HPRA
An tÚdarás Rialála Táirgí Sláinte
Health Products Regulatory Authority

Guide to
Preparation of a Site Master File for Breeder/Supplier/Users under Scientific Animal Protection Legislation

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This guide does not purport to be an interpretation of law and/or regulations and is for guidance purposes only.

CONTENTS

1 SCOPE

This guidance applies to all establishments involved in the breeding, supply and use of animals regulated by Directive 2010/63/EU (the Directive) and S.I. No. 543 of 2012, as amended by S.I. No. 434 of 2013, S.I. No. 174 of 2014, S.I. No. 552 of 2016 and S.I. No. 553 of 2018 (hereafter referred to as the Regulations). The guidance is an addition to the HPRA 'Guide to Applications for Breeder/Supplier/Users under Scientific Animal Protection Legislation'.

The purpose of the site master file (SMF) is to provide the HPRA with an introduction to the breeder/supplier/user establishment and its activities.

2 INTRODUCTION

A site master file (SMF) is a document that the HPRA requests the holder of a breeder/supplier/user establishment authorisation regulated by scientific animal protection legislation, or an applicant for a new authorisation, to provide. It is a legal requirement in accordance with Regulation 36(2)(h) of the Regulations.

The SMF provides information concerning the:

- organisational structure, including the lines of responsibility,
- establishment locations, premises and buildings where breeding, supplying or animal use takes place
- species of animals bred, supplied or used and the activities and principal areas of scientific research, educational or regulatory studies conducted,
- animal care and welfare monitoring systems in place,
- application of the 3R principles (replacement, reduction and refinement),
- quality management system employed,
- provision of training and supervision of competence of personnel at the breeder/supplier/user establishment.

The SMF is a requirement whether or not the breeder/supplier/user actively operates an animal facility, or is simply the initiator or coordinator of studies on animals which are regulated under the legislation and which are conducted on its behalf, under an authorisation pertaining to the breeder/supplier/user whether for profit or not. Given the heterogeneity of breeders/suppliers/users, there will be aspects of this guide that are more relevant to some applicants than others. However, applicants should endeavour to complete all sections in as much detail as possible.

The SMF belongs to the quality management system of the establishment and must be kept updated accordingly.

3 FORMAT OF SITE MASTER FILE

The SMF should contain adequate information in an easily-readable format when printed. Where possible, simple plans, outline drawings or schematic layouts should be used instead of narratives.

Where a single SMF is common between two or more establishment locations that share the same animal welfare body and quality management system, site-specific details of each establishment location should be provided separately to easily allow the identification of:

- the species of animal bred/supplied/used at each establishment location,
- the buildings and facilities at each establishment location,
- the activities conducted at each establishment location,
- the identities of those persons designated under Regulation 44-48 of the Regulations and other key personnel as appropriate at each establishment location.

Where an application for a breeder/supplier/user authorisation is in respect of wild animals or for farms not owned or managed on behalf of the breeder/supplier/user, the SMF will be necessarily succinct but should still address the main points set out in section 4 below.

There should be version control of the SMF and it should contain information on both effective and review dates. It should be subject to regular review to ensure that it is up-to-date and representative of current activities. It can be requested by the HPRA inspectorate at any time. Each appendix can have an individual effective date, allowing for independent updating of the appendices.

The following section provides information on the content and key areas for the SMF.

4 CONTENT OF SITE MASTER FILE

It should be noted that the content is not limited to the items indicated and described in this section but is inclusive of all relevant details related to the breeder/supplier/user.

4.1 Title page

This page should display the name of the breeder/supplier/user authorisation holder. The address, Eircode, telephone number and key contact details should be included.

The title page should also indicate the name of the author(s), the date of issue, the version number and the date on which revision is due.

4.2 Copy of any current breeder/supplier/user authorisation(s)

If the breeder/supplier/user already holds an authorisation for any of the establishment locations, details of this should be provided. This section may be relevant for cases where an additional establishment location is proposed for use by a breeder/supplier/user already authorised by the HPRA.

4.3 Details of animals and activities

Details of the species of animals kept, or proposed to be kept, at each establishment location should be provided. This information should include the approximate numbers of animals of each species, as well as information on whether the animals are bred on site or imported.

Where the animals are supplied to a breeder/supplier/user from a source within the EU, details of the authorisation of the supplier(s) by the relevant member state competent authority should also be provided. Where animals are sourced from outside the EU, information should be provided confirming that the animals have been sourced from an authorised breeder in the country of origin and have been transported to Ireland in accordance with national and EU legislation.

Information should be provided on how the requirement is met that animals belonging to the species listed in Annex I of Directive 2010/63/EU are specifically bred for use in procedures.

Where a breeder/supplier/user does not have an animal facility itself but acts as a coordinator for projects undertaken at farm level or involving wild animals at additional locations that are not authorised, information on the species and numbers of animals proposed for use should be provided.

An estimate of the number of active project authorisations and overall number of animals used in procedures annually at the establishment should be provided in the SMF.

The nature of the activities carried out should be outlined in a general way, so as to provide an understanding of the operations and procedures being undertaken.

4.4 Establishment locations

A detailed description of all the establishment locations of the breeder/supplier/user where animals are bred and/or supplied and/or used should be provided. This should include a map from the nearest national primary route. If an establishment location is within a university campus or other institutional site, details of the exact location within the grounds should be given. If an establishment location is within an industrial development, an access map should be provided. This information must be provided for every establishment location authorised or for which authorisation is sought.

Where a breeder/supplier/user does not have an animal facility itself but acts as a coordinator for projects undertaken at farm level or involving wild animals at additional locations that do not have their own breeder/supplier/user authorisation, the SMF should detail from where operations are initiated and managed, and where records are kept. A map showing the route from the nearest national primary route should also be included here.

4.5 Access information

Details of any local access information or special precautions that might be relevant to the HPRA inspector should be identified. This includes information such as any Health and Safety Statement applying to personnel, as well as practical information e.g. visitor car parking, security requirements, relevant contact telephone numbers to organise the visit etc. Note that unannounced inspections may also be conducted; information on how inspectors will be accommodated on arrival for an unannounced inspection should be provided including information on out-of-hours and weekend access by inspectors.

Information on how unauthorised access to animal units is prevented should also be provided.

4.6 History

A brief history of the breeder/supplier/user establishment should be provided. This should detail when the breeder/supplier/user establishment was initially set up and provide a brief chronology of the various activities relating to the conduct of procedures on animals from commencement to the present day. Any new units or buildings or significant upgrades to facilities in recent years should be highlighted.

4.7 Site drawing and description

In this section, a basic schematic drawing or plan of the facilities at each establishment location covered by the breeder/supplier/user authorisation should be provided.

For example, in the case of a laboratory animal facility, the drawing should indicate (as relevant/not exhaustive):

- Animal breeding areas
- Animal receipt and holding rooms
- Animal procedure rooms, including surgery, imaging rooms or other rooms
- Facilities for gowning and showering for personnel/visitors
- Feed rooms, cleaning rooms and stores
- Culling rooms
- Freezers
- Office and administrative areas
- Facility maintenance rooms
- Toilets and locker rooms

- Location of pest control baits or traps

Where the rooms are multipurpose and can accommodate animals of different species, the plan should refer to the species most commonly kept.

In the case of a facility housing farm animals, the plan should indicate (as relevant and not exhaustive):

- Areas such as sheds/stables/paddocks where animals are kept
- Procedural areas including surgical suites where relevant
- Recovery areas
- Feed rooms and stores
- Office and administrative areas
- Toilets and locker rooms
- Location of pest control baits or traps

4.8 Personnel

An organogram outlining the organisational structure should be provided. Job titles should be included, along with the names of individuals involved in the management of the breeder/supplier/user establishment and the responsible persons, as defined in the legislation, outlined in the application form. It may be necessary to include more than one organogram in order to capture all the relevant levels and departments of the organisation, or to capture the organisation structure of all establishment locations.

In the case of a breeder/supplier/user that does not have an animal facility itself but acts as a coordinator for projects undertaken at farm level, or involving wild animals at locations that do not have their own breeder/supplier/user authorisation, it is necessary to give the names, titles and contact details of key personnel involved in the conduct of the project management, procedures or euthanasia.

An indication of the number of employees engaged in caring for animals, project management, performing procedures (including staff or students if relevant) and performing euthanasia should be provided.

4.9 Responsibilities

Details of how the responsibilities of the following persons are exercised are required:

(i) Compliance officer(s): the person(s) responsible for compliance of the establishment with the provisions of Article 20(2) of the Directive and Regulation 44 of the Regulations

(ii) Animal care and welfare officer(s): the person(s) responsible for overseeing the welfare and care of the animals at the establishment (Article 24(1)(a)) of the Directive and Regulation 45 of the Regulations)

(iii) Information officer(s): the person(s) responsible for ensuring that the staff dealing with animals have access to information specific to the species housed in the establishment (Article 24(1)(b) of the Directive and Regulation 45A of the Regulations)

(iv) Training officer(s): the person(s) responsible for ensuring that the staff are adequately educated, competent and continuously trained and that they are supervised until they have demonstrated the requisite competence (Article 24(1)(c) of the Directive and Regulation 46 of the Regulations)

(v) The designated veterinarian or suitably qualified expert in accordance with Article 25 of the Directive and Regulation 48 of the Regulations.

The list of responsible persons is not exhaustive. If other key members of staff are involved, their role and responsibilities should also be documented. In respect of each individual identified, the reporting lines for ensuring compliance with the legislation and for ensuring any corrective actions are taken should be made explicit. The responsibility for follow-up actions advised by the animal welfare body and those listed above and/or otherwise responsible in the breeder/supplier/user establishment should be outlined.

In some smaller breeder/supplier/user establishments, several responsibilities may be undertaken by the same person.

In the case of establishment locations that are linked together as part of the same breeder/supplier/user authorisation, even if geographically distant from each other, the requirements outlined in this section apply. Thus, it is possible that the persons listed in points (ii) to (v) above might differ between establishment locations within the same overall breeder/supplier/user authorisation. If so, the local arrangements for the responsibilities exercised should be documented in full and may be included as a separate appendix for each establishment location or in a secondary SMF.

In the case of a breeder/supplier/user that does not have an animal facility itself but acts as a coordinator for projects undertaken at farm level or involving wild animals at locations that do not have their own breeder/supplier/user authorisation, information on how the responsibilities are delineated as per the Regulations is still required.

4.10 Animal welfare body

The terms of reference and information on the composition and terms of appointment of members of the animal welfare body (AWB) should be provided here. It should confirm that the members of the AWB include at least one person responsible for the welfare and care of the animals, and in the case of a user, a scientific member.

How the AWB performs the tasks required of it in Regulation 50 should be outlined. In addition, the means by which the AWB receives input from the DV or suitably qualified expert should be outlined.

An outline of the meeting schedule should be provided. The procedure for capturing the output of the AWB and for acting on its advice should be documented.

Where the AWB is a subgroup of an in-house ethics committee, clear information should be provided on the relationship between the two bodies and how the legal functions of the AWB are met in practice.

In the case of breeder/supplier/user establishment locations that are linked together as part of the same breeder/supplier/user authorisation, even if geographically distant from each other, it is permissible for a single AWB to serve all the establishment locations. In this case, it would be expected that members of the AWB will have visited the establishment locations in question sufficiently often to be familiar with the well-being and care of the animals involved in projects being undertaken at those establishment locations. It is preferable that each establishment location would have at least one person serving on the AWB.

In the case of a breeder/supplier/user that does not have an animal facility itself but acts as a coordinator for projects undertaken at farm level or involving wild animals at locations that do not have their own breeder/supplier/user authorisation, the AWB remains a legal requirement and evidence that it operates in accordance with the legislation is mandatory. Persons serving on such a body are expected to be familiar with how animals are to be handled and cared for, as well as the 3R principles.

4.11 Ethics committees

Although there is no legal requirement to have an ethics committee, if a breeder/supplier/user has its own ethics committee then a brief summary should be provided. The terms of reference of the ethics committee and information on meeting schedules as well as the composition, expertise and terms of appointment of the ethics committee should be given. The HPRA 'Guide to Ethics Committee Assessment of Project Applications under Scientific Animal Protection Legislation' includes guidance on what is expected from an ethics committee.

4.12 Animal health and welfare system

The system for monitoring the health and welfare of animals at the breeder/supplier/user establishment should be outlined.

Information on the following should be provided:

- The routine health checks performed on animals on a daily basis
- Any preventative health programme in place, as well as any routine screening conducted on the animals
- Policies in place for out-of-hours animal care (evenings, weekends, and public holidays)

- The system in place for communicating with the designated veterinarian (DV) and how the advice of the DV is disseminated and recorded
- How any unexpected adverse events or increase in the level of severity encountered during the conduct of a procedure or project is escalated to the DV and AWB
- How the 3R principles (Replacement, Reduction and Refinement) are applied – this should be evidenced by relevant examples
- The enrichment programme implemented and details on how this is reviewed to ensure best practice
- Policies on good surgical practice and asepsis (if relevant)
- Policies regarding the receipt, storage and usage of anaesthetics, analgesics, and veterinary medicines (if relevant)
- The methods of euthanasia employed and details on carcass disposal
- Policies on re-use of animals (if applicable)
- Policies on re-homing and setting free of animals (if relevant)
- The supply of feed, how supplies are maintained in the face of adverse weather conditions, and any special treatments for feed (e.g. irradiation)
- The water system used, how the system is tested and maintained (if relevant)
- How animal health and well-being is ensured where an application for a breeder/supplier/user authorisation is in respect of wild animals, or for farms not owned or managed on behalf of the breeder/supplier/user (short description).

4.13 Facility control and maintenance

Information on how the security of all establishment locations is maintained, including how access to unauthorised persons is prevented, should be provided.

Information about how environmental parameters (air changes, temperature, relative humidity, noise, lighting, etc.) are controlled and how they are recorded should be provided (if relevant). Information on how the lighting is adjusted for albino animals and the policy for filter changing should be provided (if relevant).

In the case of aquatic animals kept in a tank, information on maintenance of water quality should be provided.

It should be clarified whether all cages, pens or animal containment facilities are in accordance with the requirements of Annex III of the Directive (i.e. size and stocking density).

It should be indicated how any bio-security measures in place, including rodent, fly and pest control, are implemented.

Specific information on facility hygiene, including the cleaning of cages or rooms should be provided.

Details of periodic tests undertaken to demonstrate that systems are running effectively, including alarms to indicate system failure, should be provided. System back-up measures in place to ensure site functioning during times of electricity outages etc. should be described. Information on crisis/disaster planning and management should be provided.

4.14 Quality management system

This section should describe the elements of the quality management system in place at the breeder/supplier/user establishment. This should include details on the general organisation of the documentation system, including version control of documents, as well as training documents and standard operating procedures (SOPs).

Details on how project documentation is managed (including records of procedures performed) should be provided. Information should also be provided on how project deviations are handled. The system for dealing with non-compliances with the legislation should also be described. The information on the quality management system should include a description of the processes in place which ensure that users are aware of the conditions attached to project and individual authorisations and how it is ensured that users comply with those conditions.

It is expected that there will be written processes (SOPs) for the care of animals and for the conduct of procedures and euthanasia in place.

Information should be provided on how reports from any internal audits conducted as well as any advice given by the DV or suitably qualified expert and the AWB are collated.

Records should be provided of any other audits or inspections (e.g. good laboratory practice) related to the operations at the breeder/supplier/user within the previous three years as well as any remedial measures undertaken (if any) arising from such inspections.

A record should also be appended on any inspection conducted within the last three years by the Department of Agriculture, Food and the Marine, or local authority or other governmental organisation in relation to animal breeding, animal transport, animal welfare, controlled drug use, records of animal remedies etc.

If there is a 'whistle blowers charter' in place, this system should be described.

A key part of the quality management system relates to training; this is described separately below.

4.15 Training

It is necessary to provide details of how the designated training officer(s) for the breeder/supplier/user exercises that responsibility in accordance with Regulation 46 of the Regulations.

Details of how training is undertaken and recorded at organisational level should be provided. The system for ensuring that competency in the conduct of procedures and euthanasia should be clearly outlined. A detailed description should be provided of the system for ensuring that new personnel have the necessary education and theoretical training and are subsequently trained and assessed as competent in any procedures, euthanasia or care of animals before they are approved to do so unsupervised.

The system for recording that personnel have been trained and judged to have achieved competence in procedures conducted, euthanasia and in animal care should be outlined, including where training records are held and how they are kept up-to-date. Information should also be provided in relation to how staff undergo continuous training and education in order to maintain competence (e.g. CPD). The HPRA 'Guide to Training, Education and Competency Requirements under Scientific Animal Protection Legislation' includes guidance on education and training requirements.

4.16 Records management

The following information should be provided:

- How animal records are generated and maintained (in accordance with Regulation 63)
- How individual authorisation records and project authorisation records are kept.
- How the breeder/supplier/user ensures compliance with any specific conditions relating to the authorisations in place.
- How the breeder/supplier/user ensures compliance with any standard operating procedures for the conduct of procedures and/or euthanasia in animals.
- How the actual severity of the procedures is recorded in preparation for annual statistical reporting (in accordance with Regulation 68).

5 MAINTAINING THE SITE MASTER FILE

Details should be provided on how the breeder/supplier/user establishment plans to ensure the SMF is revised and updated on a periodic basis (at least once annually).