledgeable on the routine implementation of good <i>in vitro</i> method practices for regulatory use in human safety assessment.
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322	<b>Foetal bovine serum (FBS)</b>	Fetal bovine serum derived from clotted blood is the most widely used growth supplement for cell and tissue culture media because of its high content of embryonic growth promoting factors. When used at appropriate concentrations it
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325		may supply many defined and undefined components that have been shown to
326		satisfy specific metabolic requirements for the culture of cells and tissues.
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328	<b>Genetically modified micro-organisms</b>	
329	<b>(GMMs),</b>	A micro-organism in which the genetic material has been altered in a way that
330		does not occur naturally by mating and/or natural recombination.
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333	<b>Good cell culture practice (GCCP) and</b>	
334	<b>GCCP2.0</b>	Guidelines developed in 2005 to define minimum standards in cell and tissue
335		culture work. This GCCP guidance lists a set of six principles intended to support
336		best practice in all aspects of the use of cells and tissues <i>in vitro</i> , and to
337		complement, but not to replace, any existing guidance, guidelines or regulations.
338		GCCP2.0 is the updated version which is currently being drafted.
339		
340	<b>Good Laboratory Practice (GLP)</b>	A quality system applied to the conduct of non-clinical health and environmental
341		safety testing that is intended for submission to regulatory authorities in support
342		of the registration, licensing or regulation of chemical and related products. It
343		concerns the organisational process and the conditions under which these studies
344		are planned, performed, monitored, recorded, archived and reported. It ensures
345		uniformity, consistency, reproducibility, quality and integrity of chemical non-
346		clinical safety tests.
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348	<b>Hazard</b>	An intrinsic feature of a stressor (e.g. chemical or physical in nature) to cause
349		harm or adverse effects to human health and to the environment. It is a qualitative
350		(for example in the case of classifications) or quantitative expression of the
351		adverse effects elicited by a test item under defined conditions of exposure.
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354	<b>High performance liquid chromatography</b>	
355	<b>(HPLC)</b>	High performance liquid chromatography (or high-pressure liquid
356		chromatography) is a chromatographic technique that can separate a mixture of
357		compounds when in solution and is used in biochemistry and analytical chemistry
358		to identify, quantify and purify the individual components of the mixture.
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360	<b>High-efficiency particulate arrestance</b>	
361	<b>(HEPA)</b>	High-efficiency particulate arrestance, also sometimes called high-efficiency
362		particulate arresting or high-efficiency particulate air, is a type of air filter used to
363		create an aseptic environment, through retention of a certain number of particles,
364		depending of the category of the filter. Aseptic conditions are required for <i>in vitro</i>
365		cell and tissue culture work to ensure reliability an reproducibility of results
366		obtained.
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368	<b>High-throughput screening (HTS)</b>	A high throughput method for scientific experimentation, relevant to the fields of
369		biology and chemistry, and especially used in drug discovery. HTS involves an
370		automated-operation platform, data processing and control software. HTS allows
371		a researcher to quickly conduct many biochemical, genetic or pharmacological
372		tests and obtain a large number of information from a single experiment.
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374	<b><i>In silico</i></b>	The term <i>in silico</i> refers to the technique of performing experiments via computer
375		simulations. Examples are structure-activity relationships (SAR) and quantitative
376		structure-activity relationships (QSAR)
377		
378	<b><i>In vitro</i></b>	The term <i>in vitro</i> (Latin for "in the glass") refers to the technique of performing a
379		given experiment in a test tube, or, more generally, in a controlled environment
380		outside of a living organism.
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382	<b><i>In vitro</i> method endpoint</b>	Defined as quantitative measurable characteristics that serve as indicators of a
383		pathologic process or related biochemical or molecular events, e.g. measured
384		absorbance in a cytotoxicity assay or a skin irritation <i>in vitro</i> method.
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386	<b><i>In vitro</i> to <i>in vivo</i> extrapolation (IVIVE)</b>	<i>In vitro</i> to <i>in vivo</i> extrapolation refers to the qualitative or quantitative
387		transposition of experimental results or observations made <i>in vitro</i> to predict
388		phenomena <i>in vivo</i> , i.e. in whole organisms.
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390	<b><i>In vivo</i></b>	
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392		The term <i>in vivo</i> ("within the living") refers to experimentation using a whole, living organism as opposed to a partial or dead organism, or an <i>in vitro</i> controlled environment. Animal testing and clinical trials are two forms of <i>in vivo</i> research.
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396	<b>Inhibitor or spiked up control</b>	Mix of test item and positive control to assess any effect of inhibition of the test item on the test system endpoint measurements.
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399	<b>Integrated testing strategies (ITS)</b>	Integrated testing strategies enable to significantly increase the use of non-animal testing information for regulatory decision making, and thus to minimise the need for animal testing. To this end, operational procedures are developed, tested and disseminated that guide a transparent and scientifically sound evaluation of test items in a risk-driven, context-specific and substance-tailored manner.
400		The envisaged decision theory framework includes alternative methods such as chemical and biological read-across, <i>in vitro</i> results, <i>in vivo</i> information on analogues, qualitative and quantitative structure-activity relationships, thresholds of toxicological concern and exposure-based waiving.
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409	<b>Intellectual property rights (IPR)</b>	Intellectual property refers to creations of the mind: inventions; literary and artistic works; and symbols, names and images used in commerce. Industrial Property includes patents for inventions, trademarks, industrial designs and geographical indications.
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414	<b>International Uniform Chemical Information Database (IUCLID)</b>	A software application designed to capture, store, maintain and exchange data on intrinsic and hazard properties of chemicals (substances and mixtures). It is essential for chemical industry to comply with the new legislation which entered into force on 1 June 2007. The freely downloadable tool will assist chemical companies globally in fulfilling their obligation to submit data to the Agency under the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) legislation from 1 June 2008.
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424	<b>Limit of detection (LOD), Lower limit of quantification (LLOQ) and Upper limit of quantification (ULOQ)</b>	The Limit of detection and the upper and lower limits of quantification are important parameters that need to be determined during <i>in vitro</i> method development. The LOD is the lowest amount of test item in a sample that can be detected with (stated) probability, although not quantified as an exact value. The LLOQ and ULOQ are the lowest and highest amounts of test item in a sample that can be quantitatively determined with a stated acceptable precision and accuracy, under stated experimental conditions. The usefulness and optimal throughput of an <i>in vitro</i> method may depend on the appropriate determination of the LOD and the ULOQ and LLOQ.
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435	<b>Lipophilicity</b>	The ability of a chemical (substance and mixture) to dissolve in non-polar environments such as oils, lipid membranes, and non-polar solvents such as hexane or toluene.
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439	<b>Mass spectrometry (MS)</b>	Analytical technique that measures the mass-to-charge ratio of charged particles. It is used for determining masses of particles, for determining the elemental composition of a sample or molecule, and for elucidating the chemical structures of molecules such as peptides and other chemical compounds.
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443	<b>Maximum average score (MAS)</b>	The maximum average Draize score was utilised as the primary quantitative measurement of eye irritation potential in rabbits.
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446	<b>Metadata</b>	Metadata is data that describe the attributes of other data, and provide context and meaning. Typically, these are data that describe the structure, data elements, inter-relationships and other characteristics of data. It also permits data to be attributable to an individual.
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451	<b>Micro-organism</b>	Any microbiological entity, cellular or non-cellular, capable of replication or of transferring genetic material, including viruses, viroids, animal and plant cells in culture.
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455	<b>Minimal essential medium (MEM)</b>	Developed by Harry Eagle, is one of the most widely used of all synthetic cell culture media for <i>in vitro</i> cell and tissue culture work.
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458	<b>Minimum significant ratio (MSR)</b>	Parameter that can be used to quantify assay reproducibility and resolution (the smallest ratio between compound potency which can be detected in the <i>in vitro</i> method).
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461	<b>Mixture<sup>2</sup></b>	A combination of two or more chemicals (liquid or solid) that do not react with each other
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465	<b>Multi-component test chemicals<sup>3</sup></b>	Mixtures comprising a complex mix of individual test chemicals with different solubility and physical-chemical properties. In most cases, they can be characterised as a homologous series of test chemicals with a certain range of carbon chain length/number or degree of substitution. These materials are frequently referred to as “complex mixtures”. However, in this guidance document, these are referred to as “multi-component test chemicals”.
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472	<b>Mutual Acceptance of Data (MAD)</b>	The OECD Mutual Acceptance of Data is a multilateral agreement which states that test data generated in any member country in accordance with OECD Test Guidelines and GLP shall be accepted in other member countries for assessment purposes and other uses relating to the protection of human health and the environment. The application of MAD avoids unnecessary and costly duplication of testing as well as non-tariff barriers to trade. In addition, it saves laboratory animals used for <i>in vivo</i> testing.
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480	<b>Nanomaterials</b>	A natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm - 100 nm.
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485	<b>Negative control</b>	Separate part of a test system treated with an item for which it is known that the test system should not respond; the negative control provides evidence that the test system is not responsive under the actual conditions of the assay.
486		
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489	<b>Omics</b>	Omics is a general term for a broad discipline of science and engineering for analysing the interactions of biological information objects in various omes (these include genome, transcriptome, proteome, metabolome, expressome, and interactome). Some examples of ‘Omics’ technologies: - genomics - proteomics - metabolomics - transcriptomics
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499	<b>Particulates</b>	Also known as particulate matter (PM), fine particles and soot, are tiny subdivisions of solid matter suspended in a gas or liquid. In contrast, aerosol refers to particles and/or liquid droplets and the gas together. Sources of particulate matter can be man-made or natural. Air pollution and water pollution can take the form of solid particulate matter or be dissolved. Salt is an example of a dissolved contaminant in water, while sand is generally a solid particulate.
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506	<b>Physiologically based pharmacokinetic, physiologically based toxicokinetic, physiologically based biokinetic (PBPK/PBTK/PBBK)</b>	Physiologically based toxicokinetic, or alternatively referred to as physiologically based pharmacokinetic or biokinetic models, are quantitative descriptions of absorption, distribution, metabolism, and excretion (ADME) of synthetic or natural chemical substances in humans and other animal species. PBTK models are increasingly being used as an effective tool for designing toxicology experiments and for conducting extrapolations essential for risk assessments (e.g. in pharmaceutical research and drug development, and in health risk assessment for cosmetics or general chemicals).
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516	<b>Polymerase chain reaction (PCR)</b>	Polymerase chain reaction is a molecular biology <i>in vitro</i> technique. Using the natural ability of DNA polymerase to synthesise a new strand of DNA
517		

<sup>3</sup> Consideration is given to the consistency with the definition of “multi-component test chemicals” (or “complex test chemicals”) in Chapter 1 of a draft “Guidance Document on the Use of the Harmonized System for the Classification of Chemicals which are Hazardous for the Aquatic Environment” (ENV/JM/HCL(2000)11).

518		complementary to the offered template strand, millions of copies of a specific DNA sequence are made.
519		
520		
521	<b>Positive control</b>	Separate part of the test system treated with an item the response to which is known for the test system; the positive control provides evidence that the test system is responsive under the actual conditions of the assay.
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525	<b>Prediction Model</b>	The method by which the <i>in vitro</i> endpoint value(s) is used to predict the <i>in vivo</i> equivalent activity (i.e., degree of toxicity).
526		
527		
528	<b>Proficiency chemicals</b>	A panel of chemicals with known and statistically well-defined responses in a particular <i>in vitro</i> method. These are items used e.g. to verify that a laboratory carries out the <i>in vitro</i> method correctly, or to validate alternative newly developed test systems intended for use with the particular <i>in vitro</i> method.
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533	<b>Quality assurance</b>	A system of procedures, checks, audits, and corrective actions to ensure that all research, testing, monitoring, sampling, analysis, and other technical and reporting activities are of the highest achievable quality.
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538	<b>Quality assurance programme</b>	A defined system, including personnel, which is independent of study conduct and is designed to assure test facility management of compliance with GLP.
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541	<b>Quality control</b>	Documented activity which seeks to confirm that starting materials for assays (including cell lines) and key stages of individual assays and the final results, meet prescribed specifications. It should be clear that this is not the same as quality assurance. ISO 9000 defines quality control as "part of quality management focused on providing confidence that quality requirements will be fulfilled".
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548	<b>Quality management system (QMS)</b>	Can be expressed as the organisational structure, procedures, processes and resources needed to implement quality management. GLP specifically refers to a quality system of management controls for test facilities and organisations to try to ensure the uniformity, consistency, reliability, reproducibility, quality, and integrity of test item non-clinical safety tests. Of all QMS regimes, the ISO 9000 family of standards is probably the most widely implemented worldwide.
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555	<b>Raw data</b>	Original records and documentation, retained in the format in which they were originally generated (i.e. paper or electronic), or as a 'true copy'. Raw data must be contemporaneously and accurately recorded by permanent means. In the case of basic electronic equipment which does not store electronic data, or provides only a printed data output (e.g. balance or pH meter), the printout constitutes the raw data.
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562	<b>Reagent</b>	Term used for media additives, compounds added to a system to induce a chemical reaction, anything added to get the <i>in vitro</i> method or related assays to work etc.
563		
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566	<b>Reference item</b>	Any chemical (substance and mixture) or product used to provide a basis for comparison with the test item reference items are used e.g. during method development to verify that the method classifies test items correctly, or in every experimental run of a finalised method to verify system performance according to the acceptance criteria.
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572	<b>Relevance</b>	The term "Relevance" describes whether a procedure is meaningful and useful for a particular purpose.
573		
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575	<b>Reliability</b>	The term "Reliability" describes whether a procedure can be performed reproducibly within and between laboratories and over time.
576		
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578	<b>Replace, Reduce, Refine (3Rs)</b>	3Rs is the short for "Replace, Reduce, Refine". A term describing current internationally accepted strategies for minimising suffering of laboratory animals used in experimental research. The optimal solution is to replace the test method requiring animal experiments with one or several <i>in vitro</i> methods; if this is not possible at least it might be possible to modify the methods so that it is possible to Reduce the number of animals being used in each study without compromising data quality; if this is also not possible it might at least be possible to Refine the
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585		test method so that experiments are conducted in a way minimising stress and
586		other impact on the animals.
587		
588	<b>Robustness</b>	The insensitivity of test results to departures from the specified test conditions
589		when conducted in different laboratories or over a range of conditions under
590		which the test method might normally be used. If a test is not robust, it will be
591		difficult to use in a reproducible manner within and between laboratories.
592		
593	<b>Safe Harbour</b>	The international Safe Harbour Privacy Principles or Safe Harbour Privacy
594		Principles were principles which were overturned on October 24, 2015 by the
595		European Court of Justice, which enabled some US companies to comply with
596		privacy laws protecting European Union and Swiss citizens. US companies
597		storing customer data would self-certify that they adhere to 7 principles, to
598		comply with the EU Data Protection Directive and with Swiss requirements. The
599		US Department of Commerce developed privacy frameworks in conjunction with
600		both the European Union and the Federal Data Protection and Information
601		Commissioner of Switzerland.
602		Within the context of a series of decisions on the adequacy of the protection of
603		personal data transferred to other countries, the European Commission made a
604		decision in 2000 that the United States' principles complied with the EU
605		Directive - the so-called "Safe Harbour decision". However, after a customer
606		complained that his Facebook data were insufficiently protected, the European
607		Court of Justice declared in October 2015 that the Safe Harbour Decision was
608		invalid, leading to further talks being held by the Commission with the US
609		authorities towards "a renewed and sound framework for transatlantic data
610		flows".
611		The European Commission and the United States agreed to establish a new
612		framework for transatlantic data flows on 2nd February 2016, known as the "EU-
613		US Privacy Shield".
614		
615	<b>Saturation concentration</b>	The maximum dissolved concentration of a test chemical that can be achieved
616		under the test conditions.
617		
618	<b>Sensitivity</b>	A measure of <i>in vitro</i> method performance that describes the proportion of all
619		evaluated test items that are classified as positive for a particular toxicological
620		endpoint, which are predicted as positive by the actual <i>in vitro</i> method.
621		
622	<b>Service level agreement (SLA)</b>	A contract between a service provider (either internal or external) and the end
623		user that defines the level of service expected from the service provider.
624		
625	<b>Short tandem repeat (STR)</b>	Short Tandem Repeat (STR) DNA profiling, is used to uniquely identify human
626		cell lines derived from the tissue of a single individual allowing researchers to
627		ascertain if their cultures were misidentified or cross-contaminated.
628		
629	<b>Signal windows (SW)</b>	A measure of the separation between the sample (positive control) and the blank
630		(negative control/solvent) including the variability of both measurements.
631		
632	<b>Single nucleotide polymorphism analysis</b>	
633	<b>(aSNP)</b>	Single nucleotide polymorphism or SNP (pronounced snip) analysis is a
634		technique to detect a DNA sequence variation occurring when a single nucleotide
635		- A, T, C, or G - in the genome (or other shared sequence) differs between
636		members of a species (or between paired chromosomes in an individual). For
637		example, two sequenced DNA fragments from different individuals, AAGCCTA
638		to AAGCTTA, contain a difference in a single nucleotide.
639		
640	<b>Solid phase microextraction (SPME)</b>	Is a solid phase extraction sampling technique that involves the use of a fiber
641		coated with an extracting phase, that can be a liquid (polymer) or a solid
642		(sorbent), which extracts different kinds of analytes (including both volatile and
643		non-volatile) from different kinds of media.
644		
645	<b>Solubility limit in water</b>	The maximum attainable concentration or concentration at thermodynamic
646		equilibrium between aqueous pure phase and solid (or liquid or gaseous) pure
647		phase.
648		
649	<b>Specificity</b>	A measure of <i>in vitro</i> method performance that describes the proportion of all
650		evaluated test items that are classified as negative for a particular toxicological
651		endpoint, which are predicted as negative by the actual <i>in vitro</i> method.

652		
653	<b>Standard deviation (SD)</b>	A measure that is used to quantify the amount of variation or dispersion of a set of data values.
654		
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656	<b>Standard operating procedure (SOP)</b>	A documented procedure which describes how to perform tests or activities normally not specified in detail in study plans or test guidelines.
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659	<b>Structure-activity relationships and quantitative structure-activity relationships (SAR/QSAR)</b>	Structure-activity relationships and quantitative structure-activity relationships, collectively referred to as (Q)SARs, are simplified mathematical representations of complex chemical-biological interactions that can be used to predict the physicochemical and biological properties of molecules.
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665	<b>Study plan</b>	A document which defines the objectives and experimental design for the conduct of the study, and includes amendments (i.e. an intended change to the study plan after the study initiation date).
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669	<b>Suspension</b>	A stable dispersion of solid particles in a liquid.
670		
671	<b>Test item</b>	A chemical (substance and mixture) or product that is the subject of a study.
672		
673	<b>Test pre-submission form (TPF) and Test submission template (TST)</b>	For the evaluation of the readiness of an <i>in vitro</i> method to enter the EURL ECVAM validation process, the method needs to be officially submitted to EURL ECVAM by compiling as a first step the electronic version of the test pre-submission form to allow a preliminary assessment of the status of development, optimisation and/or validation of an <i>in vitro</i> method and its potential relevance with regard to the 3Rs (replacement, reduction, refinement of animal testing). If this step is satisfactory a complete submission is requested which requires the compilation of a detailed test submission template.
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683	<b>Test system</b>	A test system means any biological, chemical or physical system or a combination thereof used in a study. <i>In vitro</i> test systems are mainly biological systems (e.g. cells or tissues), although some of the more recent developments in alternatives to conventional <i>in vivo</i> testing (e.g., gene arrays for toxicogenomics) may also exhibit some attributes of physical-chemical test systems, and still others, e.g., toxicometabonomics, may mainly rely on analytical methodology. Test kits, including proprietary test kits, should also be considered as test systems.
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692	<b>Testing method</b>	The term testing method is used to describe both a published, well-evaluated test guideline method (e.g. OECD) and a not-fully-developed method soon ready for submission to validation bodies. A testing method is a process or procedure used to obtain information on the characteristic of a substance or agent. Toxicological testing methods generate information regarding the ability of a substance or agent to produce a specific biological effect under specified conditions.
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699	<b>Toxicological endpoint</b>	A direct marker of progression to an adverse outcome - e.g. morphological or physiological changes, functional impairments, disease symptoms or death - used to describe an adverse health effect (or a probability of that adverse effect) resulting from exposure to a test item. The test system response to an exposure of a test item may be measured by a series of endpoints. The most sensitive endpoint (critical endpoint) is the one that occurs at the lowest exposure level and associated with an adverse response (committed step).
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707	<b>Training Set</b>	The set of test items used to develop the prediction model for an assay. The training set items should have strong reference data (i.e., values from a recognised regulatory assay) against which the <i>in vitro</i> assay endpoint values can be compared.
708		
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712	<b>Untreated control</b>	Separate untreated part of a test system that is kept under the original culture conditions; the untreated control provides baseline data of the test system under the conditions of the assay.
713		
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715		
716	<b>Validation</b>	Validation is the process by which the reliability and relevance of a procedure are established for a specific purpose.
717		
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719	<b>Validation set (test items)</b>	The set of test items used to assess the predictive capacity of an <i>in vitro</i> method based on the performance of the endpoint values by the reference test results.
720		
721		Testing of the validation test items set is a principal part of <i>in vitro</i> method
722		validation.
723		
724	<b>Vehicle or solvent control</b>	The separate part of a test system to which the vehicle (i.e. solvent) for the test
725		item is added without the test item; the vehicle control provides evidence for a
726		lack of influence of the chosen vehicle on the test system under the actual
727		conditions of the <i>in vitro</i> method.
728		
729	<b>Within-laboratory assessment</b>	Phase in which different operators from the same laboratory perform (or run) the
730		<i>in vitro</i> method independently and at different times to establish whether or not
731		an <i>in vitro</i> method can be successfully established in one laboratory.
732		
733	<b>Xenobiotic</b>	A chemical foreign to the biological system, structurally distinct from
734		endogenous compounds present within the biological system.
735		
736	<b>Z-factor</b>	A measure of the separation between control and sample signal which takes into
737		account the dynamic range of the <i>in vitro</i> method and the data variation
738		associated with the signal and control measurements. It is suitable for <i>in vitro</i>
739		method quality assessment.

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## 740 Introduction

741 The availability of a guidance document on Good *In vitro* Method Practices (GIVIMP) for  
742 "The development and implementation of *in vitro* methods for regulatory use in human safety  
743 assessment" was identified by the scientific and regulatory community (OECD) as a high  
744 priority requirement to reduce the uncertainties in cell and tissue-based *in vitro* method  
745 derived predictions.

746 An Expert Group was therefore established to develop such a guidance document. The first  
747 draft guidance document was prepared following a GIVIMP meeting on the 24<sup>th</sup> and 25<sup>th</sup> of  
748 February 2015 in Ispra, Italy (see Annex 3) with additional input from experts who could not  
749 be present at the meeting. For this first draft version expert input was received from EURL  
750 ECVAM, European receiving authorities (European Food Safety Authority EFSA, European  
751 Medicine Agency EMA, the European Chemicals Agency ECHA), from the European Union  
752 Network of Laboratories for the Validation of Alternative Methods (EU-NETVAL, e.g. from  
753 the Belgian, Dutch, Italian, Spanish and Swedish laboratories), from ECVAM's Stakeholder  
754 Forum (ESTAF, e.g. the European Society of *In vitro* Toxicology), from the EU and OECD  
755 Working Group on GLP (e.g. delegates from Belgium, The Netherlands, The United  
756 Kingdom, Poland, Italy, France, Singapore), from 3Rs Centres (Centre for Alternatives to  
757 Animal Testing, CAAT), from regulatory agencies (e.g. RIVM), from scientists from large  
758 industries and SMEs and from international scientists with expertise in stem cells, cell  
759 biology, Good Laboratory Practice (GLP) and *in vitro* methods.

760  
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762

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781 Council.

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808 <sup>26</sup>Novartis Vaccines, Basel, Switzerland.  
809

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811 version and gave useful additional input<sup>4</sup>.

812 This first draft, currently for revision by the OECD Working Group on GLP and the  
813 nominated experts from the WNT, has been be circulated in September for review by all 37  
814 members of the European Union Network of Laboratories for the Validation of Alternative  
815 Methods (EU-NETVAL). An updated version revised draft will be submitted at the beginning  
816 of January for a second OECD commenting round. EURL ECVAM will then prepare the  
817 final version for proposed adoption at the OECD meeting in April 2017.

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<sup>4</sup> Susanne Belz, Mounir Bouhifd, Laura Gribaldo, Tomislav Horvat, Tracey Holley, Annett Janusch Roi, Roman Liska, Alfonso Lostia, Agnieszka Lidia Swiatek, Francesca Pistollata, Anna Price, Clemens Wittwehr, Andrew Worth.

818 **Scope**

819 There is a community desire for non-animal methods, but regulators demand validated and  
820 internationally accepted *in vitro* methods (i.e. OECD test guidelines or ISO standards). To  
821 accommodate the desires of regulatory authorities, a number of *in vitro* methods, often based  
822 on the use of human cells and tissues, were submitted to international validation bodies  
823 during the last two decennia. However, the experience gained during these validations  
824 revealed that many *in vitro* methods need serious improvements in design, robustness and  
825 reliability before they can be successfully implemented in a routine laboratory environment  
826 and generate data sets which can be used to support regulatory decisions. Therefore, OECD  
827 approached EURL ECVAM to coordinate the issuing of a guidance on Good *In Vitro* Method  
828 Practices (GIVIMP) for the development and implementation of *in vitro* methods for  
829 regulatory use in human safety assessment. The major goal of GIVIMP consists of improving  
830 the reliability and robustness of *in vitro* methods, reducing the uncertainties of *in vitro* based  
831 predictions and therefore increasing the acceptance of the *in vitro* estimated safety measures  
832 by regulatory agencies. The scope of the GIVIMP guidance is taking into account good  
833 scientific, technical and quality practices, to ensure that the overall process, starting from *in*  
834 *vitro* method development up to the final *in vitro* method implementation for regulatory use  
835 becomes more efficient and effective.

836 This guidance document targets all players involved in the process, e.g. *in vitro* method  
837 developers, *in vitro* test system producers, validation bodies, producers of equipment,  
838 materials and reagents, *in vitro* method end-users such as EU-NETVAL test facilities, testing  
839 laboratories, large industries and small to medium enterprises as well as receiving authorities,  
840 monitoring authorities, accreditation bodies and OECD. The guidance aims to further  
841 facilitate the application of the OECD Mutual Acceptance of Data agreement for data  
842 generated by *in vitro* methods and as such contribute to avoidance of unnecessary duplicate  
843 testing. This guidance describes the areas related to *in vitro* method development,  
844 standardisation, harmonisation, and international acceptance that would benefit from more  
845 detailed scientific, technical and quality guidance.

846 The GIVIMP document has been written with different end users in mind, including GLP  
847 routine test facilities but also research laboratories developing new *in vitro* methods. In the  
848 latter case it is obvious that the laboratory will not be able to fully comply with this document  
849 on all points. However, it is necessary to comply with a set of good practices within the *in*  
850 *vitro* method life cycle so as not to jeopardise the acceptance and routine use of the *in vitro*  
851 method in a regulatory environment.

852 This guidance is not intended to duplicate or replace existing OECD guidance or advisory  
853 documents but rather it is complementary, addresses specific gaps and aims to collect  
854 available references and information on best scientific, technical and quality practices in one  
855 document. GIVIMP takes into account the requirements of the existing OECD guidelines and  
856 advisory documents to ensure that the guidance is complementary and fully in line with these  
857 documents.

858  
859 This document is divided into 10 sections covering:

- 860 1 Responsibilities
- 861 2 Quality considerations
- 862 3 Facilities
- 863 4 Apparatus, material and reagents
- 864 5 Test systems

865	6	Test and reference items
866	7	Standard operating procedures (SOPs)
867	8	Performance of the method
868	9	Reporting of results
869	10	Storage and retention of records and materials
870		

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## 871 1 Responsibilities

### 872 1.1 *In vitro* method developers

873 *In vitro* methods are often developed without the primary aim of being used for regulatory  
874 purposes, but are rather focused on the discovery of disease pathways or investigation of  
875 mechanisms of action induced by external factors causing cell disturbance. However, these *in*  
876 *vitro* methods in development can form the basis for *in vitro* methods for specific toxicity  
877 endpoints, during drug and/or other chemicals safety assessment or for toxicity screening  
878 during product quality control processes.

879 Researchers aiming to develop *in vitro* methods suitable for regulatory testing purposes must  
880 be aware that beyond the ‘short-term’ repeatability, that is consonant with the good scientific  
881 work required in discovery, the quality principles for test acceptance by receiving authorities  
882 have additional requirements (OECD, 2005a). To harmonise and speed up the validation  
883 process and accelerate the acceptance of new *in vitro* methods by receiving authorities, the *in*  
884 *vitro* method developer should keep in mind that the quality of historical data and  
885 documentation regarding the *in vitro* method submitted will have a significant impact on the  
886 validation process.

887 Briefly, the *in vitro* method developer is responsible for providing a clearly written and well  
888 documented *in vitro* method description, and related standard operating procedure(s)  
889 (SOP(s)), considering all aspects described in the present guidance document.

890 The developer's knowledge and understanding of the *in vitro* method is the basis for  
891 establishing an approach to control the *in vitro* method and to set for instance adequate  
892 acceptance criteria for the results obtained when running an *in vitro* method.

893 *In vitro* method developers should:

- 894 • Understand the sources of variation of the *in vitro* method
- 895 • Detect the presence and degree of variation in the results
- 896 • Understand the impact of variation of the *in vitro* results on the related predictions
- 897 • Control the variation in a manner to make a sound, relevant and reliable *in vitro*  
898 method

899 Each developer should judge whether he or she has gained sufficient understanding of the *in*  
900 *vitro* method to provide a high degree of assurance to successfully propose the *in vitro*  
901 method for regulatory applications.

902 *In vitro* method developers should also take into account the Intellectual Property (IP)  
903 guidelines regarding test systems as set out on the OECD website (<http://www.oecd.org/>).  
904 Proposals for projects aiming at the development of new test guidelines should provide  
905 information on Intellectual Property Rights (IPR) aspects, as transparently as possible. In  
906 particular, the following information is expected to be provided: "Describe if the *in vitro*  
907 method includes components, equipment or other scientific procedures that are covered (or  
908 pending) by IPR (e.g., patents, patent applications, industrial designs and trademarks) and/or  
909 intended to remain confidential. Information should be provided on the overall availability of  
910 the IPR-protected components including whether they are commercially available or require a  
911 Material Transfer Agreement (MTA) or other licensing agreements. In addition, the  
912 possibility of providing a generic description of the IPR-covered component/test system as  
913 well as any other element intended to remain confidential should be disclosed and whether  
914 Performance Standards have been developed for the *in vitro* method."

915 *In vitro* methods proposed for regulatory use should not contain elements that are confidential  
916 to the extent that this impedes adequate scientific validation of the mechanistic relevance of  
917 the method.

918 When *in vitro* method developers conclude that their *in vitro* method is sufficiently  
919 developed, they can then proceed to an in-house validation. When such internal assessment is  
920 successful, they can submit the *in vitro* method to a validation body for the formal validation  
921 of the method, or, can organise the validation by themselves. In order to have the *in vitro*  
922 method considered for regulatory acceptance, *in vitro* method developers will have to contact  
923 their national coordinator to develop a project proposal for a new Test Guideline. Project  
924 proposals for new Test Guidelines need the active support of regulatory authorities in at least  
925 one member country, and have to meet a regulatory need in member countries.

926 In conclusion, at the end of the test development process, the *in vitro* method developers  
927 should be able to prove that the *in vitro* method they offer to the validation body is robust,  
928 reliable, relevant, and supported by high quality data as described in the present guidance.

## 929 **1.2 Test system providers**

930 *In vitro* test systems are mainly biological systems, quite often consisting of tissues or cell  
931 lines. It is difficult, if not impossible, to identify cell lines from different origins based solely  
932 on morphology and or culture characteristics. Infection or contamination of a cell line with an  
933 adventitious virus or mycoplasma may significantly change the characteristics of the cells but  
934 again such contamination may not be evident. Cell lines will also change with time in culture,  
935 and to add to all these natural hazards it is all too easy to incorrectly label or cross-  
936 contaminate different cell lines in a busy cell culture laboratory (ECACC Handbook –  
937 Fundamental Techniques for ECACC Cell Lines<sup>5</sup>).

938 The OECD GLP recommends that test system providers should adhere to a formal quality  
939 system, such as International Standard ISO 9001, and particularly Part 1 - Specification for  
940 Design/Development, Production, Installation and Servicing.

941 The test system provider must also provide all relevant safety information, in compliance  
942 with national and international regulations, for the transport, use and disposal, including  
943 containment in the case of an accident.

944 The Guidance on Good Cell Culture Practice: A Report of the Second ECVAM Task Force  
945 on Good Cell Culture Practice (GCCP) (Coecke *et al.*, 2005) provides a minimal set of  
946 information that is essential when working with cells or tissues of animal or human origin  
947 (Table 1), while the OECD GLP No 14 (The Application of the Principles of GLP to *in vitro*  
948 Studies (OECD, 2004a)) states that the characterisation of test systems can be directly  
949 fulfilled by information from the supplier.

950

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<sup>5</sup> <http://www.sigmaaldrich.com/life-science/cell-culture/learning-center/ecacc-handbook.html>

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**Table 1: Examples of requirements for documentation concerning the origins of cells and tissues**

	Isolated organs and tissues of animal origin (e.g. rat brain tissue)	Primary cultures of animal origin (e.g. rat hepatocytes)	All materials of human origin (e.g. cord blood)	Cell lines (e.g. Balb/c, 3T3)
Ethical and safety issues	+	+	+	Applicable, if human or involving recombinant DNA or pathogens
Species/strain	+	+	+	+
Source	+	+	+	+
Sex	+	+	+	+
Age	+	+	+	+
Number of donors	+	+	If applicable	na
Health status	+	+	+	+
Any special pre-treatment	+	+	+	+
Organ/tissue of origin	+	+	+	+
Cell type(s) isolated	+	+	+	+
Isolation technique	+	+	+	+
Date of isolation	+	+	+	+
Operator	+	+	+	+
Supplier	+	+	+	+
Informed consent	na	na	+	If human, may be applicable
Material transfer agreement	na	na	+	+
Medical history of donor	na	na	+(if available)	If human, may be applicable (if available)
Pathogen testing	If applicable <sup>a</sup>	If applicable <sup>a</sup>	+ <sup>a</sup>	+ <sup>a</sup>
Shipping conditions	+	+	+	+
State of material on arrival	+	+	+	+
Cell line identification and authentication	na	na	na	+
Mycoplasma testing	na	na <sup>b</sup>	na <sup>b</sup>	+

<sup>a</sup>Screening tests for animal colonies or donors of cells and tissue may be appropriate.

<sup>b</sup>May be important if material is preserved for longer term use (e.g. as feeder layers for other cultures).

na = not applicable.

953

### 954 1.3 Validation bodies

955 In general, it is the mandate of national and international governmental validation agencies  
956 (ECVAM, ICCVAM, JACVAM, etc.) to promote and facilitate *in vitro* method validation for  
957 regulatory acceptance to replace or reduce *in vivo* animal testing.

958 The validation body's responsibility is to contribute to both an effective validation process  
959 and to *in vitro* method quality. The basic principle of validation is that an *in vitro* method  
960 should be produced that is fit for its intended use. The validation process consists of  
961 collection and evaluation of data, from the *in vitro* method design stage to the availability of a  
962 routine method, which establishes scientific evidence that the *in vitro* method is capable of  
963 consistently delivering quality and scientifically relevant data for the specific purpose it is  
964 designed for. Ideally the following conditions exist:

- 965
- Quality, safety, and efficacy are designed or built into the *in vitro* method.
- 966
- Quality and a sound scientific basis of the *in vitro* method are assured during the
- 967
- entire *in vitro* method life cycle towards regulatory acceptance.
- 968
- Each step towards a routine running of the *in vitro* method is controlled, and
- 969
- documented to assure that the *in vitro* method meets all scientific and quality
- 970
- attributes.

971 The validation process involves a series of activities taking place retrospectively and/or  
972 prospectively over the lifecycle of the *in vitro* method once submitted to a validation body.

973 Taking into account the above conditions, test developers can submit their *in vitro* methods to  
974 a validation body and ask for support in the validation process.

975 For example, the entire EURL ECVAM test submission process<sup>6</sup> follows 2 mandatory steps:

976 *Step 1: Pre-submission - is based on the electronic submission of the EURL ECVAM*  
977 *Test Pre-submission Form (TPF). The TPF will allow EURL ECVAM to perform a*  
978 *preliminary assessment of the status of development of the in vitro method and the*  
979 *potential relevance to the 3Rs (replacement, reduction, refinement of animal testing).*

980 *Step 2: Complete Submission - requires the compilation of a detailed Test Submission*  
981 *Template (TST). The TST will be made available by EURL ECVAM after successful*  
982 *conclusion of step 1 and the test submitter will be formally invited to complete it and*  
983 *providing also a SOP in the ECVAM DataBase service on ALternative Methods (DB-*  
984 *ALM) format.*

985 On the basis of a test submission, a validation body can make a final decision as to whether  
986 the submitted *in vitro* method qualifies for entering the validation process.

987 In "Practical aspects of designing and conducting validation studies involving multi-study  
988 trials" (Coecke *et al.* 2016), details are given that focus on practical aspects of conducting  
989 prospective *in vitro* validation studies by laboratories that are EU-NETVAL laboratories.  
990 Prospective validation studies within EU-NETVAL comprise multi-study trials involving  
991 several laboratories or "test facilities" and typically consist of two main steps:

992 (1) The design of the validation study by EURL ECVAM and

993 (2) The execution of the multi-study trial by a number of qualified laboratories within  
994 EU-NETVAL coordinated and supported by EURL ECVAM.

995 The approach adopted in the conduct of these validation studies adheres to the principles  
996 described in the OECD guidance document on the Validation and International Acceptance  
997 of new or updated *in vitro* methods for Hazard Assessment No. 34 (OECD, 2005a). The  
998 (Coecke *et al.*, 2016) paper, mainly focuses on the processes followed to carry out a  
999 prospective validation of *in vitro* methods involving different laboratories with the ultimate  
1000 aim of generating a dataset that can support the development of an international test guideline  
1001 (e.g. by the OECD) or the establishment of performance standards of *in vitro* methods.

1002 Upon successful validation by validation bodies or other entities, an *in vitro* method can be  
1003 presented to the OECD for regulatory acceptance. Once *in vitro* methods are consolidated  
1004 within an OECD test guideline (TG), data produced by using those methods are mutually  
1005 accepted by all receiving authorities.

1006

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<sup>6</sup> <https://eurl-ecvam.jrc.ec.europa.eu/test-submission>

1007 **1.4 Producers of equipment, materials and reagents**

1008 When performing established testing methods (validated or not), the test results can only be  
1009 accepted if the equipment, materials and reagents (test and reference items, media additives,  
1010 compounds added to a system to induce a chemical reaction, etc.) used, are of proven quality  
1011 as established by formal testing or evaluation procedures. To be able to prove this, test end  
1012 users will need to work with preferred suppliers who are selected on predefined criteria (e.g.  
1013 controlled transport, technical support, assured delivery, batch selection allowed, ISO  
1014 certification present, etc.). The characteristics of the supplied materials and reagents should  
1015 be appropriately documented in adequate quality documents such as a certificate of analysis,  
1016 batch release certificate or similar. Suppliers who cannot fulfil these criteria have to be  
1017 excluded from delivering products used to run *in vitro* methods, as the quality of test data  
1018 cannot be guaranteed nor be acceptable for receiving bodies. It is the responsibility of the test  
1019 end-user to verify and assure the quality of the products and materials (see chapter 2.4).

1020 **1.5 *In vitro* method end-users**

1021 As the aim of this document is to provide guidance for *in vitro* methods for regulatory use in  
1022 human safety assessment, the majority of end-users will be GLP compliant test facilities. If a  
1023 safety study is conducted for regulatory purposes, compliance with the principles of GLP is  
1024 required. GLP test facilities are covered by national and/or international GLP regulations and  
1025 must adhere to the responsibilities as defined in these regulations.

1026 The OECD Mutual Acceptance of Data (MAD) is a multilateral agreement which states that  
1027 test data generated in OECD countries and full adherent countries – (Argentina<sup>7</sup>, Brazil,  
1028 India, Malaysia, South Africa and Singapore)<sup>8</sup> in accordance with OECD Test Guidelines and  
1029 the OECD Principles of GLP shall be accepted in other member countries by regulatory  
1030 bodies for assessment purposes and other uses relating to the protection of human health and  
1031 the environment<sup>9</sup>. However, end-users should also document their competency to perform a  
1032 test in compliance with a specific TG, by running the proficiency chemicals and  
1033 demonstrating the overall quality assurance system of the test facility (see Section 6.5/8.6).

1034 Non-GLP *in vitro* method users can profit from the use of the GIVIMP guidance. In these  
1035 cases no regulations exist and no responsibilities are defined. It is highly recommended to  
1036 apply all necessary good scientific, technical and quality practices that the guidance describes  
1037 so as to reduce the uncertainties in the use of cell and tissue-based *in vitro* method: Examples  
1038 of critical importance described in this document relate to guidance on test systems such as  
1039 the documentation concerning the origins of cells and tissues (see Table 1), the evaluation of  
1040 the performance of the *in vitro* method, adequate measures to ensure test item exposure and  
1041 test item-test system compatibility, the guidance for suppliers of equipment, materials and  
1042 reagents, evaluation of competence and training for executing a particular *in vitro* method,  
1043 etc. Appropriate accreditation (ISO, 2015, 2005) may be requested or recommended in some  
1044 other cases.

1045 In case no specific Test Guideline harmonised template is available, all generated test data  
1046 should be submitted in an easily readable format to facilitate the decision making process of

<sup>7</sup> Full adherence for Argentina only applies to industrial chemicals, pesticides and biocides

<sup>8</sup> <http://www.oecd.org/env/ehs/non-memberadherentstotheoecdsystemformutualacceptanceofchemicalsafetydata.htm>

<sup>9</sup> <http://www.oecd.org/env/ehs/mutualacceptanceofdatamad.htm>

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1047 the risk assessors, preferentially according to the OECD guidance document for describing  
1048 non-guideline *in vitro* methods Series on Testing and Assessment No. 211 (OECD, 2014).

1049 Data generated by non-validated *in vitro* methods, if submitted as supporting data, need to be  
1050 accompanied by proof of relevance and scientific validity of the selected test system together  
1051 with the description of the critical points of the test system used, including sensitivity, limits  
1052 of detection etc.

## 1053 **1.6 Receiving authorities**

1054 Receiving authorities receive non-clinical safety data as part of regulatory submissions and  
1055 they must ensure that the legal requirements are met. Receiving authorities in Europe include  
1056 the European Chemicals Agency (ECHA), European Medicines Agency (EMA), European  
1057 Food Safety Authority (EFSA), as well as various national agencies that are responsible for  
1058 assessing safety data. Receiving authorities in the United States include the Environmental  
1059 Protection Agency (EPA) and the Food and Drug Administration (FDA).

1060 The responsibility of the receiving authorities is to check that test data are obtained according  
1061 to available OECD TG and guidance documents and they use the data accordingly in their  
1062 evaluations and provisions in law. For GLP studies, they may verify whether the responsible  
1063 test facility has been found in compliance by a national monitoring authority (see below) or  
1064 request a study audit if the facility has not been subject to a GLP inspection by a national  
1065 monitoring authority. The receiving authorities may additionally indicate to *in vitro* method  
1066 developers where they see needs for new or better tests, and to validation bodies which tests  
1067 deserve priority in the validation.

1068 The majority of European regulation requiring toxicological data, allow or even encourage  
1069 the use of alternative methods (e.g. Regulation (EC) No 1107/2009 for plant protection  
1070 products, Regulation (EU) No 528/2012 for biocides, Regulation (EC) No 1907/2006 for  
1071 industrial chemicals, known as REACH) (Heringa *et al.*, 2014). Regulation (EC) No  
1072 1223/2009 for cosmetics does not allow any *in vivo* animal testing.

1073 As a result of these developments European, but also other international regulatory bodies,  
1074 tend to accept data generated by alternative methods, including validated *in vitro* methods  
1075 and, in specific cases, also non-validated *in vitro* methods, especially as supportive  
1076 information or when mechanistic data are needed. They have adopted the 3Rs principles and  
1077 are now proactively supporting the use and implementation of alternative methods<sup>10</sup>.

1078 The European Medicines Agency (EMA) has recently drafted a number of documents  
1079 expressing their vision and action plans towards the implementation of the 3R principles  
1080 (EMA, 2014). According to the new EMA draft guideline on regulatory acceptance of 3Rs  
1081 methods, multiple and flexible approaches are considered acceptable to demonstrate scientific  
1082 validity of new testing approaches and their fitness for regulatory use, either as pivotal,  
1083 supportive or as exploratory mechanistic studies. Besides established formal validation  
1084 processes by recognised institutions such as the Centres for the Validation of Alternative  
1085 Methods (CVAMs) and The European Directorate for the Quality of Medicines &  
1086 HealthCare, the EMA draft guideline is offering a new approach for submission and  
1087 evaluation of a proposal for regulatory acceptance of 3R testing approaches via an EMA in-  
1088 house procedure. One interesting option of this process is the collection of real-life data by  
1089 using a new 3R testing approach in parallel with the data generated using existing methods.

<sup>10</sup> <https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals/in-vitro-methods>

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1090 Data generated with the new method will however not be used as part of the regulatory  
1091 decision making process (“safe harbour”) and will be used solely for the purpose of  
1092 evaluation of the new method for possible future regulatory acceptance.

## 1093 **1.7 GLP monitoring authorities**

1094 For studies conducted for regulatory purposes, the responsibility for evaluating the results of  
1095 the study lies with the regulatory reviewer at the receiving authority. However, this  
1096 evaluation can only be effective if the study data can be relied upon. The principles of Good  
1097 Laboratory Practice (GLP) ensure that the quality and scientific integrity of the data can be  
1098 demonstrated and the conduct of the study reconstructed.

1099 *GLP was developed in the 1970s in response to fraudulent scientific safety studies that were submitted*  
1100 *to regulatory authorities in support of applications for the regulatory registration/approval of drugs to*  
1101 *FDA. Subsequently the principles of GLP were developed by the OECD to ensure data reliability and*  
1102 *reconstructability of safety studies. The principles apply to all non-clinical health and environmental*  
1103 *safety studies required by regulations for the purpose of registering or licensing chemical products of*  
1104 *various kinds. The principles have been published in 1981 as an annex to the OECD Council Decision*  
1105 *on MAD<sup>11</sup>. The decision states that ‘data generated in the testing of chemicals in an OECD Member*  
1106 *Country in accordance with the OECD Test Guidelines (Annex I of this decision) and OECD*  
1107 *Principles of Good Laboratory Practice (Annex II of this decision) shall be accepted in other member*  
1108 *countries for purposes of assessment and other uses relating to the protection of man and the*  
1109 *environment’. Since 1981 a number of additional guidance, consensus and advisory documents have*  
1110 *been published in the OECD Series on Principles of GLP<sup>12</sup>.*

1111 *The Advisory Document of the OECD Working Group on GLP n° 14 specifically addresses in vitro*  
1112 *Studies (OECD 2004b): ‘The purpose of this document is to facilitate the proper application and*  
1113 *interpretation of the GLP Principles for the organisation and management of in vitro studies, and to*  
1114 *provide guidance for the appropriate application of the GLP Principles to in vitro studies, both for test*  
1115 *facilities (management, QA, archivist, study director and personnel), and for national GLP compliance*  
1116 *monitoring authorities.’*

1117 *In the European Union, the principles of GLP are included in Directive 2004/10/EC, while the*  
1118 *compliance monitoring procedures are included in Directive 2004/9/EC. GLP provisions are included*  
1119 *in legislation for chemicals, human medicinal products, veterinary products, detergents, feed additives,*  
1120 *food additives, genetically modified food or feed, pesticides, biocides and cosmetics (Coecke et al.*  
1121 *2016). The current European medical device directives do not require GLP, but the harmonised*  
1122 *standard series ISO 10993 require that all in vitro tests ‘shall be conducted according to recognised*  
1123 *current/valid best laboratory/quality practices, for example Good Laboratory Practice (GLP) or*  
1124 *ISO/IEC 17025’. However, the current proposal for a new Medical Device Regulation does require*  
1125 *GLP where applicable.*

1126 The role of GLP Monitoring Authorities (MAs) may vary considerably from region to region,  
1127 however their responsibilities in general remains the same, i.e. to ensure the compliance of  
1128 GLP studies. GLP Compliance Monitoring is intended to ascertain whether test facilities have  
1129 implemented the GLP Principles and that studies are performed in compliance with the GLP  
1130 principles.

1131 The OECD expects Member countries to establish national MAs, a body or bodies  
1132 responsible for monitoring the GLP compliance of test facilities within its territories and  
1133 according to national legal and administrative practices. In the European Union, the  
1134 principles of GLP are included in Directive 2004/10/EC, while the compliance monitoring  
1135 procedures are included in Directive 2004/9/EC, where each member state is required to  
1136 implement a monitoring programme, where GLP registered facilities are inspected on a

<sup>11</sup> <http://acts.oecd.org/Instruments/ShowInstrumentView.aspx?InstrumentID=263&InstrumentPID=361>

<sup>12</sup> <http://www.oecd.org/chemicalsafety/testing/goodlaboratorypracticeglp.htm>

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1137 regular basis, approximately every two to three years. Routine monitoring inspections will  
1138 include study audits. In addition, MAs can be requested by a receiving authority to conduct  
1139 specific study audits as a result of concerns raised following the review of a regulatory  
1140 submission. The MA has ultimate responsibility for determining the GLP compliance status  
1141 of test facilities and the acceptability of a study audit. The MA also has responsibility for  
1142 taking any action based on the results of test facility inspections or study audits which are  
1143 deemed necessary.

1144 The respective national compliance MAs are also responsible for the exchange of information  
1145 on the compliance of test facilities inspected, and also should provide relevant information  
1146 concerning the countries' procedures for monitoring compliance. They have the  
1147 responsibility to facilitate the mutual acceptance of test data (MAD) generated for submission  
1148 to regulatory authorities of OECD Member countries and other countries that are full  
1149 adherents to MAD.

## 1150 **1.8 Accreditation bodies**

1151 The International Organisation for Standardisation (ISO) is an independent, non-  
1152 governmental membership organisation and the world's largest developer of International  
1153 Standards with a central secretariat based in Geneva, Switzerland. The ISO story dates back  
1154 to 1946 when delegates from 25 countries met at the Institute of Civil Engineers in London  
1155 and decided to create a new international organization 'to facilitate the international  
1156 coordination and unification of industrial standards'<sup>13</sup>.

1157 In this organisation, different industries define their specific technical standards and quality  
1158 management requirements and issue ISO standards to guide conformity. Companies and  
1159 organisations working according to ISO guidelines can ask for a conformity check and  
1160 certification by independent accreditation bodies. ISO itself is not a controlling body, but has  
1161 established a committee on conformity assessment (CASCO) guiding certification  
1162 organisations.

1163 While the OECD Principles of GLP and ISO/IEC 17025 (OECD, 2016a) both set out  
1164 requirements for quality management systems under which testing is conducted, they have, as  
1165 a result of their evolution and history, different purposes (OECD, 2016a).

1166 The OECD Principles of GLP are used as a regulatory control mechanism to assure the  
1167 quality and integrity of non-clinical health and environmental safety studies regulated under  
1168 law. Such testing, for the most part, is complex and variable. The Principles are specifically  
1169 designed to be applied to individual studies to accommodate the complexity and wide variety  
1170 of such studies due the different scientific disciplines involved, for the different chemicals  
1171 under test. The OECD Principles of GLP are therefore, out of necessity, quite general in their  
1172 requirements and take the form of a set of principles.

1173 ISO/IEC 17025 is an international standard intended to be applied by laboratory facilities  
1174 conducting testing, according to established or specifically developed methodologies. The  
1175 focus of the standard is on the on-going operation, monitoring and management of the  
1176 laboratory itself, and on the capacity of the laboratory to produce consistent and reliable  
1177 results that are scientifically valid. ISO/IEC 17025 can, in theory, be applied to any testing  
1178 laboratory in any scientific discipline including those performing non-clinical testing. It is a

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<sup>13</sup> <http://www.iso.org>

1179 reliable indicator of technical competence, and many industries routinely specify laboratory  
1180 accreditation for suppliers of testing services.

## 1181 **1.9 OECD**

1182 The OECD strives for international harmonisation of test methods for toxicity and risk  
1183 assessment of new products, and issues globally accepted Test Guidelines (TGs) that are  
1184 accepted by regulatory bodies of all OECD member states and MAD-adherent economies.

1185 The availability of a guidance document on Good *In vitro* Method Practices (GIVIMP) for  
1186 "The development and implementation of *in vitro* methods for regulatory use in human safety  
1187 assessment" was identified by OECD as a high priority requirement by both the Working  
1188 Group on GLP (WG GLP), and nominated experts from the Working Group of the National  
1189 Coordinators of the Test Guidelines Programme (WNT) to reduce the uncertainties in cell  
1190 and tissue-based *in vitro* method derived predictions with the OECD *in vitro* test guideline  
1191 methods.

1192 Other national and international organisations are developing policies and standards for  
1193 scientific practice to assure quality in implementation of *in vitro* methods. OECD has by  
1194 supporting the GIVIMP endeavour, taken the responsibility to seek consensus on the current  
1195 best *in vitro* method practices and will help to ensure that *in vitro* methods used for  
1196 regulatory purposes are scientifically sound, of high quality, reproducible, credible, and  
1197 acceptable. Generic *in vitro* method OECD TGs incorporating performance standards are  
1198 being written to allow acceptance of both non-proprietary and proprietary *in vitro* methods by  
1199 regulatory agencies and to provide assurance that any *in vitro* cell and tissue culture system  
1200 performs over time in a manner that is consistent with the test system as it was originally  
1201 validated (Gupta *et al.* 2005; Rispin *et al.* 2006).

1202

## 1203 2 Quality Considerations

### 1204 2.1 Quality assurance versus quality control

1205 In order to adopt GIVIMP during the test development phase or the routine phase of an *in*  
1206 *vitro* method, it is necessary to have a good understanding of the relevant QA frameworks  
1207 and definitions. In particular, users should be aware that a quality assurance programme in an  
1208 OECD guidance has a particular meaning (OECD, 2005a, 2004c, 1998a), that is a defined  
1209 system, including personnel, which is independent of study conduct and is designed to assure  
1210 test facility management of compliance with the Principles of GLP.

1211 There are numerous definitions of quality control, but for the purposes of GIVIMP, quality  
1212 control is the documented activity which seeks to confirm that starting materials for assays  
1213 (including cell lines) and key stages of individual assays and the final results meet prescribed  
1214 specifications. It should be clear that this is not the same as Quality Assurance, which is the  
1215 overall quality system designed to assure the quality of results (see Table 2). Specific  
1216 requirements may be reviewed with respect to the criticality of any change, but it must be  
1217 borne in mind that a good quality system should be under ongoing review to ensure current  
1218 best practice is sustained and to enable the requirement for continuous improvement.

1219  
1220

**Table 2: Examples of differences between quality assurance and quality control**

1221

Feature	Quality Assurance (QA)	Quality Control (QC)
Nature	Proactive: prevents occurrence of errors, is process oriented and is a managerial tool.	Reactive: detects an error, is product oriented and is a corrective tool.
Format	Set of SOPs to assure that the required standard is met at every stage in the process.	Review and test quality in a product or service, against a set of given requirements.
Aims	Doing things right the first and every time to prevent errors.	Detect deviations/defects that need corrective action.
Scope	Focused on continuous improvement of processes.	Typically follows the process established as part of QA function.
Responsibilities	Management but also requires commitment from all staff.	May be performed independently but overall responsibility lies with organisation delivering the product or service.
Examples of relevant activities	Creating a process. Designing templates/check lists. Identifying defects in a process (i.e. QC). Root cause analysis. Making recommendations to improve a process or service. Developing a measurement system to assess process effectiveness. Checking a process.	May include: Reviews. “Walk-throughs”. Inspection. Testing (verification and validation). Monitoring control charts.

### 1222 2.2 Quality Control of test system

1223 Quality control of the *in vitro* cell and tissue test systems must be a shared responsibility of  
1224 the manufacturer of for instance proprietary test systems or suppliers of cells, tissues or tissue  
1225 constructs, the test facility which uses the *in vitro* test system, and the entity that submits the

1226 *in vitro* method and the related test system for regulatory acceptance. Tissue constructs or cell  
1227 cultures may have a short shelf life. Proprietary *in vitro* methods and the related *in vitro*  
1228 systems may be relatively expensive; therefore the number of replicate systems available for  
1229 quality control efforts by *in vitro* test facilities may be limited by practical considerations. In  
1230 light of these considerations, the user may sometimes be dependent on the manufacturer for  
1231 many of the basic elements of quality control, including cell or tissue characterisation and  
1232 functional performance of the *in vitro* test system. The manufacturer should be expected to  
1233 provide adequate documentation of quality control testing of representative test system from  
1234 each batch manufactured.

1235 In addition, the user must provide a quality control check in the test facility on a regular basis  
1236 appropriate to the test system so that the *in vitro* method performs as expected after transport  
1237 and handling of the test systems in that particular method. For cell cultures, records should be  
1238 kept of cell passage, of preservation, and of quality controls.

1239 Moreover, records recommended by GCCP or other relevant guidance documents (e.g. ISO  
1240 standards, GLP) should be kept. The developer/user should confirm the key quality attributes  
1241 (essential characteristics) on receipt, and periodically confirm the genetic/phenotypic  
1242 stability, identity and freedom from contamination. Guidance on cell and tissue culture work  
1243 is available for either general (Coecke *et al.*, 2005) or specific (Andrews *et al.*, 2015;  
1244 Geraghty *et al.*, 2014; ISCBI, 2009) applications.

### 1245 **2.3 Quality control of consumables and reagents**

1246 Consumables (plastic ware such as flasks, cryovials, culture dishes, culture slides, tubes, cell  
1247 scrapers) and *in vitro* method reagents (test and reference items, media additives, compounds  
1248 added to a system to induce a chemical reaction, etc.) may have passed through a number of  
1249 entities (producers, suppliers, shippers etc.) thus, their quality must be assured by good  
1250 documentation, traceability, confirmation of suitable storage/shipment, identification, quality  
1251 control and preparation for use in an *in vitro* method. Attention will also need to be given to  
1252 the suitability of reagents and to the safety and ethical provenance of cells (Annex 2 and  
1253 Annex 3).

1254 Consumables and reagents should be reliably available, consistent in their properties and for  
1255 critical reagents, alternative sources should be identified. Certain materials which are critical  
1256 to the performance of a method and which may be subject to significant variation, such as  
1257 conventional serum products and growth promoting reagents, should be quality controlled  
1258 before use (by functional tests) and this may include in-house pre-use testing. In addition,  
1259 SOPs should mention that expiry dates should be documented.

1260 Laboratories can perform quality control checks of consumables, but the process how to do  
1261 this is not always evident. Some laboratories have established procedures whereby a  
1262 percentage of consumables from each lot number are evaluated prior to use in *in vitro* work.  
1263 This may be especially useful for test facilities inquiring the cause of contamination. While  
1264 this approach will not prevent contamination, it can provide data from any profile(s)  
1265 developed during these checks, which can be used for future evaluation of potential  
1266 contamination events. Ideally, sterile consumables with appropriate certificates should be  
1267 used where possible. Alternatively, some consumables can be treated with ultraviolet (UV)  
1268 light, gamma irradiation and/or autoclaved. These preventive measures may be useful in  
1269 limiting contamination events. Other consumables, such as centrifugal filter units and filtered  
1270 pipette tips, cannot be pre-treated. In the case no commercial sterile and documented  
1271 centrifugal filter units and filtered pipette tips are available, establishing a method for  
1272 detecting contamination from these items is very important.

1273 Again, as far as possible, reagents that are documented as sterile should be used without  
1274 further quality control. Alternatively, laboratories should also run quality control checks on  
1275 reagents prior to use in *in vitro* work. These checks assist in determining if a reagent is free of  
1276 contamination at that time. Negative controls and reagent blanks provide a means to detect  
1277 contamination from reagents. Negative controls can then be assessed on an ongoing basis to  
1278 demonstrate that they remain contaminant free. Including and assessing negative controls and  
1279 reagents blanks are critical quality control steps. These controls provide a means of detecting  
1280 reagent contamination and, on occasion, sporadic contamination. Because many  
1281 contamination events are sporadic, negative results in these controls do not necessarily mean  
1282 that samples from the same batch are contaminant free. Additionally, the detection of  
1283 contamination in these controls does not mean that all batch samples have been affected.

1284 Reagents may be selected on the basis of history of use or reference in relevant documents  
1285 associated with regulatory accepted *in vitro* methods (e.g. validation reports, *in vitro* method  
1286 SOPs). Established reagents should have predefined acceptance criteria, which must be met  
1287 and accepted before a new batch is used. Same reagent obtained from different suppliers may  
1288 each have specific and not necessarily similar acceptance criteria. Acceptance criteria must  
1289 be established for different reagents considering the degree of risk they represent to the final  
1290 results. This risk can be assessed based on the manufacturer/supplier's information on  
1291 traceability and control on sourcing, processing, quality control (QC) and shipment. This can  
1292 be addressed by:-

- 1293 1) Considering the potential impact of the perceived risk to prioritise certain reagents,
- 1294 2) Formally evaluate (the quality management system of) the supplier and
- 1295 3) Establishing suitable service level agreements (SLA) with the provider ensuring  
1296 quality, availability and shipment of the reagent. Acceptance of individual batches of  
1297 reagents can be addressed by review of key elements of the certificate of analysis,  
1298 compliance with specific conditions of the SLA provided by the manufacturer/  
1299 supplier or a combination of these and supplementary evaluation which may include  
1300 pre-use testing to assure that individual batches are fit for purpose.
- 1301 4) Consistency of lot qualification tests on critical reagents. Serum can be a critical  
1302 reagent for cell-based *in vitro* methods and lot qualification testing is common  
1303 practice. Standardised serum is available. However, functional tests including  
1304 acceptance criteria needs to be defined.

1305 Any reagent stocks prepared in the test laboratory for use in routine *in vitro* methods should  
1306 be documented, assuring use of acceptable reagents (as above) and documenting the  
1307 preparation of these stocks in batch preparation records. A batch number, storage conditions  
1308 and an expiry date should be assigned (and printed on the label), which can be documented in  
1309 records of performance of routine assays. It is also wise to have procedures for maintaining  
1310 and controlling laboratory stocks of reagents such as minimum stock levels and identification  
1311 and qualification of alternate suppliers to support continuity of testing studies etc. The  
1312 stability of test items and reference items under storage and test conditions should be verified,  
1313 if appropriate, and expiry dates allocated as appropriate (see GLP principles II.6.2.4). If a test  
1314 item is administered in a vehicle, the homogeneity, concentration and stability of the test item  
1315 in that vehicle should be determined (see GLP principles II.6.2.5).

## 1316 **2.4 Data management**

1317 Before beginning to collect data from *in vitro* test procedures, it is important to assess the  
1318 format of collection, the complexity involved and requirements for traceability, storage,

1319 verification and transmission of data. Data should be recorded concurrently with the  
1320 performance of the procedures. Specific standards may apply for data from regulatory testing  
1321 and manufacturing (Coecke *et al.*, 2005; FDA, 2003; OECD, 1999). Data from material  
1322 provided by tissue donors may also be subject to the requirements of data management and  
1323 control under local, regional, national or international rules and regulations such as the EU  
1324 Directive on Data Protection (NB. national and regional rules should be consulted as these  
1325 may vary). It should be ensured that data reported accurately reflect the results obtained  
1326 during experimental work, by performing adequate quality control of the data.

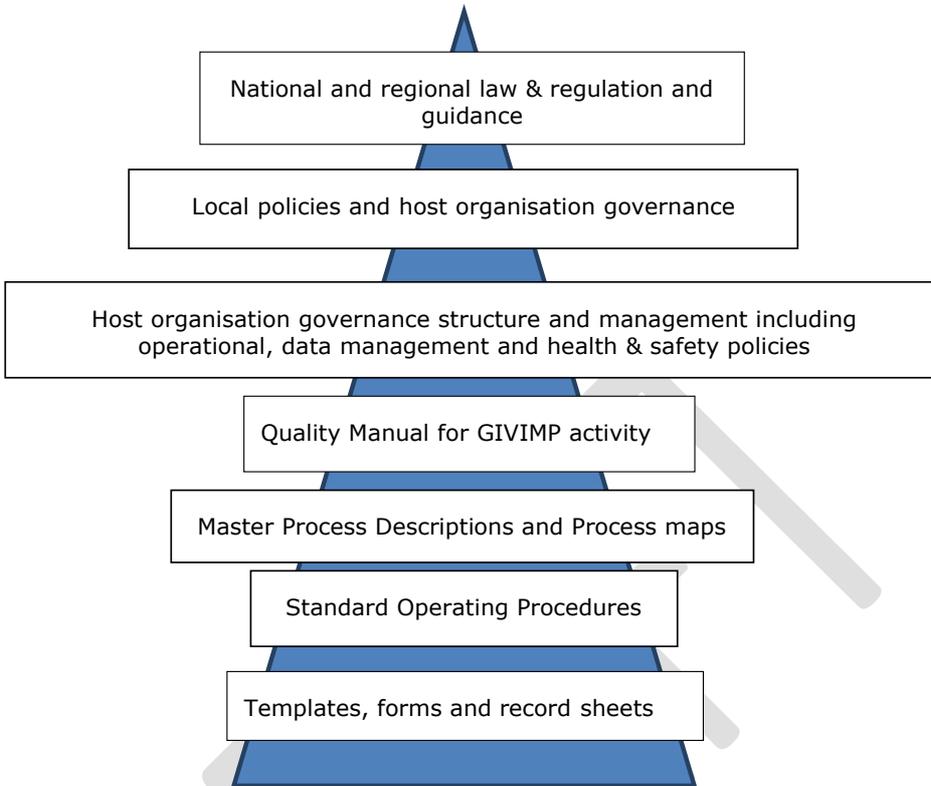
## 1327 **2.5 Types of documentation**

1328 Documentation in a quality system typically involves documents and records at several levels  
1329 (Figure 1). The overarching document is a high-level, accurate description of the types of  
1330 work performed by the organisation or group, key policies and standards adopted for  
1331 delivering the work and the structure of the quality system used to deliver all aspects of test  
1332 performance and provision of results. In some systems, this may be called a “quality  
1333 manual”. Another level may include overviews of procedures referring to the various specific  
1334 testing methods involved at the next level. Finally, supporting the SOPs, there will be formal  
1335 record sheets for test and control data and templates for reporting results. Another example  
1336 for descriptive and prescriptive documents is provided in the WHO handbook on quality  
1337 practices in Biomedical Research (WHO, 2013).

1338 In many formal quality systems, including GLP, there will need to be a document control  
1339 convention which assures that all documents are developed and approved in a formal process,  
1340 that active versions are accurately dated, authored and approved with specific version  
1341 numbers that will avoid inadvertent use of obsolete testing methods.

1342

1343 **Figure 1: Hierarchy of governance and management documents**



1344

1345 NB: this schematic overview is intended to reflect some general aspects of documentation  
1346 hierarchy and is not a prescriptive requirement of GIVIMP or GLP. Another example for  
1347 descriptive and prescriptive documents is provided in the WHO handbook on quality  
1348 practices in Biomedical Research (WHO, 2013). QA documentation may be structured in  
1349 different ways as required in different organisations and regulatory jurisdictions.

## 1350 **2.6 Staff training and development**

1351 Training files are helpful to capture all procedures in which staff should be trained before  
1352 they are considered competent. These may include regulatory requirements of the work,  
1353 specific controlled procedures (e.g., SOPs, testing methods), use and storage of  
1354 documentation, as well as general training in best practice such as indicated in GCCP (2005).  
1355 When new staff is recruited to work in the laboratory, it is important to guide the staff and  
1356 review and document any training requirements before assignment to carry out any tasks. A  
1357 written training plan might serve as a basis for a formal training record, which should be  
1358 reviewed periodically by their line manager. It may be helpful to demonstrate competence in  
1359 each procedure by recording individual elements of training in a particular SOP, until the  
1360 trainee is considered competent and the training records are signed to authorise that they can  
1361 perform the procedure independently. Training may include:

1362 1) self-study of testing methods and SOPs and recording that the document has been  
1363 read and understood,

1364 2) correct performance of the procedure, witnessed by a qualified supervisor a  
 1365 minimum number of times and notification from the trainer or supervisor that the staff  
 1366 member is competent to perform the task independently.

1367 A list of core training for *in vitro* cell culture laboratory staff is given in GCCP (Coecke *et*  
 1368 *al.*, 2005) and special aspects of training are also referred to in other sections of this  
 1369 document where relevant.

1370 It is good practice to record all training in staff training records or periodic competency  
 1371 reviews, which should be regularly updated. In some circumstances, the host organisation or  
 1372 relevant professional bodies may run or support attendance at supplementary training and  
 1373 education which should also be documented to demonstrate maintenance of ongoing  
 1374 professional development and support assurance that current best practice is maintained in  
 1375 testing procedures. Annual review of staff performance is also a useful tool for considering  
 1376 ongoing training needs.

1377 **2.7 Assurance of data integrity**

1378 Data integrity is fundamental for any quality system and starts with good quality  
 1379 documentation (see Table 3).

1380 **Table 3: Key criteria to be addressed for data generated under a GLP environment (ISPE,**  
 1381 **2012)**

Criteria		GLP
<b>Attributable</b>	Who acquired the data or performed the action	Initials/signature/UserID
<b>Legible</b>	Data must be recorded permanently in a durable medium and be readable	
<b>Contemporaneous</b>	Documented at the time of activity	Date and time (stamp)
<b>Original</b>	Original or true copy	
<b>Accurate</b>	No errors, no undocumented changes	QC, QA audits
<b>Complete</b>	All data available	QC, QA audits
<b>Consistent</b>	Traceability, dataflow, date timestamps	
<b>Enduring</b>	Recorded on paper or electronically	
<b>Available</b>	Accessible for the lifetime of the record	Archiving

1382  
 1383 For validation of certain documents, such as spread sheets, there may be specific procedures  
 1384 to adopt good practices e.g. (Esch *et al.*, 2010; OMCL, 2009). It may be necessary to have an  
 1385 audit trail of modifications.

1386 If data is translated between different recording methods, systems and/or data bases and in  
1387 particular critical phases like manual or semi-automatic transfer (e.g. Excel™ files to  
1388 database for kinetic assessment, combination of information obtained from 2 or 3 databases  
1389 to one database), correct resolution of pre- and post-translation data should be reviewed and  
1390 confirmed by a qualified person. For handwritten data, translated into an excel sheet, it is also  
1391 advisable for the changes to be verified by the same person who has made the observations.  
1392 These issues are of special concern where data are exchanged between countries (e.g. for  
1393 pharmacokinetic assessment). When data translation occurs between different software or  
1394 data base systems their compatibility and inability to be altered in translation should be tested  
1395 and will need to involve appropriate validation procedures (see i) below)

1396 Data Integrity (DI) closely correlates with good scientific practices. The same principles  
1397 should be applied when using either paper based and electronic systems, or both. It should be  
1398 assured that the obtained information is unchanged from the source, and has not been  
1399 intentionally modified, altered or destroyed. To ensure DI for both systems, the following  
1400 components of this process should be taken into consideration.

- 1401 a) Sample integrity: Information and decisions based on data from samples used must be  
1402 robust, so sample control should be ensured from point of entry into the laboratory  
1403 through to data review and data release.
- 1404 b) Integrity of materials/solutions: The right standard of materials/solutions must exist to  
1405 ensure a valid reference, so the process for standardisation and requirements for re-  
1406 standardisation should be established e.g. documentation of receipt, calculation and  
1407 preparation, traceability, assignment of expiry or retest dates etc. Reference data  
1408 needs to be complete (e.g. lot number, reference standard data). For further details see  
1409 Section 4.2.
- 1410 c) Instrument and equipment: The data generated by instruments and equipment must be  
1411 robust. The equipment unit(s) must be suitable for their “intended use”, therefore the  
1412 equipment must be calibrated or qualified by appropriately trained personnel.  
1413 Calibration should, where appropriate, be traceable to national or international  
1414 standards of measurement. In order to operate within specification, scheduled  
1415 maintenance of the equipment and instruments once again must be performed by  
1416 qualified personnel. For examples and more information see Section 4.1.
- 1417 d) Documentation and result reporting: Records must be clear and accurate. All activities  
1418 should be recorded at the time they are performed (see Annex 2). Records should also  
1419 be chronological, traceable, and readily retrievable. Original documents must be  
1420 clearly identifiable (e.g. time stamps, watermarks) and standardised, predefined,  
1421 authorised forms and templates should be used wherever possible and applicable.  
1422 Records should be signed and dated allowing for clear identification, no pencil, no  
1423 recording on loose ‘post-it’ notes, “white-out” paste or scrap sheets of paper should  
1424 occur. Any corrections written on documents should be signed and dated by a trained  
1425 staff member. Transcriptions if performed need to be attached to the original results  
1426 (full traceability) and reviewed. Chronology of recorded data and correct page  
1427 numbering must be ensured.
- 1428 e) Proficiency of the analyst/operator: The person producing the data using samples,  
1429 materials/solutions, instruments and equipment, documenting and reporting results  
1430 must be relied upon to produce robust data. Therefore, the ability of the person to  
1431 perform a task accurately and proficiently should be ensured, e.g. through appropriate  
1432 training (see section 2.6). The person must also understand that destroying, deleting,  
1433 hiding or using selected data without scientific justification (or even falsifying data)  
1434 are not acceptable. Facility management policies should assure a working

- 1435 environment in which that when a mistake has been made, the individual concerned  
1436 should feel comfortable to report and explain it and not conceal it.
- 1437 f) Method validation and verification: The *in vitro* method has to be validated or verified  
1438 “suitable for its intended use”.
- 1439 g) Effective review and verification: A clear definition and understanding of raw data  
1440 should be ensured. There needs to be traceability to the testing method used, source  
1441 data and verification of raw data. SOPs need to be in place for data handling, record  
1442 retention and good documentation practices and deviation handling etc.
- 1443 h) Additional considerations for electronic data: In addition to comments made above, if  
1444 a system is required to maintain electronic data, it should be managed by unique user  
1445 identity and password combination. If the system does not permit this, a paper-based  
1446 log must be in place to record who uses the generic user and password combination,  
1447 or who uses the unprotected equipment. Paper records can be reviewed for any  
1448 amendments or crossings out/deletions plus the signature/date of and the reason for  
1449 doing so. This is to be replicated in an electronic system in the same way by use of an  
1450 electronic log (audit trail). Where there are multiple users, an approach to periodically  
1451 review who has system access must be in place. There must be a periodic user  
1452 account review procedure. There should be procedures in place for assigning access  
1453 rights to each user. The level of access should be in line with the tasks that have to be  
1454 performed.
- 1455 i) Data storage, archive & retrieval: Data must be stored in a safe and secure place for  
1456 paper-based systems and in protected folders for electronic systems. An approach  
1457 must be in place to ensure that data are protected against loss, damage or overwriting.  
1458 Manipulation of stored paper or electronic records must not be possible. Electronic  
1459 records must be held in a format that is not readily corruptible and protected from  
1460 deliberate or accidental alteration (e.g. CFR 21 part 11, GLP: see OECD GLP  
1461 Guidance Document 17).

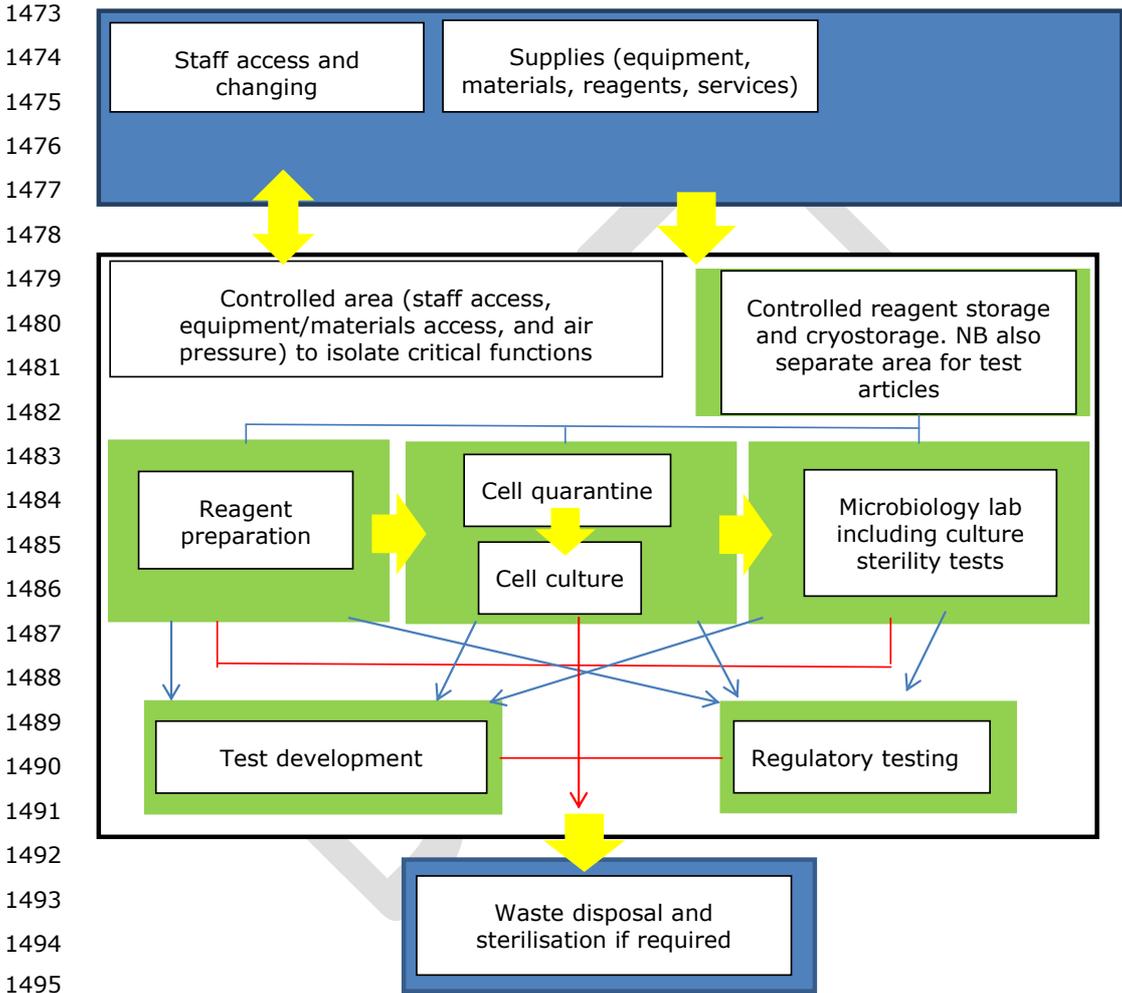
1462 A system must be in place for the archive of electronic and paper data and records (see 10.3).  
1463 It should be considered and tested how the data and records can be retrieved and used to re-  
1464 create a complete accurate picture on the rare occasions that this is required.

1465

1466 **3 Facilities**

1467 A very important aspect in the process of *in vitro* method development to *in vitro* method  
1468 routine use is the need for a well-designed facility to ensure that good quality results are  
1469 produced in a safe and efficient manner. The types of laboratory areas which might need to  
1470 be separated are indicated in Figure 2.

1471  
1472 **Figure 2: A typical "onion ring" structure used to separate different operational areas.**



1493  
1494  
1495  
1496 **It may not be possible or acceptable to separate such laboratory functions but they are among the**  
1497 **considerations for separation (physical or process/training) that someone establishing or running the**  
1498 **facility should be aware of and there may be other issues which must be considered for different kinds of**  
1499 **work. It is wise to avoid physical contact between materials transfers (blue arrows) and waste removal**  
1500 **(red arrows) so that there is very low risk of contamination from waste affecting reagents, cultures and**  
1501 **test materials.**

1502 As stated in OECD No 14 (OECD, 2004c), facilities should be suitable to maintain the assay,  
1503 resulting data and all archived items.

1504 Facilities must be fit and suitable for the purpose of the work; that is, size, construction, and  
1505 location should be appropriate, and the building should allow for the separation of activities.

1506 Both test developer facilities and routine use facilities should ensure to be designed or  
1507 adapted to have separate areas for similar but unrelated work and sample preparation. In  
1508 addition, buildings should be validated for the required functionality (e.g. air handling) and  
1509 properly monitored (e.g. air pressure differences, flow patterns, etc.), with easily accessible  
1510 results. Validation of facilities should be formally documented. Environmental control  
1511 systems should be regularly maintained and serviced, with full records of maintenance and  
1512 any modifications to demonstrate appropriate upkeep and function. All the necessary permits  
1513 should be in place before any activities are initiated. Finally, there should be dedicated areas  
1514 for data storage and archiving.

### 1515 **3.1 Containment**

1516 Cell lines and primary tissues may carry a variety of different microorganisms or pathogens,  
1517 which can potentially cause human disease, pose hazard to employees and distort the *in vitro*  
1518 method results. Cell lines and primary tissues should be handled at biosafety (hazard) level 2,  
1519 unless the cells are known to be specific pathogen-free. This level of containment is also  
1520 appropriate for monoclonal antibody-containing supernatants and cell homogenates. Access  
1521 to level 2 facilities should be restricted to authorised personnel only, and specific risk  
1522 assessment and training activities should be followed according to the national legislation on  
1523 Level 2 containment (Coecke *et al.*, 2005; Geraghty *et al.*, 2014).

1524 As a minimum, all cell and tissue work should be performed in a Class II biological safety  
1525 cabinet as even screened tissues or cell cultures may carry infectious agents not covered by  
1526 virological screening. Depending on the kind of test items in the *in vitro* method, several  
1527 subtypes of Class II biological safety cabinets must be considered. Horizontal (Class I) flow  
1528 cabinets, where the airflow is directed at the operator, are intended for sterile media  
1529 preparation and not for use with tissues and cell cultures due to the inability to exclude all  
1530 infectious agents in screening and to avoid the widespread laboratory contamination with  
1531 mycoplasma or bacterial and fungal contaminants. For this reason they should only be used if  
1532 the cells are known to be pathogen-free. Class I cabinets are also not appropriate when  
1533 potentially toxic chemicals might be used (which is often the case for *in vitro* methods for  
1534 regulatory use). In the case of using toxic chemicals it is recommended to let the outflowing  
1535 air pass through a volatile organic compound-filter (active charcoal) after a High-Efficiency  
1536 Particulate Arrestance (HEPA) filter.

1537 If microscopes or other equipment are to be installed in biological safety cabinets, the cell  
1538 containment equipment should be checked for flow disruption as well as operator and cell  
1539 culture protection.

1540 Splashes and aerosols carry contamination and infection risks, which can not only endanger  
1541 the operator, but also compromise the integrity of the *in vitro* method (i.e., cross  
1542 contamination of cell lines or introduction of adventitious agents). Therefore, all procedures  
1543 should aim at minimising aerosol production. Any procedures likely to produce aerosols  
1544 should be contained (biosafety cabinet) or the material should be rendered harmless.

1545 As contaminated working surfaces can lead to microbial contamination or cross-  
1546 contamination between cell lines and pose a risk to the *in vitro* method quality, working  
1547 surfaces should be easy to clean, resistant to acids, alkalis, solvents and disinfectants. There  
1548 should be appropriate documented procedures for disinfection of work surfaces, safety  
1549 cabinets and equipment.

1550 Higher containment levels may be required depending on the biosafety risk level of the  
1551 biological agents handled. If *in vitro* work is to be performed with group 3 or 4 human  
1552 hazards, which can cause severe human disease and may be a serious hazard to employees or  
1553 spread to the community, then separated facilities, appropriate levels of biosafety, such as air  
1554 filtration and negative pressure differences will need to be maintained. Groups 3 and 4 are  
1555 more complex in complying with specific facility requirements and personnel skills.  
1556 Therefore, *in vitro* methods for regulatory use in human safety assessment should be  
1557 developed to require mainly level 2 biosafety.

### 1558 **3.2 Level of separation to avoid cross-contamination**

1559 Measures should be taken to ensure adequate separation of different biological agents and *in*  
1560 *vitro* studies taking place in the same physical environment (OECD, 2004a). The integrity of  
1561 each test system and study should be protected by spatial or temporal separation from other  
1562 studies and test systems to avoid cross-contamination and mix-up. Air flow requirements, for  
1563 example, are opposite for spaces where human cell lines are used (flow out of the space to  
1564 avoid their contamination) and for spaces where pathogenic micro-organisms are used for  
1565 tests (flow into the space to avoid spread of the pathogens).

1566 Tissues and cells from different studies can be kept in the same incubator provided that they  
1567 are labelled appropriately, placed in a different position and none of the test items are volatile  
1568 enough to cause contamination. Tissues and cells from different species or *in vitro* methods  
1569 where yeast and bacteria are used would require a higher level of separation. The most  
1570 important issue here is to separate the areas used for cell culture/tissue and microbiological  
1571 culture (see Figure 2). Other degrees of separation may be achieved using the specific  
1572 requirements described elsewhere for quarantine of untested material.

1573 Temporal separation of test systems should be used in Class II biological safety cabinets.  
1574 This can be achieved by handling only one cell line at a time, followed by cleaning and  
1575 decontamination of the cabinet, working surfaces and related equipment.

1576 Rooms and areas used for preparation and mixing of test and reference items with vehicles  
1577 should allow aseptic working conditions in order to minimise the risk of microbial  
1578 contamination of the test system.

1579 Appropriate training should be given to the authorised personnel regarding the necessary  
1580 precautions to prevent contamination and cross-contamination.

1581 When performing molecular biology techniques and especially PCR-based assays, which are  
1582 high sensitivity methods, extreme care should be taken in facility design and operation in  
1583 order to avoid false-positive results. False-positive results can originate, for example, from  
1584 sample-to-sample contamination, from carry-over of nucleic acid from previous amplification  
1585 of the same or similar target. Cloned DNA or virus infected cell cultures may represent other  
1586 source of contamination<sup>14</sup>.

1587 The greatest threat of contamination lies in laboratories that manipulate amplified or cloned  
1588 DNA; laboratories exclusively performing real-time PCR and properly discarding all  
1589 amplified products without opening the reaction tubes or sealed plates are less liable to  
1590 contamination.

<sup>14</sup> <https://www.gov.uk/government/publications/smi-q-4-good-laboratory-practice-when-performing-molecular-amplification-assays>

Field Code Changed

1591 It is vital that the correct workflow is followed in a molecular laboratory in order to minimise  
1592 contamination and ensure good laboratory practises are followed. It is the responsibility of all  
1593 laboratory staff to ensure that the workflow is followed. The equipment, consumables and  
1594 laboratory coats should be dedicated to each area. If possible it is helpful to colour code  
1595 racks, pipettes and laboratory coats in the different areas to be able to easily monitor  
1596 movement between the different areas. Powder-free gloves should be used throughout the  
1597 process in all the different areas as the powder on powdered gloves might result in assay  
1598 inhibition. It is particularly important to always use powder-free gloves in the pre-PCR area,  
1599 as this is prone to contamination by RNases.

1600 Perform physical separation of pre- and post-PCR assay stages. Between these two areas the  
1601 work flow should be uni-directional and the relative air pressure and direction should differ.  
1602 It is recommended for personnel working with post-PCR assay stages to not work with pre-  
1603 PCR parts later the same day.

1604 PCR reactions should be set up in a separate room from that used for post-PCR manipulation.  
1605 Bench areas should be wiped daily with hypochlorite solution following use and contaminated  
1606 areas should be additionally decontaminated with ultra-violet radiation if fitted. Hypochlorite  
1607 solution (20% or greater) should not be applied to stainless steel (types 304/347, 316 and 400  
1608 series) as it leads to corrosion with repeated use. Reagents should be taken from clean storage  
1609 into the pre-PCR area and never taken or shared with post-PCR areas.

1610 Where possible, the PCR facility should be organised in four discrete rooms/areas:  
1611 (Requirements may vary with assay format e.g. real time PCR does not require post-PCR  
1612 analysis).

1613 - **Reagent preparation clean room:** it is free from any biological material such as  
1614 DNA/RNA, cloned material, etc.). Primers and reagents aliquoting is recommended to  
1615 minimise contamination consequences. The air pressure should be positive and blow  
1616 out of the room. The clean areas must be kept free of amplicon at all times, to ensure  
1617 this occurs there should be no movement back from the dirty area to the clean area. If  
1618 under extreme circumstances a consumable or reagent needs to be moved backwards  
1619 it must be thoroughly decontaminated with bleach and ethanol. Returning racks  
1620 should be soaked in 1% bleach overnight before soaking in distilled water and placing  
1621 in the clean area. To ensure minimal movement between areas during the running of  
1622 molecular assays, it is optimal to have dedicated storage (freezer, fridge and room  
1623 temperature) for each area.

1624 - **Nucleic acid extraction room:** in this area samples are processed, reverse  
1625 transcriptase step of RT-PCR is performed and DNA or cDNA and positive controls  
1626 are added to the PCR reaction mix (prepared in the Reagent preparation clean room).  
1627 The air pressure should be positive and blow out of the room. If chemicals are stored  
1628 in this area appropriate facilities and storage requirements should be in place.

1629 - **Amplification room:** PCR machines are housed in this room. It may contain an area  
1630 (cabinet with air pressure slightly positive) for the nested PCR.

1631 - **Product analysis room:** post-PCR manipulations such as agarose gel electrophoresis  
1632 are performed in this area. It is thus a contaminated area and therefore no reagents,  
1633 equipment, coats, etc. used in this room should be used in any other PCR areas. The  
1634 air pressure should be negative and blow into the room.

### 1635 3.3 Air handling, water supply, environmental control, heating and cooling

1636 Air handling systems should be operated to ensure that the correct environment is maintained  
1637 for the type of work conducted in the laboratory. These systems should be subject to regular

1638 maintenance by qualified personnel. In case *in vitro* work involves serious human pathogens,  
1639 the laboratory should operate with specific trained personnel, using biosafety level 3 and 4  
1640 and the room should be kept at negative pressure to guard against infection spread. In  
1641 contrast, work with cell and tissue cultures, for example, may require positive pressure  
1642 relative to other laboratory areas to minimise the risk of test system contamination from the  
1643 outside. When HEPA filters are used in differential pressure isolation rooms, the filters and  
1644 their fittings and seals need to be thoroughly examined and tested at regular intervals (e.g.  
1645 annually). Decontamination should be carried out before servicing is carried out. The air  
1646 handling system should also be designed to account for exhaust air from the Class II  
1647 biological safety cabinets that are vented to the outside of the building.

1648 Cell culture work requires high-quality ultra-pure water, which is usually deionised via  
1649 reverse osmosis, followed by passage through a series of carbon and micropore filters  
1650 eliminating organic materials and pyrogens. Tissue culture grade water should be controlled  
1651 for pH, conductance and total organic carbon, as well as absence of endotoxins. Note that  
1652 pyrogens can be deleterious to cell cultures at concentrations below the level of detection for  
1653 organic carbon. Where small quantities of purified water are required for cell culture this may  
1654 be obtained by obtaining water for irrigation (WFI) or other medically approved pure-water  
1655 preparations (Stacey and Davis, 2007).

1656 Heating, cooling and humidity should be adequate for the comfort of laboratory occupants  
1657 and for operation of laboratory equipment, and should not adversely affect test system  
1658 survival/behaviour and test item stability. For example, in some cases (e.g. preparation of  
1659 microscopic slides) specific humidity might be required.

1660 Many tissue culture media components are sensitive to white light (especially sun light). The  
1661 blue wavelengths are of particular concern. Filters can be used in the room and laminar flow  
1662 cabinet light to reduce this exposure where necessary.

1663 Mid to long term storage of media is usually best at temperatures below ambient lab  
1664 temperatures. Accordingly, an optimal solution may be to store all cell culture media at 4°C  
1665 (refrigerator) or frozen (electric freezer) as recommended by the manufacturer. There may be  
1666 exceptions to this general opinion but manufacturers' instructions should always be consulted.

### 1667 **3.4 Cell and tissue culture transportation and cryostorage**

1668 Because cells and tissue in culture are often transported across the world, it is very important  
1669 to keep these test systems as healthy as possible during the long transport times. A quality  
1670 cell culture incubator makes it possible to transport valuable and delicate cell cultures in a  
1671 temperature-controlled environment, so that they are less likely to become damaged during  
1672 the transport process. However, one should note that the incubator for transport has limited  
1673 space (2-3 plates or flasks) and adequate sealing of plates is necessary to avoid leakage  
1674 during transport. Because of their fragile nature, live cells and tissues cannot be shipped like  
1675 a regular package in a cardboard box or shipping envelope. They must be transported in the  
1676 special temperature-controlled environment of a mini-cell culture incubator, if they are  
1677 expected to reach their destination in good condition. Technologies have provided such  
1678 solutions during the last decennia. Alternatively, good low temperature transport practices  
1679 can allow also for safe transport of cells and tissue systems. Cells are usually shipped on dry  
1680 ice. Ideally, temperature should also be monitored (e.g. by using data-logger) during  
1681 transportation, especially for long distance transport.

1682 Cryostorage systems should ensure the long term preservation of the stored test system. For  
1683 cryopreserved cell cultures, the viability of mammalian cells is progressively lost within

1684 months at -80°C, thus, long term storage below the glass transition point of water (-136°C) is  
1685 recommended. While true for mammalian cells, this is not the case for bacteria or yeast.

1686 Storage in the vapour phase of liquid nitrogen is generally advised for all cells and necessary  
1687 for potentially infectious cells and tissues. This eliminates the chances of transfer of  
1688 pathogenic material between vials which can occur in the liquid phase of nitrogen (Coecke *et*  
1689 *al.*, 2005), Appendix 1). It is also considered safer as liquid nitrogen can enter storage vials if  
1690 they are stored in the liquid phase and cause them to explode upon thawing. If vials need to  
1691 be stored in the liquid phase, protection wrapping may be considered.

1692 Cryostorage requires temperature and liquid nitrogen level monitoring to ensure that the test  
1693 system stocks are at optimal storage temperature. Cryostorage vessels can be fitted with  
1694 alarms and data loggers and liquid nitrogen levels recorded at regular intervals (e.g. weekly).

1695 In cases when ultra-low electrical -150°C freezers are used, CO<sub>2</sub>, liquid N<sub>2</sub> or electrical  
1696 backup systems need to be in place to guard against loss of power supply.

1697 Storing valuable test system stocks in more than one cryostorage location is recommended  
1698 for security/back up purposes, and off-site storage may also need to be considered in disaster  
1699 recovery plans for the facility.

### 1700 **3.5 Quarantine for new test systems**

1701 All new cells and tissues should be quarantined in the laboratory and in storage until  
1702 determined free of contaminating microorganisms (see Section 5). Early checks of cell  
1703 authentication are also recommended to avoid wasted time and resources on unauthentic cell  
1704 lines. If a separate quarantine laboratory is not available, a quarantine biological safety  
1705 cabinet, a dedicated incubator and liquid nitrogen tank can be used. Alternatively, other steps  
1706 can be taken to minimise contamination risks, such as handling the quarantine cells last on  
1707 each day, rigorous post-manipulation disinfection of the work areas and placing cultures for  
1708 incubation in a filter-sealed container into the general incubator (Geraghty *et al.*, 2014). Cells  
1709 procured from a cell bank may carry a certificate of analysis for contamination tests  
1710 performed. The certificate will list the tests performed and may give details of testing  
1711 methods. As a minimum, a mycoplasma test should be performed upon receipt.

1712

## 1713 4 Apparatus, material and reagents

### 1714 4.1 Apparatus

1715 Apparatus, including validated computerised systems, used for the generation, storage and  
1716 retrieval of data, and for controlling environmental factors relevant to the study should be  
1717 suitably located and of appropriate design and adequate capacity. In general, all apparatus  
1718 used should be operated and maintained correctly by trained staff to ensure correct use and  
1719 knowledge on the procedures for equipment maintenance and calibration.

1720 Computerised systems should be formally validated prior to use in a GLP environment (see  
1721 10.1). Apparatus should be periodically inspected, cleaned, maintained, and calibrated  
1722 according to SOPs and records of these activities should be maintained (OECD, 1998b).

1723 As stated in OECD document *Number 14* (OECD, 2004b), the commonly observed, routine  
1724 requirements for apparatus used in a GLP environment apply equally to apparatus used for *in*  
1725 *vitro* development work, like laminar flow cabinets and incubators, there are some specific  
1726 points and issues of particular importance for the latter. As an example, equipment such as  
1727 microbalances, plate readers, centrifuges, micropipettes, laminar air flow cabinets, fridges  
1728 and freezers, water baths, and incubators should be regularly maintained and calibrated  
1729 (traceable to international standards) where possible, to ensure the integrity and reliability of  
1730 the results. For each type of equipment, critical parameters (e.g. supply of gases for mass  
1731 spectrometry; liquid nitrogen levels in storage containers, CO<sub>2</sub> levels in incubators; or  
1732 functioning of filters to ensure sterility of the air in addition to the airflow in the laminar flow  
1733 cabinets) should be identified as requiring continuous monitoring or the setting of limit  
1734 values together with installation of alarms.

1735 Centrifuges which are routinely used in cell and tissue culture work (sub-culture work,  
1736 cryopreservation etc.) produce aerosols and therefore it is important to consider models that  
1737 have sealed buckets. Ideally, one should consider working with models where the condition  
1738 of the load can be observed without opening the lid. Besides the containment issues for  
1739 centrifuges, when documenting their operation, it is necessary to specify centrifugation  
1740 speeds as x g rather than rpm (unless the rotor radius is stated), incubation conditions, time  
1741 and volumes of centrifugation with tolerances when relevant, and any other information that  
1742 enables the accurate reproducibility of procedures. In addition, procedures should be  
1743 established on how to respond in case of an emergency (e.g. broken tube).

1744 Working with cell and tissue culture *in vitro* requires a strictly controlled environment for  
1745 cell growth. This is achieved using specialised incubators which provide the correct and  
1746 controlled growth conditions (temperature, humidity, CO<sub>2</sub> levels), which should be checked  
1747 (and logged) on a regular basis. To provide the required humidity, incubators are frequently  
1748 equipped with a water basin at the bottom. This combination of high humidity and  
1749 temperature increases the risk of bacterial or fungal contaminations. To reduce the risk of  
1750 microbial contamination, copper-coated incubators are now available. Antifungal or  
1751 bactericidal agents can be added to incubator water trays to reduce the risk of bacterial and  
1752 fungal growth (but any possible impact on the *in vitro* method to be carried out should be  
1753 checked and documented). Incubators with self-sterilising cycles may also be used, although  
1754 this does not replace regular cleaning and maintenance.

1755 Similarly, waterbaths used to thaw and/or to warm up stored solutions like medium and  
1756 frozen stocks, or to defrost vials of cryopreserved cells and tissues, carry a high risk of  
1757 introducing contamination. The use of bactericidal and fungicidal agents in waterbaths can

1758 aid in the control of contamination, but the impact on the test system should be checked and  
1759 documented. Alternatively, cleaning procedures and regular change of water may be a better  
1760 choice.

1761 A laminar air flow cabinet can be considered as a critical piece of equipment for cell and  
1762 tissue culture work, since, when it is used correctly (see 3.1), it ensures a clean working  
1763 environment protection for both the operator and for cells/tissues and other materials and  
1764 reagents.

1765 For equipment such as refrigerators and freezers, temperatures should be checked regularly  
1766 and preferably logged: simple data loggers are available to log the temperature at set  
1767 intervals. In addition to the regular recording of temperatures, an alarm system to alert staff  
1768 when acceptable operating limits are exceeded is desirable, and a backup system should be in  
1769 place, such that materials may be transferred from one fridge/freezer to another, in case of  
1770 malfunction.

1771 For all equipment used during an experiment, acceptable operating limits should be set,  
1772 monitored and recorded. Equipment should be fit for purpose with respect to sensitivity and  
1773 selectivity. Prior to use, it should be established that the equipment is functioning according  
1774 to the (suppliers') specifications and it should be qualified and validated for its intended use,  
1775 e.g. via a formal DQ/IQ/OQ/PQ process. Since DQ/IQ/OQ/PQ are not specifically defined in  
1776 GLP, and its application is not always harmonised, several test facilities follow the OMCL  
1777 guidelines for qualification of equipment (OMCL, 2011). The equipment needs to be  
1778 maintained and calibrated at regular intervals depending on the type of equipment and the  
1779 frequency of use. As an example, pipettes or micropipettors may need to be calibrated more  
1780 frequently than centrifuges.

1781 It may be necessary to have separate procedures for regular checks (e.g. daily checks of  
1782 pipettes used) and complete calibration (monthly or quarterly, depending on the frequency of  
1783 use). The standard operating procedures need to describe how to deal with data produced  
1784 with a potentially uncalibrated pipette. When equipment such as a pipette is out of  
1785 specifications during a calibration, it is important to determine how to interpret data that have  
1786 been generated since the most recent successful calibration and determine the impact of the  
1787 potential deviation to the outcome of the study. Therefore, it is crucial to record every piece  
1788 of equipment, uniquely identified, that has been used during the performance evaluation of an  
1789 *in vitro* method. In general, facility practices should ensure that equipment is within  
1790 specifications before the start of study and throughout the experimental phase to avoid the  
1791 rejection of the *in vitro* study. Nevertheless, some test facilities use periodical calibrations for  
1792 pipettes (e.g. every 3 months), given their low failure rate.

1793 To enable broader use of a new method, successful transfer to a range of equipment and  
1794 different laboratories should be demonstrated. This increases the robustness of the method.  
1795 To increase transferability, preference should be given to the use of generally widely  
1796 available equipment. In addition, the impact of the use of a certain type or brand of  
1797 equipment on the outcome of the individual assays or the overall *in vitro* method needs to be  
1798 determined. An *in vitro* method should specify the acceptable limits that the equipment  
1799 should meet to be used for a specific *in vitro* method<sup>15</sup>.

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<sup>15</sup> [http://www.iso.org/iso/iso\\_catalogue/catalogue\\_tc/catalogue\\_tc\\_browse.htm?commid=48908](http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_tc_browse.htm?commid=48908)

## 1800 4.2 Materials and reagents

1801 Critical materials and reagents can influence the outcome of *in vitro* studies and it is therefore  
1802 important to identify and control them in each experimental phase. In using the term critical  
1803 materials and reagents we refer to highly complex preparations used as a fundamental  
1804 component in the *in vitro* method, which are not currently definable in terms of composition,  
1805 stability or biological activity. Examples include processed tissue and cell culture  
1806 preparations, which may contain viable cells. As with all reagents, the standards of  
1807 preparation and testing of kits should be clear and traceable and they should be used before  
1808 their expiry date. Further guidance on complex cell systems such as 3D culture, is given in  
1809 Annex 2. For GLP studies, preparation of substrates and use of reagents and kits should be  
1810 documented in sufficient detail to allow for complete reconstruction of these activities.

1811 Other examples of critical reagents are serum and growth factors. Each of the critical reagents  
1812 should either be sourced from a reputable supplier, who accompanies the shipment with a  
1813 certificate of analysis, or one should ensure that there are appropriate quality controls (see  
1814 Annex 2). These controls may include in-house growth or functional characterisation and the  
1815 controls should be done by trained personnel and according to procedures described at *in*  
1816 *vitro* method development laboratories or in the standard operating procedures (SOPs) of  
1817 routine or GLP facilities. It is recommended to perform a batch validation to reduce the  
1818 introduction of unknown variables into a culture system that can interfere with assay or  
1819 overall *in vitro* method performance. For this purpose a batch is tested first and when  
1820 approved, a large quantity of the batch can be acquired to reduce variability during the  
1821 performance of a certain number of assays.

1822 The use of good quality assurance practices applies to all laboratory reagents and  
1823 consumables. For instance, preparation of reagents should follow a standardised and fully  
1824 documented methodology that lists supplier information, lot numbers of component  
1825 chemicals and reagents, dates of preparation, and the names of the staff involved in the  
1826 preparation. Substances should be tested against reagents and standards of known reactivity  
1827 before being released for use, and the results of these tests must be recorded (on, for example,  
1828 special reagent preparation forms). All prepared solutions should have unique lot numbers (a  
1829 laboratory-based system is acceptable as long as the provided numbers are actually unique).  
1830 This information log prevents duplication and should comprise lot numbers, dates,  
1831 descriptions, expiry dates, and signatures. For both reagents and reagents mixtures, the  
1832 container should be inert to the stability of the substance or mixture and clearly labelled with  
1833 the following details:

- 1834 • contents or identity
- 1835 • potency (titre, concentration, or activity, for example)
- 1836 • storage temperature
- 1837 • preparation date
- 1838 • unique lot number
- 1839 • container number (in case there are multiple containers of the same lot)
- 1840 • date first opened (as appropriate)
- 1841 • expiration date (determined by experimentation or reference to manufacturer's  
1842 recommendation)
- 1843 • signature of the person who prepared the contents.

1844 Much of this information can be recorded separately with a unique identification number log.

1845 Even when reagents are sourced from a reputable supplier, it remains important to assure the  
1846 stability of the reagents during shipment conditions, in addition to the storage. For example,

1847 reagents shipped frozen should arrive frozen and this should be documented on the receiving  
1848 document. The presence of a data logger is the best practice in these cases.

1849 Storage should be done according to the manufacturer's specifications in the supplied  
1850 certificate. Most solutions which come in a large quantity should be aliquoted, in order to  
1851 minimize the number of times a bottle is opened and thus minimize risk of contamination  
1852 (and spread of contamination). This is particularly important for solutions which require  
1853 storage below 0°C, in order to avoid repeated freeze-thaw cycles. When reagents need to be  
1854 thawed and possibly frozen again, it is recommended to determine the number of freeze-thaw  
1855 cycles that the reagents can withstand (EMEA, 2011; FDA, 2001; Viswanathan *et al.*, 2007).  
1856 Stability of aliquots should be verified in the lab performing the *in vitro* method and not rely  
1857 solely on literature data.

1858 In these cases, quality controls need to be performed according to pre-defined procedures  
1859 described in SOPs. Normally, stability of the analyte in the studied matrix is evaluated using  
1860 at least triplicate samples of the low and high concentrations, which are analysed  
1861 immediately after preparation and after the applied storage conditions that are to be  
1862 evaluated. The thawed samples are analysed against a calibration curve, obtained from  
1863 freshly prepared calibration standards, and the obtained concentrations are compared to the  
1864 nominal concentrations. The deviation should be within previously established acceptance  
1865 criteria (usually  $\pm 20\%$  for large molecules). It is absolutely necessary that the number of  
1866 cycles in the freeze/thaw stability evaluation should equal or exceed that of the freeze/thaw  
1867 cycles of study samples.

1868 When pipetting problematic volatile/viscous liquids or suspensions, it is strongly  
1869 recommended to use positive displacement pipettes. Certain chemicals may exhibit non-  
1870 specific adsorption to the plastic tips of pipettes and the use of low-binding materials  
1871 (including glass) or acoustic droplet ejection (Ekins *et al.*, 2013; Grant *et al.*, 2009) can be  
1872 utilised to alleviate these issues.

## 1873 **4.3 Basal medium**

1874 Depending on the circumstances, the basal culture medium can be serum-supplemented (as in  
1875 traditional cell culture methods) or serum-free, but supplemented with additives necessary for  
1876 obtaining satisfactory cell proliferation and production, or for maintaining a desired  
1877 differentiation status. Many slightly different formulations exist under the same general  
1878 medium names, such as Minimum Essential Medium (MEM), and even subtle changes in the  
1879 medium formulation can substantially alter the characteristics of certain cells and tissues. In  
1880 many cases, these variations are deliberate for specific applications. Therefore, the medium to  
1881 be used should be precisely specified, and it is important to check that new supplies of  
1882 medium meet the required specifications (Coecke *et al.*, 2005).

### 1883 **4.3.1 The use of serum in cell culture**

1884 The use of serum has been discouraged in recent years due to the necessity of animals to  
1885 produce it, while *in vitro* methods are mostly developed to replace animal use. Furthermore,  
1886 serum contains many undefined factors and these could change every time a new batch of  
1887 serum is ordered, even if it is from the same source. In this respect, serum starvation, use of  
1888 serum-free media and serum replacements has become standard practice in many  
1889 laboratories.

1890 Despite the availability of serum-free media and serum replacements, serum is still used in a  
1891 lot of *in vitro* development work. Animal serum can be derived from adult, new born or

1892 foetal sources. Bovine sera are most commonly used, and during the last few decades, foetal  
1893 bovine serum (FBS) has become the standard supplement for cell culture media. However,  
1894 each new batch of serum may contain different concentration of growth factors and  
1895 hormones, Therefore new batches should be tested on a relevant range of cell lines for cell  
1896 attachment, spreading, cloning efficiency, growth rates and activity in functional assays  
1897 (Geraghty *et al.*, 2014).

1898 Cell lines which have been derived or cultured in serum-containing media long-term may  
1899 become dependent on the multitude of growth factors present in serum and may experience a  
1900 phenotypic drift upon abrupt serum withdrawal. This may manifest as growth arrest or  
1901 activation/inactivation of various signalling pathways. Serum can also be used to mimic the  
1902 protein binding occurring in the blood *in vivo*, but this is a process for which specific  
1903 attention and calculation should be taken into account. Specific test item aspects need  
1904 consideration in choosing to work with serum: 1) If the test item is known to bind to protein,  
1905 its effect might not be seen unless a very high concentration of test item is used (see section  
1906 6.3 on biokinetic parameters); 2) If the test item antagonises an endogenous circulating  
1907 hormone or factor, the serum might contain such hormone or factor and may thus affect the  
1908 assay results.

1909 Test developers determine serum specifications that meet their particular needs (e.g. to allow  
1910 the cells to function like in the *in vivo* situation, as much as possible, to enhance test result  
1911 utility) and match the natural behaviour of the cells as much as possible, including the  
1912 maximum acceptable levels of serum components, such as immunoglobulins (which may  
1913 have inhibitory effects), endotoxins (indicative of bacterial contamination, but are also  
1914 powerful cell mitogens), and haemoglobin (indicative of haemolysis during clotting).

1915 Animal sera are a potential source of microbiological contaminants, notably mycoplasma,  
1916 bovine viruses, and possibly the agent which causes Bovine Spongiform Encephalopathy  
1917 (BSE). Consideration should be given to impact of contamination with the most common  
1918 viruses in bovine herds such as BVDV and BPV agents (WHO 2010). Suppliers use a variety  
1919 of techniques, including filtration, irradiation and heat-inactivation, to reduce microbial  
1920 contamination. Nevertheless, it is wise, and for some applications, obligatory, to specify  
1921 sourcing of serum from countries where there is a low risk of infection, and, in the case of  
1922 bovine sera, from not too old animals to reduce any potential risks (Festen 2007). The use of  
1923 human serum is restricted to specialised applications as it carries additional risks, such as the  
1924 potential presence of human pathogenic viruses. Its use must be subject to the strictest quality  
1925 controls, including documentation to demonstrate origin and viral safety (Coecke *et al.*,  
1926 2005).

1927 Variability between serum batches can lead to experimental variability and reduce inter-  
1928 laboratory reproducibility, representing a major cost associated with cell culture (Usta *et al.*,  
1929 2014). Notably, the use of serum can possibly lead to unexpected or undesired outcomes. In  
1930 this regard, a study has shown that serum can inhibit transforming growth factor (TGF)- $\beta$ 1-  
1931 induced chondrogenesis in fibroblast-like type-B synoviocytes (Bilgen *et al.*, 2007). In  
1932 another study, FBS, compared to autologous (human) serum, was found to induce a more  
1933 differentiated and less stable transcriptional profile in human bone marrow mesenchymal  
1934 stem cells, particularly at late passages, as shown by analysis of genome-wide microarray  
1935 analysis (Shahdadfar *et al.*, 2005).

1936 Moreover, EU legislation, through the Directive 2010/63/EU on protection of animals used  
1937 for scientific purposes, offers a certain amount of protection for foetal forms of mammals.  
1938 Considering that blood harvesting from foetal calves can cause pain and distress in these  
1939 animals, as previously reported (Jochems *et al.*, n.d.; van der Valk *et al.*, 2004), and

1940 considering Articles 1 and 3 of the Directive, harvesting of FBS from live bovine fetuses in  
1941 the last third of their development for scientific purposes is a procedure under the Directive.

1942 In 2008 the ECVAM Scientific Advisory Committee (ESAC) stated that "*for methods*  
1943 *forwarded to ECVAM for validation/prevalidation where [the use of non-animal alternatives*  
1944 *to serum] is not fulfilled a justification for future use must be provided, including measures*  
1945 *taken to seek non-animal alternatives to [FBS]*" (ESAC, 2008) The drawbacks of using FBS  
1946 and recommendation to replace it with available chemically defined serum free media is also  
1947 mentioned in the 2005 GCCP guidance issued by EURL ECVAM (Coecke *et al.*, 2005).

1948 Additionally, FBS is a by-product of the meat industry and for this reason is dependent on  
1949 several external and generally unpredictable factors, such as weather conditions (e.g.,  
1950 changes of climate with drought or flood) or variations in beef consumption (e.g., switch to  
1951 poultry). All these factors may make FBS supply unpredictable (Brindley *et al.*, 2012).

1952 For all these reasons, serum-free media, (animal) protein-free media and chemically-defined  
1953 media has gained interest over the years in order to avoid many of the disadvantages  
1954 associated with the use of serum, as recently commented (Pamies *et al.*, 2016).

#### 1955 **4.3.2 Serum-free media and serum replacements**

1956 Serum-free media are thought to circumvent the batch-to-batch variability issues associated  
1957 with serum and offer better reproducibility and the potential for selective culture and  
1958 differentiation of specific cell types (Geraghty *et al.*, 2014). Nevertheless, serum-free  
1959 compositions may still need to be validated and monitored similarly to serum containing  
1960 media as they are often not completely chemically defined. For instance, serum free media  
1961 can include other poorly defined supplements such as pituitary extracts, chick embryo  
1962 extracts, bovine milk fractions or bovine colostrum. Furthermore, some so-called 'defined'  
1963 media contain complex serum replacement mixtures including chemically undefined agents.  
1964 Notably B27 and its alternative NS21 used in the culture of neural cells contain bovine serum  
1965 albumin and transferrin which can exhibit batch-to-batch variation in biological activity  
1966 (Chen *et al.*, 2008). Therefore, it may be useful to carry out pre-use testing on new batches of  
1967 reagents which could demonstrate variability that cannot be foreseen from manufacturers'  
1968 information. Another example of an essential component prone to batch-to-batch variability  
1969 is the so-called 'basement membrane extract', purified from Engelbreth-Holm-Swarm (EHS)  
1970 mouse sarcoma cells and marketed under various trade names.

1971 Serum-free medium formulations play a critical role for the culture of stem cells, such as  
1972 human embryonic stem cells (hESCs) and human induced pluripotent stem cells (hiPSCs),  
1973 which currently hold great promise for toxicology and regulatory testing and biomedical  
1974 research. Both hESCs and hiPSCs are often maintained on inactivated mouse or human  
1975 embryonic fibroblasts or under feeder-free conditions (using extracellular matrices) in  
1976 chemically defined, serum-free media, in order to avoid the presence of undefined or  
1977 unknown serum components (which may compromise the differentiation towards desired cell  
1978 lineages) and the risk of contaminations from pathogens (e.g., mycoplasma, viruses, and  
1979 prions) (Pistollato *et al.*, 2012; Yamasaki *et al.*, 2014).

#### 1980 **4.4 The use of antibiotics in cell culture**

1981 Routine culture of cell lines under GCCP (Coecke *et al.*, 2005; Geraghty *et al.*, 2014; Stacey  
1982 and Davis, 2007) should not require the use of antibiotics and it can never be relied on as a  
1983 substitute for effective aseptic techniques. However, its use is still widespread due to  
1984 established routine procedures in many laboratories. Antibiotics are agents that may arrest or

1985 disrupt fundamental aspects of cell biology, and, while they are effective against prokaryotic  
1986 cells (i.e. bacteria), they are also capable of causing toxic effects in animal cells. Not  
1987 surprisingly, antifungal agents, being directed at higher order, eukaryotic micro-organisms,  
1988 are likely to be more toxic to animal cell cultures. Given these obvious contra-indications, the  
1989 use of antibiotics in cell and tissue culture should be focused in two areas: a) protection of  
1990 materials at high risk of contamination such as tissues, organs and primary cultures in cases  
1991 where sterility cannot be guaranteed; and b) the positive selection of recombinant cell clones  
1992 based on the expression of antibiotic resistance genes (Coecke *et al.*, 2005).

#### 1993 **4.5 Additional media components**

1994 Some media components are heat labile (e.g., L-glutamine), sensitive to light (e.g., retinoic  
1995 acid) or have a limited half-life in diluted state or at high ionic strength, such as in prepared  
1996 media (e.g., epidermal and fibroblast growth factors). These issues are best addressed by  
1997 preparing a small volume of media necessary to cover the period of stability of the most  
1998 sensitive component and discarding bottles after a set time period. Appropriate size aliquots  
1999 of those labile components may be frozen by an appropriate method for long-term storage. In  
2000 this respect, stock solutions with low concentrations of protein aqueous growth factors may  
2001 require the addition of albumin or other excipients, to prevent adsorption to plastic and to  
2002 increase stability in the frozen state. Stabilised forms of glutamine and retinoic acid are also  
2003 available to avoid these issues.

2004 In case culture media or other reagents have to be sterilised via heat or filtration, the impact  
2005 of the procedure should be assessed and recorded. For example, heat sterilisation may result  
2006 in degradation (or denaturation) of one or more of the components and filtration can remove  
2007 individual and/or essential components (e.g. Fe<sup>2+</sup> or Fe<sup>3+</sup> iron products that enhance growth  
2008 of mammalian eucaryotic cells in serum-free cultures).

#### 2009 **4.6 Dedicated media to particular cell lines**

2010 Different cell types or tissues need to be cultured in culture media containing various  
2011 components at different concentrations to allow optimal growth. Although certain cell lines  
2012 may be grown in media with the same composition, sharing media increases the risk of cross-  
2013 contamination. Therefore, each cell line should be cultured with separate dedicated media,  
2014 which must not be shared with other cell lines.

## 2015 5 Test Systems

2016 *In vitro* method cell and culture-based test systems are routinely used by all industries and  
2017 regulatory bodies in toxicity testing, safety assessment, and risk evaluation. The greatest use  
2018 of *in vitro* test systems, however, is for elucidating mechanisms of toxicity and/or  
2019 demonstrating the biological process involved, when exposing test systems to toxicants of  
2020 various kinds. With the advances in genetics and genetic screening approaches, routine *in*  
2021 *vitro* methods include already the use of either genetically altered cells, stem cells, stem-cell-  
2022 derived models and organ-on-chip models and other complex and sophisticated systems.

### 2023 5.1 GCCP

2024 Good Cell Culture Practice identifies a set of core principles of best practice for working with  
2025 simple but also with more complex cell and tissue culture systems (Annex 1 and Annex 2).  
2026 Failure to comply with GCCP can have serious consequences for individual researchers and  
2027 their employers, which include invalidation of important data sets, ethically compromised  
2028 research, loss of crucial cultures due to microbiological contamination, failed patent  
2029 applications and injury or infection amongst laboratory workers. These could clearly have  
2030 serious consequences for the institutions involved, including the threat to scientific  
2031 reputation, legal and regulatory compliance and cost of wasted resources.

2032 The principles of the first version of GCCP published in 2005 (Coecke *et al.*, 2005) remain  
2033 highly relevant to cell culture practice for *in vitro* methods today (see Annex 1), and aims at a  
2034 far broader set of applications, including research, manufacture of medicines, and laboratory  
2035 based GLP testing. In providing the detailed and specific principles of best practice for the  
2036 handling and management of cell cultures systems, GCCP is a vital component of GIVIMP.

2037 A new and updated version of GCCP called “GCCP2.0” is under development through  
2038 collaboration between European, Japanese and North American experts and incorporates  
2039 more recent developments in cell culture, and in particular addresses the new technological  
2040 developments of human pluripotent stem cell lines and complex 3D culture systems. During a  
2041 workshop in 2015 (see Annex 2) new key elements for GCCP 2.0 were identified.

### 2042 5.2 Cell and tissue sourcing

2043 Complex biological substrates such as cell and tissue cultures may have passed through a  
2044 number of stages of development before they are qualified for an *in vitro* method and it is  
2045 important that this track is documented, thus assuring traceability to original source materials,  
2046 source cell banks, absence of contamination by major classes of biological agents (e.g.  
2047 mycoplasma, bacteria, fungi and cytopathic viruses), genetic identity/consistency and  
2048 stability of desired functionality. See Annex 1, GCCP principle 3 and [Table 1](#) in  
2049 section 1.2 for examples of document requirements concerning the origins of cells and tissues  
2050 and see paragraph 5.5 below.

2051 Proposed sources of test systems should be qualified by the user to assure they are  
2052 appropriately traceable, have been quality controlled for key features (see paragraph 5.7  
2053 below) and in addition, the user should check that there is solid ethical provenance (e.g.  
2054 hPSCreg registry<sup>16</sup>) and safety assessment for the cells. In addition, intellectual property

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<sup>16</sup> <http://www.hpscereg.eu/>

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2055 should be checked to ensure it does not impact on the use of the cell line and data. For more  
2056 detailed information on these issues see (Stacey *et al.*, 2016).

2057 In the case of human tissues and primary cells, there will also be a requirement to assure  
2058 donor consent and to manage sensitive personal data e.g. according to the EU Data Protection  
2059 Directive. Human tissue is precious and difficult to secure. The broad range of issues in  
2060 securing tissues for testing were addressed at the 32<sup>nd</sup> Workshop of the European Centre for  
2061 Validation of Alternative Methods (Anderson *et al.*, 1998) and where tissues cannot be  
2062 sourced via a qualified tissue bank, there should be an agreed testing method in place with  
2063 clinical contacts regarding all aspects of harvesting, preparation, labelling, storage and  
2064 transfer (for an example see (Stacey and Hartung, 2006)). It is also important to assess the  
2065 risks of viral contamination of primary cells and tissues. Approaches to risk assessment are  
2066 described in (Stacey and Hartung, 2006). Tissues should be obtained from tissue banks  
2067 holding only materials from screened donors and this will significantly assist in managing  
2068 viral safety issues.

2069 Availability of cell lines from a certified source (established cell banks with a high quality  
2070 standard; reputable culture collections, commercial provider), that usually provide extensive  
2071 documentation on the origins and characterisation of the test system, should be assured<sup>17</sup>.  
2072 Moreover (or alternatively), master and working cell banks should be established to  
2073 guarantee a cell supply of constant quality and records kept of the original source.

2074 If test systems used in *in vitro* studies are genetically modified the Directive 2009/41/EC  
2075 (EU, 2009) is applicable. This Directive lays down common measures for the contained use  
2076 of genetically modified micro-organisms (GMMs), aimed at protecting human health and the  
2077 environment. A notification has to be sent to the competent authorities before any use  
2078 commences in the premises. A risk assessment of the GMMs used has to be performed. The  
2079 Annexes to the Directive detail the criteria for assessing the risks of GMMs to health and the  
2080 environment, as well as the protective measures for each of the four levels of containment.  
2081 The Directive lays down the minimal standards applicable to the contained use of GMMs.  
2082 Individual European member States are also permitted to take more stringent measures.

### 2083 **5.3 Handling and maintenance of the test system**

2084 During routine handling and maintenance, growth and survival characteristics of the cell  
2085 system (such as cell viability, doubling time, etc.) and subculturing details (e.g. date of  
2086 subculture, subculture intervals, seeding density, passage number, etc.) should be recorded  
2087 and documented in the study report, since they are required for the complete traceability of  
2088 results. The documentation provided by the test system supplier should be taken into account  
2089 together with the historical data, when available, and used to establish acceptance criteria.  
2090 See [Table 1](#) for examples of document requirements concerning the handling,  
2091 maintenance and storage of cells and tissues.

2092 Different cell lines have different growth rates which may depend on several environmental  
2093 factors. Whether cells grow and divide in a monolayer or in suspension, they usually follow  
2094 the same characteristic growth pattern in which four different phases can be recognized: lag,  
2095 log (or exponential), stationary (or plateau) and decline. Growth during exponential growth  
2096 or log phase is usually fairly constant and reproducible for a given set of growth conditions  
2097 (ATCC, 2014). Each cell line will show different cell proliferation kinetics during the log

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<sup>17</sup> [http://wiki.toxbank.net/w/images/1/18/ToxBank\\_D4\\_6\\_final\\_10\\_04\\_13.pdf](http://wiki.toxbank.net/w/images/1/18/ToxBank_D4_6_final_10_04_13.pdf)

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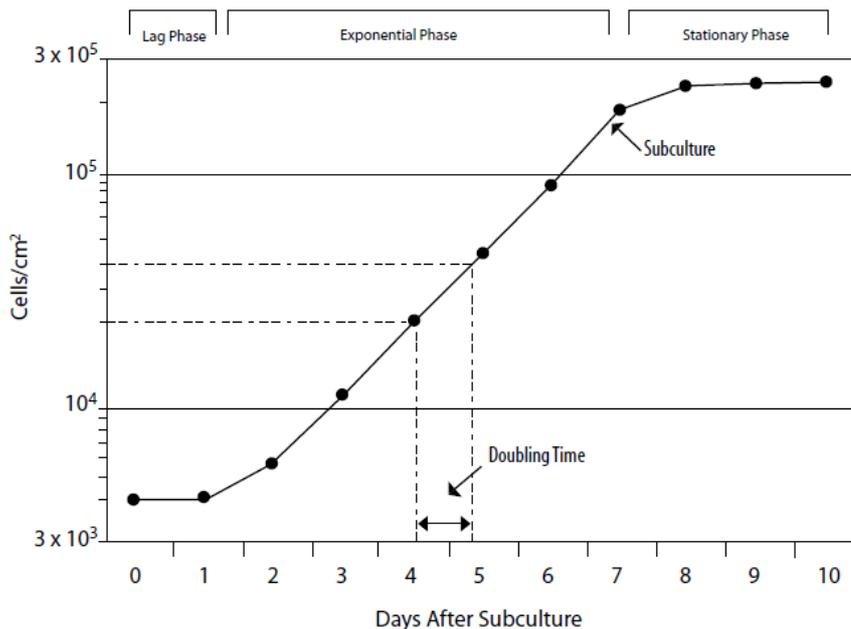
2098 phase and it is therefore the optimal phase for determining the population doubling time  
2099 (ECACC, 2010).

2100 Many dividing primary human cell cultures have a split ratio of one in two (1:2), while  
2101 continuous cell lines have much higher splitting rates. In order to ensure viability, genetic  
2102 stability, and phenotypic stability, cell lines need to be maintained in the exponential phase,  
2103 i.e. they need to be subcultured before a monolayer becomes 100% confluent or before a  
2104 suspension reaches its maximum recommended cell density.

2105 Many cell lines can be subcultured based on a rough estimate of cell density, and this is the  
2106 usual practice unless stated otherwise in the cell maintenance protocol. Some cell lines  
2107 require a fixed seeding density and subculturing scheme and counting the number of cells is  
2108 required (Wilson *et al.*, 2015). Most commonly cell counting is performed using the Bürker  
2109 Türk or Neubauer counting chambers. When automated cell counters are used, their correct  
2110 functioning would need to be demonstrated (Cadena-Herrera *et al.*, 2015; Gunetti *et al.*,  
2111 2012; Phelan and Lawler, 2001).

2112

2113 **Figure 3: Growth curve for cells grown in culture. Cells should be subcultured while still**  
2114 **in the exponential phase (ATCC, 2014)**



2115

2116

2117 Each test facility should develop SOPs, where details are provided about how to thaw,  
2118 handle, count, maintain and store cell lines. For example, the procedure to univocally assign  
2119 progressive passage numbers as well as the selected assay(s) to determine the cell stock  
2120 viability should be established.

## 2121 5.4 Cryopreservation

2122 Improved technologies that allow cryopreservation of *in vitro* cell and tissue cultures at  
2123 different stages of differentiation, and their long-term storage has introduced new or more  
2124 standardised *in vitro* test system into the pipeline of potential *in vitro* methods to be used in  
2125 human safety assessment. Controlled-rate and slow freezing, also known as slow  
2126 programmable freezing have been used all over the world for freezing down cell and tissue  
2127 cultures to better preserve it for eventual thawing, before it is frozen, or cryopreserved, in  
2128 liquid nitrogen. New methods are constantly being investigated due to the inherent toxicity of  
2129 many cryoprotectants.

2130 As described in GCCP Principle 1 'Establishment and maintenance of a sufficient  
2131 understanding of the *in vitro* system and of the relevant factors which could affect it'  
2132 (Coecke *et al.*, 2005) it is important to prepare preserved banks of cells intended for use, to  
2133 assure that reliable stocks can be obtained for testing, which are at a consistent passage level  
2134 from the original 'seed stock'. This is in order to avoid the effects of changes or cross-  
2135 contamination which may occur if cell lines are maintained indefinitely. Standard  
2136 cryopreservation methods using DMSO (10%) and serum (20%) as cryoprotectants,  
2137 combined with a slow cooling rate (e.g. -1°C/min), will usually be successful for most cell  
2138 lines. However, it is important to check the viability of preserved stocks in case of freezing  
2139 failure and also to try to assure consistency between individual vials in a cell bank regarding  
2140 cell number, viability and desired functionality. It is important to note that viability  
2141 measurements made immediately post-thaw can give misleadingly high values as many cells  
2142 can be lost during the 24 h recovery phase post thawing. Therefore, it may be important to  
2143 understand what losses occur at this stage.

## 2144 5.5 Cell line identity and genetic aberrations

2145 Ideally, there should be traceability to the original provider of the cell line and the related  
2146 documentation. However, a frequent problem in the use of cell culture is the use of cell lines  
2147 which have become cross-contaminated, misidentified (see ICCLAC database of cross  
2148 contaminated or misidentified cell lines<sup>18</sup>), mixed-up, or underwent genomic instability  
2149 (Allen *et al.*, 2016; Fratini *et al.*, 2015; Kleensang *et al.*, 2016; Vogel, 2010). This is not  
2150 always detectable by cell morphology only. Establishing an early stock (or retention of a  
2151 sample of original tissue) which is DNA fingerprinted will provide an important reference for  
2152 future cell banks and for other centres. Short Tandem Repeat (STR) profiling is typically  
2153 applied and has considerable background qualification for use in human samples (ISCBI,  
2154 2009). STR analysis can be performed in most laboratories that have the capabilities to  
2155 execute molecular techniques. It is an easy, low cost and reliable method for the  
2156 authentication of human cell lines. An ANSI US standard exists for this technique with cell  
2157 lines. For non-human samples, STR methods might be available but may need to be qualified  
2158 for specificity to individual cell lines (ASN-0002: Authentication of Human Cell Lines:  
2159 Standardization of STR Profiling can be found at <http://webstore.ansi.org>). Other techniques  
2160 have also been used including isoenzyme analysis but probably the most common and well-  
2161 qualified technique is cytochrome oxidase gene sequencing (Ono *et al.*, 2007). However, the  
2162 field of genetic analysis is progressing rapidly and interested parties should maintain  
2163 knowledge of current best scientific practice in this area as next generation sequencing begins  
2164 to become a routine tool.

<sup>18</sup> <http://icclac.org/databases/cross-contaminations/>

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2165 Genetic instability is inherent in cell cultures and it is wise to minimise the number of  
2166 passages over which cells are maintained (typically p15-20). Although passage number alone  
2167 is not a reliable parameter to ensure good cell functioning, it is good practice to define a limit  
2168 for the maximum number of passages, possibly in combination with defined performance  
2169 characteristics. At that limit, new cultures should be restarted from a working cell bank. The  
2170 use of cells at higher passage numbers must be justified and their integrity and functionality  
2171 demonstrated. Cultures at passage numbers beyond which it is known that the cell line  
2172 functionality is maintained should not be permitted for use. Where cells are known to be  
2173 extremely unstable, some form of genetic testing, such as karyology or molecular analysis  
2174 like single nucleotide polymorphism arrays (aSNP) or comparative genomic hybridisation  
2175 (aCGH) may need to be performed. In particular, this applies to recombinant cell lines  
2176 including those maintained with antibiotic selection.

2177 There are special issues for stem cells. Stem cell lines may contain a mixture of diploid and  
2178 aneuploid cells, which may be unavoidable, but genetic testing (see above) can be used to  
2179 screen for progressive change (e.g. between master and working cell banks) which could  
2180 impact on the suitability of the cell culture. Human iPSC lines should also be tested for  
2181 absence of ectopic expression of reprogramming genes and where produced by non-  
2182 integrating vectors, for elimination of the vector.

## 2183 **5.6 Contaminants screening: sterility, mycoplasma, virus**

2184 Standard sterility tests are published and may be used for cell stocks and cultures. However,  
2185 it is important to bear in mind that these are usually based on inoculation of broth cultures  
2186 which may not support the growth of all contaminating micro-organisms. Alternative  
2187 molecular methods such as identification by PCR and DNA sequencing of ribosomal RNA  
2188 may be used.

2189 It is absolutely mandatory to quarantine (see 3.5) and to confirm to be negative for  
2190 mycoplasma and free of bacteria, yeast and fungi of all cultures passaged in a particular  
2191 laboratory environment.

2192 Viruses may arise as contaminants of cell cultures via the original donor used to produce the  
2193 cell line or feeder cells and other biological reagents used in cell culture. They may cause  
2194 cytopathic effects, in which case the culture should be discarded, or they may have no effect  
2195 and become diluted out when fresh uncontaminated reagents are used. In certain cases they  
2196 may establish persistent infections, although this is believed to be rare. Whatever the  
2197 outcome, their presence and influence on cell biology may be significant as amongst other  
2198 effects they may modify transcription factor networks and alter the cells' biology. To assure  
2199 lab worker safety, some organisations require testing of all human cell lines for serious  
2200 human pathogens such as human immunodeficiency virus (HIV) and Hepatitis B&C or  
2201 evidence that the donors did not have these pathogens. However, such testing clearly does not  
2202 cover more common human infections, and human pathogens may also be carried by cells  
2203 from other species. Cell cultures should therefore always be handled and disposed of as if  
2204 they are potentially infectious (Stacey, (2007) chapter 31: Risk assessment of animal cell  
2205 cultures, In : Medicines from Animal Cells (Stacey and Davis, 2007). Cell line testing may  
2206 be initiated if there are special hazards associated with the work or with the cells. Workers  
2207 should always follow local rules for performing cell culture work, maintain their competence  
2208 in aseptic processing, as well as carry out regular and careful inspection of cells for any  
2209 unusual effects or morphologies that might indicate infection. It is an important part of a  
2210 robust testing regime for contamination to have a procedure for managing positive results,

2211 whether this means immediate discard or quarantine until a means of action can be decided  
 2212 along with detection of the root cause supplementary testing (Stacey, 2011).

2213 **5.7 Quality Control**

2214 It is important that certain key go/no-go points are established during the preparation and use  
 2215 of the test system for an *in vitro* method.

2216 Typically, for use of cell lines, appropriate integrity checks should be applied at the sourcing  
 2217 of new cell lines or cell bank preparation, to assure stable passage and expansion for use and  
 2218 reproducible starting cells used to provide the test substrate, and, finally, to ensure acceptable  
 2219 and reproducible performance against controls in formal tests. [Table 4](#) shows an  
 2220 example of measures at different stages.

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2222 **Table 4: Applicability of Integrity Checks on Cultures**

Characteristic	Source *	Early stocks of preserved vials**	Cell banks***	Routine in process testing of stock cultures****
Morphology	X	X	X	X
Viability	X	X	X	X*****
Identity	X	X	X	
Doubling time	X	X	X	X*****
Mycoplasma	X	X	X	X
Viruses	(X donor)		(X master bank)	
Bacteria and Fungi			X	X*****
Function/phenotype		X	X	
Genetic stability			X	(X)
Absence of reprogramming vectors (iPSC lines)		X	X	

2223 \*This may be provided in writing but ideally with evidence of test results or a qualified service provider test  
 2224 result. These tests should also be performed on the cells arriving in the lab as soon as samples can be obtained.

2225 \*\* A small number of vials frozen as soon after arrival of a new culture to avoid loss in case of a lab accident.

2226 \*\*\*Ideally master and working banks should be established (Coecke *et al.*, 2005) but testing may be focused on  
 2227 the master stock with more routine checks applied to working cell banks e.g. mycoplasma and viability.

2228 \*\*\*\*Stock cultures of cell lines maintained for use in *in vitro* methods should be tested routinely e.g. all lines in  
 2229 culture tested once per month.

2230 \*\*\*\*\*Viability testing at passage will also be helpful to ensure consistent seeding of fresh cultures and assays  
 2231 for more reliable maintenance of stock cultures and reproducibility of cell-based *in vitro* methods. For this, the  
 2232 assays described under 6.2.1.1 can be applied.

2233 \*\*\*\*\*For diploid cultures, passage number is roughly equal to the number of population doublings (or  
 2234 population doubling level) since the culture was started (ATCC, 2014).

2235 \*\*\*\*\*To avoid development of low grade contamination, sterility testing may be desirable for long term  
2236 cultures. These may also be sustained as separate replicate sets of flasks to provide backup cultures in case of  
2237 contamination.

2238 Where primary cell cultures and tissues are used, variation in properties between individual  
2239 donors must be considered, and each new batch should be qualified or controlled for key  
2240 functionality. Special care should be taken to note any unusual observations in case of  
2241 contamination or viral cytopathic effects or transformation, and all primary cell cultures  
2242 should ideally be cryopreserved and screened for mycoplasma. Human and animal tissues  
2243 and primary cells used for testing will also need to be appropriately documented, As part of  
2244 QC for tissues, their differentiated state should also be documented, which may require a  
2245 range of assays, which may include, morphology, histochemistry, cell markers, specific tissue  
2246 function and cell-cell/matrix interactions (Stacey and Hartung, 2006). For primary cells  
2247 prepared from tissues stored as banks of cryopreserved vials of cells, similar QC approaches  
2248 can be used as adopted for banks of continuous cell lines (see [Table 4](#)Table 4).

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## 2249 **5.8 Biomarkers and functional tests to confirm the required cell function state**

2250 It is important to recognise that cell quality can vary during passaging, and in particular the  
2251 time point in the growth curve at which cells are harvested may affect performance. In  
2252 general, cells are best harvested in the logarithmic phase of growth. Accordingly, each culture  
2253 used to set up an *in vitro* method should be subject to a key control regime measuring or  
2254 indicating functionality. Acceptability criteria should be defined for functional tests and  
2255 biomarkers that indicate the correct cell state. These may for example include: neuronal  
2256 activity, competency of biochemical transformation, response to reference bioactive  
2257 compounds, response to reference items in the particular *in vitro* method the cells are to be  
2258 used for etc. In this way, each culture can be controlled, and consistency in *in vitro* methods  
2259 is supported. Additionally, key markers which are associated with poor performance may be  
2260 identified for future improvement. For example, expression of self-renewal genes (e.g. Oct4,  
2261 Nanog, Sox2) in stem cell cultures is crucial to the functionality of the cell population  
2262 (further examples for stem cells are laid out in Pistollato *et al.*, 2014 and Stacey *et al.*, in  
2263 press).

## 2264 **5.9 Special issues for microbial strains**

2265 Microbial strains are used in many *in vitro* methods, and all the generic aspects for *in vitro*  
2266 methods given here are also applicable. However, there may be special requirements needed  
2267 to be applied to assure selection of certain mutant or recombinant strains (as for some  
2268 recombinant cell lines). Moreover, functional tests (biochemical, cell biological, etc.) may  
2269 need to be necessary to assure correct identity of each species and/or strain. Preservation of  
2270 cultures is usually achieved by freeze-drying, for which storage conditions and their stability  
2271 may vary for different organisms. Some strains may require cryopreservation and/or more  
2272 careful testing for genetic integrity (including maintenance of plasmids) and relevant function  
2273 (e.g. sensitivity to UV-light or antibiotic resistance) on recovery.

## 2274 **5.10 Qualification of reference strains**

2275 Where a common cell line or organism is recommended for a particular *in vitro* method it  
2276 may be available from numerous sources. The selected cell line should be qualified for use in  
2277 a way which can assure consistent function in the method. The idea of reference cell banks to  
2278 act as central sources for all users of cell substrates has been developed by WHO (WHO,  
2279 2010) and formal or regulatory *in vitro* methods may quote catalogue references from culture

2280 collections for both microorganisms and cell lines. However, culture collections may not  
2281 necessarily check the performance of such strains using reference testing methods and as  
2282 such, this still will need to be conducted by the *in vitro* method developer or user. If an  
2283 original and quality controlled source of a cell line is not available, it is wise to obtain cells  
2284 from more than one source in order to compare their performance and authenticity, as cross  
2285 contamination of cell lines is very common. Moreover, cell lines with different histories of  
2286 use in test facilities have shown to result in different phenotypic characteristics.

DRAFT

## 2287 **6 Test and reference items**

2288 This chapter describes the characterisation and preparation of the test item (e.g. a chemical to  
2289 be characterized for potential hazard) and of relevant reference items for the *in vitro* test.  
2290 Furthermore, details will be given as to how test item stability must be monitored, how the *in*  
2291 *vitro* test environment can affect the test item and how the biokinetics of the test item in the  
2292 *in vitro* method should thus be assessed. These aspects are important to ensure reproducibility  
2293 among laboratories and certainty that the outcome of the *in vitro* test is indeed related to the  
2294 test item. Additionally, it is described which control and additional items should be applied in  
2295 general to verify correct function of the *in vitro* test, such as negative and positive controls  
2296 (OECD, 2004c).

2297 A distinction is made between aspects that are important in the development phase of an *in*  
2298 *vitro* method, and those that matter when the *in vitro* method is used routinely for regulatory  
2299 purposes. For instance, the use of test and control items may differ between test development  
2300 and routine use.

2301 The stability of the test item (or its representative preparation) and whether it is in contact  
2302 with the reactive part of the test system in a known or assessable concentration should be  
2303 determined when applying the *in vitro* method, in order to collect robust data from the *in*  
2304 *vitro* method.

### 2305 **6.1 Test item**

#### 2306 **6.1.1 Considerations during the development of the method**

2307 Test items are not used in the phase of *in vitro* method development, i.e. before the method  
2308 performance has been validated. During the phase of test development, chemicals or products  
2309 with well-known characteristics are evaluated to assess the relevance of the method and to  
2310 amass results which will be used to set the acceptance criteria (see 6.4). Nevertheless, during  
2311 the development phase, it is important to determine:

- 2312 • The different natures of test items for which the method is intended (define if the *in*  
2313 *vitro* method can be used for liquids, solids, certain powders, mixtures, multi-  
2314 component test chemicals, certain preparations, suspensions, nanoparticles,  
2315 emulsions, etc. (OECD, 2000)). Moreover, the process of preparation of these test  
2316 items should be explored.
- 2317 • The process of preparation of the test item, if needed before the test.
- 2318 • Which chemicals are suitable as reference and control items.

##### 2319 **6.1.1.1 Nature of test items for which the method is suitable**

2320 The nature of the substances for which the developed *in vitro* method is suitable for may be  
2321 characterised, but not necessarily limited to, by describing it by using a number of different  
2322 properties (see below). The list given below is not exhaustive and may need to be developed  
2323 depending on the nature of the test. It is important to note that solubility is a highly important  
2324 yet often neglected characteristic and is therefore described in more detail in a separate  
2325 section (6.1.1.2):

- 2326 • State: solid, liquid, gas and all in between-states such as aerosol, dust, or viscous liquid  
2327 (see OECD TG 114 for determination of the viscosity of liquids); depending on its state,  
2328 the substance could require preparation steps before the test (see also [6.1.1.36-1.1.3](#)) or a  
2329 specific administration mode in the method, such as dry dispersion with pressurised air,  
2330 nebulisation of a liquid formulation, or spark generation.

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- 2331 • Appearance: nominal size, morphology, size distribution, aggregation and agglomeration  
 2332 phenomena and surface characteristics (surface area, surface charge, surface chemistry)  
 2333 are essential characteristics to know the nature of a certain nanomaterial (OECD series  
 2334 on the Safety of Manufactured Nanomaterials, n°36).
- 2335 • Colour: some test items interfere due to this characteristic with the endpoint detection  
 2336 method.
- 2337 • Physicochemical characteristics:
- 2338 - pH for test item in solution (see OECD TG 122 for pH determination) and pK<sub>a</sub> (pKa  
 2339 indicates to what extent the test item may become ionised at the pH of the test  
 2340 system). Changes of pH can also affect the test item in other ways than its ionisation  
 2341 (see OECD TG 111 for sensitivity of hydrolysis to the pH, for example).
  - 2342 - Osmolality
  - 2343 - Volatility
  - 2344 - Solubility: see 6.1.1.2
  - 2345 - Dissociation constants in water (see OECD TG 112): dissociation is the reversible  
 2346 splitting into two or more species which may be ionic. The dissociation governs the  
 2347 form of the substance in the test system, which in turn determines its behaviour and  
 2348 transport and which thus may affect the adsorption of the substance to culture dishes  
 2349 or the penetration into cells or adsorption onto proteins in solution or resulting in a  
 2350 aspecific aggregation behaviour.
  - 2351 - Lipophilicity (see OECD TG 123 and 107 for determination of the partition  
 2352 coefficient = K<sub>ow</sub>).
  - 2353 - Homogeneity and conditions of stable homogeneity
  - 2354 - Sensitivity to photolysis (OECD TG 316 is meant for environmental fate, thus less  
 2355 suitable for this purpose, but can be used as a basis)
    - 2356 • Composition and purity: chemical purity/contaminants, microbiological  
 2357 contaminants (including e.g. cell walls of decomposed microorganisms),  
 2358 biological purity (e.g. of cells lines or test microorganisms, or complex  
 2359 protein mixtures (vaccines)), composition of complexes (vegetal extracts,  
 2360 products of fermentation, etc.). In case of a mixed solution, the list of  
 2361 ingredients with percentages of each component can be relevant to  
 2362 describe the composition. For each component, information like molecular  
 2363 weight, chemical formula, CAS number, etc., is useful. Complex  
 2364 substances could require different information. For example, substances of  
 2365 Unknown or Variable composition, Complex reaction products or  
 2366 Biological materials (UVCBs) cannot be sufficiently identified by their  
 2367 chemical composition, because the number of constituents is relatively  
 2368 large and/or the composition is, to a significant part, unknown and/or the  
 2369 variability of composition is relatively large or poorly predictable. The  
 2370 composition could then be defined by the manufacturing process  
 2371 description<sup>19</sup>.
  - 2372 • Conditions of stability: the limits of temperature, pressure, and humidity to maintain  
 2373 stability of the test item (to be compared with the *in vitro* method conditions).
  - 2374 • Microbiological status: requiring aseptic conditions or not.
- 2375  
 2376 In general, the limits on test item suitability are determined so that reproducible and definable  
 2377 interactions between test item and test system can be guaranteed (see chapter 6.2).

<sup>19</sup> [https://echa.europa.eu/documents/10162/13587/10\\_sb\\_siduvcb\\_d1\\_lrws\\_20120203\\_en.pdf](https://echa.europa.eu/documents/10162/13587/10_sb_siduvcb_d1_lrws_20120203_en.pdf)

### 2378 6.1.1.2 Solubility

2379 The solubility defines how much of the test item (molecular and ionized forms) that can be  
2380 maximally dispersed in the solvent to be used for the test (=thermodynamic solubility). The  
2381 rate of dissolution (in practical terms: fraction of dissolved test item after a fixed time) is  
2382 called kinetic solubility (Jouyban and Fakhree, 2012). This section is focused on  
2383 thermodynamic solubility.

2384 The reason why solubility is an important property to know of a test item is that, above this  
2385 limit, the substance precipitates and the effective concentration in the test medium is lower  
2386 than the nominal concentration. Precipitates may also affect read-outs of the *in vitro* method  
2387 and lead to impaired reproducibility within and between labs. It is thus important to ensure  
2388 that all test items are properly dissolved for use in the *in vitro* method. The highest test  
2389 concentration has to be below the solubility limit.

2390 Different ways to determine the solubility of a substance in a defined solvent are available.  
2391 While computational methods for solubility predictions in different types of solvent or  
2392 matrices are available (Bergström et al., 2002; Persson et al., 2013), it remains difficult to  
2393 predict the solubility in the medium used for the *in vitro* method. Most frequently, solubility  
2394 of a compound is determined visually, by determining whether a clear solution is formed  
2395 after adding the substance of interest. However, while the visual test is very simple to apply,  
2396 it gives only a rough impression of the solubility. In most cases however, it is sufficient for  
2397 simple checking of solubility where reliability can be enhanced by use of microscopy to  
2398 detect solid particulates or liquid droplet suspension (indicative of insolubility). However, it  
2399 is a rather subjective operator-dependent judgement. Reliability can also be improved in a  
2400 relatively easy way by centrifugation, particularly for detection of precipitation in medium  
2401 dilutions, where foaming may obscure visual observation. Note that solubility is affected by  
2402 the composition of the substance (presence of impurities) and by the test conditions  
2403 (temperature, incubation time, possible adsorption to the test vessel or to medium  
2404 constituents (e.g. albumin)). OECD TG 105 can be used for the determination of the aqueous  
2405 solubility of pure substances which are stable in water and not volatile, and OECD TG 116  
2406 can be used for fat solubility determination (fat solubility is the mass fraction of substance  
2407 which forms a homogeneous phase with a liquid fat (oil) without giving rise to chemical  
2408 reactions). Nephelometric, UV-spectroscopic and HPLC methods can also be used to  
2409 determine solubility (Hoelke *et al.*, 2009).

2410 Nephelometry facilitates solubility determination, particularly suited to serial measurement  
2411 (e.g., ranges of chemicals and/or concentrations) allowing systematic and precise evaluation  
2412 of turbidity due to dispersed precipitation, independent of matrix composition. However, the  
2413 measurement is relative, requiring a definition of threshold turbidity for insolubility based on  
2414 expedient practice with detection limit dependent on instrument sensitivity. Moreover, even  
2415 nephelometry may not detect chemicals such as transparent immiscible liquids for which  
2416 visual inspection, enhanced by experienced microscope observation, remains a reliable  
2417 approach.

2418 HPLC and UV spectrophotometry provides a quantitative determination of concentration  
2419 with the use standard curves. While both methods are valid for solutions prepared in solvent,  
2420 they may not be valid for preparations in biological media, which contain many components  
2421 that often interfere with solubility detection. Cell culture media cannot be injected into HPLC  
2422 columns and their multiple components will likely obscure the compound of interest through  
2423 their inherent UV absorbance over a range of wavelengths. This necessitates pre-purification  
2424 and extraction steps for quantifying test item concentration in media via HPLC.

2425 Test item chemicals are generally dissolved in solvent (e.g., DMSO, Ethanol) to create a  
2426 stock solution at a predetermined target concentration (e.g., 50mg/mL or 100mM). The test  
2427 item should have a relatively high solubility in the solvent of choice and the solvent should  
2428 not interfere with the test item (e.g. inactivate the compound). For example, the commonly  
2429 used solvent DMSO can reduce the effects of the platinum complexes (Hall *et al.*, 2014). In  
2430 addition, the solvent should not affect cell health or the phenotype of the cells in the assay  
2431 when diluted in media. Furthermore if the stock solution is diluted in media up to a  
2432 concentration exceeding the solubility of the substance, the test item may precipitate.

2433 Regarding the sample preparation procedure, the following issues are key for reproducible  
2434 results:

2435 - Optimal time for dissolution in solvent: Does the drug dissolve immediately (1 min  
2436 vortex) in the solvent or does it require additional treatment (sonication and warming)  
2437 and time (e.g., 2 hours or overnight)?

2438 - Solubility in media upon dilution: Including incubation to mimic assay conditions may  
2439 be relevant: i.e., monitoring stability on incubation (e.g. at assay temperature and in the  
2440 presence of CO<sub>2</sub>) over a time period (e.g. 24 hours).

2441 - Visual inspection of solubility: Unless sample material is expensive or available  
2442 quantities are limited, stock solutions for visual inspection of solubility should be  
2443 prepared with a minimum weight of 25mg, and in a minimum volume of 0.5 ml.

2444

2445 The solubility in assay medium may be higher than in pure water, due to adsorption to  
2446 medium contents such as proteins. In addition, the higher temperature applied in the *in vitro*  
2447 method (37°C) than in OECD TG 105 (20°C) will give rise to a higher solubility in the assay.  
2448 However, assay media typically have a rather high ionic strength and an inherently a complex  
2449 composition. This makes it difficult to predict test item solubility upon dilution from stock  
2450 solution in various media solvents. Therefore, it is also necessary to determine the solubility  
2451 of the final test concentrations in the assay medium under assay conditions. In case of  
2452 inorganic substances, the anion and cation part of the test item may precipitate with other  
2453 cations and anions present in the culture medium, if the solubility of these newly combined  
2454 salts is exceeded. It is therefore recommended to visually monitor the test system for  
2455 precipitation, and to verify whether the anions and cations present in the medium can form  
2456 low-solubility salts with the test item.

2457 Test items insoluble within an acceptable concentration range should be considered  
2458 incompatible with the *in vitro* method. A remedy may be to increase the solvent  
2459 concentration in the *in vitro* method. However, the tolerable solvent concentrations will  
2460 depend on the solvent and the test system used: As a general rule, the final solvent  
2461 concentrations should be as low as possible to avoid any potential interference with the *in*  
2462 *vitro* method. The concentration of solvent present in the final test concentration should be  
2463 considered in the test controls.

2464 As for nanomaterials, special issues on measuring solubility and dispersion characteristics  
2465 may arise. For these materials, the specific guidance documents are best followed, which are  
2466 continuously being developed (Scenhir, 2015). Any toxicity testing using *in vitro* methods  
2467 should pay special attention to the agglomeration/aggregation behaviour, and the insoluble/  
2468 partially-soluble nature of nanomaterials (Scenhir, 2015). Possibilities for dis-agglomeration  
2469 and re-aggregation of nanomaterials should also be considered: some properties of  
2470 nanomaterials may change due to interaction with the surrounding media.

2471 **6.1.1.3 Test item preparation**

2472 Test items may have to go through various steps of preparation, such as dissolution, dilution,  
2473 extraction by wetting or centrifugation before being suitable for use in the *in vitro* method.  
2474 These steps must preserve the characteristics of the test item. The purpose of each step of the  
2475 preparation has to be explained, and the critical limits step/procedure should be determined.  
2476 The impact on the test item stability, homogeneity and integrity should be assessed.

2477 Once prepared as a dilution in a solvent, chemical stability in solution is crucial, since it  
2478 determines the concentration of the work solution to be applied to the test system. The  
2479 concentration in stock solutions and exposure medium has to be measured over time, to check  
2480 for stability and avoid aberration in cell treatment. Relevant examples of compounds  
2481 hydrolysed in aqueous solutions can be found in (Crean *et al.*, 2015; Pomponio *et al.*, 2015).

2482 For more complex test items there are existing guidelines to aid this process: e.g. ISO 10993-  
2483 12 gives conditions of the extraction to obtain a representative extract of medical devices  
2484 depending on their composition, and The OECD series on the Safety of Manufactured  
2485 Nanomaterials, n°36, gives advice on how to prepare and characterise a nanomaterial  
2486 solution.

2487 **6.1.2 Considerations for the final user of the validated method**

2488 The type of test item for which the developed *in vitro* method is suitable has to be defined in  
2489 the description of the validated method. Test items at the user stage should be characterised  
2490 as required by the GLP principles (see OECD n°1, chapter 6.2): “each test and reference item  
2491 should be appropriately identified (...); the identity, including batch number, purity,  
2492 composition, concentrations, or other characteristics to appropriately define each batch of the  
2493 test or reference items should be known (...).The stability of test and reference items under  
2494 storage and test conditions should be known (...). If the test item is administered or applied in  
2495 a vehicle, the homogeneity, concentration and stability of the test item in that vehicle should  
2496 be determined (...).”

2497 Interactions with the test system should be predicted and a way of assessment of such  
2498 interactions should be implemented (cf section 6.2). Important examples are adsorption to  
2499 protein, precipitation with carbonate in the medium and hydrolysis by aqueous environment.

2500 **6.2 Interaction between test item and test system**

2501 A two-way interaction has to be assumed between the test item and the test system. In one  
2502 respect, the test system can affect the test item (in analogy to pharmacokinetics in *in vivo*  
2503 models; detailed in 6.4). In another respect, the test item can affect the test system in specific  
2504 ways (alteration of a readout, in accordance with the design and intended application of the  
2505 test system; (see Sections 5 and 8) or in non-intended ways, by interfering with the overall  
2506 performance of the biological model on which the test system is based, or by disturbing a  
2507 correct readout of the test endpoint. There are endless possibilities for artefacts to be created  
2508 in this way. As not all of these can be controlled automatically, experienced operators and  
2509 personnel interpreting the test data are required to detect potential problems. Problem  
2510 detection is also facilitated by regular inclusion of consistency controls and plausibility  
2511 considerations (e.g. do compounds with similar structure or similar mode of action behave  
2512 similarly?; can effects be reversed; does another test system for the same biological process  
2513 give similar results?; are findings consistent with biological expectations concerning  
2514 concentration and timing of effect?; etc.). For more detailed discussion, three elements of an  
2515 *in vitro* test will be considered separately (Aschner *et al.*, 2016; Schmidt *et al.*, 2016): the test

2516 system (biological model), the test endpoint, and the analytical endpoint (Leist *et al.*, 2010).  
 2517 These issues are relevant both in the development stage of an *in vitro* method and in the  
 2518 application stage.

2519

2520 **6.2.1 Interference with the test system**

2521 Test items can disturb the test system, especially if it is based on living cells, as they are  
 2522 highly responsive to changes in their environment. The most frequent and serious disturbance  
 2523 is general cytotoxicity often leading to cell death.

2524

2525 **6.2.1.1 Cytotoxicity**

2526 If the test endpoint is not cytotoxicity, then cytotoxicity triggered by test items is a serious  
 2527 confounder and needs to be controlled for. Indeed, changing cell numbers *in vitro* is known to  
 2528 affect observed effect concentrations (Gülden *et al.*, 2015, 2001). This is particularly  
 2529 important in repeated treatments (Kramer *et al.*, 2015).

2530 Measurement of cytotoxicity should be done using the same conditions as used for the  
 2531 specific test endpoint (i.e. in identical samples, ideally during the same run, or even better on  
 2532 the same plate), so as to obtain reliable and relevant cytotoxicity data. Alternative approaches  
 2533 use measurements in parallel cultures. Viability controls in related, but not identical, culture  
 2534 conditions (different plate format, different cell preparation, etc.) should be avoided. The  
 2535 definition of cytotoxicity is not trivial. Often 100% cytotoxicity is referred to as 100% cell  
 2536 death, however, for a cytotoxicity assay with a metabolic activity endpoint, a 100%  
 2537 cytotoxicity just means that the metabolic activity is 0% compared to the healthy control  
 2538 cells. Therefore, the choice of method used for cytotoxicity determination, but also the  
 2539 interpretation of the results needs careful consideration (see [Table 5](#)~~Table 5~~). A single  
 2540 endpoint is usually not sufficient to be fully conclusive. A combination of cell counting and a  
 2541 population measure (e.g. resazurin reduction), or a combination of a viability measurement  
 2542 (calcein staining; dye exclusion, neutral red uptake) and a cell death measurement (propidium  
 2543 iodide uptake; LDH-release; annexin V staining) provides a greater level of certainty.  
 2544 Importantly, positive and negative controls for the viability assay have to be included and  
 2545 need to be considered for normalisation of viability data.

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2546 An important point to consider is the timing of cell death. For instance, a test item may  
 2547 trigger definitive cytotoxicity (e.g. > 70% of the cell population dying within 16 h). If the  
 2548 specific test endpoint (and cytotoxicity) is measured after e.g. 4 h, then cytotoxicity will not  
 2549 be measurable by the method of choice in the test, although the cascade of cell death may  
 2550 have been triggered. There are no established rules on how to deal with this (relatively  
 2551 frequent) situation. One solution is to follow up on test results by alternative tests for the  
 2552 same endpoint, or by using the same test with a changed incubation scheme (e.g. prolonged  
 2553 incubation). This is particularly important, if data are used for risk assessment and far-  
 2554 reaching regulatory decisions.

2555

2556 **Table 5: Viability testing of cell cultures**

Endpoint	Assay	Mechanism and comments
1. Structural cell damage (non-invasive)	Evaluation of overall cell shape, cytoplasmic structure, flatness and outline	Screening assay that covers many forms of damage with high sensitivity, if observer is experienced. May be automated and rendered quantitative to some extent by high

	properties on a good phase contrast light microscope	content imaging. <b>Advantages:</b> high throughput, non-invasive, repeatable on same well over time. <b>Disadvantages:</b> No clear prediction model (only qualitative data, no exact cell death definition), no stand alone approach; requires extensive experience of operator.
	LDH-release test	Cells with intact membrane retain their content of LDH enzyme; LDH is released when cell membranes rupture (non-viable cells), and the enzyme can then be measured in the supernatant. To give fully quantitative data, the assay requires normalisation to the total LDH content of a culture well. It can to some extent be repeated for the same culture at different time points. <b>Advantages:</b> Measurement of a definite/unambiguous cell death endpoint; can be combined with cell function assays. Allows cells to be used for other purposes, if only supernatant is sampled. <b>Disadvantages:</b> Information only for cell populations. Normalisation necessary (extra wells for controls). Frequently high background LDH levels are observed (e.g. from serum components; signal/noise ratio can be bad in some culture media or with some cell types). Problems with long-term assays involving medium changes.
2. Structural cell damage (invasive)	Membrane penetration by dyes to detect 'cytotoxicity' (e.g. naphthalene black, trypan blue, propidium iodide, ethidium bromide, EH-1)	Dyes are selected so that they stain non-viable cells, but do not enter viable cells with an intact cell membrane. Some of the dyes stain the entire cell (e.g. trypan blue), others stain the nucleus/DNA (e.g. propidium iodide). Dyes that only stain dead cells usually need a combination with a method that stains/identifies all cells (such as phase contrast for trypan blue, or a nuclear counterstain (H-33342, acridine orange, SYTO-13) for fluorescent dyes. <b>Advantages:</b> Rapid and usually easy to interpret. Gives information on the single cell level. High throughput and absolute quantification are possible (high content imaging). <b>Disadvantages:</b> May overestimate viability since apoptotic cells continue to have intact membranes and may appear viable. Some dyes (e.g. trypan blue, H-33342) are cytotoxic, so that the evaluation has to be performed rapidly.
	Retention of dyes within intact cells to detect 'viability' (e.g. fluorescein diacetate or calcein-AM)	After dye exposure, viable cells fluoresce when observed under UV light. The lipid-soluble dyes are transformed by cellular enzymes (esterases) into lipid-insoluble fluorescent compounds that cannot escape from cells with intact membranes. Thus, cells can be observed under a microscope (single cell analysis) or with a fluorescent plate reader (population analysis). The dyes are often used in combination with a cytotoxicity stain (e.g. propidium iodide). <b>Advantages:</b> Rapid and usually easy to interpret. Gives

		<p>information on the single cell level (including morphological information on the cell shape). High throughput and absolute quantification are possible (high content imaging, fluorescent plate reader or FACS).</p> <p><b>Disadvantages:</b> Some cells leak the dyes; some cells actively export the dyes through P-gp activity. Many fluorescent dyes are prone to photo-bleaching, and some may be sensitive to their local environment (pH etc).</p>
	Evaluation of programmed cell death/apoptosis markers	<p>As programmed cell death is a universal cell biological process based on defined biochemical pathways and organelle changes, the activation of cell-death-associated pathways is often used as surrogate marker for cell death. An example for such a pathway is the activation of caspases (detectable in populations by enzymatic analysis or in single cells by staining) or the activation of endonucleases (detectable on population level as DNA-fragmentation). Moreover, a typical type of chromatin condensation (detectable by DNA stains) and the display of phosphatidylserine on the outside of the plasma membrane (detectable by annexin staining) is highly correlated with apoptotic death.</p> <p><b>Advantages:</b> Adds mechanistic information to cytotoxicity data. Several endpoints are easy to quantify and useful for high through-put measurements.</p> <p><b>Disadvantages:</b> Not all types of cell death may be detected by a given endpoint. Needs to be combined with a general cytotoxicity test. Some endpoints are prone to artefacts (annexin staining) and some staining techniques (TUNEL, caspase-3) lead to an un-intentional selection of subpopulations. Caspase activity measurement does not easily yield a prediction model for the extent of cell death.</p>
3. Cell growth	Cell counting	<p>For some cell populations, continued growth is a defining feature, and thus impaired growth needs to be considered as a reduction of viability. Notably, impaired growth/proliferation is not necessarily correlated with cell death; it is thus rather a functional viability endpoint than a cytotoxicity measure. A special case for growth is the increase in cell size without proliferation. This feature is e.g. seen for the extension of neurites by neurons. The gold standard analytical endpoint for the growth/proliferation endpoint is counting (or morphometry). There are many ways of counting cells, either as single particles (e.g. by FACS or HCI) or by assessing a biochemical parameter correlated to cell number (e.g. DNA content).</p> <p><b>Advantages:</b> growth can be a sensitive parameter of cell well-being.</p> <p><b>Disadvantages:</b> growth is a functional endpoint, not necessarily linked to cytotoxicity; artefacts for growth endpoints may arise from inhomogeneous growth of subpopulations: moreover, growth may hide ongoing cell</p>

		death, and thus needs careful control in combination with cytotoxicity assays.
	BrdU or EdU incorporation	<p>Measures new DNA synthesis based on incorporation of the easily detectable nucleoside analogs BrdU (or EdU) into DNA. BrdU can be detected e.g. by fluorescent-labelled antibodies in permeabilised cells. Alternatively, radiolabelled thymidine can be used.</p> <p><b>Advantages:</b> Measurement on single cell level. Easy to quantify and use at high throughput.</p> <p><b>Disadvantages:</b> BrdU/EdU can be cytotoxic; no information available on how often one given cell has divided. High cost and effort compared to counting.</p>
	Staining of cellular components that are proportional to overall cell mass (proteins by e.g. sulforhodamine B or crystal violet; DNA by Hoechst H-33342)	<p>These assays evaluate a surrogate measure of overall cell mass and assume that it correlates with total cell number. In non-proliferating cells, or with continuous ongoing proliferation, the endpoints are also frequently used as indicators of cytotoxicity, as dead cells often detach from plates and reduce the overall cell mass.</p> <p><b>Advantages:</b> Simple and cheap; lots of historical data</p> <p><b>Disadvantages:</b> Mostly not a single cell measure but only population level. Protein staining is only a surrogate endpoint of real cell number. For DNA quantification with Hoechst 33342: fluorescent probe penetration, bleaching, and cytotoxicity are issues to be considered.</p>
4. Cellular metabolism	3-(4,5-dimethylthiazol-2-yl)-2,5-diphenyltetrazolium (MTT) assay, or similar tetrazolium dye reduction assays from multiple suppliers	<p>Biochemical activity (mostly mitochondrial metabolism; production of reducing equivalents like NAD(P)H) in viable cells causes reduction of the tetrazolium dye. The resultant formazan is extracted and measured spectrophotometrically. The rate of formation of formazan corresponds to the function of essential cellular processes like respiration.</p> <p><b>Advantages:</b> High throughput, easy, robust, low cost. Used in several ISO standards and OECD test guidelines. High sensitivity. Can be used for tissue constructs.</p> <p><b>Disadvantages:</b> Measures amount of viable cells (only indirect measure of cell death), and needs control for contribution of proliferation. Cells with reduced mitochondrial function may appear non-viable. Inhibition of cell metabolism by the test item causes low values in the assay which is not necessarily related to cell viability. Some test items interfere with the assay e.g. by reducing the dye why interference testing is recommended. Measurement usually not on single cell level. Some cell cultures need long time to reduce sufficient amount of dye (no sharp time point for viability definition). Assessment of kinetic of the reduction may be necessary to ensure proper selection of incubation time with a tetrazolium dye (to avoid reaching plateau of OD).</p>

	Resazurin reduction assay (sometimes called Alamar blue)	<p>Similar to tetrazolium reduction assays. Fluorescent/absorbent resorufin is formed from resazurin through mitochondrial metabolism of viable cells.</p> <p><b>Advantages:</b> Many tests can be performed rapidly in multi-well dishes. Cells can be tested repeatedly (non-invasive measurement). High sensitivity.</p> <p><b>Disadvantages:</b> Cells with reduced mitochondrial function may appear non-viable. Some test items interfere with the assay (e.g. superoxide also reduces the dye) why interference testing is recommended. Measurement only on population level. Some cell cultures need a long time to reduce sufficient resazurin (no sharp time point for viability definition).</p>
	Mitochondrial depolarisation assays (based on fluorescent indicator dyes)	<p>Many organelle functions are used as endpoints of general cell health. Most frequently, mitochondrial function is assessed (see MTT, resazurin). One mitochondrial test on the single cell level is the measurement of mitochondrial membrane potential by addition of potential sensing fluorescent dyes like JC-1, TMRE, MitoTracker, etc. Quantification is by HCl or FACS</p> <p><b>Advantages:</b> fast, cheap, high throughput; single cell information.</p> <p><b>Disadvantages:</b> as for MTT (measures cell function, not cytotoxicity). Artefacts by test items that affect mitochondria specifically. Artefacts by test items that affect plasma membrane potential. Artefacts due to bleaching, quenching and unquenching, and due to shape changes and clustering of mitochondria.</p>
	Neutral red assay (ISO 10993)	<p>A cell organelle function assay assessing lysosomal function. Active cells accumulate the red dye in lysosomes and the dye incorporation is measured by spectrophotometric analysis.</p> <p><b>Advantages:</b> Low cost. Used in several ISO standards and OECD test guidelines. Historic data base.</p> <p><b>Disadvantages:</b> Normalisation required for quantitative measurement, e.g. with protein content or number of cells. Gives usually information only at the population level. Not suited for tissue constructs and certain cell lines.</p>
	ATP assays	<p>Measurement of the total ATP content in a cell population. Dying cells fail to produce ATP, have an increased ATP consumption, and may lose ATP through perforations of the plasma membrane. For the test, cell lysates are prepared, and the ATP content is assessed by a luminometric assay.</p> <p><b>Advantages:</b> fast, high throughput</p> <p><b>Disadvantages:</b> no single cell data, expensive, requires a luminometer, as MTT: measurement of viable cell mass, not a direct measure of cytotoxicity. Artefacts as for other mitochondrial tests.</p>

2557

#### 2558 **6.2.1.2 Functional disturbances**

2559 While the strict definition of cytotoxicity refers to cell death, a wider interpretation also  
2560 includes adverse effects on cells that alter their functionality but do not lead to cell death  
2561 (within the observation period). For instance, protein synthesis may be impaired, or  
2562 mitochondrial function altered. Cytostasis, where dividing cells do not die but cease dividing,  
2563 is another example of delayed cell death which can impact the endpoint measures. This can  
2564 affect the specific endpoint of a test system (e.g. luciferase reporter assay), without being  
2565 relevant for the intended test objective. Test items with such properties can lead to erroneous  
2566 readouts.

#### 2567 **6.2.1.3 Disturbed differentiation state or gene/protein expression**

2568 A special case of artefacts caused by test items is the change of biological properties of the  
2569 test without overt cytotoxicity. The most common example is an altered differentiation of  
2570 cells or an altered composition of cell sub-populations. For instance, a test item might alter  
2571 cell differentiation state in a migration assay, and this alteration might lead to altered  
2572 migration. The item would be wrongly classified as modifying cell migration. Another  
2573 example would be measurement of monocyte function (e.g. cytokine release) in a whole  
2574 blood assay. If a test item leads to platelet degranulation, it might influence the overall  
2575 endpoint of the *in vitro* method without affecting the monocyte response as such.

#### 2576 **6.2.1.4 Altered communication/adhesion properties**

2577 Another special case of artefacts can be generated by interference of the test item with cell  
2578 adhesion or communication. This is listed here separately, as it would not normally be  
2579 detected by cytotoxicity assays, but it would strongly alter the behaviour of the test system  
2580 (biological model) in the test situation. An example is binding of test item to molecules used  
2581 for the coating of culture dishes. This would then alter readouts such as migration or neurite  
2582 growth, without really affecting such processes within the cells (and without necessarily  
2583 being relevant *in vivo*).

#### 2584 **6.2.2 Interference with *in vitro* method endpoint**

2585 For pure test items, most of the unwanted interactions with the *in vitro* method are covered by  
2586 considering undesired interactions with either the test system or the *in vitro* method endpoint.  
2587 The majority of interferences with the *in vitro* method endpoint will be related to cytotoxicity  
2588 (immediate or delayed cell death or functional impairment), as covered in 6.2.1.1. For test  
2589 items containing impurities or non-inert additional substances in their formulation (see 6.2.4)  
2590 the situation can become more complex: this highlights the need to have clear specification  
2591 for the test item, as stated above. For instance, impurities (e.g. detergents or solvents) may  
2592 alter skin or blood-brain-barrier (BBB) permeability (without being cytotoxic) and thus result  
2593 in incorrect data on the pure test item of interest, if the *in vitro* test assesses e.g. skin or BBB  
2594 permeation capacity. In other cases the test item is a finished product. Then potential  
2595 impurities and contaminations are part of the product and their effect on the response is  
2596 important and has to be evaluated.

#### 2597 **6.2.3 Interference with the analytical endpoint**

2598 Interference of the test item with the *in vitro* method endpoint means that the test item  
2599 disturbs the normal measurement results. This can be controlled for by performing the *in*  
2600 *vitro* method using adequate positive, negative, blank or vehicle controls. If the endpoints are

2601 of analytical nature, the controls can also be spiked with test item to verify that the test item  
2602 do not in any way hinder the normal function of the test system or interfere with the readout.

2603  
2604 Examples of such kind of interference include:

2605 **Fluorescence/absorbance-based methods:** disturbance by test items that fluoresce or absorb  
2606 at the evaluation wavelength, or test items that quench fluorescence.

2607 **Enzymatic assays:** alteration of enzyme function, of co-factor, or of other limiting reagents  
2608 by test item; display of enzymatic activity (or chemical reactivity) by test item itself.

2609 **Resazurin/ or MTT reduction:** strongly reducing agents directly reduce resazurin/ (or MTT)  
2610 non-enzymatically. Compounds that trigger the release of superoxide can trigger reduction of  
2611 resazurin by superoxide. This results in erroneous cytotoxicity data.

2612 Another relevant example of this kind of interference is provided by the interactions between  
2613 test reagents and nanomaterials in colorimetric assays for cytotoxicity (such as  
2614 sulforhodamine B dye, or MTT used in the viability assays) (Scenhir, 2015). Moreover, some  
2615 nanomaterials may themselves disperse/absorb light and therefore interfere with the  
2616 measurements in colorimetric assays. Some of these problems might be overcome by either  
2617 adding appropriate controls or modifying existing protocols: as an example removal of  
2618 nanomaterials via centrifugation before reading the assay can reduce the variations in data  
2619 generated for the same nanomaterials (Scenhir, 2015).

#### 2620 **6.2.4 Consideration of interferences not coming from the active ingredient**

2621 With test items that are not pure, the interferences with the test may come from impurities or  
2622 from ingredients of the formulation. Particularly difficult cases arise when such additional  
2623 chemicals are inactive alone, but synergize somehow with the effect of the test item.

2624 This can also occur for the solvent of the test item. Frequently, a solvent concentration that  
2625 does not affect the standard endpoint of a test as such (e.g. 0.1% DMSO) may still alter the  
2626 effect of a test item on the test system (e.g. in the case of DMSO: through the antioxidant  
2627 properties of DMSO; or through its effect on cell membranes; or through other activities  
2628 including cell differentiation).

2629 In case of a test item consisting of a natural mixture (e.g. essential oils), it should be  
2630 considered to test the mixture as well as the known pure substances present, since the other  
2631 ingredients of the mixture can change the overall effect of the test item. The different kinetics  
2632 of the ingredients must then be considered; however, although ingredients that are not  
2633 absorbed *in vivo* will not be able to have an effect on the test item systemic toxicity, they may  
2634 affect test item toxicity *in vitro*.

#### 2635 **6.3 Biokinetics / dose extrapolation**

2636 Just like the biokinetics *in vivo* are about what the body of the organism does to the test item,  
2637 the biokinetics *in vitro* concerns what the *in vitro* test environment does to the test item. A  
2638 central issue in biokinetics is that generally only the freely dissolved molecules of a chemical  
2639 can pass membrane barriers and reach a target inside a cell. Thus, in an *in vitro* system, the  
2640 freely dissolved concentration of the test item in the medium or in the cell (as close to the  
2641 target as possible) is the central parameter. Different processes result in a freely dissolved  
2642 concentration that is not the same as the nominal concentration, (i.e. the added  
2643 concentration). These processes are described in e.g. (Heringa *et al.*, 2006) and (Groothuis *et*  
2644 *al.*, 2015), and were one of the main topic investigated by the FP7 EU Project Predict-IV,  
2645 aimed to improve the predictivity of *in vitro* assays for unwanted effects of drugs after  
2646 repeated dosing integrating biokinetics and biodynamic data. As one of the project outputs, a

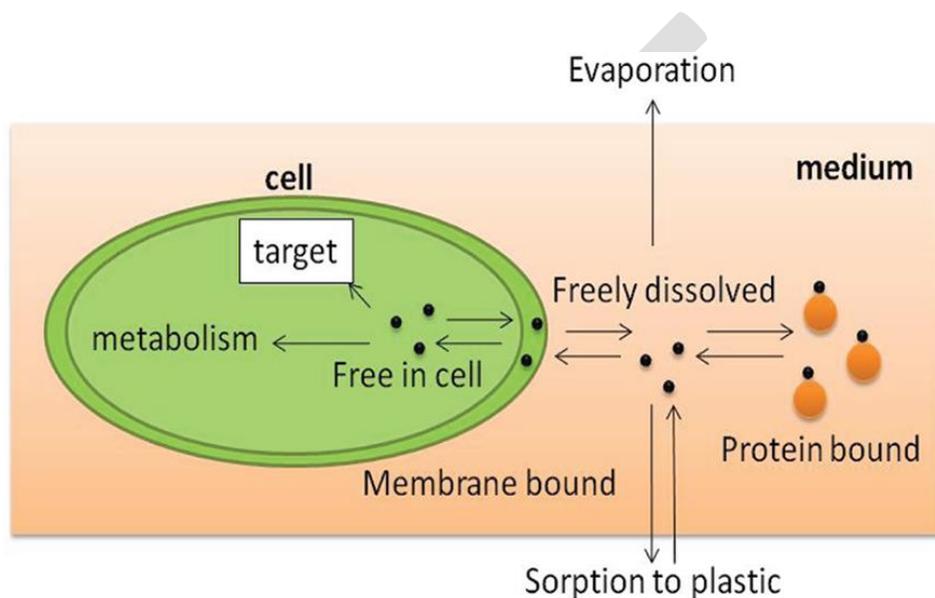
2647 step-wise strategy was applied to measure and model cell exposure levels over time of a  
2648 selected number of drugs in the developed *in vitro* assays. The strategy and the major  
2649 obtained results are described in (Kramer *et al.*, 2015).

2650 Figure 3 schematically depicts the different processes, which can affect a xenobiotic *in vitro*  
2651 bioavailability. Also the processes that change the identity of the test item, affecting its  
2652 stability, are described briefly in the following.

2653

2654 **Figure 4: Schematic representation of the processes that can cause the final target**  
2655 **concentration to be different than the nominal concentration in an *in vitro* test (Kramer**  
2656 ***et al.*, 2012)**

2657



2658

### 2659 6.3.1 Kinetic processes

#### 2660 6.3.1.1 Evaporation / plastic binding / precipitation

2661 *In vitro* systems are often open, with a small gap between the well plate and the lid, to allow  
2662 air circulation for provision of oxygen for the cells. This air circulation allows volatile  
2663 substances to evaporate into the air of the incubator. This may decrease the concentration in  
2664 the medium in the test system, but can also contaminate medium in e.g. blank wells, as the  
2665 substance can dissolve from the air into the medium of other wells present in the well plate or  
2666 even the incubator. An example showing the effect of evaporation on test results can be  
2667 found in Tanneberger et al 2010 (Tanneberger *et al.*, 2010).

2668 Lipophilic substances tend to bind to the plastic the cell culture plates are made of, although  
2669 differences exist among the types of plastic used. The adsorption to polycarbonate is limited,  
2670 but in organ-on-a-chip devices made of Polydimethylsiloxane (PDMS), there will be  
2671 partitioning between the PDMS and the medium. PDMS is even used as an extraction  
2672 material for-solid phase microextraction (SPME) (Heringa and Hermens, 2003), it is  
2673 therefore not suitable for *in vitro* test devices for testing of chemical substances. Glass is a  
2674 better material to avoid binding to some extent, but very lipophilic substances are known also  
2675 to bind to glass. Silanized glass can decrease this binding even further. Using glass has other

2676 practical downsides in *in vitro* tests. Examples where considerable binding to plastic was  
2677 measured are the one of Kramer *et al.* (Kramer *et al.*, 2012). In this study, it is also shown  
2678 how the addition of serum to medium decreases the binding to plastic. Other examples are  
2679 reviewed in (Kramer *et al.*, 2015), reporting results of the Predict-IV project on cyclosporine  
2680 A, amiodarone and chlorpromazine. The addition of serum to medium decreases the binding  
2681 to plastic, but likely also the uptake into the cells (Pomponio *et al.*, 2015).

2682 Sorption of the test item to cell-attachment matrices (e.g. collagen or matrigel layer used with  
2683 hepatocytes in culture) is a specific aspect of interaction with the test device, although the  
2684 relationship between a test item's lipophilicity and binding to is not as clear cut as it is for  
2685 binding to plastic labware. The possible physical sequestration of test items, can lead to  
2686 overestimating intracellular concentrations (Kramer *et al.*, 2015).

#### 2687 **6.3.1.2 Chemical degradation**

2688 The aqueous environment of the medium in an *in vitro* test enables spontaneous hydrolysis  
2689 (i.e. without the aid of an enzyme) of substances with structures sensitive to this chemical  
2690 reaction. During the time the test system, e.g. the well plate, is outside of the incubator, light  
2691 will reach the medium and photolysis can take place for light sensitive substances. Therefore,  
2692 information on hydrolysis and photolysis sensitivity is necessary before a substance is tested  
2693 in an *in vitro* method (see 6.1.1.1). More generally, each test facility should have adequate  
2694 test item characterisation procedures in place to identify if the test item characteristics are  
2695 compatible with the *in vitro* method.

#### 2696 **6.3.1.3 Metabolism/metabolic stability**

2697 Some cell types have metabolic capacity, meaning that they contain significant levels of  
2698 enzymes that convert the test substance to another substance. Especially cells originating  
2699 from liver, intestine and lung are known to possess metabolic capacity, in decreasing order.  
2700 In test systems with such cells, especially from these tissues, the concentration of the test  
2701 item may decrease because of this metabolism, and the concentration of metabolites will  
2702 increase. When a positive hazard response is obtained in such a cell system, it may thus either  
2703 be caused by the test item itself, or its metabolite(s). The time profile of the response can  
2704 reveal which is the main causative agent: when there is a lag time for the response (compared  
2705 to the positive control or other reference items), it could be that a metabolite is responsible  
2706 for the response. A good example is described in (Pomponio *et al.*, 2015)

2707

#### 2708 **6.3.1.4 Protein binding**

2709 Serum is often added to cell culture medium to supplement it with important factors required  
2710 for cell proliferation and maintenance. Serum-free medium is available and used, but not all  
2711 cell types thrive in such culture conditions. Serum contains proteins, including albumin,  
2712 which has non-specific binding sites, to which most organic substances tend to bind. As  
2713 proteins are large molecules that do not transfer across a membrane, the binding to a protein  
2714 renders a test item unavailable for cellular uptake, thus unable to reach any target inside the  
2715 cell. An example of the effect of serum protein binding can be found in Heringa *et al.*,  
2716 (Heringa *et al.*, 2004) and in Pomponio *et al.*, (Pomponio *et al.*, 2015). On the other hand,  
2717 serum proteins can also make some test items more accessible or more stable. E.g., for  
2718 medical devices a medium with serum is preferred for extraction because of its ability to  
2719 support cellular growth as well as to extract both polar and non-polar substances. In addition,  
2720 protein binding also occurs *in vivo*. Gulden *et al.* 2005 therefore developed an *in vitro-in vivo*  
2721 extrapolation method extrapolate nominal effective *in vitro* concentrations equivalent *in vivo*

2722 plasma concentrations by accounting for the differences in protein concentrations (Gülden  
2723 and Seibert, 2003).

#### 2724 **6.3.1.5 Cell membrane absorption**

2725 Cell membranes are composed of fatty acids, thus provide a lipid environment in which  
2726 lipophilic substances will like to absorb. These absorbed molecules are then also not  
2727 available for a target inside the cell. An example showing the effect of membrane sorption  
2728 can be found in Gülden *et al.* (Gülden *et al.*, 2001) and in Bellwon *et al.*, (Bellwon *et al.*,  
2729 2015).

#### 2730 **6.3.2 Measurement of free concentration /passive dosing**

2731 Clearly, several processes can influence how much of the added test substance will actually  
2732 reach the target and this relates to its saturation concentration. If test results are based on the  
2733 added, or nominal, concentrations, considerable variation between laboratories may be  
2734 obtained. Furthermore, *in vitro* processes are included in these results (e.g. an EC<sub>50</sub>),  
2735 rendering these unfit for extrapolation to *in vivo* (see IVIVE below and (Kramer *et al.*,  
2736 2015)). For example, if there is considerable evaporation, the EC<sub>50</sub> *in vitro* will appear to be  
2737 much higher than it will be in the same tissue *in vivo*, as there is no evaporation *in vivo*.  
2738 Thus, in order to obtain pure EC<sub>50</sub> values, that relate target concentrations to responses, these  
2739 target concentrations should be measured. As the precise concentration at the target site  
2740 inside the cell is too difficult to measure, the best approximation should be measured: the free  
2741 concentration in the cell or in the medium. The free concentration in the cell is often still  
2742 difficult to measure, therefore the free concentration in the medium (similar to the cellular  
2743 concentration for membrane permeable substances), or the total concentration in the cells  
2744 (often for metals) are usually measured. Further information can then be added by  
2745 calculations that take physicochemical and biochemical properties (e.g. transporter  
2746 substrates) of the substances into account.

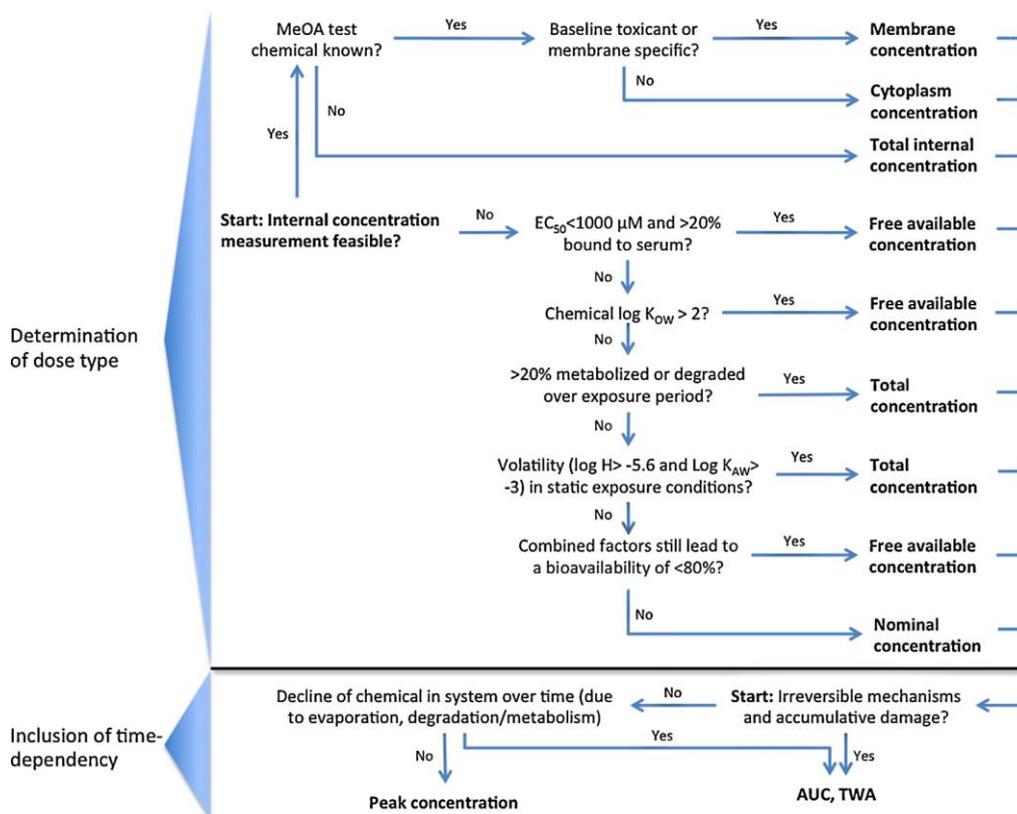
2747 Methods with which the free concentration can be measured have been reviewed in Heringa  
2748 *et al.* 2003 (Heringa and Hermens, 2003). This review also describes how negligible  
2749 depletion-solid phase extraction (negligible depletion SPME) should be applied to measure  
2750 free concentrations. This method is very suitable for *in vitro* tests, as it is suitable for small  
2751 volumes. Examples of its application in *in vitro* tests are (Heringa *et al.*, 2004), (Broeders *et*  
2752 *al.*, 2011), and (Kramer *et al.*, 2012).

2753 Measuring the free concentrations does require extra effort and resources in the conduct of  
2754 the *in vitro* test, as e.g. a chemical analysis method is necessary. This effort can be saved in  
2755 some instances, depending on the properties of the test item: in case of very hydrophilic, non-  
2756 volatile substances that hardly bind to serum proteins, there will hardly be any losses and the  
2757 nominal concentration will be very similar to the free concentration. Groothuis *et al.*  
2758 (Groothuis *et al.*, 2015) provide a decision scheme on which concentration should/can be  
2759 used as dose metric.

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**Figure 5: Flow chart to aid in choosing an appropriate dose metric for a specific *in vitro* toxicity test (Groothuis *et al.*, 2015)**



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First, a choice should be made for dose type based on the characteristics of the chemical and available knowledge. Then, the metric can be integrated or averaged in case of time-dependent exposure and irreversible mechanisms, or steady reduction over time. Peak concentration is defined here as the maximum concentration reached during the exposure period. BK/TD may be applied to model partitioning and assess concentration changes over time. The chart has been compiled by (Groothuis *et al.*, 2015) using literature data (Austin *et al.*, 2002; Glden *et al.*, 2010; Glden and Seibert, 2003; Knbel *et al.*, 2012; OECD, 2011, 2006a, 2006b; Reinert *et al.*, 2002; Riedl and Altenburger, 2007).

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To avoid the effort of measuring free concentrations in every sample, passive dosing can be applied. In this method, a disk or ring of absorbent material, which is loaded with the test substance, is added to the sample. After a time of equilibration, the free concentration will have become proportionate to the concentration in the disk or ring, governed by the partition coefficient between water and the disk or ring material. If this partition coefficient has been predetermined, and if the amount of substance in the ring or disk by far exceeds the amount to be dissolved in the medium, then the free concentration in each sample can be easily calculated, and does not need to be measured. A more detailed description of the method can be found in Smith *et al.* (Smith *et al.*, 2010). This reference, as well as Smith *et al.* (Smith *et al.*, 2013), give examples of how passive dosing can be applied to *in vitro* tests.

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*In vitro to in vivo extrapolation* (IVIVE) refers to the qualitative or quantitative transposition of experimental results or observations made *in vitro* to predict phenomena *in vivo*, on full living organisms. When the response of the *in vitro* test is plotted against the free

2785 concentration (or the nominal concentration only in case it can be demonstrated/estimated  
2786 this approximates the free concentration), toxicity parameters such as the EC<sub>50</sub> or a  
2787 benchmark concentration (BMC) can be derived from the obtained curve. This *in vitro*  
2788 toxicity parameter can be used as point of departure (PoD) for *in vitro* test circumstances and  
2789 directly applicable to *in vivo* extrapolations (Leist, 2014, Blaauboer 2012). The  
2790 corresponding *in vitro* concentrations can be converted into relevant plasma concentrations  
2791 by taking the protein and lipid concentrations in plasma and cell culture medium into account  
2792 (Bosgra and Westerhout, 2015; Zimmer *et al.*, 2014). In a final step, this concentration can be  
2793 used as input for physiologically based pharmacokinetic (PBPK) models to estimate the dose  
2794 that would result in the respective plasma concentration in man. This way an external  
2795 benchmark dose (BMD) can be obtained. PBPK models describe the kinetic processes *in*  
2796 *vivo*, relating external doses to tissue concentrations in time. For these models, some  
2797 physical-chemical properties of the test substance need to be known, as well as some kinetic  
2798 parameters such as the fraction absorbed, rate of metabolism, tissue partition coefficients,  
2799 protein binding coefficients and urinary excretion rate. An example of how this can be  
2800 performed is described in Louisse *et al.* (Louisse *et al.*, 2010). Good modelling practices for  
2801 PBPK models have been described by Loizou *et al.* (Loizou *et al.*, 2008). The  
2802 recommendations from a joint EPAA - EURL ECVAM on how PBTK modelling platforms  
2803 and parameter estimation tools could enable animal-free risk assessment are reported in  
2804 Bessems *et al.*, (Bessems *et al.*, 2014).

#### 2805 **6.4 Reference and control items**

2806 The inclusion of relevant reference and control items, and the setting of acceptance criteria on  
2807 the basis of historical data, is essential for regulatory applicability of *in vitro* methods. By  
2808 including the correct reference and control items, the data set obtained from the *in vitro*  
2809 method will demonstrate the correct functioning of the test system and the method used for  
2810 analysis and therefore the validity of the executed experiments.

2811 Reference items can be one or more items where a specific readout and well-known response  
2812 is expected (OECD, 2004a). The reference item(s) is used to provide a basis for comparison  
2813 with the test item or to validate the response of the test system to the test item i.e., provide a  
2814 known measurable or observable response. Notable requirements for the reference chemicals  
2815 include having a well-defined chemical structure and purity and availability from commercial  
2816 sources without prohibitive costs, hazards or disposal considerations. Reference items should  
2817 be specific to the endpoint being measured. Documentation should be available to justify the  
2818 selection of the reference items. While these reference chemicals are meant to represent the  
2819 minimum to evaluate the performance of *in vitro* methods they can be substituted with other  
2820 chemicals from the same class or substances possessing similar activity.

2821 Reference item(s) should be tested for batch-to-batch variability and be appropriately  
2822 characterised (e.g., purity, stability) and identified (e.g., CAS number) (GLP Principles,  
2823 No.1). Solubility, stability, and purity need to be established for each reference item used,  
2824 and acceptance criteria based on historical data need to be developed. The continuous  
2825 monitoring of the reference items, e.g. in the format of a control chart, is important to prove  
2826 that the *in vitro* method continues to perform within the limits, and is consistent over time.

2827 Control items are used to control the proper performance of the test system (OECD, 2004a).  
2828 Monitoring and recording performance against negative and positive control items may  
2829 constitute sufficient proof for the responsiveness of a given test system. Non-response of the  
2830 test system to the negative control and response to the positive control, within the acceptance  
2831 criteria, show that the test system is “reactive” and behaves as expected. For positive,

2832 negative, and vehicle control items (in those cases where the negative control is different  
2833 from the solvent control), it may or may not be necessary to determine concentration and  
2834 homogeneity, since it may be sufficient to provide evidence for the correct, expected  
2835 response of the test system to them. Such evaluation may consist of documented evidence  
2836 that the response of the respective test systems to these positive, negative, and/or vehicle  
2837 control items does not deviate from the historical control values recorded in the test facility,  
2838 which should furthermore be comparable to published reference values. Guidance on how to  
2839 compile and use historical data can be found in literature. Hayashi (Hayashi *et al.*, 2011)  
2840 describes the compilation and use of historical data specifically for genotoxicity data, but this  
2841 approach can also be applied in a broader context. A more general approach is described by  
2842 Yoshimura (Yoshimura and Matsumoto, 1994).

2843 The positive control item is one that has a consistent and predictive effect in the *in vitro* test  
2844 system. It is often used to assess aspects such as the characteristics of the test system and  
2845 whether the *in vitro* methods gives reproducible results for this positive control over time in  
2846 accordance with historical data. Moreover, a positive control-induced endpoint value that  
2847 meets the predefined acceptance criteria, assures that when a test item has no effect on the *in*  
2848 *vitro* method, the negative result is not caused by an error during the testing phase. Therefore,  
2849 the results from the control test items are of utmost importance to show that a valid run has  
2850 been performed when test data for each unknown test item are submitted to regulatory  
2851 authorities.

2852 The response to reference items may be used to characterise the test system. Therefore,  
2853 particular attention should be given to the definition of appropriate acceptance criteria for the  
2854 response to each selected reference item. Acceptance criteria should be available when the  
2855 method can be considered as fully developed and subsequently enter the validation process  
2856 As such, acceptance criteria, should be available prior to the start of the *in vitro* study when  
2857 used for regulatory purposes.

2858 Acceptance criteria for reference items, positive, negative and vehicle control items (e.g.,  
2859 purity, known response, cytotoxicity) should be developed and detailed in the SOP.

2860 Records of receipt, storage, preparation and use should be available to allow for a full  
2861 reconstruction of the history and use of each reference item.

## 2862 **6.5 Use of proficiency chemicals**

2863 While reference chemicals are used to validate the *in vitro* method, proficiency chemicals are  
2864 used to test the suitability of a laboratory to carry out the *in vitro* method and produce  
2865 acceptable results.

2866 Transfer of a new method to another laboratory is part of the development and validation  
2867 process before a new *in-vitro* test can be accepted by regulators. The developer of the *in vitro*  
2868 method should provide a list of proficiency chemicals. Proficiency chemicals should be fully  
2869 characterised in the new *in vitro* method. By comparing the results of testing the selected  
2870 proficiency chemicals by both laboratories, the inter-laboratory transfer of the new *in vitro*  
2871 method can be evaluated

2872 Proficiency chemicals selected for validation of the assay should cover a range of responses  
2873 within the *in vitro* method's dynamic range. In addition, a good proficiency chemical set  
2874 should include representatives of several chemical classes within the applicability domain of  
2875 the *in vitro* method [chemical classes for which the test is intended]. The number of  
2876 proficiency chemicals should be chosen in such a way that a new laboratory can be confident  
2877 that their results will be acceptable and robust. Since this greatly depends on the properties of

2878 the method, some methods may require 5 proficiency chemicals, while for others up to 20  
2879 compounds should be tested. On average, a list of proficiency chemicals usually contains  
2880 around 10 materials when the method is transferred to an OECD test guideline. In this way,  
2881 new laboratories undertaking the *in vitro* method can demonstrate their proficiency.  
2882

DRAFT

## 2883 **7 Standard Operating Procedures (SOPs)**

2884 According to the Principles of GLP, documented procedures which describe how to perform  
2885 tests or activities normally not specified in detail in study plans or test guidelines are defined  
2886 as standard operating procedures (SOPs). SOPs are a set of written documents describing  
2887 routine or repetitive activities (e.g. *in vitro* methods and complementary procedures) that  
2888 facilitate consistency in the quality and integrity of a product or end-result. SOPs are required  
2889 by GLP. Outside the GLP environment, terms such as testing methods, instructions,  
2890 worksheets, and laboratory operating procedures are often used. In principle SOPs are unique  
2891 to an organisation, as they are part of an integrated quality assurance process of a facility.

2892 The aim of a SOP is to ensure that procedures are carried out in a reproducible way by  
2893 qualified personnel. Therefore SOPs need to be written with sufficiently detailed but clear  
2894 work instructions and be kept simple, to minimise the risk for misinterpretation.

2895 An *in vitro* method will be supported and documented by a number of different SOPs, forms,  
2896 templates and worksheets. Besides the description of the main test procedure, also SOPs for  
2897 supporting procedures (e.g. the handling of cell cultures, waste handling, cleaning  
2898 procedures, operating and calibration instructions for the equipment, record keeping,  
2899 reporting, archival, quality assurance procedures, etc.) need to be available and referred to.  
2900 To avoid lengthy documents, the instructions are preferably divided into a series of short  
2901 SOPs. SOPs should be readily available to personnel in each working area.

### 2902 **7.1 *In vitro* method SOP(s) development**

2903 The development of an *in vitro* method for regulatory testing purposes by using complex  
2904 animal or human cells and tissues as test systems is a difficult and time-consuming task. In  
2905 the initial stages of the development, the procedure will undergo many changes and each step  
2906 needs to be described in laboratory records, which will crystallise into a laboratory procedure  
2907 or a SOP along the test development process. During this period, also the historical data set  
2908 of the model compounds will be collected. This dataset will be needed to define the critical  
2909 and relevant end-parameters, the control and reference items and associated acceptance  
2910 criteria.

2911 Once the method is sufficiently developed and all parameters are defined, the *in vitro* method  
2912 SOP(s) is/are sufficiently "routine" and standardised to be used for an in house validation  
2913 process during which the *in vitro* method is checked for repeatability (accuracy & precision),  
2914 selectivity, sensitivity, and stability assessment over time. Likewise, its robustness is assessed  
2915 (i.e. the influence of critical (external) parameters on the outcome parameters), as it is  
2916 important to secure the test performances in different laboratory environments, albeit within  
2917 defined boundaries.

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2919 **Figure 6: Evolution of a Standard Operating Procedure**

<b>SOP Evolution</b>
<b>No routine =&gt; No SOP =&gt; no reproducibility</b>
<b>Method becomes routine =&gt; Draft SOP</b> <ul style="list-style-type: none"> <li>- Describe the <i>in vitro</i> method procedure</li> <li>- Historical data of reference items are generated in a controlled way</li> </ul>
<b>SOP Version 01</b> <ul style="list-style-type: none"> <li>- Advanced <i>in vitro</i> method description</li> <li>- Acceptance criteria for valid/invalid experiments</li> <li>- Lists of needed equipment, reagents, consumables and reference items</li> <li>- Calculation of results</li> </ul>
<b>SOP Version xx</b> <ul style="list-style-type: none"> <li>- Further optimised procedure</li> <li>- Acceptance criteria for valid/invalid experiments</li> <li>- Calculation of results for test items</li> <li>- Data recording Forms, Data Calculation forms</li> <li>- SOP is robust</li> </ul>

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2921 During the in house validation process, weaknesses can come to light that demand for  
 2922 adaptation (optimisation) and which might also trigger the re-initiation of a new validation  
 2923 cycle. Optimisation of the SOP should be performed by following a formal procedure. It is  
 2924 critical that any parameter(s) to be changed should be chosen prior to the optimisation  
 2925 process, including the steps to be performed: it is recommended to define these steps in  
 2926 amendment in the validation study plan, so that every passage is recorded in a proper way.  
 2927 Also, the historical data should be annotated to allow tracking, comparison and measurement  
 2928 of the acquired optimisation.

2929 Upon a satisfactory completion of the validation process, the method development can be  
 2930 finalised and the final set of SOPs associated with the *in vitro* method will be available.

2931 In addition, the test developer should be aware that if the established *in vitro* method makes  
 2932 use of complex instrumentation and software, including data analysis and computer models  
 2933 and if developed in-house (e.g. excel data analysis templates), this software will also require  
 2934 documentation and full validation with SOPs for correct use, prior to transferring the *in vitro*  
 2935 method to the validation bodies.

2936 Once an *in vitro* method has been validated and published, e.g. in the format of an OECD  
 2937 Test Guideline (TG), the end-users will, from the published method, need to develop their  
 2938 own set of SOPs which are applicable and integrated into their organisation to assure the  
 2939 correct execution of the *in vitro* method within their facility environment.

## 2940 **7.2 Preparing Standard Operating Procedures**

2941 As indicated above, the guidance how to correctly perform the *in vitro* method is given in a  
 2942 set of SOPs, covering how to execute the *in vitro* test but also SOPs referring to general  
 2943 supporting procedures e.g. test system handling, solubility assessment, cytotoxicity

2944 measurement, equipment maintenance, calibration and cleaning; handling of test and  
2945 reference items; record keeping, reporting, storage, and retrieval, etc. The reason for not  
2946 having all these steps and processes described in one single SOP, but a set of  
2947 methods/procedures referring to other specific SOPs is to have available and easy-to-handle  
2948 documents, to be consulted by the personnel involved. However, to avoid deviating  
2949 procedures over time, it is advisable to include cross-references between these SOPs rather  
2950 than duplicating information as it might otherwise not be updated in all documents where it  
2951 appears.

2952 SOPs should be written in the active voice and concisely explain a procedure in a step-by-  
2953 step, easy-to-read format. The information presented should be unambiguous and not overly  
2954 complicated. The document should not be wordy, redundant, or overly lengthy but simple  
2955 and short. The inclusion of a flow chart to illustrate the process can help to make it clear.

2956 A SOP is best written by the people actually performing the work on a daily basis. The  
2957 finalised SOP needs to be reviewed and approved by laboratory management. SOPs are not  
2958 static documents and need to be systematically reviewed on a periodic basis and adapted  
2959 whenever something changes (products/ equipment / facility...), in order to be possible to  
2960 fully adhere to. As soon as a new version is approved, all concerned personnel need to be  
2961 informed before the new version comes into force. From that date onwards the obsolete  
2962 version needs to be made unavailable and adequately archived. To allow and control this, all  
2963 SOPs need to have a unique identifier (Title / version number / approval date). It is also  
2964 recommended to keep the revision history of the document in the document. SOPs should be  
2965 formally authorised by test facility management.

2966 SOPs may be written according to a pre-set template and may contain (adapted from “EPA  
2967 (USA) “Guidance for Preparing Standard Operating Procedures (SOPs) – EPA QA/G-6  
2968 /2007”): (EPA, 2007) ;

- 2969 • Title page or page header (including: a unique name which describes the essence of the  
2970 SOP; the name of the author or authors and the signatures of reviewers and approvers, an  
2971 identification code -if applicable-, the revision number, the date of approval and effective  
2972 date, and number of total pages in case it is not included in the subsequent pages).
- 2973 • Change log (list summarising the changes from each previous edition of the SOP).
- 2974 • Table of contents in particular necessary for longer SOPs. In some GLP test facilities short  
2975 SOPs (e.g. 5 pages) do not always have a table of contents.
- 2976 • Purpose/objective – (identifying the intended use of the procedure).
- 2977 • Field of Application/Scope (identifying when the procedure is to be followed, and  
2978 explaining who the intended user of the document is and what the method does and does  
2979 not cover).
- 2980 • Summary of main steps (can be illustrated by a flow chart, if desired).
- 2981 • Definitions (defining any words, phrases, or acronyms used in the SOP).
- 2982 • Personnel qualifications/responsibilities (identifying any special qualifications users  
2983 should have such as certification or training experience and/or any individual or positions  
2984 having responsibility for the activity being described)..
- 2985 • Reference to all related SOPs and other documents (forms, templates, worksheets etc.) to  
2986 be used together with the SOP (not necessarily as a separate section)
- 2987 • Health & safety warnings (indicating the possible risks to address and the personal  
2988 protection equipment and containment equipment to use).
- 2989 • Procedure (including: a list of the equipment, reagents, consumables and reference  
2990 materials, with their quality requirements; pre-analytical preparation: sample collection,

2991 handling and preservation; data processing; evaluation of results against acceptance  
2992 criteria; post-analytical activities: reporting of results; sample and chemicals discarding).  
2993 • Criteria, checklists, or other standards that are to be applied during the procedure.  
2994 • Records management (specifically, e.g., as forms to be used and locations of files).  
2995 • *In vitro* method acceptance criteria section - describe any control steps and provisions for  
2996 review or oversight prior to acceptance of the results.  
2997 • Reference Section - cite all references that have been consulted during the authoring of the  
2998 SOP.  
2999 • In addition to the first page, all the subsequent pages of a SOP should include the title, the  
3000 identification code (if applicable), the revision number, the page number (and the total  
3001 number of pages).

3002

DRAFT

## 3003 **8 Performance of the method**

3004 To assess *in vitro* method performance one needs to define the selection of reference and  
3005 control items as these are used to check the performance of the method. Of critical  
3006 importance is also how acceptance criteria (often based on historical data) are developed and  
3007 defined for the method regarding its performance.

3008 The number of replicates for each condition (e.g. chemical concentration) should be  
3009 specified. During method development the number of replicates must be chosen using  
3010 appropriate statistical methods. For example, a statistical power analysis (Crawley, 2015) can  
3011 be used to calculate the desirable number of replicates to detect a defined difference between  
3012 treatments with pre-set levels of confidence (Krzywinski and Altman, 2013). However, one  
3013 should be aware that this number can be too high to be useful in practice. Alternatively the  
3014 statistical power is provided for the chosen number of replicates.

3015 Additionally, when multiple concentrations of a test item are tested, the mathematical curve  
3016 fitting model (e.g. dose-response curve) can be computed with increasing number of  
3017 replicates. The lowest number of replicates that gives satisfactory variability of the parameter  
3018 of interest (e.g. IC<sub>50</sub> within acceptable limits) can be used in future studies (Assay Guidance  
3019 Manual, HTS Assay Validation, Section 5.2 assay guidance (Iversen *et al.*, 2004)). Apart  
3020 from these statistical considerations, sometimes practicalities such as cost and availability of  
3021 replicates may also play a role in the selection process. However the impact of reducing  
3022 replicates should always be subjected to careful analysis and corresponding power should be  
3023 given.

3024 Similarly, the number of independent experiments needs to be evaluated. For instance, *in*  
3025 *vitro* methods with a high degree of inter-experimental variability, such as those using  
3026 primary tissues, may need a higher number of independent experiments compared to *in vitro*  
3027 methods employing continuous cell lines.

3028 Statistical methods can be very useful in the process of optimising new *in vitro* methods.  
3029 Newly developed *in vitro* methods can include steps that may be interpreted differently and  
3030 result in significantly different readouts for the different interpretations. To obtain an *in vitro*  
3031 method that leads to accurate, reliable and robust readouts, the results of several  
3032 combinations of any changes in the *in vitro* method would have to be assessed. Given the big  
3033 number of variables that may or may not be changed, it is nearly impossible to approach all  
3034 these combinations experimentally. In such cases, factorial design of experiments may be of  
3035 added value. These are efficient at evaluating the effects and possible interactions of several  
3036 factors (independent variables). A statistical approach predicting the effect of changes in  
3037 testing method steps on the observed readout (known also as method robustness assessment)  
3038 would allow for the development of an efficient *in vitro* method design, since the  
3039 experimental robustness check can be based on a much smaller subset of combinations (Box  
3040 *et al.*, 2005; Groten *et al.*, 1997).

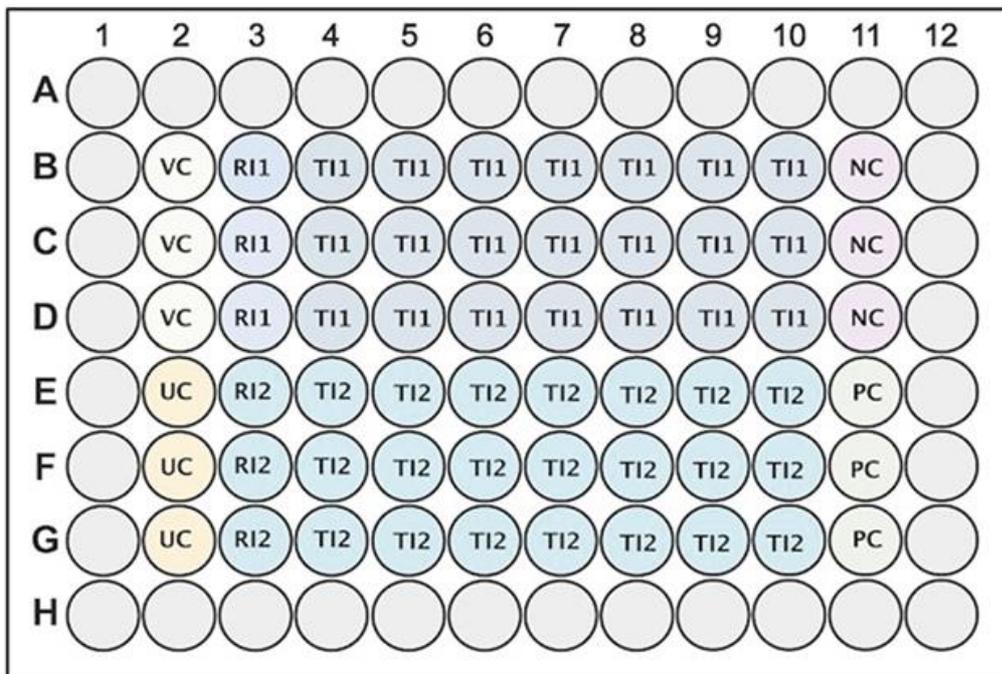
3041

### 3042 **8.1 Plate layout**

3043 The plate layout should be such that cross-contamination (e.g. between test items) can be  
3044 controlled for (replicates). It should also allow for cross-plate comparison by using  
3045 appropriate reference and control items. An example of an experimental 96-well plate layout  
3046 using reference and control items is shown in [Figure 1](#) (Coecke *et al.*, 2014).  
3047

3048  
3049

**Figure 7: Example of plate layout. PC positive control, RI reference item, NC negative control, UC untreated control, VC vehicle control, TI test item**



3050  
3051

3052 The example plate layout (Figure 6) minimises potential edge effects (difference between  
3053 outer and inner wells due to evaporation). For strategies to assess edge effects and drift see  
3054 Section [Error! Reference source not found.8.7](#). Another way to assess plate drift is to  
3055 include vehicle controls (VC) on both the left and right side of the plate. Left and right VCs  
3056 should not differ more than a certain percentage for the plate to be accepted. For example, in  
3057 the test in appendices, the following criteria is used: a test meets acceptance criteria if the left  
3058 and the right mean of the VCs do not differ by more than 15% from the mean of all VCs  
3059 (National Institutes of Health, 2001).

3060 Comparison across plates, evaluation that different plates provide comparable data, should  
3061 also be taken into account for the plate design.

3062 The inclusion of relevant reference and control items, and setting of acceptance criteria on the  
3063 basis of historical data, is essential for regulatory applicability of *in vitro* methods and should  
3064 be considered when developers decide on their plate lay-out. By including the correct  
3065 reference and control items, the data set obtained from the *in vitro* method will demonstrate  
3066 the correct functioning of the test system and the method used for analysis and therefore the  
3067 validity of the experiments executed.

3068 In addition, certain reference chemicals may be volatile (e.g. solvents) or may contaminate  
3069 neighbouring wells by capillary action, the wicking effect (Sullivan, 2001) and this may need  
3070 to be taken into account in designing plate layouts. For instance, the commonly used cell lysis  
3071 surfactant Triton X can affect cell viability in neighbouring wells and should be used at low  
3072 concentrations or separated from cell-containing wells by placing wells containing media or  
3073 buffer in-between.

## 3074 8.2 Data analysis

3075 When data need to be transformed by formulas for normalisation, computer scripts and/or  
3076 any model equations fit to the data, this should be documented in the SOP (OECD, 2014).  
3077 Formulas for normalisation (checked for accuracy) should be documented, validated (when  
3078 implemented in electronic format) and disclosed along with a description and justification of  
3079 the controls used in the calculation. Computer scripts used to process raw data (e.g. Excel  
3080 spreadsheets, scripts, macros etc.) should be validated and fully documented.

3081 When a model equation is fitted to the data (as in the case of dose-response curves, standard  
3082 curves or other models), the equations and reasoning behind their choice need to be stated.  
3083 For example, when fitting a dose-response curve, the type of the equation fitted to the data  
3084 should be stated (e.g., four parameter logistic curve), along with any constraints (e.g. top  
3085 constrained to 100% in normalised data) and weightings (e.g. by inverse data uncertainty)  
3086 applied (Motulsky and Christopoulos, 2004). Furthermore, the software name and version  
3087 used to fit the equations should be listed/stated, as well as the confidence interval of the  
3088 measurements of interest (e.g. IC50 values) and the relevant goodness of fit parameters (R-  
3089 square, sum of squares etc.) stated. Also see section [Error! Reference source not found.8.8](#)  
3090 of the current document and section 4.3 of OECD 211 (OECD, 2014) (OECD, 2014) as the  
3091 same data will need to be reported in the late stages of method development during the  
3092 assessment of method performance.

## 3093 8.3 Data-intensive *in vitro* methods

3094 The last decennia brought a paradigm shift in toxicity testing of chemical compounds, relying  
3095 more on less expensive and higher throughput high-content screening *in vitro* methods. They  
3096 allow the processing of hundreds or thousands of compounds simultaneously enabling the  
3097 identification of mechanisms of action, and ultimately facilitating the development of  
3098 predictive models for adverse health effects in humans. Furthermore, image analysis and  
3099 genomics-based *in vitro* method read-outs are getting more popular for *in vitro* method  
3100 developers due to the data rich information obtained with such methods.

3101 The utility of "big data" for regulatory safety assessment has been discussed recently, for  
3102 example omics (ECETOC 2013) or High Throughput screening (Judson 2013). These data  
3103 could be used in various contexts, such as supporting evidence for read-across, defining  
3104 categories or to allow the design of Integrated Testing Strategies (ITS). Still, most  
3105 applications have focused on screening and prioritisation as in the EPA ToxCast program  
3106 (Judson 2010).

3107 Although some technologies have been extensively used for more than a decade, e.g.  
3108 microarrays, debate is still ongoing about the reproducibility of experiments and the  
3109 comparability of results at different sites and on different platforms. Consensus is still to be  
3110 achieved concerning best practices in many critical aspects such as the experimental design  
3111 and protocols for sample preparation and handling, data processing, statistical analysis and  
3112 interpretation. One of the important challenges to be addressed for regulatory acceptance is  
3113 related to quality assurance (Bouhifd *et al.*, 2015). The maintenance of high standards is  
3114 essential for ensuring the reproducibility, reliability, acceptance, and proper application of the  
3115 results generated. A certain level of standardisation is also needed since "big data" are  
3116 generated using diverse technological platforms and various biochemical, analytical and  
3117 computational methods, producing different data types and formats.

#### 3118 8.4 Acceptance criteria

3119 Because the *in vitro* tests for the prediction of human health effects are intended to predict a  
3120 quantitative endpoint response predictive of the degree of human hazard, it is essential that  
3121 the test performs consistently over time and across laboratories. The positive control response  
3122 plays a major role in determining that consistency ([Error! Reference source not  
3123 found. Figure 40](#)). To do that, the positive control needs to induce a known change in the  
3124 endpoint measure(s) that falls at a point within the dynamic range of the test. That way,  
3125 increased and decreased magnitudes of response can be measured.

3126 In many cases, the acceptable range for the positive control response is based on a statistical  
3127 analysis of the historical range for the assay (firstly produced at the developer's laboratory,  
3128 then supplemented by data from validation studies, and finally produced in the laboratory  
3129 performing the *in vitro* method). For data, which follows an approximately normal  
3130 distribution, the mean and standard deviation are calculated and the acceptance range is set at  
3131 for instance plus or minus two standard deviations from the mean response. For example, the  
3132 Bovine Corneal Opacity and Permeability (BCOP) *in vitro* method using 100% ethanol as the  
3133 positive control (selected because it induces both increased opacity and fluorescein passage),  
3134 the mean published *in vitro* score (opacity + 15×permeability) was  $51.6 \pm 6.2$  (mean  $\pm$   
3135 standard deviation SD), which would set the acceptable range ( $\pm 2SD$ ) to be 39.2 to 64.0  
3136 (n=1171 trials) (Harbell *et al.*, 2014).

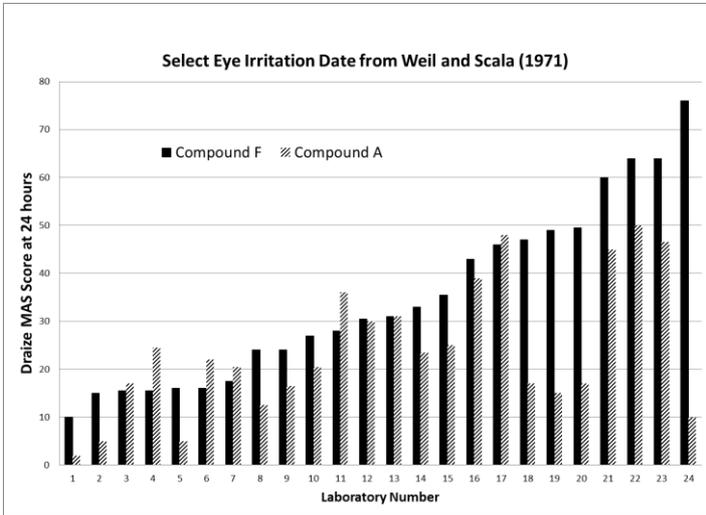
3137 Development of the positive control should begin as early in the *in vitro* method development  
3138 process as is practical (Hartung *et al.*, 2004). Positive control performance can help identify  
3139 dependent variables that impact assay consistency. It is essential that the positive control  
3140 should be incorporated into the assay every time it is performed. The positive control is  
3141 particularly important during the *in vitro* method development stage where data are being  
3142 generated to define the prediction model for translating the *in vitro* endpoint data into a  
3143 prediction of human (animal) health effects. A robust positive control historical record will  
3144 facilitate technology transfer to another test facility as part of the *in vitro* method transfer  
3145 process.

3146 The challenge of evaluating *in vitro* method performance over time and across laboratories is  
3147 not unique but is often not addressed with *in vivo* test system. *In vitro* test systems have a  
3148 large number of dependent variables. The operator is wholly responsible for maintaining test  
3149 system homeostasis and consistency.

3150 The importance of positive controls is exemplified by a Draize eye irritation study "Study of  
3151 intra- and inter-laboratory variability in the results of rabbit eye and skin irritation tests" in  
3152 (Weil and Scala, 1971). [Figure 8](#) shows the 24-hour Draize Maximum Average  
3153 Scores (MAS) for two of the test materials: Compound F (46% aqueous triethanolamine  
3154 lauryl sulfate) and Compound A (95% ethanol). The data are arrayed according to the MAS  
3155 reported for Compound F and A. Without a positive control, there is no means to compare  
3156 data from one laboratory to another or one laboratory over time.

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3157  
 3158 **Figure 8: Sample data from the Draize Eye Irritation test on two chemicals at 24 hours**  
 3159 **after instillation**



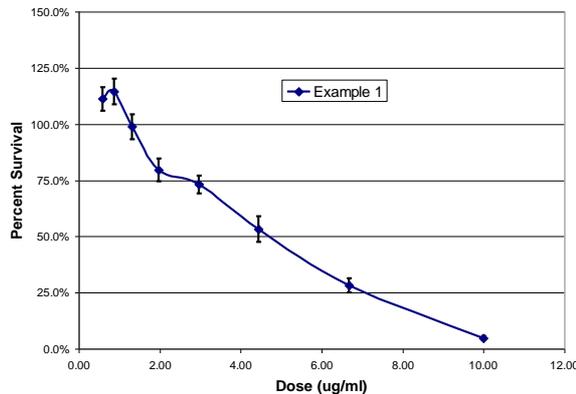
3160  
 3161 The data are arrayed in order of increasing maximum average score (MAS) for compound F.  
 3162 The corresponding MAS for compound A is paired with the MAS for compound F from that laboratory.

3163  
 3164 [Figure 9](#)[Figure 10](#) shows three concentration response curves from a keratinocyte-based  
 3165 cytotoxicity assay (neutral red uptake endpoint) treated with sodium lauryl sulfate. The  
 3166 difference between these curves shows the information that can be gained from a concurrent  
 3167 positive control. They also illustrate the importance of having multiple concentration points  
 3168 in the active range so as to narrowly define the 50% relative survival point. The 50% survival  
 3169 point (concentration) for the positive control compound is often the basis for establishing the  
 3170 acceptance criteria for a dilution-based cytotoxicity assay. This approach allows increased  
 3171 and decreased sensitivity to be readily identified.

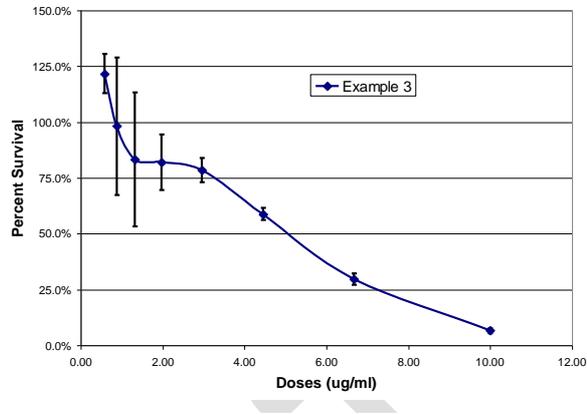
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3172 **Figure 9: A 96-well based cytotoxicity assay using human keratinocytes**

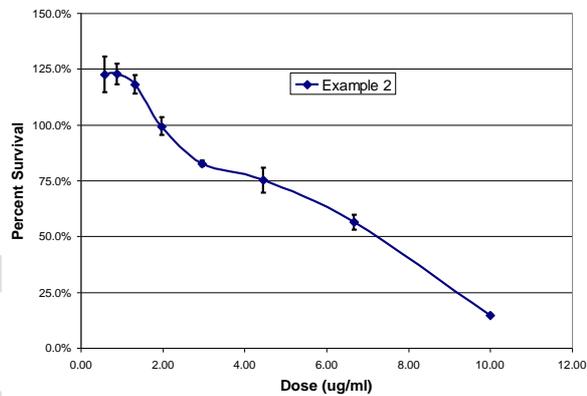
A. An example of normal positive control concentration response curve for this assay.



**B. This is an example of poor cell seeding leading to inconsistent neutral red uptake in replicate wells.**



**C. An increase in cell number per well has induced a right shift of the SDS cytotoxicity curve.**



3173

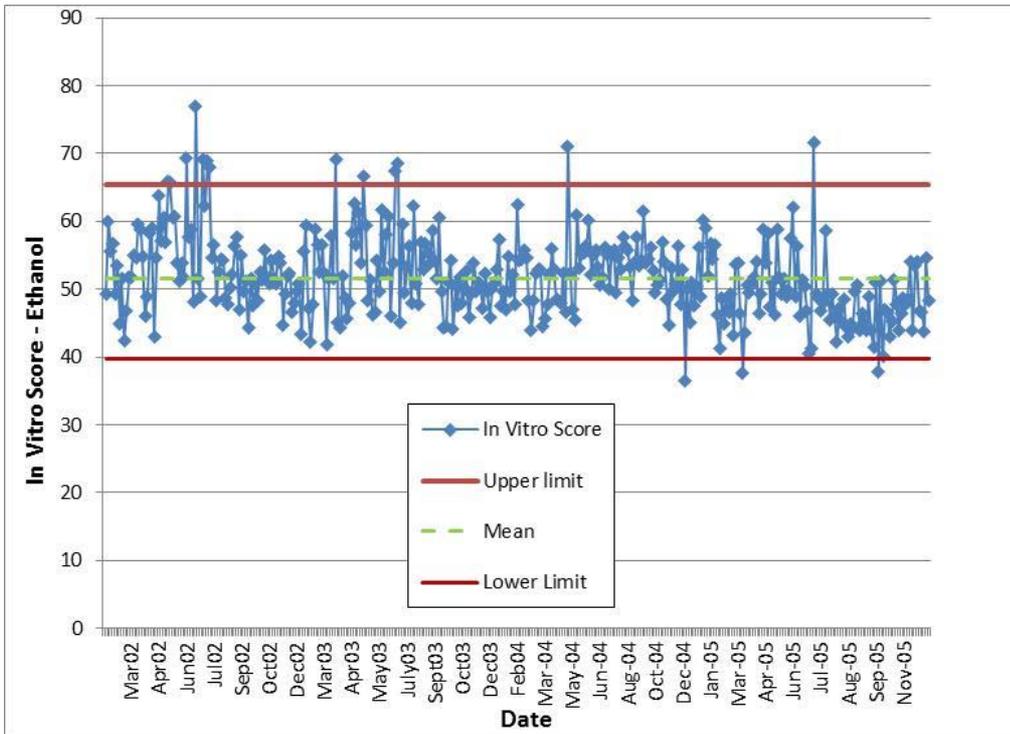
3174 In selecting a positive control, it is desirable but not always possible to select a single positive  
 3175 control to address all endpoints or exposure conditions. In the genetic toxicity *in vitro*  
 3176 methods, such as the bacterial reverse mutation (Ames) assay, two positive controls are used  
 3177 for each bacterial strain to address direct mutagenic activity and metabolic activation of a  
 3178 promutagen with rat liver S9 (Zeiger *et al.*, 1988). In the BCOP, one positive control is used  
 3179 for the liquids exposure testing method and another for the solids exposure testing method  
 3180 (OECD, 2009).

3181 Finally, the importance of testing the positive control concurrently with the unknown test  
 3182 materials each time the *in vitro* method is run is illustrated in [Figure 10](#) (Ulrey et  
 3183 al., 2005). This Figure shows the quality control chart for the BCOP using the ethanol control  
 3184 for each test performed over a period of 2.5 years. The acceptable upper limit is shown with a  
 3185 light line between 60 and 70. There is a cluster of points that extend above the upper limit (in  
 3186 mid-2002). These were failed assays which were repeated. The basis of the failures was not  
 3187 immediately clear since the eyes looked quite normal upon arrival in the laboratory.  
 3188 However, the patterns became clear and the cause was traced to improper handling of the  
 3189 eyes in the abattoir. Without the concurrent positive control data, it would not have been  
 3190 possible to identify the problem and prevent inappropriate data from being reported. Isolated  
 3191 tissues or tissue constructs as test systems can be difficult to properly evaluate visually and so

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3192 the functional test provided by the concurrent controls is often the only way to measure their  
3193 integrity.

3194 **Figure 10: A quality control chart for the ethanol positive control for the BCOP showing**  
3195 **the acceptable range and deviations above and below (March 2002 to November 2005-**  
3196 **courtesy of IIVS)**



3197  
3198  
3199 In the same vein, establishing an expected range for the negative control is important to  
3200 assure that the test system performs normally and to determine the detection limit of the  
3201 assay.  
3202 Finally, it is also important to establish the cut-off value of the acceptance criteria for  
3203 quantitative endpoints, i.e. whether it will be accepted not less to or higher than a specified  
3204 value, including the number of significant figures. Having a result of 50.4, and an acceptance  
3205 criteria of  $>50$  is not acceptable as the number of significant figures are not comparable  
3206 (using an acceptance criteria of  $\geq 50$  would be acceptable), however the preferred approach is  
3207 to specify the same number of significant figures both for the acceptance criteria and the  
3208 measured result e.g. acceptance criteria of  $> 50.0$  (one significant figure) and a measured  
3209 result of 50.4 (would be accepted).

### 3210 **8.5 Dynamic range/range of application**

3211 The response of the instrument and the *in vitro* method with regard to the readouts of interest  
3212 should be known, and should be evaluated over a specified concentration range. An important  
3213 characteristic of the method performance, for both quantitative and qualitative *in vitro*  
3214 methods is often referred to as Limit Of Detection (LOD). It determines the lowest actual  
3215 concentration or signal that can be consistently detected with acceptable precision, but not  
3216 necessarily quantified. In case of normally distributed data, the LOD is often determined as

3217 the concentrations at the average response + 3\* SD of the negative control range, as this gives  
3218 only 1% chance of a false positive.

3219 For quantitative measurements, the boundaries of the dynamic range are determined by the  
3220 lowest and highest analyte concentrations that generate results that are reliably produced by  
3221 an *in vitro* method without dilution of the sample. To ensure the ability of the method to yield  
3222 test results that are directly proportional to the analyte concentration (cell number, enzyme  
3223 activity) the linearity of the method should be ensured within the given range. Subsequently,  
3224 to facilitate efficient method transfer, the linear regression parameters (correlation  
3225 coefficient, slope, y-intercept as well as residual sum of squares) should be submitted along  
3226 with a plot of the data. When the upper limit is exceeded, samples fall outside of the linear  
3227 range, they may need to be diluted (when the upper limit is exceeded), if possible. In case the  
3228 samples give a result below the lower limit of the linear range, it may be useful to change to a  
3229 different apparatus with a higher sensitivity or adapt the sample preparation to obtain higher  
3230 concentrations, if possible.

3231 The lower limit of linearity is frequently referred to as the lower limit of quantification  
3232 (LLOQ) and the upper limit of linearity as the upper limit of quantification (ULOQ). The  
3233 upper limit of linearity may be restricted by the highest available concentration in a sample or  
3234 by the saturation of the signal generated by the instrument. The lower limit of quantification  
3235 may also be based on the negative control range.

3236 For certain assays/methodologies, equations other than the linear can be fit as a standard  
3237 curve, provided that the user is operating within the range of the assay/equipment (see 4.1  
3238 and above). However, it is recommended that the simplest model that adequately describes  
3239 the concentration-response relationship is used. Selection of weighting and use of a complex  
3240 regression equation should be justified. (Burd, 2010; EMEA, 2011; FDA, 2001; Viswanathan  
3241 *et al.*, 2007).

## 3242 **8.6 Signal intensity**

3243 The signal to noise (S/N) ratio is frequently applied for methods, which exhibit background  
3244 noise (observed as the variation of the blanks) as baseline. It is calculated by comparing  
3245 measured signals from samples with positive control item with those of blank samples. Note:  
3246 concentrations of positive controls should be chosen in a low to medium range (giving a clear  
3247 signal, but rather in the lower range of the linear range). While the S/N ratio is useful for  
3248 tests, in which the blank (negative control) and the positive control exhibit comparable levels  
3249 of variation, measures that take into account the levels of variability of both the blank and the  
3250 sample may be more appropriate for biochemical and cell biology research.

3251 They include:

- 3252 • Signal windows (SW) (Sittampalam, 1997): these allow for the calculation of the  
3253 separation between the sample (positive control) and the blank (negative  
3254 control/solvent) including the variability of both measurements:

$$3255 \quad SW = \frac{Mean_{sample} - Mean_{control} - 3*(SD_{sample} + SD_{control})}{SD_{sample}}$$

3256 A common SW acceptance criterion is  $SW \geq 2$  for biological assays.

- 3257 • Z-factors (Zhang *et al.*, 1999): they represent both the assay signal dynamic range and  
3258 the data variation associated with the signal measurements, and therefore are suitable

3261 for assay quality assessment. Z-factors  $\geq 0.4$  indicate acceptable separation between  
3262 the signal and the blank.

3263

$$Z = 1 - \frac{3 * (SD_{sample} + SD_{control})}{Mean_{sample} - Mean_{control}}$$

3264

## 3265 8.7 Signal variability and plate uniformity assessment

3266 The Assay Guidance Manual (HTS Assay Validation, Section 3 (Iversen *et al.*, 2004))  
3267 proposes a signal variability and plate uniformity assessment when developing new *in vitro*  
3268 methods. This assessment serves to quantify the variability of assay output for the minimum  
3269 (base, background), middle (close to EC<sub>50</sub>) and maximum (highest/maximal) assay readings.  
3270 By employing an interleaved format one can calculate the coefficient of variation of the min,  
3271 mid and max signals, Z-factors and signal windows. Exemplary acceptance criteria have been  
3272 proposed as coefficient variation CV $\leq 20\%$ , Z-factor $\geq 0.4$  and SW $\geq 2$ . In addition, the data  
3273 from this assessment can be used to derive the number of required replicates, using power  
3274 analysis (Crawley, 2015; Krzywinski and Altman, 2013).

3275 Furthermore, seeding density variation, plate edge effects and drift can also be examined in  
3276 this experimental setup using heat maps (e.g. created with Excel) or graphical plots.

3277 Edge effects are differences in growth in outer wells compared to inner wells. They are often  
3278 due to uneven evaporation rates or plate stacking and can be a source of variation, as outer  
3279 wells can often present as outliers compared to inner wells. Edge effects can be detected by  
3280 using a heat map of the readouts from the plate uniformity assessment, or by plotting the  
3281 signal readouts as a function of well position.

3282 The plate uniformity assessment can also detect drift effects, i.e. trends in signal from left-  
3283 right or top-bottom. Drifts can be due to seeding density variation during the process of initial  
3284 cell seeding in plates. For example, cells may be settling down in the master vessel which is  
3285 used to store a cell suspension used to seed a particular plate. Additionally, using the same set  
3286 of tips on a multichannel pipette while pipetting cells in media compositions prone to  
3287 foaming, may compromise the accuracy of the seeding. Higher variability, which cannot be  
3288 resolved via technique optimisation may require increased numbers of replicates, more drug  
3289 concentrations used to calculate dose-response or a higher numbers of independent  
3290 experiments (Iversen *et al.*, 2004).

## 3291 8.8 Reliability of endpoint calculations

3292 The coefficient of variation, signal windows and Z-factors are poorly suited to determine the  
3293 variation and reproducibility for potency estimates in dose-response experiments. Comparing  
3294 inflection point parameters such as IC<sub>50</sub> or EC<sub>50</sub> is further complicated by the fact that they  
3295 are not normally distributed and require logarithmic transformation before averaging or  
3296 statistical comparison (Christopoulos, 1998; Motulsky and Christopoulos, 2004).

### 3297 8.8.1 Confidence intervals for EC<sub>50</sub>s

3298 While the parameters derived from non-linear regression analysis, like IC<sub>50</sub> and EC<sub>50</sub> values,  
3299 are not normally distributed, their logarithms are (the potency estimates are log-normally  
3300 distributed). Therefore, when multiple independent experiments are run, EC<sub>50</sub> values from  
3301 multiple runs can be combined by using their geometric mean, calculated by averaging the

3302 logEC<sub>50</sub> values. The standard error of the mean of the logEC<sub>50</sub> values can be further used to  
3303 calculate 95%-confidence intervals for the EC<sub>50</sub> of a number of independent experiments.  
3304 Another way of quantifying dose-response curve reproducibility is by using the minimum  
3305 significant ratio (MSR) (Eastwood *et al.*, 2006).

#### 3306 **8.8.2 Minimum significant ratio**

3307 The MSR is a parameter that can be used to quantify assay reproducibility and resolution (the  
3308 smallest ratio between compound potency which can be detected in the *in vitro* method). The  
3309 so-called 'replicate experiment study' (Assay Guidance Manual, HTS Assay Validation  
3310 Section 4 (Iversen *et al.*, 2004)) uses the differences between the potency estimates for 20-30  
3311 compounds in two independent assay runs to estimate the within-run assay variability over a  
3312 range of potencies. The SD of the difference between logIC<sub>50</sub>s in run 1 and run 2 is  
3313 computed. The  $MSR=10^{2 \cdot SD}$  is computed and example acceptance criteria have been given as  
3314  $MSR < 3$  (meaning up to three-times potency difference between runs is judged acceptable).

3315 The control compound MSR can be calculated for controls where data for at least six runs is  
3316 available and gives an estimate of between-run variability. The control compound MSR is  
3317 calculated as  $MSR=10^{2 \cdot s}$ , where s is the standard deviation of the log<sub>10</sub>EC<sub>50</sub> values across  
3318 runs, assuming one EC<sub>50</sub> result per run (Haas *et al.*, 2004).

#### 3319 **8.8.3 Variability and outliers**

3320 The degree of variability judged acceptable should be given for the critical parameters of the  
3321 assay- CV, Z-factors, SW, MSR or 95%-CI for IC<sub>50</sub> measurements.

3322 Criteria to detect/remove outliers should be stated and the reasoning behind should be given  
3323 (Motulsky and Brown, 2006; Pincus, 1995).

3324 Variability should be determined for within runs (= repeatability), for within the laboratory (=  
3325 intra-laboratory reproducibility), and for between laboratories (inter-laboratory  
3326 reproducibility) during validation (Burd, 2010; EMEA, 2011; FDA, 2001; Viswanathan *et al.*,  
3327 2007).

#### 3328 **8.8.4 Transferability: in between lab transfer**

3329 The transferability of an *in vitro* method from the developer laboratory to a second laboratory  
3330 is a crucial step for demonstrating the robustness of the established procedures and/or SOPs.  
3331 This step is necessary to evaluate the practicability of the test and to identify possible sources  
3332 of within- and between-laboratory variability. Moreover it provides also an estimation of the  
3333 amount of training that will be necessary to successfully transfer the test to an inexperienced  
3334 laboratory. A good inter-laboratory reproducibility proves transferability.

#### 3335 **8.9 Accuracy, reliability and uncertainty**

3336 The usefulness of an *in vitro* method depends on its accuracy and reliability to correctly  
3337 classify chemicals according to its stated purpose (e.g., sensitivity, specificity, positive and  
3338 negative predictivity, false positive and false negative rates). These values often are obtained  
3339 from continuous data and categorised accordingly (e.g. as strong, weak). In such case cut off  
3340 values are used and their impact on the accuracy and reliability should be taken into account.  
3341 The use of confidence bounds taking into account the distance to these cut off values should  
3342 be considered.

3343 There are a number of measures that can be used to assess method performance and the  
 3344 confidence of the test predictions (Gaddis and Gaddis, 1990), based on Table 6. Below is an  
 3345 example that has been used in the validation process of different *in vitro* methods that are  
 3346 now OECD test guideline methods.

3347  
 3348 **Table 62: Possible outcomes of a test result of a chemical in a validation**

		Gold Standard Test	
	Total number	Condition positive	Condition negative
Test outcome	Test outcome positive	True positive (TP)	False positive (FP)
	Test outcome negative	False negative (FN)	True Negative (TN)

3349  
 3350 The sensitivity is the ability of a test to reliably classify positive substances:  
 3351

$$\text{Sensitivity (\%)} = 100 \cdot \frac{TP}{(TP + FN)}$$

3352

$$\text{False negative rate } (\beta) = 1 - \text{sensitivity} = \frac{FN}{(TP + FN)}$$

3353  
 3354 The specificity is the ability to reliably classify negative substances:  
 3355

$$\text{Specificity (\%)} = 100 \cdot \frac{TN}{(TN + FP)}$$

$$\text{False positive rate } (\alpha) = 1 - \text{specificity} = \frac{FP}{(TN + FP)}$$

3356  
 3357 The positive predictive value (PPV) is the proportion of correct positive responses among  
 3358 materials testing positive by an *in vitro* method:  
 3359

$$\text{PPV (\%)} = 100 \cdot \frac{TP}{(TP + FP)}$$

3360  
 3361 The negative predictive value (NPV) is the proportion of correct negative responses among  
 3362 materials testing negative by an *in vitro* method:  
 3363

$$\text{NPV (\%)} = 100 \cdot \frac{TN}{(TN + FN)}$$

3364  
 3365 What level of sensitivity, specificity, etc. is acceptable is not standardised. Such levels are  
 3366 also very dependent on the list of chemicals with which they are determined, therefore strict  
 3367 boundaries in acceptable levels for these accuracy parameters are not realistic. Generally  
 3368 though, sensitivities below 75% should not be accepted.

3369 A discussion on what is a gold standard for an *in vitro* test, is very important here, as this is  
 3370 where many validations of *in vitro* tests fail currently. Comparison to an *in vivo* test is

3371 problematic, because of several reasons such as: (i) species differences e.g. in case of rat *in*  
3372 *vivo* and human cells *in vitro*; (ii) *in vivo* tests may include more pathways to a certain effect  
3373 (endpoint) than the *in vitro* test. In this case the *in vitro* test would detect fewer *in vivo*  
3374 (“true”) positives. The situation may also be reverse, e.g. due to compensations *in vivo* not  
3375 existing *in vitro*; (iii) the test endpoints *in vivo* and *in vitro* may not be 100% identical; (iv)  
3376 the *in vitro* test does not reflect *in vivo* toxicokinetics and metabolism, which can lead to  
3377 fewer (e.g. in case of toxification by metabolic enzymes) or increased positives (e.g. in case  
3378 of detoxification or an absorption barrier) being found by an *in vitro* test without any  
3379 metabolic competence, compared to an *in vivo* test; (iv) lack of mechanistic understanding of  
3380 the underlying biological processes resulting in a positive or negative effect *in vivo*. Hereby it  
3381 should be mentioned that many routinely used animal-based methods correlate poorly to the  
3382 effects observed in humans. It might happen, therefore, that an *in vitro* test with human  
3383 tissues shows very poor sensitivity and specificity when compared to the animal test and  
3384 would therefore seem to be a poor test. Comparison to human data as the golden standard  
3385 could in that case show whether the *in vitro* test is really poor, or actually a better test than  
3386 the animal test.

3387 The chemicals used for determining accuracy and reliability should therefore be selected with  
3388 care (only the ones working through the pathways included in the *in vitro* method) and this  
3389 assessment should include toxicokinetic information on these chemicals.

3390 EFSA’s Scientific Committee defines uncertainty as referring to “all types of limitations in  
3391 the knowledge available to assessors at the time an assessment is conducted and within the  
3392 time and resources available for the assessment”. Examples include:

- 3393 • Possible limitations in the quality and representativeness of data.
- 3394 • Comparing non-standardised data across countries or categories.
- 3395 • Choosing one predictive modelling technique over another.
- 3396 • Using default factors (such as the weight of an average adult).

3397 Since 2013, EFSA’s Scientific Committee has been developing guidance<sup>20</sup> on how to assess  
3398 uncertainty in a structured and systematic way. The aim is to offer a tool-box of  
3399 methodologies – both quantitative and qualitative – and related training for EFSA’s Scientific  
3400 Panels and staff as well as for other organisations (e.g. researchers, national authorities) that  
3401 carry out scientific work on EFSA’s behalf.

3402 In addition, IPCS has published a guidance document on "Evaluating and expressing  
3403 uncertainty in hazard characterization"(IPCS, 2014), which is focussed on animal test results.  
3404 However, described concepts such as the benchmark dose (BMD), including its uncertainty  
3405 characterisation, can also be used for *in vitro* assays.  
3406

3407

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<sup>20</sup> <https://www.efsa.europa.eu/sites/default/files/160321DraftGDUncertaintyInScientificAssessment.pdf>

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3408 **9 Reporting of Results**

3409 *In vitro* methods must be fully documented by good recording and reporting practices and  
3410 contain all pertinent details to allow subsequent and adequate analysis and reporting of  
3411 results. For example, lot numbers, catalogue numbers, supplier details, and expiry dates for  
3412 chemicals and reagents must be listed, as well as temperatures and times (e.g. storage of  
3413 chemicals, incubation steps in the *in vitro* method), specific identification of critical  
3414 equipment used and, perhaps most importantly, any deviations from SOPs. All this  
3415 information must be directly and accurately recorded, signed and dated by the person  
3416 performing the activity, as these recordings are important for the correct interpretation of the  
3417 results obtained.

3418 Experimental details and results should be easily located; a log page at the front of a  
3419 notebook may help track the recordings and observations. Any reference to computer files  
3420 containing data should also be catalogued in the notebook. Data files should always be  
3421 backed-up in case of computer failure, corruption, or deletion.

3422 Reporting requirements depend on the different development phases of the *in vitro* method.  
3423 For regulatory use, requirements for reporting are described in the GLP Principles. Reporting  
3424 adequate information and results of all developmental phases will increase the confidence in  
3425 the *in vitro* method and would allow for general acceptability by regulatory authorities.

3426 Classical use of *in vitro* method information such as results derived and reported from OECD  
3427 *in vitro* test guideline methods (e.g. Ames, *in vitro* skin irritation, *in vitro* eye irritation)  
3428 conducted at GLP test facilities are accepted by regulatory authorities of OECD member  
3429 states and MAD-adhering economies. In contrast, results derived from non-standard *in vitro*  
3430 methods and non-testing methods (QSARs, etc.) are not necessarily accepted by regulators  
3431 but might be submitted as supporting information.

3432 There is an increasing tendency towards more transparency when publishing work which  
3433 may lead to better reproducibility of published data (Guidelines for Transparency and  
3434 Openness Promotion (TOP) Open Science Framework<sup>21</sup>). The EU Competitiveness Council  
3435 has also announced their target that all scientific publications resulting from publicly funded  
3436 research should be publicly available by 2020<sup>22</sup>.

3437 Sharing of data in public repositories is also being encouraged and best principles regarding  
3438 the publication of scientific data have also been addressed by others, such as the FAIR  
3439 (Findable, Accessible, Interoperable, and Reusable) Guiding Principles for scientific data  
3440 management and stewardship, by the Nature Publishing Group<sup>23</sup>. This initiative not only  
3441 promotes more transparency and openness but also promotes the use of computer readable  
3442 datasets and data mining so that computers have the ability to access the data autonomously,  
3443 unaided by their human operators, which is core to the FAIR Principles.

3444 In addition to the increasing openness and transparency, the publication of negative results is  
3445 also gaining more ground e.g. Journal of Negative Results in BioMedicine is an open access,  
3446 peer reviewed journal that provides a platform for the publication and discussion of non-  
3447 confirmatory and "negative" data.

<sup>21</sup> <https://osf.io/ud578/>

<sup>22</sup> <http://english.eu2016.nl/documents/press-releases/2016/05/27/all-european-scientific-articles-to-be-freely-accessible-by-2020>

<sup>23</sup> <http://www.nature.com/articles/sdata201618>

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3448 The information provided by individual *in vitro* methods, as well as *in silico* predictions, can  
3449 be combined, interpreted and used for regulatory decision making by means of Integrated  
3450 Approaches to Testing and Assessment (IATA) (OECD 2016c). An IATA is an approach that  
3451 integrates and weighs all relevant existing evidence and guides the targeted generation of new  
3452 data, where required, to build up a hazard or risk assessment acceptable in regulatory  
3453 decision-making. Ideally, IATA should be informed by mechanistic understanding of the  
3454 underlying toxicokinetics and toxicodynamics. A framework for capturing the toxicodynamic  
3455 information is provided by Adverse Outcome Pathways<sup>24</sup>.

3456 Structured integration of different data types can be performed at different levels, including  
3457 raw data and summarised level data. Different levels of data integration can then be used  
3458 including Boolean combinations of categorised results, scoring approaches, decision trees,  
3459 deterministic and probabilistic approaches. As experience is gained, approaches to data  
3460 integration can become standardised. Such approaches, called “defined approaches,” can thus  
3461 become core elements of IATA. A defined approach is a formalised decision-making  
3462 approach consisting of a fixed data interpretation procedure used to interpret data from a  
3463 defined set of information elements (OECD 2006a,b).

3464 When submitting *in vitro* data to a receiving authority, the use of OECD endorsed templates  
3465 (e.g. OECD Harmonised Template 201 – Intermediate Effects) is encouraged but is not yet  
3466 obligatory. This is facilitated by the use of IUCLID (International Uniform Chemical  
3467 Information Database), a software application used to record, store, maintain and exchange  
3468 data on intrinsic and hazard properties of chemical substances.

## 3469 9.1 Publishing

3470 It is essential to have all the results reported in a uniform manner to facilitate their use in the  
3471 IATA framework, where the same dataset can be used in many different ways. It is good  
3472 practice to publish scientific results in a timely manner. The results will be used and re-used  
3473 by other scientists, competitors, modellers or validation study statisticians. Moreover, for any  
3474 systemic endpoint the prediction is/will be based on the results of many different studies,  
3475 using different methods performed in different facilities.

3476 Therefore, data sharing is encouraged by default, unless there is reason for confidentiality. It  
3477 is recommended to not only publish the results, but also the method/SOP (e.g. Nature testing  
3478 methods, JOVE, Testing method Exchange, Springer Testing methods, DB-ALM, JRC-  
3479 QSAR DB) and using public data-sharing standards and repositories for raw data such as  
3480 ISA-TAB (<http://isa-tools.org/>, Dryad, Figshare, and Scientific data  
3481 (<http://www.nature.com/sdata/>). In the same vein, assay modifications and further  
3482 developments should be published, while tests are still in a development or pre-validation  
3483 phase. Such publications should include the changes leading to improvement, the rationale  
3484 for them, and this should also entail information on which changes reduce assay performance,  
3485 or that do not result in an improvement.

## 3486 9.2 Reporting of method validation

3487 Validation is at the interface between *in vitro* method development/optimisation and  
3488 regulatory acceptance/international recognition and ensures a science-based and  
3489 conscientious evaluation of *in vitro* methods and approaches (e.g. Integrated Testing

<sup>24</sup> <http://www.oecd.org/chemicalsafety/testing/adverse-outcome-pathways-molecular-screening-and-toxicogenomics.htm>

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3490 Strategies, ITS), independent of specific interests, establishing their overall performance and  
3491 fitness for a given purpose, i.e. their scientific validity<sup>25</sup>.  
3492

3493 The approach taken by the validation bodies may vary according to the needs of that body as  
3494 to whether they will coordinate the validation or whether a validation study should be  
3495 submitted to that body for assessment. In general, once a validation study has been  
3496 completed, the validation report will be submitted to the validation body for assessment of  
3497 the outcome of the validation. While the individual study raw data may not need to be  
3498 reported to the validation body, the data analysis and validation report will be required.  
3499 Completed validation studies will then undergo independent scientific peer review e.g. by the  
3500 EURL ECVAM Scientific Advisory Committee (ESAC), whose outcome will also be made  
3501 public.

3502 On completion of the validation study assessment, the recommendations of the validation  
3503 body plus the validation report will be made public, e.g. EURL-ECVAM publishes its  
3504 EURL-ECVAM Recommendations on its website. Before finalising and publishing these  
3505 recommendations, EURL-ECVAM, as a matter of routine, invites comments from the general  
3506 public. The aim of an EURL-ECVAM Recommendation is to provide EURL-ECVAM views  
3507 on the validity of the *in vitro* method in question, to advise on possible regulatory  
3508 applicability, limitations and proper scientific use of the *in vitro* methods, and to suggest  
3509 possible follow-up activities in view of addressing knowledge gaps.

3510 The validation study project plan should outline the

- 3511 • Organisations or individuals responsible for data collection
- 3512 • The means of data collection, back-up and archiving
- 3513 • Procedures for data collection (to be established in collaboration with the participating  
3514 laboratories
- 3515 • A consistent system of paper-based or electronic labelling of files and folders  
3516 including provisions to clearly label final versions.

### 3517 **9.2.1 Reporting Templates**

3518 To assist in the reporting of data generated in the various laboratories participating in a  
3519 validation study, templates are prepared either by the test submitter, the validation body or a  
3520 combination of both. These reporting templates should be designed to support later analysis  
3521 of the 'high-level' data of validation studies (e.g. by the statistician) and should be validated  
3522 before being introduced into the validation process. For a fully GLP-compliant study where  
3523 each laboratory is a test facility, the test facility's SOPs and report templates might need to be  
3524 used and the validation body subsequently introduces specific templates for analysing the  
3525 multi-study validation data.

3526 In case of laboratories operating under GLP, there should be adequate measures put in place  
3527 to assure the quality and reliability of the data being reported and recorded. However, in  
3528 cases of laboratories that do not operate under quality schemes (e.g. university laboratories) it  
3529 is highly advisable to reflect on simple procedures that allow monitoring the adequacy of data  
3530 reporting, to ensure that the data used by the statistician for final analysis are correct and  
3531 hence relevant. The simplest possible measure would be that data files are checked, at  
3532 random, by either a laboratory member or a member of the validation management (the  
3533 responsibility should be outlined in the validation project plan). Typical and avoidable

<sup>25</sup> <https://eurl-ecvam.jrc.ec.europa.eu/validation-regulatory-acceptance>

3534 mistakes are the incorrect handling (copy / pasting) of numerical values (e.g. wrong column  
3535 in an Excel sheet with consequences on automated data analyses), accidental deletion of  
3536 embedded formulas or mistakes when normalising values.

3537 Collection of data generated by participating laboratories can be done in a secure  
3538 environment by using web-based information exchange tools such as the European  
3539 Commission's CIRCABC system.

### 3540 **9.3 Data reporting for regulatory purposes**

3541 Data captured in GLP studies and results derived thereof will play an important role in  
3542 increasing the relevance of *in vitro* data in regulatory contexts. Consideration and ultimately  
3543 acceptance of *in vitro* GLP data can be promoted by using a standardised data format. IATA  
3544 and AOP knowledge, if properly captured and presented, leads to a better understanding of  
3545 toxicity mechanisms, and ultimately the AOP knowledge - derived from testing several  
3546 chemicals - may be extrapolated to predict the toxicity of all chemicals that trigger the same  
3547 Molecular Initiating Event (MIE) or Key Event (KE). Until recently, the absence of a  
3548 template to report Intermediate Effects (like MIEs and KEs) was a limiting factor

3549 The OECD had already designed and published 114 OECD Harmonised Templates (OHTs)  
3550 to report test results concerning:

- 3551 • physical/chemical properties (e.g. boiling point, density, flammability, ...),
- 3552 • human toxicity (e.g. carcinogenicity, acute toxicity, ...)
- 3553 • environmental toxicity (e.g. aquatic toxicity, terrestrial toxicity, ...)
- 3554 • other properties describing degradation, accumulation etc.

3555 These templates are geared towards results derived from classical (mostly OECD guideline)  
3556 studies, focusing on apical endpoints, i.e. Adverse Outcomes.

3557 However, reporting MIEs or KEs with such a classical OHT would tie them inseparably to  
3558 the one Adverse Outcome the one template covers, which is undesirable, as the (*in-vitro*, *in-*  
3559 *silico* mechanistic) information is then not easily accessible for building AOPs leading to  
3560 other Adverse Outcomes: A Key Event can be relevant not only for one AOP, but several.  
3561 Reporting the Intermediate Effect in an "AO-neutral" template makes the data available for  
3562 all kinds of AOPs.

3563 A new, AO-neutral OHT was therefore needed that would allow reporting observations from  
3564 mechanistic (*in-vitro* and *in-silico*) tests, without immediately locking into one of several  
3565 AOs the Intermediate Effect could lead to.

3566 Knowing not only about results of animal tests (classical OHTs), but being able to cross-  
3567 reference these test results with the intermediate effect observations (new OHT) has the  
3568 potential to lead the way towards a less animal-centred hazard assessment.

3569 The OECD therefore started an initiative to come up with a stable, stakeholder-endorsed  
3570 OHT for reporting on "intermediate effects" being observed via *in vitro* assays and possibly  
3571 other non-animal test methods (computational predictions etc.). The template was titled  
3572 "OHT 201 - Intermediate effects".

3573 OHT 201 was endorsed by the OECD Joint Meeting in 2015 and was finally published in  
3574 August 2016, see [http://www.oecd.org/ehs/templates/harmonised-templates-intermediate-](http://www.oecd.org/ehs/templates/harmonised-templates-intermediate-effects.htm)  
3575 [effects.htm](http://www.oecd.org/ehs/templates/harmonised-templates-intermediate-effects.htm) for more details.

3576 The basic principle of OHT 201 is that:

- 3577       • one or several objective observation(s) (= results from non-classical test methods)  
3578       • lead(s) to one subjective conclusion (= Intermediate Effect present, yes or no).

3579 A properly filled in OHT 201 template therefore conveys a clear statement:

- 3580       • Based on observations  $O_1, O_2, \dots O_n$   
3581       • a certain chemical  
3582       • triggers/does not trigger  
3583       • a certain intermediate effect  
3584       • on a certain biological level  
3585       • at a certain effect concentration.

3586 With OHT 201 being implemented in IUCLID, the ICT system used by industry to fulfil  
3587 reporting obligations under more and more legislative programmes (e.g. REACH), the notion  
3588 of Intermediate Effects (and implicitly AOPs and predictive toxicology) has started to get  
3589 attention in the regulatory world. This is a first step towards the acceptance of results from  
3590 alternative tests for regulatory purposes, with the ultimate goal of replacing *in-vivo*-centred  
3591 Adverse Outcome observations with alternative-methods-centred IATA/AOP considerations  
3592 as the basis for risk assessment.

3593 For *in vitro* methods without a guideline, the Office of Pesticide Programs U.S.  
3594 Environmental Protection Agency recommends following OECD Guidance Document 211  
3595 (OECD, 2014) for describing non-guideline *in vitro* methods (EPA, 2016).

## 3596 **10 Storage and retention of records and materials**

3597 As the ultimate goal is to develop an *in vitro* method which will be formally validated for its  
3598 future use in a regulatory environment following a quality system (e.g. GLP), it is essential to  
3599 have some knowledge of the regulatory requirements specifically relating to the storage and  
3600 retention of data, records and materials as the *in vitro* method should be designed so as to be  
3601 easily transferrable into a GLP facility.

3602 Data, records and material (specimen) integrity arrangements must be in place throughout the  
3603 *in vitro* method lifecycle to ensure that the accuracy and completeness of data, records and  
3604 materials are retained. The lifecycle includes all phases in the life of the data, records and  
3605 materials, from their initial creation or purchase through processing, use, retention, archival  
3606 and retrieval, and eventual destruction. It is vital that formal records used to confirm the  
3607 results and how they were obtained are held in a stable/secure form and location which is  
3608 documented and traceable and for which there is a minimum storage period. Disposal after  
3609 such storage periods should be recorded and a summary report of the stored data and the  
3610 means of destruction prepared and held.

3611 Retention arrangements (classified as either archive or backup in case of electronic data)  
3612 must be designed to protect data, records and materials from deliberate or accidental changes,  
3613 manipulations or deletions thus ensuring integrity throughout the retention period. Archiving  
3614 is defined as the long term, permanent retention of completed data and relevant metadata,  
3615 records or materials in its final form. Archived data, records or materials may need to be  
3616 stored for many years and must be permanently locked such that no changes can be made  
3617 without detection. In the case of paper records, storage must be in dry and fire- and light-  
3618 proof conditions. In addition to this, they should be easily retrieved for regulatory  
3619 inspections.

3620 Storage, retention and archiving requirements vary considerably throughout the lifecycle of  
3621 the *in vitro* method. In the early stages, e.g. method development, there are less formal  
3622 requirements for storage and retention of records and materials than in the later stages and in  
3623 general will follow the university/institute/company policy regarding the storage and  
3624 retention of data, records or materials (where such a policy exists). The development phase  
3625 should be used to define the raw data, preferably described in the *in vitro* method itself, and  
3626 any data (e.g. metadata), records or materials, to be retained when used in a regulatory  
3627 environment (e.g. GLP).

3628 As the use of human cells and tissues is critical for the development and implementation of *in*  
3629 *vitro* methods for regulatory use in human safety assessment, already in the early stages care  
3630 has to be taken regarding their ownership, their identity and who can control their fate. A  
3631 number of treaties, laws, and regulations help to guide the ethical collection of human-  
3632 derived specimens (Clinchem, n.d.)(<http://www.clinchem.org/content/56/11/1675.full>).

### 3633 **10.1 Archiving of materials**

3634 An effective archiving system must also provide for the archiving of study samples and  
3635 materials, e.g. slides, specimens, test items and reference material under suitable storage  
3636 conditions (OECD, 2007a). Specimens and materials should be stored only as long as they  
3637 are stable. The Principles of GLP state that: “a sample for analytical purposes from each  
3638 batch of test item should be retained for all studies except short-term studies”. The same rules  
3639 apply to these archives as apply to the paper based archive, i.e. access restrictions, retrieval  
3640 and removal of items, etc.

3641 The storage conditions should be optimal for these samples and often these archives will  
3642 require dedicated storage facilities, e.g. low temperature storage such as -20°C, liquid  
3643 nitrogen storage or storage of items under inert conditions. Where special storage equipment  
3644 is required, the rules governing the control and maintenance of this equipment must be  
3645 applied. Where computerised systems are used, these systems must also follow the facility's  
3646 policy regarding the use of computerised system, including qualification and validation of  
3647 said systems (OECD, 2016b).

3648 Samples of test and reference items or specimen may however be discarded when the quality  
3649 of the material no longer permits evaluation. Obviously, the storage conditions should be  
3650 optimal for these samples. When samples of test and reference items or specimens are  
3651 disposed of before the end of the required retention period, the reason for disposal should be  
3652 justified and documented (e.g. the reason might be perishable specimens such as blood  
3653 smears, freeze-dried preparations and wet tissues).

## 3654 **10.2 Document and record management**

3655 Good Document Practices should be followed for both paper records and electronic records  
3656 in order to assure data integrity. These principles require that documentation has the  
3657 characteristics of being Attributable, Legible, Contemporaneously recorded, Original and  
3658 Accurate (sometimes referred to as ALCOA). These essential characteristics apply equally  
3659 for both paper and electronic records (WHO, 2016).

3660 When working under a quality system (e.g. ISO, GLP), the management of documents and  
3661 records to be retained will be described in the quality system's documentation such as in the  
3662 Quality Manual or various SOPs. In a regulatory environment, e.g. GLP, principles and  
3663 national laws detail the archiving requirements (OECD, 2007a). Where no formal quality  
3664 system exists the general concepts for storage of records still apply.

3665 When storing electronic records it is critical that the relationships between data and metadata  
3666 are maintained intact throughout the data life cycle, as the data alone cannot provide the  
3667 necessary information to recreate a study.

3668 Electronic records may be stored either as flat files, e.g. individual files, or in a relational  
3669 database. Storing data in flat files is relatively trivial to implement, for example files may be  
3670 stored on a local drive or on a network share, however the data stored in this way rarely  
3671 contains all the relevant metadata, rendering the data incomplete. Due to the nature of flat  
3672 files, the user will have full access to the file(s), which presents a greater data integrity risk  
3673 since data can be moved, manipulated or even deleted without tracking.

3674 Conversely, a relational database file structure is much more secure as it stores the data and  
3675 metadata in different places but maintains the relationship between them. This makes it  
3676 inherently more difficult to selectively delete, amend or recreate the original data and the  
3677 metadata trail of actions, and most systems provide an audit trail to see who has done what  
3678 and when. Such systems mean an upfront investment in software and time (training, etc.), and  
3679 the life cycle of the relational database software must also be taken into consideration (e.g.  
3680 upgrading, etc.). Once a system has been put in place it is difficult to migrate to another  
3681 system and retain all metadata links, specifically the audit trail data. Migrating to a new  
3682 system for whatever reason (e.g. current system becomes obsolete) will prove expensive in  
3683 cost, time and retraining of personnel.

3684 **10.2.1 Documents and records to be retained**

3685 It is imperative that the historical data, paper-based or in the form of electronic data, are  
3686 effectively managed so as to prevent any data integrity issues as this data may be requested  
3687 when submitting the method for formal validation.

3688 As compliance with the principles of GLP is required by law for safety studies on chemical  
3689 products around the world, it is important that newly developed *in vitro* methods can be  
3690 suitable to be performed in a GLP environment from the very beginning of their  
3691 development, avoiding an adaption phase at the very end of the process (Coecke *et al.*, 2016).  
3692 Ideally, all data supporting the validity of a test method should have been obtained in  
3693 accordance with the principles of GLP (OECD, 2005b). Studies which support validations  
3694 may or may not be subject to verification depending on compliance monitoring authorities'  
3695 programmes<sup>26</sup>.

3696 In most cases electronic templates (e.g. Excel spreadsheets) will have been developed and  
3697 validated for the processing of the study data. These electronic files must be populated with  
3698 the acquired data from each laboratory and forwarded to the validation body upon conclusion  
3699 of the study. It is recommended that also these electronic files are stored, at least until the  
3700 conclusion of the complete validation process. The validation body also has responsibility for  
3701 ensuring the integrity of the transfer of these files and their long term storage. It is highly  
3702 recommended that the transfer of these files is not performed via email, but using a secure  
3703 file transfer system (e.g. https or sftp or similar). The transfer integrity of the files may be  
3704 controlled by creating a checksum for each file and checking the checksum at the end of the  
3705 transfer steps.

3706 FDA has previously advised that defining paper records as "raw data" (the so called  
3707 typewriter rule) does not satisfy the predicate rules, that the industry has misinterpreted the  
3708 2003 21 CFR Part 11 Scope and Applications Guidance (FDA, 2003) and that "the printed  
3709 paper copy of the chromatogram would not be considered a true copy" <sup>27</sup>. Although this  
3710 comment was made about chromatographic data, the principles have much wider  
3711 implications.

3712 Many electronic records are important to retain in their dynamic (electronic) format, to  
3713 enable interaction with the data. Data must be retained in a dynamic form where this is  
3714 critical to its integrity or later verification. This should be justified based on risk.

3715 **10.3 Archiving and retention**

3716 In a regulatory environment, when studies are GLP compliant, the archiving retention time is  
3717 usually defined in national legislation, however where there is no retention time specified, the  
3718 OECD recommends that records and materials should be retained for at least three inspection  
3719 cycles so that inspectors can evaluate the compliance of the test facility with the principles of  
3720 GLP (OECD, 2007b).

3721 Data is generated during the experimental phase of studies and during this phase the integrity  
3722 of the data must be ensured until final archiving of the study. This data will usually be  
3723 required for further analysis and as such will not be formally archived until the completion of  
3724 the study. It is important that access to this data, both electronic and hard copies, is controlled  
3725 until the final archiving upon completion of the study. It is recommended, where possible or

<sup>26</sup> <http://www.oecd.org/env/ehs/testing/glp-frequently-asked-questions.htm>

<sup>27</sup> <http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm124787.htm>

Field Code Changed

Field Code Changed

3726 feasible, that the electronic data is set as read-only or that an audit trail is provided, detailing  
3727 who did what and when.

### 3728 **10.3.1 Retrieval**

3729 Each facility should have in place procedures concerning the retrieval of archived records and  
3730 materials. The procedures should detail who may retrieve records and materials, for how long  
3731 and the return of records and materials to the archive. All steps mentioned above need to be  
3732 documented and traceable.

3733 In the case of electronic records, viewing the records without the possibility of alteration or  
3734 deletion of the archived version does not constitute “retrieval” of a record. Most systems  
3735 available nowadays support read-only access, without the possibility to change or delete the  
3736 archived record.

### 3737 **10.3.2 Backup and restore**

3738 When archiving electronic documents, periodic backups should be performed of the  
3739 electronic archives. These backups do not constitute archived records, however as they may  
3740 be required to be restored in the case a system failure, the same rules regarding access to the  
3741 archived electronic records should be applied to access to the backup(s). In general backups  
3742 are foreseen for short term storage and not long term storage or archiving and therefore the  
3743 long term readability of these archives is usually not an issue, however the restoration of the  
3744 backups should also be checked on a regular basis.

3745 Data generated during the experimental phase of the study should also be covered by the  
3746 backup and restore policy of the facility.

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4145 [http://www.altex.ch/resources/Pamies\\_of\\_160823\\_v4.pdf](http://www.altex.ch/resources/Pamies_of_160823_v4.pdf)

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### Annex 3 Experts participating at the GIVIMP meeting 24-25 February 2015

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