



INTUITIONLABS / RESEARCH & PRACTICAL GUIDANCE

GAMP 5: Computerized System Validation in Pharma

Build practical AI for pharma and biotech with IntuitionLabs. We help life-science teams turn complex information and workflows into useful software, governed knowledge systems and AI tools.

Published by IntuitionLabs · 2025-05-31 · gamp 5 · computer system validation · pharmaceuticals · regulatory compliance · fda 21 cfr part 11 · eu annex 11 · ispe · automated manufacturing · data integrity · risk-based approach

Original article: <https://intuitionlabs.ai/articles/gamp-5-computerized-system-validation-pharma>



In this article

1. GAMP 5: Computerized System Validation in Pharma
2. What is GAMP 5? Purpose and History
3. Key Principles and Lifecycle Approach of GAMP 5
4. GAMP 5 and Regulatory Compliance (FDA 21 CFR Part 11, EU Annex 11, and Recent Updates)
5. Applying GAMP 5 to Computerized System Validation (CSV)
6. Examples and Case Studies of GAMP 5 in Practice
7. Conclusion
8. Need CSV Help?

[Revised January 25, 2026]

GAMP 5: Computerized System Validation in Pharma

In the highly regulated pharmaceutical sector, **Good Automated Manufacturing Practice (GAMP 5)** provides a comprehensive framework for validating computerized systems to ensure they are fit for intended use and meet regulatory requirements. GAMP 5 is not a law or regulation itself, but an industry guidance published by the International Society for Pharmaceutical Engineering (ISPE) that has become the *de facto* standard for computer system validation in pharma [tricentis.com](https://www.tricentis.com). By following GAMP 5, companies can achieve **cost-effective, risk-based validation** of automation technology, thereby safeguarding patient safety, product quality, and data integrity [ispe.org](https://www.ispe.org). This article will explain what GAMP 5 is (its purpose and history), outline its key principles and lifecycle approach, discuss its role in regulatory compliance (e.g. [FDA 21 CFR Part 11](https://www.fda.gov/regulatory-information/fda-cfr-part-11) and EU Annex 11), and illustrate how it applies to **computerized system validation (CSV)** with examples of real-world applications.

What is GAMP 5? Purpose and History

GAMP stands for *Good Automated Manufacturing Practice*, a set of guidelines and best practices for managing the **design, implementation, and maintenance** of automated systems in regulated industries [linkedin.com](https://www.linkedin.com). It was initiated in 1991 in the United Kingdom by a group of pharmaceutical industry validation experts (the GAMP Forum, which later became part of ISPE) seeking to address the growing complexity of computerized systems in **pharmaceutical manufacturing** [linkedin.com](https://www.linkedin.com). Over the years, GAMP evolved through several versions, each expanding and refining the guidance:

- **GAMP Version 1 (1994):** Focused on standardizing validation activities for computerized systems [linkedin.com](https://www.linkedin.com).
- **GAMP 2 (1995):** Introduced some early concepts of risk-based approaches to system validation [linkedin.com](https://www.linkedin.com).
- **GAMP 3 (1998):** Expanded the scope to broader applications, including IT infrastructure and supplier quality audits [linkedin.com](https://www.linkedin.com).
- **GAMP 4 (2001):** Emphasized a full **system lifecycle model** and defined clear validation deliverables for each phase [linkedin.com](https://www.linkedin.com).
- **GAMP 5 (2008):** The fifth version (first edition) shifted strongly to a **risk-based approach** to compliance, promoting scalability and efficiency in validation to reflect advancements in automation and software [linkedin.com](https://www.linkedin.com).

GAMP 5 remains the current version, with a **Second Edition published in 2022** to update the guidance for modern technologies. The core principles and framework from 2008 were maintained, but the 2022 update addresses new developments such as increased use of cloud service providers, agile software development

methods, and emerging tech like [AI](#) and blockchain [ispe.org](#) [ispe.org](#). Notably, ISPE highlights that GAMP 5 aims to "protect patient safety, product quality, and data integrity by facilitating ... computerized systems that are effective, reliable, and of high quality" [ispe.org](#). In practice, GAMP provides a **"risk-based approach to compliant GxP computerized systems"**, meaning it helps companies focus their validation efforts on what matters most for **Good Manufacturing Practice (GMP)** compliance [ispe.org](#). It is widely recognized by regulators and industry alike as the leading guidance for **GxP computer system validation and compliance**[ispe.org](#).

In July 2025, ISPE published the **ISPE GAMP® Guide: Artificial Intelligence**, a comprehensive 290-page guide that serves as the definitive resource for developing and using AI-enabled computerized systems in GxP environments [ispe.org](#). This standalone guide is designed to be used alongside GAMP 5 Second Edition and bridges established GAMP concepts with the unique characteristics of AI and machine learning systems.

GAMP 5 is a non-mandatory guidance, but its adoption is widespread because it aligns closely with regulatory expectations. ISPE and its GAMP Community of Practice continually update the guidance to stay current with good IT and software engineering practices [ispe.org](#). This ensures that using GAMP 5 helps firms meet the latest standards of quality and compliance in computerized systems without relying on outdated methods.

Need help with GAMP 5 compliance? Our CSV services draw on consultants with 23+ years at Pfizer and 13 years at Veeva. [Schedule a free assessment](#) →

Key Principles and Lifecycle Approach of GAMP 5

GAMP 5 is built on a set of **key principles** that guide its practical implementation. These principles ensure that validation efforts are science-based, risk-based, and efficient. The **five guiding principles** of GAMP 5 can be summarized as follows [tricentis.com](#):

1. **Product and Process Understanding:** Successful validation begins with deep knowledge of the product and process. GAMP 5 encourages *critical thinking* to distinguish critical aspects from non-critical ones, focusing on areas impacting patient safety, product quality, and data integrity [scilife.io](#). A solid understanding of how a system supports the pharma process allows teams to make risk-based decisions and ensure the system is truly *suitable for its intended use*.
2. **Lifecycle Approach within a Quality System:** GAMP 5 adopts a **system lifecycle model** for computerized systems, from initial concept through retirement [scilife.io](#). Rather than treating validation as a one-time event, it must be an ongoing process that covers **requirements definition, design, development, testing, deployment, operation, and eventual decommissioning**. All these stages occur under a pharmaceutical quality management system to maintain control. Following a lifecycle approach ensures that validation and quality assurance activities are planned and executed at every critical phase [linkedin.com](#).
3. **Scalable Validation Effort:** One principle of GAMP 5 is that the rigor of the lifecycle activities should be *scalable* to the size and risk of the system [scilife.io](#). In other words, the approach is not "one-size-fits-all." Simple or low-risk systems may need a leaner validation process, whereas complex or high-risk

systems require more extensive effort. GAMP 5 allows using different development models (Waterfall, V-model, Agile, etc.) or even reduced/extended lifecycle models as appropriate [scilife.io](#). This scalability ensures efficient use of resources – applying just enough validation to meet compliance and control risk without unnecessary bureaucracy.

4. **Science-Based Quality Risk Management:** Consistent with ICH Q9 principles, GAMP 5 places risk management at the forefront. Manufacturers are expected to **identify and assess risks to patient safety, product quality, and data integrity**, and use those risk assessments to prioritize validation testing and controls [scilife.io](#) [scilife.io](#). In practice, this means dedicating the most effort to critical functions of a system (those that, if they failed, could potentially impact product quality or compliance) and applying lighter effort to non-critical features. By focusing on risk, GAMP 5 helps avoid spending excessive time on documentation of inconsequential details, instead advocating **“more testing over more documentation”** for what truly matters [scilife.io](#). For example, rather than capturing voluminous screenshots for every test step, GAMP 5 suggests using *exception-based* recording (logging only deviations or unexpected outcomes) for routine tests, while thoroughly investigating and evidencing any issues that arise [scilife.io](#). This risk-based approach improves efficiency and effectiveness of validation.
5. **Leveraging Supplier Involvement:** Modern pharmaceutical systems often rely on third-party software or services. GAMP 5 advises organizations to **leverage vendor activities and documentation** wherever possible [scilife.io](#). Suppliers (e.g. software developers or equipment manufacturers) typically provide their own testing, quality certificates, and technical documentation. Rather than duplicating all of this work, regulated companies should make use of supplier documentation and expertise as part of their validation strategy – after performing appropriate supplier assessments. This principle is closely tied to current industry practices of auditing and qualifying vendors. By integrating supplier-provided validation evidence (like vendor test results or compliance certificates), companies can streamline their CSV efforts while still meeting GAMP and regulatory standards [scilife.io](#).

Lifecycle Approach: One of the cornerstone concepts in GAMP is managing the computerized system’s **entire lifecycle**. GAMP 5 defines lifecycle phases such as **Concept, Project, Operation, and Retirement** [scilife.io](#) [scilife.io](#). In the **Concept** phase, a regulated company identifies a need or opportunity for automation and defines initial requirements at a high level (this phase is often before a specific solution is chosen) [scilife.io](#). Next is the **Project** phase, where the system is specified in detail, built or configured, and verified (tested) against specifications prior to going live [scilife.io](#). Following deployment, the system enters the **Operational** phase – this is typically the longest phase, covering day-to-day use in production. During Operation, the focus is on maintaining the validated state through change control, periodic reviews, incident management, and routine re-validation as needed [scilife.io](#). Finally, the **Retirement** phase ensures that when a system is decommissioned, it is done in a controlled manner (including proper data archival and verification that the replacement system is validated if applicable).

Historically, GAMP has often been illustrated by the **“V-model”** – a visual representation of the development and validation lifecycle that links each stage on the “left” (requirements and design) to a corresponding testing activity on the “right” [qbdgroup.com](#). The V-model shows how the process flows from user requirements down to system configuration/build, and then back up to user acceptance testing, forming a V-shaped sequence [qbdgroup.com](#) [qbdgroup.com](#). For example, user requirements defined at the start must be verified by

acceptance testing at the end; functional specifications are verified by functional testing; and so forth, ensuring traceability between what was planned and what was tested [qbdgroup.com](#) [qbdgroup.com](#). This model also incorporates **Installation Qualification (IQ)** to verify the system is installed correctly, **Operational Qualification (OQ)** to verify it performs as intended under various conditions, and **Performance Qualification (PQ)** to confirm the system meets user needs in the actual operational environment [qbdgroup.com](#). The V-model (a form of waterfall methodology) was the main lifecycle model illustrated in the original GAMP 5; however, the 2022 Second Edition acknowledges that many projects now use iterative or **Agile development** approaches [scilife.io](#). GAMP 5 now clarifies that its principles can be applied in a non-linear fashion as well – the key is still maintaining rigor and traceability, even if the software is released in rapid, incremental cycles [scilife.io](#). In all cases, **quality risk management** accompanies the lifecycle: GAMP 5 aligns with the idea that risk assessments should guide the depth of validation at each stage, consistent with EU and FDA expectations that risk management be applied throughout a system's life [health.ec.europa.eu](#).

Figure: The GAMP 5 "V-model" illustrates the system development lifecycle and its corresponding validation steps. On the left side, user requirements and system specifications are defined by the user (regulated company), while on the right side, various testing and verification activities ensure those requirements are met in the implemented system [qbdgroup.com](#) [qbdgroup.com](#). This model underscores traceability: every requirement must be tested, and every test ties back to a specified requirement. Risk management and quality oversight (not shown explicitly in the diagram) underpin each phase of the V-model, aligning with GAMP 5's risk-based approach.

GAMP 5 and Regulatory Compliance (FDA 21 CFR Part 11, EU Annex 11, and Recent Updates)

A major reason GAMP 5 is so valued in the pharmaceutical industry is its close alignment with regulatory compliance requirements. Pharmaceutical regulators like the U.S. Food and Drug Administration (FDA) and European Medicines Agency (EMA) mandate control over computerized systems used in GMP environments. **GAMP 5 provides a practical roadmap to fulfill these mandates.** Recent regulatory developments in 2025 have further reinforced the importance of risk-based validation approaches aligned with GAMP principles.

FDA 21 CFR Part 11: In the United States, 21 CFR Part 11 is the FDA regulation governing electronic records and electronic signatures. Part 11 requires that when companies use digital systems to record GMP data, they must implement certain controls to ensure those records are trustworthy and equivalent to paper records. A foundational requirement of Part 11 is **system validation**. Specifically, 21 CFR §11.10(a) states that persons who use computerized systems to create or maintain electronic records must **validate those systems to ensure accuracy, reliability, consistent intended performance, and the ability to discern invalid or altered records** [ecfr.gov](#). Part 11 also calls for technical controls such as secure, computer-generated **audit trails** that record changes to data (with timestamps and user IDs) [ecfr.gov](#), as well as system access controls, electronic signatures, and record retention mechanisms [ecfr.gov](#). GAMP 5's entire philosophy of lifecycle validation directly addresses §11.10(a) – by following GAMP's guidance, firms can produce the documented evidence that a system does what it purports to do and can detect any data alterations. In fact, adopting GAMP 5 makes it *easier to comply with diverse regulations*, including Part 11, because it integrates requirements like audit trails and security into the validation lifecycle [tricentis.com](#). As an illustration of why this

matters, FDA inspectors have issued warning letters to companies for failing to validate their software and implement audit trails. For example, one 2022 FDA warning letter noted a firm's production software "was not validated and lacked audit trails," meaning the company could not ensure data integrity or traceability in batch records [fda.gov](https://www.fda.gov). Such violations lead to regulatory enforcement actions. Using GAMP 5 would help prevent these issues by ensuring **validation plans, test protocols, and controls for data integrity (like unique user accounts and audit logging) are in place** as part of the system lifecycle.

EU GMP Annex 11: In the European Union, the primary guidance for computerized systems is **EU GMP Annex 11** (Computerised Systems), which is an annex to the EU GMP guidelines. Annex 11 explicitly requires that **all computerized systems used in GMP processes be validated** and that IT infrastructure be qualified health.ec.europa.eu. The document emphasizes applying **risk management throughout the system's lifecycle, taking into account patient safety, data integrity, and product quality** health.ec.europa.eu – a statement that closely mirrors GAMP 5 principles. Annex 11 is structured to cover project-phase controls (like validation planning, user requirements, and supplier assessment) as well as operational-phase controls (such as data accuracy checks, incident management, change control, periodic review, security, and audit trails) scilife.io. By following GAMP 5, companies inherently address these areas: for example, GAMP's supplier management principle aligns with Annex 11's requirement to assess vendor reliability and have formal agreements with suppliers health.ec.europa.eu. GAMP's focus on documentation and lifecycle validation corresponds to Annex 11's mandate that validation documentation cover relevant lifecycle steps and that companies justify their approach based on risk assessment health.ec.europa.eu. In summary, **GAMP 5 operationalizes the expectations of Annex 11**. Regulators in the EU expect firms to have controlled computerized systems, and inspectors are generally familiar with GAMP-based validation packages. While GAMP 5 itself is not legally binding, it is widely recognized by regulators and industry, and following GAMP is considered an effective way to **support compliance with 21 CFR Part 11, EU Annex 11, and related regulations** scilife.io scilife.io.

It should be noted that GAMP 5 also complements other regulatory and industry standards beyond Part 11/Annex 11. For instance, it aligns with **ICH Q9 (Quality Risk Management)** for risk-based decision making, and with **data integrity** guidance (such as FDA and MHRA data integrity guidelines) by providing a systematic way to ensure data are complete, consistent, and accurate throughout the system's life. The second edition of GAMP 5 even references FDA's newer **Computer Software Assurance (CSA)** initiative, which similarly encourages critical thinking and risk-based assurance rather than brute-force testing of everything ispe.org. Overall, implementing GAMP 5 helps a company build computerized systems and validation evidence that are better prepared for regulatory scrutiny, although compliance still depends on meeting each jurisdiction's specific requirements.

FDA Computer Software Assurance (CSA) Final Guidance (September 2025)

On **September 24, 2025**, the FDA released its final guidance document "**Computer Software Assurance for Production and Quality System Software**" [fda.gov](https://www.fda.gov). Written for medical device manufacturers (software used as part of device production or the quality system), this guidance formalizes a risk-based approach to software validation, representing a significant shift away from traditional documentation-heavy Computer System Validation (CSV) toward a more flexible, outcome-focused approach gmpinsiders.com.

Key aspects of the final CSA guidance include:

- **Risk-Based Validation:** The guidance recommends that manufacturers base their computer software assurance approach on a documented risk assessment and determination of the system's potential impact on product quality, patient safety, and record integrity.
- **Flexible Testing Methods:** FDA explicitly endorses a least-burdensome program that can include scripted testing, unscripted/exploratory testing, continuous monitoring, and leveraging supplier/developer evidence where appropriate.
- **Digital-First Documentation:** Digital records like system logs, audit trails, and automated outputs are preferred over paper-heavy documentation.
- **Cloud Computing Definitions:** The guidance now includes formal definitions for Cloud, IaaS, PaaS, and SaaS environments.
- **Alignment with ISO 13485:** The guidance supplements FDA's 2002 General Principles of Software Validation and aligns with the FDA's February 2026 harmonization with ISO 13485 under the amended Quality System Regulation [double-helix.com](https://www.double-helix.com).

Although the CSA guidance is scoped to medical device manufacturers rather than pharmaceutical GMP, its risk-based, critical-thinking approach is consistent with the principles GAMP 5 has long advocated.

EU GMP Annex 11 Revision (2025 Draft)

The European regulatory landscape is also evolving. In **July 2025**, the European Commission, EMA and PIC/S released for public consultation draft revisions to **EU GMP Annex 11 (Computerised Systems)**, along with a new **Annex 22 on Artificial Intelligence** and updates to **Chapter 4 (Documentation)** gmp-compliance.org. The public consultation closed on October 7, 2025. As of October 2026, the Commission's EudraLex page continues to list Annex 11 as the January 2011 revision; the proposed revisions remain drafts rather than final, applicable GMP guidance.

Major changes in the revised Annex 11 include:

- **Computerised Systems as Core GMP Assets:** The revision recognizes computerized systems as core GMP-controlled assets rather than supporting tools, underlining their critical role in product quality and patient safety qbdgroup.com.
- **Enhanced PQS Requirements:** Organizations must implement a robust Pharmaceutical Quality System (PQS) covering the entire lifecycle of computerised systems, from design and validation through operation, maintenance, cybersecurity, and retirement.
- **Global Harmonization:** The draft was prepared jointly with PIC/S and is intended to align with international frameworks such as ICH Q9 and ICH Q10; commentators note it is broadly consistent with GAMP 5's risk-based concepts montrium.com.
- **Data Integrity Standards:** Enhanced emphasis on ALCOA+ principles, audit trails, and secure access controls aligned with FDA Part 11 and WHO guidelines.
- **New Annex 22 on AI:** The draft proposes, for the first time, specific GMP requirements for artificial intelligence and machine learning models used in GMP environments; it is not yet final gmpinsiders.com.

Applying GAMP 5 to Computerized System Validation (CSV)

Computerized System Validation (CSV) is the process of planning, testing, and documenting that a computer-based system will do what it is intended to do in a consistent and reliable manner. In pharmaceutical manufacturing and quality operations, CSV is essential because any software or automated system that affects GMP data or product quality must be validated to ensure it consistently meets requirements. GAMP 5 provides a structured methodology to perform CSV effectively.

When applying GAMP 5 to CSV, the process typically includes: **validation planning, requirements definition, risk assessment, system configuration/build, verification testing**, and **ongoing control**. All of these correspond to the V-model and lifecycle stages discussed earlier. Under GAMP, the CSV effort starts with a **Validation Plan** that defines the scope and strategy for the system's validation qbdgroup.com. This plan is informed by risk: critical functionality will require more rigorous validation. Next, **User Requirements Specifications (URS)** are developed to state exactly what the users (e.g. manufacturing or lab personnel) need the system to do qbdgroup.com. GAMP 5 emphasizes that requirements should cover not only functional needs but also regulatory and data integrity needs (for example, requirements for audit trail functionality, electronic signatures, and report generation can be included to meet compliance) qbdgroup.com. A **traceability matrix** is usually created to map each requirement through the design and testing process, ensuring nothing is missed qbdgroup.com.

System design and configuration (whether it's software coding or system setup) follows, and **supplier involvement** is key here – if it's a third-party software, much of the configuration and unit testing may be done by the supplier according to their quality system. GAMP 5, as noted, allows leveraging that work scilife.io. Once the system is built or configured, **verification** (testing) is performed to prove the system meets all specifications and user needs. This typically includes IQ/OQ/PQ testing: verifying the installation, challenging the system's functions under various conditions (operational tests), and confirming it performs correctly in a simulated or actual production scenario (performance qualification) qbdgroup.com. GAMP 5 encourages focusing test efforts on the most critical requirements identified via risk assessment scilife.io. For example, if a system manages critical calculations for a production process, the CSV tests will rigorously verify those calculations (including edge cases), whereas less critical features (like a minor user interface preference) might not need exhaustive testing. The goal is to **demonstrate with evidence** that all high-risk functions work correctly and that the system as a whole is reliable and secure.

Importantly, GAMP 5 extends CSV into the **operational phase**. After the initial validation and go-live, the system must be kept in a validated state. This means establishing **standard operating procedures (SOPs)** for system use, training users, instituting **change control** for any updates (so changes are assessed for risk and the system is re-validated as needed), performing **periodic reviews** to ensure the system remains compliant as regulations or business needs change, and having **incident management** procedures for any errors or deviations encountered during use scilife.io health.ec.europa.eu. GAMP's guidance is that validation is not a one-time checklist, but an ongoing assurance process over the system's life. For instance, if a software patch is applied or a new feature is configured, a risk-based assessment should determine what level of re-testing or documentation update is required.

Another practical element of GAMP-based CSV is **software category classification**. GAMP 5 classifies software systems into different categories based on their complexity and how they are created: from Category 1 (infrastructure software like operating systems), through standardized configurable packages, up to Category 5 (custom-developed applications) [linkedin.com](#) [scilife.io](#). These categories help determine the scope of validation. A **Category 3** system (commercial off-the-shelf product used with no customizations) might be validated primarily by verifying proper installation and basic functionality, whereas a **Category 5** bespoke system demands a full specification and extensive testing effort. Category definitions were slightly streamlined in GAMP 5 (for example, a category for firmware was removed) but the principle remains that **the more novel or custom a system is, the more validation work is expected** [scilife.io](#). This is another way GAMP 5 keeps CSV efforts commensurate with risk and complexity.

In summary, applying GAMP 5 to CSV means **following a lifecycle, risk-based process to attain and maintain system compliance**. It provides templates for what documents to produce (like validation plans, requirements specs, test protocols, reports), but it gives flexibility to tailor these to each project's needs. The end result of a GAMP 5 CSV is a body of evidence demonstrating the system is **effective, of high quality, and compliant with GMP regulations** [ispe.org](#). This not only satisfies auditors and inspectors, but also gives the pharmaceutical company confidence that their automated processes (whether it's an equipment control system, a laboratory information management system, or an ERP module handling production records) will consistently work as intended.

Examples and Case Studies of GAMP 5 in Practice

The principles of GAMP 5 may sound abstract, but they have very tangible applications in pharmaceutical manufacturing and quality systems. Below are one published case study and two illustrative (hypothetical) scenarios:

- Manufacturing Equipment Software – Risk-Based Validation:** One case study comes from IMA Active, a manufacturer of automated capsule fillers and tablet press machines for pharma production. IMA Active applied GAMP 5 principles when developing new control software for two of its machines (the Prexima rotary tablet press and the Mylab granulation and coating system). The company recognized that increasing automation meant software had become a **critical component for ensuring product quality and patient safety**. Using GAMP 5's risk-based approach, they identified which functions of the machine software were most critical to product quality (for example, dose accuracy, process parameter limits, data recording) and focused validation efforts on those areas [ima.it](#) [ima.it](#). They performed a formal **risk assessment** to determine potential failure points, then devised targeted verification tests and controls to mitigate those risks [ima.it](#) [ima.it](#). By leveraging a multi-disciplinary team – including Quality Assurance, software engineers, and even academic experts – the company ensured the software development and verification process met both GAMP 5 guidelines and regulatory expectations. The project classified the machine software as GAMP Category 3 (non-configured product), which defined the set of verification activities the supplier had to carry out [ima.it](#). This case demonstrates how following GAMP 5 can lead to a well-documented, risk-focused validation, yielding software that reliably supports GMP processes. The authors report that the risk-based software risk assessment increased software quality and improved maintenance.

- Quality Management Systems (QMS) – Ensuring Data Integrity:** GAMP 5 is also commonly applied to corporate quality systems such as electronic document management systems or deviation tracking systems. For instance, consider a hypothetical pharmaceutical company implementing a new **Electronic Quality Management System (eQMS)** used GAMP 5 to validate the platform. They began by defining user requirements that included not just functional needs (like routing of approvals, audit trail for changes, electronic signatures for approvals) but also compliance needs (e.g., 21 CFR Part 11 technical controls). By using supplier-provided documentation from the QMS vendor (leveraging the GAMP principle of supplier involvement), the company could concentrate its internal testing on how it configured the tool for its own processes. The **risk assessment** highlighted critical requirements such as audit trail accuracy and permission settings for users. During OQ/PQ testing, the team therefore rigorously challenged those aspects – for example, verifying that the audit trail logs every significant action with timestamp and user ID, and that only authorized roles could perform certain critical tasks. Less critical configuration options (like cosmetic interface settings) were tested minimally. This targeted approach aligns with GAMP 5 guidance and satisfies both FDA and EU inspectors' focus on **data integrity**. Indeed, data integrity is a major theme in recent regulatory guidance, and GAMP 5 validation directly supports data integrity by ensuring the system has the controls to produce **accurate, reliable, and traceable data**[europeanpharmaceuticalreview.com](https://www.europeanpharmaceuticalreview.com) [europeanpharmaceuticalreview.com](https://www.europeanpharmaceuticalreview.com).
- Manufacturing Execution Systems (MES) – Comprehensive CSV:** Another illustrative (hypothetical) example is the use of GAMP 5 in validating a Manufacturing Execution System at a pharmaceutical production site. An MES coordinates workflows on the shop floor (batch recipes, equipment interfaces, real-time monitoring, electronic batch records). Given the central role of an MES in GMP compliance, a company used GAMP 5 to structure the validation during a major MES upgrade. They wrote detailed user requirements covering every GMP-critical function, from recipe management to electronic signatures on batch record steps. Using the GAMP 5 V-model, they linked each requirement to tests: for example, the requirement “*ensure only authorized operators can start a batch*” was linked to a security role test in OQ, and the requirement “*calculate component weights with 2-decimal precision*” was linked to a series of test cases verifying calculation accuracy and rounding rules. The project team categorized the software components of the MES (custom interfaces were treated as higher risk than the base platform which was a proven product). A validation package built this way **covers all life-cycle stages with traceability** and records a risk justification for the level of testing performed on each function, which is the kind of evidence inspectors look for when judging whether an MES is under control and its electronic batch records can be trusted.

In addition to positive implementations, it's worth noting that **failing to follow GAMP 5 (or similar rigorous CSV practices) can lead to serious compliance issues**. Many FDA warning letters and EU inspection findings in recent years have involved companies who did not adequately validate their computerized systems or ensure data integrity. Common violations include using uncontrolled spreadsheets for critical calculations, lack of audit trail on laboratory data systems, shared user accounts in manufacturing systems, and so on [fda.gov](https://www.fda.gov) [fda.gov](https://www.fda.gov). Each of these corresponds to a principle in GAMP 5: for example, GAMP 5 would mandate unique user access and audit trails for GMP systems (addressing those data integrity gaps) [fda.gov](https://www.fda.gov) [fda.gov](https://www.fda.gov). By studying such cases, pharma companies have learned that adopting GAMP 5 is not just about avoiding citations; it also improves their operational reliability. As one industry paper noted, GAMP 5 provides a

“significant reduction in the risk of errors and ensures compliance with regulatory standards” in automated systems europeanpharmaceuticalreview.com europeanpharmaceuticalreview.com. The framework essentially acts as a quality assurance blueprint for any GMP computerized system.

Conclusion

GAMP 5 has proven to be a cornerstone of pharmaceutical automation compliance. In summary, it is a widely-used framework (originally developed by ISPE) that guides companies on how to validate and manage computerized systems in line with GMP regulations. GAMP 5's **key principles** – from lifecycle management and risk-based validation to leveraging supplier documentation – help firms ensure their systems are not only compliant on paper but also effective and reliable in practice. By applying GAMP 5, organizations build quality into the design and operation of their manufacturing IT systems, which in turn protects patient safety, ensures high product quality, and maintains the integrity of data across all digital records ispe.org ispe.org. Its alignment with regulatory requirements like FDA 21 CFR Part 11 and EU Annex 11 makes it an invaluable tool for achieving and demonstrating compliance during inspections. Importantly, GAMP 5 is **practical** – it scales efforts to the risk at hand and encourages critical thinking over check-box compliance, echoing modern regulatory views.

Recent FDA and EU activity reflects continued regulatory attention to risk-based assurance and computerized-system controls. FDA's current CSA guidance is directed to medical-device production and quality-management systems, while the EU's proposed Annex 11 revision and new Annex 22 on artificial intelligence remain draft guidance as of July 2026. These developments should not be treated as final, generally applicable pharmaceutical CSV requirements.

For pharmaceutical professionals, understanding GAMP 5 is essential in today's environment of increasing automation, AI adoption, and data integrity scrutiny. Whether one is implementing a new laboratory information system, deploying AI/ML for process optimization, validating cloud-based solutions, or maintaining an existing ERP for batch release, GAMP 5 provides the methodology to validate that system with confidence. The case studies and examples show that GAMP 5 is not just theoretical: it helps avoid costly mistakes and streamlines validation projects. As the industry continues to embrace digital transformation and emerging technologies, GAMP 5 and its expanding family of guidance documents will continue to evolve, ensuring that **good automated manufacturing practices** keep pace with innovation. Adhering to GAMP 5 fosters a culture of quality and compliance that ultimately benefits not only the company but also the patients who rely on safe, effective medicines produced under these high standards.

Sources:

1. ISPE, *GAMP 5 Guide 2nd Edition* (2022) – Official ISPE guidance description ispe.org ispe.org.
2. Wyn, Sion & Clark, Chris. "What You Need to Know About GAMP® 5 Guide, 2nd Edition." *Pharmaceutical Engineering*, Jan/Feb 2023 – Overview of updates and continued importance of GAMP 5 ispe.org ispe.org.

3. Jeyaraman, R. "Understanding Good Automated Manufacturing Practices (GAMP): A Pillar of Pharmaceutical Integrity." LinkedIn Article, Nov 17, 2024 – History of GAMP and key concepts [linkedin.com](#) [linkedin.com](#).
4. Deshpande, R. "GAMP 5 for GxP Compliant Computerized Systems." *Scilife Blog*, Feb 20, 2025 – Explanation of GAMP 5 principles and lifecycle (including Agile updates) [scilife.io](#) [scilife.io](#).
5. Tricentis. "Compliance with GAMP 5 guidance: A checklist." *Tricentis Blog* – GAMP 5 overview and principles, benefits for compliance [tricentis.com](#) [tricentis.com](#).
6. FDA 21 CFR Part 11 (Electronic Records/Electronic Signatures) – §11.10(a) requiring system validation; §11.10(e) requiring audit trails [ecfr.gov](#) [ecfr.gov](#).
7. European Commission EudraLex Vol.4 Annex 11 (Computerised Systems), 2011 – Principle of Annex 11 (validation and risk management requirements) [health.ec.europa.eu](#) [health.ec.europa.eu](#).
8. FDA Warning Letter to Colorful Products Corp (May 10, 2022) – Example of enforcement for unvalidated software lacking audit trails [fda.gov](#).
9. European Pharmaceutical Review, "Role of GAMP 5, data integrity and QbD in QA" (March 2024) – Noting GAMP 5 as a widely used validation framework that reduces errors and ensures compliance [europeanpharmaceuticalreview.com](#) [europeanpharmaceuticalreview.com](#).
10. IMA Active Case Study (2021). "Achieving and maintaining GAMP 5 compliance: risk-based approach to software development" – Example of applying GAMP 5 in equipment software validation [ima.it](#) [ima.it](#).
11. FDA. "Computer Software Assurance for Production and Quality System Software" Final Guidance (September 24, 2025) – Risk-based approach to software validation [fda.gov](#).
12. ISPE, *GAMP® Guide: Artificial Intelligence* (July 2025) – Comprehensive guidance on AI-enabled computerized systems in GxP environments [ispe.org](#).
13. ECA Academy. "EU GMP Annex 11 (Draft 2025): Computerised Systems" – Analysis of the draft revision [gmp-compliance.org](#).
14. GMP Insiders. "FDA's 2025 Guidance On CSA: What Manufacturers Need To Know" (2025) – Overview of CSA final guidance implications [gmpinsiders.com](#).
15. Montrium. "EU GMP Annex 11 update: What changed after 14 years" (2025) – Analysis of Annex 11 revision [montrium.com](#).

Need CSV Help?

IntuitionLabs provides computer system validation services for pharma and biotech companies. Our CSV work draws on consultants with 23+ years at Pfizer and 13 years at Veeva Systems.

Our CSV Services

- **CSV Assessment & Roadmap** — Understand your validation gaps in 2-3 weeks

- **System Validation Execution** — Complete IQ/OQ/PQ validation for your critical systems
- **CSV Program Development** — Build internal validation capability that scales

Schedule a Free CSV Assessment →

Learn About Our CSV Services →

Download GAMP 5 Compliance Checklist → *(Coming Soon)*

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. <https://www.tricentis.com/learn/compliance-with-gamp-5-guidance-a-checklist>
2. <https://ispe.org/publications/guidance-documents/gamp-5-guide-2nd-edition>
3. <https://intuitionlabs.ai/articles/21-cfr-part-11-electronic-records-signatures-overview>
4. <https://intuitionlabs.ai/articles/csv-pharmaceutical-biotech-compliance>
5. <https://www.linkedin.com/pulse/understanding-good-automated-manufacturing-practices-gamp-jeyaraman-8xasc>
6. <https://intuitionlabs.ai/articles/netsuite-erp-pharma-labs-gmp-fda>
7. <https://intuitionlabs.ai/articles/anthropic-claude-4-llm-evolution>
8. <https://ispe.org/pharmaceutical-engineering/january-february-2023/what-you-need-know-about-gampr-5-guide-2nd-edition>
9. <https://ispe.com/pharmaceutical-engineering/january-february-2023/what-you-need-know-about-gampr-5-guide-2nd-edition>
10. <https://intuitionlabs.ai/articles/gmp-pharmaceutical-quality-compliance>
11. <https://ispe.org/publications/guidance-documents/gamp-guide-artificial-intelligence>
12. <https://www.scilife.io/blog/gamp5-for-gxp-compliant-computerized-systems>
13. <https://www.qbdgroup.com/en/blog/what-is-the-gamp-5-v-model-in-computerized-system-validation/>
14. https://health.ec.europa.eu/document/download/40231f18-e564-4043-94de-c031f813d38b_en?filename=mp_vol4_chap4_annex11_consultation_guideline_en.pdf
15. <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-A/part-11/subpart-B/section-11.10>
16. <https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/colorful-products-corporation-624415-05102022>
17. <https://www.scilife.io/blog/differences-21cfrpart11-annex11>
18. <https://www.fda.gov/media/188844/download>
19. <https://gmpinsiders.com/fda-2025-guidance-csa/>
20. <https://double-helix.com/posts-aside/fda-finalizes-csa-guidance-whats-changed-why-it-matters/>
21. <https://www.gmp-compliance.org/guidelines/gmp-guideline/eu-gmp-annex-11-draft-2025-computerised-systems>
22. <https://www.qbdgroup.com/en/blog/annex-11-revision-digital-compliance>
23. <https://blog.montrium.com/blog/eu-gmp-annex-11-update-changed-14-years>
24. <https://gmpinsiders.com/2025-eu-gmp-draft-chapter-4-annex-11-annex-22/>
25. <https://ima.it/pharma/papers/achieving-and-maintaining-gamp-5-compliance-ima-actives-risk-based-approach-to-software-development-and-verification-2/>

26. <https://www.europeanpharmaceuticalreview.com/news/218579/the-role-of-gamp-5-data-integrity-and-qbd-in-pharmaceutical-quality-assurance/>

THE PUBLISHER

About IntuitionLabs

IntuitionLabs is an AI consulting, custom software development and data engineering firm serving pharmaceutical, biotechnology, medical-device and other life-science organizations. We work with clinical, regulatory, medical-affairs, commercial, quality and IT teams to connect technology decisions with the work people need to accomplish.

AI consulting and adoption

Our AI enablement services cover readiness assessments, use-case selection, governance and policies, team workshops, adoption measurement and ongoing advisory support. We help organizations structure the information layer behind AI: source material, context, permissions and maintained knowledge that make generated answers useful and reviewable. Private LLM inference and hosted AI options support teams evaluating how to operate AI with appropriate control over their data and infrastructure.

Software, data and life-science workflows

IntuitionLabs develops custom software for pharma and biotech, integrates enterprise systems, and builds data engineering and business intelligence solutions. Areas of focus include AI agents, regulatory research, medical writing, medical affairs, CMC information, competitive intelligence and clinical-document workflows. Our eTMF intelligence work includes cross-system reconciliation and inspection-readiness support.

Enterprise platforms and regulated delivery

We provide Veeva services, application support, managed services, integrations and custom applications, alongside enterprise content work involving platforms such as Egnyte. For regulated workflows, our services include GxP enablement, computer-system validation and software development addressing 21 CFR Part 11 requirements. The applicable controls, validation responsibilities and acceptance criteria are defined for each engagement.

Work with IntuitionLabs

Explore [AI enablement](#), [pharma and biotech software development](#), [data engineering and BI](#), and [Veeva services](#). [Contact IntuitionLabs](#) to discuss your workflow, information sources and implementation needs.

IntuitionLabs publishes educational research to help life-science teams make informed technology decisions. Coverage of a product or organization does not imply a client relationship, endorsement or partnership.

Website: <https://intuitionlabs.ai>

This article is educational. Verify consequential medical, legal, financial, regulatory and technical decisions with appropriate professionals and the cited primary sources. Company services are described separately from the article's research findings.