1	Quality management practices of gene banks for livestock: A global review
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26	Keywords
27	Livestock, conservation, genetic resources, gene bank, quality management system
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# 29 List of abbreviations

Animal genetic resources for food and agriculture
Biological resource centre
Domestic Animal Diversity Network
Food and Agriculture Organization of the United Nations
Global Plan of Action for Animal Genetic Resources
Innovative Management of Animal Genetic Resources project
International Organization for Standardization
Organisation for Economic Co-operation and Development
Quality management system

# 31 Abstract

The genetic diversity of livestock is decreasing and many countries have created gene 32 banks for ex situ - in vitro conservation of animal genetic resources. The collection, 33 processing and storage of animal germplasm requires substantial investment and the 34 35 material collected (and associated data) is highly valuable. Therefore, quality management systems and practices are important. The objective of this study was to review the quality 36 management procedures of livestock gene banks around the world to identify the general 37 strengths and weaknesses of quality control. A survey was administered by means of an 38 online questionnaire consisting of 54 questions, most of which were yes/no with respect to 39 the presence of a particular aspect of quality management. The survey was distributed 40 through networks of the Food and Agriculture Organization of the United Nations that are 41 42 associated with animal genetic resources. Ninety responses were received from 62 countries. The gene banks were predominantly public institutions, with the main goal of 43 44 preventing breed extinction. Approximately 30% of the banks reported having a quality 45 management system, 15 of which involved formal certification. Many other banks have plans 46 to implement formal quality management within the next five years. Regarding specific 47 aspects of quality management, more emphasis was placed on material entering the banks than on eventual utilization. Among the banks processing and freezing material, 90% 48 followed specific standard operating procedures, but only 24% had policies regarding 49 provision of access to external stakeholders. Increased cooperation among livestock gene 50 banks could improve quality management. Sharing of knowledge could standardize 51 procedures and cooperating peers could evaluate the each other's quality management 52 systems. 53

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#### 57 Introduction

The genetic diversity of livestock is an important global common good for food security and 58 livelihoods. The diversity of animal genetic resources (AnGR) for food and agriculture has 59 however been continually decreasing over time [1]. The member countries of the Food and 60 61 Agriculture Organization (FAO) of the United Nations have developed and adopted the Global Plan of Action for Animal Genetic Resources (GPA-AnGR) [2], which includes 62 strategic priorities and actions to be undertaken by national governments and other 63 64 stakeholders to ensure the proper management of existing livestock genetic resources. Conservation is one of the four Strategic Priority Areas of the GPA-AnGR and it addresses 65 priorities for both in situ and ex situ conservation. "Establish or strengthen ex situ 66 67 conservation programmes" is Strategic Priority 9 of the GPA-AnGR.

Although ex situ conservation of AnGR can be accomplished in vivo with zoos, research 68 69 farms or agricultural parks, in vitro conservation through cryopreservation or "cryoconservation" [3] is usually regarded as the more cost-efficient approach [4]. 70 71 Cryopreservation of germplasm (usually semen or embryos) provides the capacity to store 72 AnGR indefinitely [5], and thus allows the creation of a collection of genetic material that can 73 eventually be used for a variety of future goals, including population management, breed conservation, preservation of phenotypic and genetic diversity, repopulation, expanding the 74 genetic base of a breed, new breed development, introgression, and research [6,7,8]. Many 75 countries have therefore adopted national cryoconservation strategies to impede the 76 decrease in the diversity of their AnGR. 77

According to the Second Global Assessment of Animal Genetic Resources, undertaken in 2015 [1], 58 countries had operational gene banks for *in vitro* conservation of AnGR and 41 countries had plans to develop such facilities. Gene banks are more common in industrialized countries than in countries with developing economies. Nearly all the countries in the European Union have national gene banks for AnGR and the European Commission supports research on cryoconservation, including the current project "Innovative Management of Animal Genetic Resources" (IMAGE). Details about the IMAGE project can

be found online at <u>http://imageh2020.eu</u>. The project currently involves 28 partners from 16
countries.

Genetic materials (and associated data) stored in animal gene banks are valuable resources. The collection, processing and storage of the materials requires substantial investment. The stored materials are an insurance to protect against the loss of valuable genetic diversity and to support or improve population management *in situ*. Gene banking is a complex operation, involving different types of materials from multiple species and specific and often complicated procedures.

93 A quality management system (QMS) is extremely useful in dealing with such complexity, to 94 identify the needs of users and other stakeholders, formalize the procedures to satisfy these 95 needs, analyze the risks and take actions for continual improvement to reach the objectives 96 of the gene bank. First, gene banks take care of the technical quality of the reproductive 97 material because maintaining their viability throughout the process is critical, inasmuch as the quality of samples is inextricably linked to the utility of the samples to their end users. 98 99 Hence, quality control of cryopreserved samples is essential for developing a successful 100 repository [8]. Beyond these technical aspects, attention to quality management has 101 continually gained importance for managers of livestock gene banks, following the Organisation for Economic Co-operation and Development (OECD) initiative in 2001 to 102 103 define the core missions of a biological resource centre (BRC). These core missions include 1) collection/acquisition, 2) documentation, 3) storage and 4) distribution of biological 104 material, with all processes recorded in an associated data set containing at least minimal 105 set of required variables. As they share these core missions, animal gene banks are 106 considered as BRCs. Several countries have adopted officially certified QMS under 107 International Organization of Standardization (ISO) 9001 standard and/or have participated 108 in the development of the recently-adopted ISO 20387 biobank standard, which includes all 109 processes and procedures of a gene bank, regardless of the biological source of material 110 (i.e. human, plant, animal or micro-organism). However, substantial variability among 111 112 countries and gene banks exists regarding quality management of animal gene banks.

This study was undertaken in the context of the IMAGE project. The objectives were to undertake a global review of quality management in animal gene banking and to identify the current areas of strengths and gaps in quality management in animal gene banks worldwide.

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#### 118 Methods

# 119 Global survey

The global survey of quality management of animal gene banks was undertaken by means 120 121 of an electronic questionnaire, utilizing the Survey Monkey® web application. The questionnaire can be viewed online at https://www.surveymonkey.com/r/HSK3H37. The 122 survey included 54 questions, grouped according to various aspects of gene bank 123 management (e.g. general management, personnel, equipment and consumables, 124 125 acquisition, collection, processing, storage and access). The majority (69%) of the questions 126 were of the Yes/No variety, usually regarding presence or absence of an indicator of quality management (e.g. a quality policy). Most of these questions allowed the possibility to choose 127 an intermediate response (e.g. to indicate a given indicator was partially completed). 128 129 Thirteen questions involved lists of items (e.g. conservation goals) for which respondents were asked to indicate all applicable options. The questionnaire had a branching structure, 130 so that certain questions were proposed to a respondent conditional on the result of a 131 preceding question. 132

The questionnaire was distributed through three channels: 1) to all known managers of 133 134 livestock gene banks in Europe; 2) to all National Coordinators for the Management of Animal Genetic Resources; and 3) to all subscribers of the Domestic Animal Diversity 135 Network (DAD-Net). National Coordinators are persons officially nominated by their 136 respective governments to coordinate national implementation of the GPA-AnGR and to 137 network with local stakeholders and FAO on AnGR-related matters [9]. DAD-Net is an email 138 discussion group on AnGR with more than 3000 subscribers. The questionnaire was made 139 140 available between May and July 2018.

# 142 Data analysis

The data resulting from the responses to the questionnaire were evaluated by applying 143 simple summary statistics to determine the proportions of gene banks that provided 144 145 affirmative or negative responses. In addition, we hypothesized that responses to the various 146 questions would not be independent; in general gene banks applying a given aspect of a QMS were likely to apply others. To test this hypothesis, simple Pearson coefficients were 147 calculated between questions. Positive responses were recorded as 1 and negative 148 responses as 0. Responses indicating partial application of a quality management practice 149 150 were coded as 0.5.

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# 152 Results

153 General characteristics of livestock gene banks

154 104 responses to the questionnaire were obtained. Ninety complete responses were 155 retained. Responses were from 62 countries (Figure 1). There were a particularly large 156 number of responses from Spain, which has a generally autonomous livestock banks in 157 nearly every state.

158 Insert Figure 1. Map showing countries that responded in color

The vast majority of responding organizations were either 100% publicly (84%) or predominantly publicly (6%) funded. Twenty-four (27%) of the responding gene banks were national in scope, the remaining were subnational. No banks were multi-national, in part because international veterinary sanitation regulations hinder international livestock gene banking.

Figure 2 shows the frequencies of species stored in the various banks. The most common was cattle, with material in 69 (77%) of the gene banks. Goat (68%) and sheep (62%) closely followed. Goose was the least reported species, with only 7 (8%) organizations

storing genetic material. Other infrequently-mentioned species included deer (N = 3), bee (N = 2), guinea fowl (N = 2), turkey (N = 1), and guinea pig (N = 1).

169 Insert Figure 2. Species with stored material

Figure 3 shows the frequencies of material types stored in the various banks. Semen was the most commonly stored material, reported by 77 organizations (86%). Among those, 25 (32%) stored no other material. Other materials included blood (N = 5), non-gonadal tissue (N = 3), and hair (N = 2).

- 174 Insert Figure 3. Types of material stored.
- 175

176 General gene bank management

177 Table 1 has proportions of gene banks with different characteristics regarding general 178 management. Thirty-six percent of the respondents reported to have a formally documented organizational and management structure. Thirteen percent reported to have undertaken a 179 stakeholder analysis and prepared a communication plan. Just over a third of the gene 180 banks (35%) reported having formal cryoconservation goals to guide their collection 181 182 activities, although an additional 42% were in the process of defining such goals. The questionnaire allowed respondents with formalized goals or goals under development to 183 specify these goals. The frequency distribution of conservation goals is shown in Figure 4. 184 The questionnaire allowed respondents to indicate more than one goal. Thirty gene banks 185 responded, all of which reported more than one goal. The most common cryoconservation 186 goals were insurance against breed extinction, management of genetic diversity, and 187 research. 188

189 PLACE TABLE 1 HERE

190 Insert figure 4 on conservation goals

Slightly more than half of the institutions that completed the survey had identified the major risks to their gene bank (Figure 5). Economic sustainability and loss of stored germplasm due to lack of liquid nitrogen or other failure in storage facility were most often reported, followed by catastrophic events, and disease and transmission of pathogens and loss of information. Only 13% of the institutions had prepared comprehensive preventive or mitigation measures to reduce or recover from potential impacts. An additional 36% had addressed some of the potential threats.

198 Insert Figure 5 on risks

199

# 200 General quality management

Twenty-seven gene banks (30%) have established a QMS, of which 15 involved formal certification. The formal approaches included 11 ISO certifications and the remaining banks cited national guidelines or regulations. Thirty-seven banks (41%) were in the process of developing a QMS.

Table 2 has results for specific aspects of QMS. A quality manager was present in 55% of the gene banks. The vast majority of quality managers had advanced degrees, with either a Master's degree or a Ph. D. Twelve percent reported to have received specialized training in quality management. The hours devoted to quality management varied widely, ranging from 0-5 hours per week to more than 40.

210 PLACE TABLE 2 HERE

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# 212 Gene bank personnel and equipment

Table 3 summarizes the key questions regarding management of personnel and equipment. Nearly 75% of gene banks had appointed a specific person responsible for overall management of the gene bank. This may or may not be the quality manager. Only about

one-third of gene banks had prepared formal job descriptions and training programs for all
employees, but most banks had these features for at least some of the staff (51 and 59%,
respectively).

Regarding equipment (Table 3) 34% of the gene banks had identified their critical equipment, and 37% reported having standard operating procedures for usage and regular maintenance of their equipment. Records of controls, routine maintenance and/or calibration of critical equipment were maintained by 32% of the respondents.

223 PLACE TABLE 3 HERE

224

# 225 Material acquisition

226 Acquisition of biological material, ownership and rights to use of stored material are critical issues for livestock gene banks, especially for international exchange following the adoption 227 of the Nagoya Protocol of the Convention on Biological Diversity (CBD) [10] and subsequent 228 national legislation. Table 4 reports the number of banks utilizing each of the five most 229 230 common acquisition procedures. Thirteen banks did not report using any of the modes of acquisition and 46 banks used multiple modes. The most commonly used approach was 231 collection of material already owned by the gene bank (or more precisely, by the government 232 for public banks). Regarding legal agreements for obtaining material for the bank, Material 233 234 Transfer Agreements or similar contracts were utilized by 59% of the banks, but only about one-third of these banks (i.e. around 20% of all banks) used such contracts for all 235 acquisitions. Presumably, the choice of using a contract depended somewhat on the 236 237 decision of the providers of material.

238 PLACE TABLE 4 HERE

239

# 240 Material collection, reception, processing, storage and distribution

241 Table 5 has the results for the main questions on quality management procedures associated with collection, reception, processing, storage and distribution of genetic material. 242 In some instances, not all gene banks were undertaking all steps of gene banking from 243 material collection to distribution (e.g. only 60 gene banks collect and process the material 244 245 they store), so the proportions reported take this factor into account. Nearly 90% of the gene banks collecting and processing material follow specific standard operating procedures for 246 these processes and take care to individually label stored samples, but a slightly smaller 247 248 proportion had a quality control system for their collected samples. A smaller number of 249 banks accept material from other sources (N = 52) than those that collect and process their 250 own. Policies and procedures for quality control of externally-processed material seem 251 somewhat less rigorous than for internally processed samples (Table 5).

More than three-fourths (77% - Table 5) of the gene banks restrict the access to the storage area, although only 30% had a system to record the entry of persons into the storage area. Separate storage systems for different material types were utilized in only 20% of banks.

255 Collection and storage procedures currently receive more attention than those related to 256 distribution. Only 22 banks (24% - Table 5) have formal policy regarding providing external 257 stakeholders with access to material, although an additional 20 banks were in the process of 258 preparing such policies. Most gene banks reported having standard operating procedures for 259 preparing samples for distribution.

260 PLACE TABLE 5 HERE

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# 262 Genetic material database

Approximately half (49%) of gene banks reported having a database for monitoring their collections and another 22% of the gene banks were in the process of developing a database system. Approximately 75% reported having some system to record and trace the material stored in the gene bank. A wide variety of data recording tools were used. Microsoft

267 Corporation (Redmond, WA, USA) products Excel® (N = 32) and Access® (N = 3) were used by half of the banks specifying their data system. Ten banks use database software 268 specifically designed for livestock cryoconservation. Five of these banks use A-GRIN, 269 developed by the National Genetic Resources Program of the United States [11], whereas 270 271 the other five use CryoWEB [12], developed for the European network of national gene banks. Animal GRIN's users are in the Americas and CryoWEB users are European. 272 Fourteen banks used an in-house software and three used commercial software other than 273 Microsoft®. 274

Twenty-one gene banks (33%) with a database system have made their data accessible to the public to a limited extent. Only one gene bank claimed full public access. In Europe, privacy legislation prevents the public sharing of some data fields. Data were backed-up regularly by 84% of the respondents with databases, although the frequencies of backing up varied substantially – ranging from each time new data are inserted to once every six months.

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#### 282 *Relationships among questions*

As hypothesized, the questions were not independent. The average Pearson correlation between pairs of questions was 0.28. Correlation coefficients were negative for only a few pairs of questions and not significantly so (P > 0.05). The average correlation between the presence of a formal QMS and all other questions was only 0.23, likely because many banks had a few procedures, processes and characteristics for quality management, even if they did not have a formal QMS.

The greatest association between two questions (r = 0.80) was for questions "Does the gene bank have a formally documented organizational and management structure?" and "Does the gene bank have a QMS?". The second largest correlation (r = 0.70) was between questions on standard operating procedures for critical equipment and recording of when

such equipment was serviced or maintained. Similar correlations (r = 0.69) were observed between questions on the presence of a data base, its regular backing-up and restriction of permission for read-write access.

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# 298 Discussion

The total of 62 responding countries seems to indicate a continual trend towards the 299 increased adoption of cryoconservation of animal genetic resources. Fifty-five and 58 300 countries reported gene banks in formal FAO assessments of the management of animal 301 genetic resources in 2007 and 2015, respectively. Moreover, those respective assessments 302 involved 169 and 129, countries, respectively, and countries were somewhat obliged to 303 304 participate, whereas this survey was entirely voluntary. The approaches toward quality 305 management of the gene banks remain highly variable. A minority (30%) of the banks 306 reported having formal QMS, but an additional 41% of banks were in the process of establishing a QMS and nearly all banks reported implementing some aspects of quality 307 management. The proportions of gene banks having individual characteristics or practices 308 309 varied greatly. Compliance was generally more common for the technical aspects of gene 310 banking, such as standard procedures for processing and freezing (88%) and guality control of processed samples (77%). Less commonplace were features associated with formal 311 QMS, such as having a management system for quality documentation (14%) and 312 313 documented identification of key processes (18%).

The reason for a low proportion of QMS among livestock gene banks may be associated with the history of the banks and their primary purpose. Nearly all the banks are public institutions, established primarily to insure against loss of local breeds or to avoid dangerously low genetic diversity in *in situ* populations. Supporting research is another common purpose, but this research is often performed by the gene bank or by closelyassociated research institutions. These conservation goals reflect a need for high technical

quality and viability of processed and stored material for potential use by the provider or gene bank and associated institutions, but less need to document quality to completely independent third parties. As noted earlier, only 13% of gene banks had undertaken stakeholder analyses and prepared communication plans and only 24% had a formal policy for external distribution of material to third parties.

325 This largely inward-looking management of gene banks may change in the future. Although 326 individual breeds are considered sovereign to each country, their genetic diversity is a 327 shared public good, at least conceptually. Many breeds are transboundary, being present in 328 more than a single country, genetic diversity of livestock continues to decrease and the need 329 for external users to access collections may increase. Economic sustainability was the most 330 commonly-cited risk to gene banking. As a buffer against potential decreases in public funding, alternative funding mechanisms, such as providing services to outside users may 331 332 become more common and these users may demand documentation of quality management. In addition, the sources of genetic material may demand greater traceability of 333 the genetic resources that they contribute. Financial constraints may also require greater 334 efficiency, such as cross-country communication and coordinated cryoconservation of 335 336 (transboundary) breeds. Standardized QMS may help facilitate cooperation in such efforts.

Similar issues have been recognized for animal gene banking outside of the livestock sector. 337 As mentioned previously, the ISO 20387 standard on biobanking for multicellular organisms 338 and micro-organisms was finalized in 2018. This standard has two particularly key principles, 339 fitness-for-purpose and assessment of competence. Requirements for quality management 340 vary according to purpose of the bank and practices undertaken to ensure quality must be 341 justified. Assessment of competence is more demanding than basic certification, such as 342 343 with ISO 9001. The FAO guidelines on cryoconservation of AnGR [3] emphasizes technical 344 aspects of gene bank management but does address the importance of documentation and the legal issues of material acquisition and access to stored material. 345

The Conservation Breeding Specialist Group of the International Union for the Conservation
 of Nature and Natural Resources' Species Survival Commission has for many years

348 promoted international dialogue on the topic of coordinating genome resource banks [13]. CBSG working groups have recognized that repositories should be developed according to 349 specific, scientific guidelines consistent with an international standard that ensures 350 practicality, high-quality ethics, and cost-effectiveness. The Global Genome Biodiversity 351 352 Network [14], an international network of genomic repositories for non-human species 353 shares and develops best practices for management of genomic samples and standards for their sharing. In humans, the World Health Organization has provided standard operating 354 355 procedures to human tissue banks for years and its International Agency for Cancer 356 Research recently published standards for biobanking in cancer research [15].

357 An initial step toward standardized quality control across gene banks may be the adoption of 358 a self- or peer-evaluation procedure or tool for livestock gene banks. Such a tool could help gene banks uncover the potential flaws in their system, as well as provide suggestions for 359 360 improvement of their QMS, thereby universalizing the QMS to some degree. Another option would be to have gene banks participate in an officially recognized external quality 361 assessment scheme by an independent authority (e.g. ISO). A comparable example is 362 accreditation through ISO 17025 for genetic testing laboratories. This obligatory quality 363 364 assessment gives service providers formal accreditation and is a legal requirement in many countries for being able to perform genetic tests on a commercial basis. Such a formal and 365 obligatory accreditation programme may not be realistic for livestock gene banks, however, 366 especially in the short term and on a global level, but a voluntary approach may be 367 achievable. 368

One of the objectives of the IMAGE project is to develop procedures for harmonizing gene bank operations and a voluntary self or peer-based review of quality management could eventually result from this effort. Complementary training and awareness-raising in quality management would also be required, but such a system would presumably not only improve the technical quality of stored samples and fitness for their intended purpose, but also help to build trust with existing utilizers of material and increase the visibility of the bank to potential new clients.

376 Improved and more-standardized QMS for livestock gene banks could have other potential advantages, such as helping facilitate international exchange of gene banked material. As 377 mentioned previously, no multi-national gene banks responded to the survey, primarily 378 because such banks practically don't exist, due in part to administrative hurdles associating 379 380 with international sanitary regulations. A standardized approach to quality management, especially if developed in collaboration with veterinary regulatory bodies (or at least with their 381 awareness) may help build a landscape in which multi-country gene banks can be 382 383 established.

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# 386 Conclusions

Gene banks for livestock are becoming more numerous as a tool to address the decreasing 387 388 diversity of animal genetic resources and to support research on a large range of domestic species. Formal QMS were reported for less than a third of the banks responding to this 389 390 survey, but steps toward adopting QMS are being taken by many others. Quality management is currently more rigorous for incoming samples than outgoing material. 391 392 Greater cooperation among gene banks, including sharing good practices, exchanging protocols and sharing data, may help improve quality management, as well as increase 393 394 efficiency for management of the genetic diversity of breeds found in more than one country. With continual development and training, a voluntary self- or peer review process could 395 eventually be developed to implement a common standard for quality management. 396

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- 454 2019.
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457 Table 1. Proportions of livestock gene banks having various characteristics or

		Proportion <sup>1</sup> of
	Characteristic or practice associated with gene bank management	gene banks
		(%)
	Formally documented organizational and management structure	36
	Stakeholder analysis and communication strategy	13
	Formal cryoconservation goals	35
	Identification of major risks to long-term sustainability	52
	Comprehensive risk prevention and mitigation plan	13
459	<sup>1</sup> N = 90 gene banks.	

458 applying various general practices associated with proper management.

Table 2. Proportions of livestock gene banks having various characteristics or
applying various general practices associated with formal Quality Management
Systems (QMS).

Characteristic or practice associated with formal QMS	Proportion <sup>1</sup> of gene banks (%)
Quality policy	23
Dedicated Quality Manager	55
Identification of key processes	18
Documented standard operating procedures for critical tasks	48
Library of all relevant regulation texts and references	30
Management system for quality documentation	14

 $^{1}N = 90$  gene banks.

466 Table 3. Proportions of livestock gene banks having various characteristics or

467 applying various general practices associated with personnel and equipment.

Characteristics regarding personnel management	Proportion <sup>1</sup> of gene banks (%)
Appointment of a gene bank manager	73
Formal job descriptions for all personnel	29
Training programme for all personnel	36
Characteristics regarding management of infrastructure	
Identification of equipment critical to gene bank operation	34
Standard operation and maintenance procedures for all critical equipment	37
System to record equipment control, maintenance and calibration events	32
'N = 90 gene banks.	

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#### Table 4. Common modes for acquisition of material and proportions of gene banks 470

471 using each mode.

Proportion <sup>1</sup> of gene banks (%)
40
34
32
33
23

472 473 N = 90 gene banks.

<sup>2</sup> For example, government research farms and institutions, including artificial insemination centres. 474

Table 5. Proportions of livestock gene banks having various characteristics or applying various general practices associated with material collection and processing, introduction into the inventory, storage and distribution. 

Dreations associated with motorial callection and processing <sup>1</sup>	Proportion of gene banks
Practices associated with material collection and processing	(70)
Standard operating procedures for processing and freezing	88
Quality control system for each collected sample of material	77
Labelling procedure to uniquely identify each unit of stored material	88
Practices associated with introduction of previously collected material <sup>2</sup>	
Policy for receiving materials processed by another entity	36
Dedicated area for receiving material from outside sources	42
Quality control system for material from outside sources	62
Practices associated with material storage <sup>3</sup>	
Restricted access to storage area	77
System to record entry of personnel into storage area	30
Separate storage of different types of material	20
Material distribution <sup>3</sup>	
Formal distribution policy	24
Standard operating procedure for preparation of material for distribution	56
$^{1}$ N = 60 gene banks	

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 $^{1}$  N = 60 gene banks.  $^{2}$  N = 52 gene banks.  $^{3}$  N = 90 gene banks.



Figure 1. Countries responding to the gene bank quality management questionnaire
(Not visible include the Cook Islands, Palau, and Vanuatu; and the occupied
Palestinian territory.)











Figure 4. Conservation goals reported by the gene banks responding to the global
survey.



498 Figure 5. Common risks to sustainability reported by the gene banks responding to the survey

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