

AI in Auditing

22th of October 2025

SARQA CONFERENCE





Agenda

1. Introduction
2. AI in preparation
3. AI during the audit
4. AI in audit reporting
5. The future and a take-home message

Disclaimer

- This, like an audit is a snapshot of the current situation.
- AI improves fast. Be on the train!



AI in Preparation

“Administrative Intelligence” or more?

AI in preparation

Audit plan and agenda.

- Often based on a good template
- Use AI to feed it

Focus on content:

- Checklists
- Regulatory criteria

Performance

- Soft skills

Part I - Basic Requirements

- [Chapter 1 - Pharmaceutical Quality Management](#)
- [Chapter 2 - Personnel](#) (into operation since 1 March 2025)
- [Chapter 3 - Premises and Equipment](#)
- [Chapter 4 - Documentation](#)
- [Chapter 5 - Production](#) (into operation since 1 March 2025)
- [Chapter 6 - Quality Control](#) (into operation since 1 October 2024)
- [Chapter 7 - Outsourced activities](#) (into operation since 1 March 2025)
- [Chapter 8 - Complaints and Product Recall](#) (into operation since 1 March 2025)
- [Chapter 9 - Self Inspection](#)

Part II - Basic Requirements for Active Substances used as Starting Materials

- [Basic requirements for active substances used as starting materials](#)

Part III - GMP related documents

- [Site Master File](#)
- [Q9 Quality Risk Management](#)

5. SPECIFIC BIOTECH ISSUES

5.1 In general, the wording "cell bank" and not "seed lot" will be used.

The aide memoire covers working cell banks and master cell banks including traceability to original cells for the master cell bank (pre-master cell bank).

5.2 General topics

1.	Area of operations/item General Biotech GMP	Notes	Crucial questions	Supporting documents
1.1	Personnel	Prevention of cross contamination	*Procedure to avoid the simultaneous handling of other living or infectious material by the same persons *Do workers pass to other areas during one working day *Log books	GMP Annex 2: 4
		Procedure to avoid the simultaneous handling of inactivated products and non-inactivated ones by the same persons	Do workers pass from areas with non-inactivated products to inactivated products areas	GMP Annex 2: 4



HOME ABOUT ICH WORK PRODUCTS MEETINGS

Home \ ICH Guidelines \ Quality Guidelines

Quality Guidelines

Harmonisation achievements in the Quality area include stability studies, defining relevant thresholds for impurities in pharmaceutical quality based on Good Manufacturing Practice (GMP).

- Q1A - Q1F Stability
- Q2 Analytical Validation
- Q3A - Q3E Impurities

AI with Checklists

Thought for 32s

Absolutely—here's a focused, practical **GMP audit checklist** tailored to a **biological API** manufacturer with **upstream + downstream, virus inactivation/removal, freeze-dried drug substance, PW/WFI generation, Grade C/D cleanrooms, and QC (chem + micro)**. It follows the spirit of **PIC/S Aide-Mémoire** and **FDA inspection playbooks** (structure, evidence, and risk emphasis).

Audit Checklist — Biological API (Upstream, Downstream, Viral Safety, Lyophilized DS, PW/WFI, Grade C/D, QC)

1) Quality System & Governance

- **Org/independence:** Clear roles; QA independent from Production/QC; escalation paths.
- **PQS elements:** Deviation/CAPA, Change Control, Risk Management (ICH Q9), Management Review.
- **Data integrity:** ALCOA+, audit trails (HPLC, EM systems, LIMS, balances, spreadsheets).
- **Supplier/outourcing:** Qualification, technical/quality agreements, performance monitoring.
- **Training & gowning:** Role-based curricula; aseptic/biological hazards; media-fill where applicable to DS handling; qualification & requalification.

Records to see: Site Master File (or equivalent), Quality Manual, last 12–24 mo. KPIs, APR/PQR (if used), deviation/CAPA logs, quality review minutes.

2) Facilities, Cleanrooms & Contamination Control (Grades C/D)

- **Zoning & flows:** People/material/equipment/ waste flows; segregation (cell culture vs purification vs virus steps); unidirectional movement; pass-throughs.
- **HVAC/pressure:** Qualified differentials, airflow p ↓ ns, recovery, alarms; Grade transitions C→D; smoke studies where relevant.

I am going to make a GMP audit of a biological API manufacturer. The manufacturing includes upstream and downstream manufacturing and the final Drug substance is freeze dries. The company makes its own pharmaceutical water and the manufacturing is in Cleanrooms of Grade D and C, virus inactivation and removal is a necessary part of the manufacturing. There is also a QC laboratory with both chemical and microbiological testing included in the scope. Could you make me an audit checklist covering these activities based on PIC/S Aide memoires and FDA inspection Checklists?



Turning a Checklist into an Agenda

Perfect — let's turn your checklist into a **structured two-day audit agenda** with two auditors, running in **parallel tracks** after a common introduction and site tour.

Two-Day Audit Agenda – Biological API Manufacturer

Day 1 (Morning) – Joint Opening & Tour

08:30 – 09:00

- **Opening Meeting** with management and QA.
- Introduce audit team, scope, objectives, and agenda.

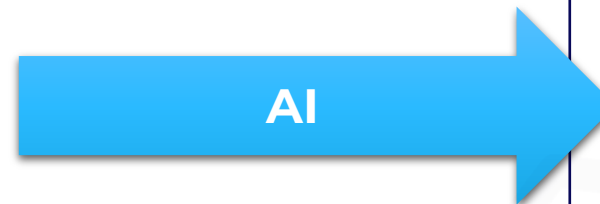
09:00 – 11:00

- **Facility Tour (both auditors together)**
 - Warehousing (materials, disposables, chemicals).
 - Pharmaceutical water generation & distribution (PW/WFI).
 - Cleanroom areas (Grade D → C).
 - Upstream bioreactors, downstream chromatography areas.
 - Viral inactivation/removal suites.
 - Lyophilization equipment.
 - QC laboratories (overview only).

11:00 – 11:15



Thanks could you turn the checklist into an agenda for a two-day audit for two auditors following two different tracks after a common tour of the facility?



Company Template
Agenda

AI and the soft skills during an audit

I am going to make the audit of the biological API manufacturer on a site outside Hyderabad in India. We are two auditors going, one man and one woman. We are both from Sweden. Are there any cultural and workplace norms or differences to Swedish norms and values we should be aware of and consider in order to get good cooperation and truthful answers to our questions during the audit?

4. Saving Face & Avoiding Embarrassment

- **India:** Strong cultural value — employees avoid admitting errors or gaps openly, especially in front of peers/managers.
- **Sweden:** Admitting problems early is seen as responsible.

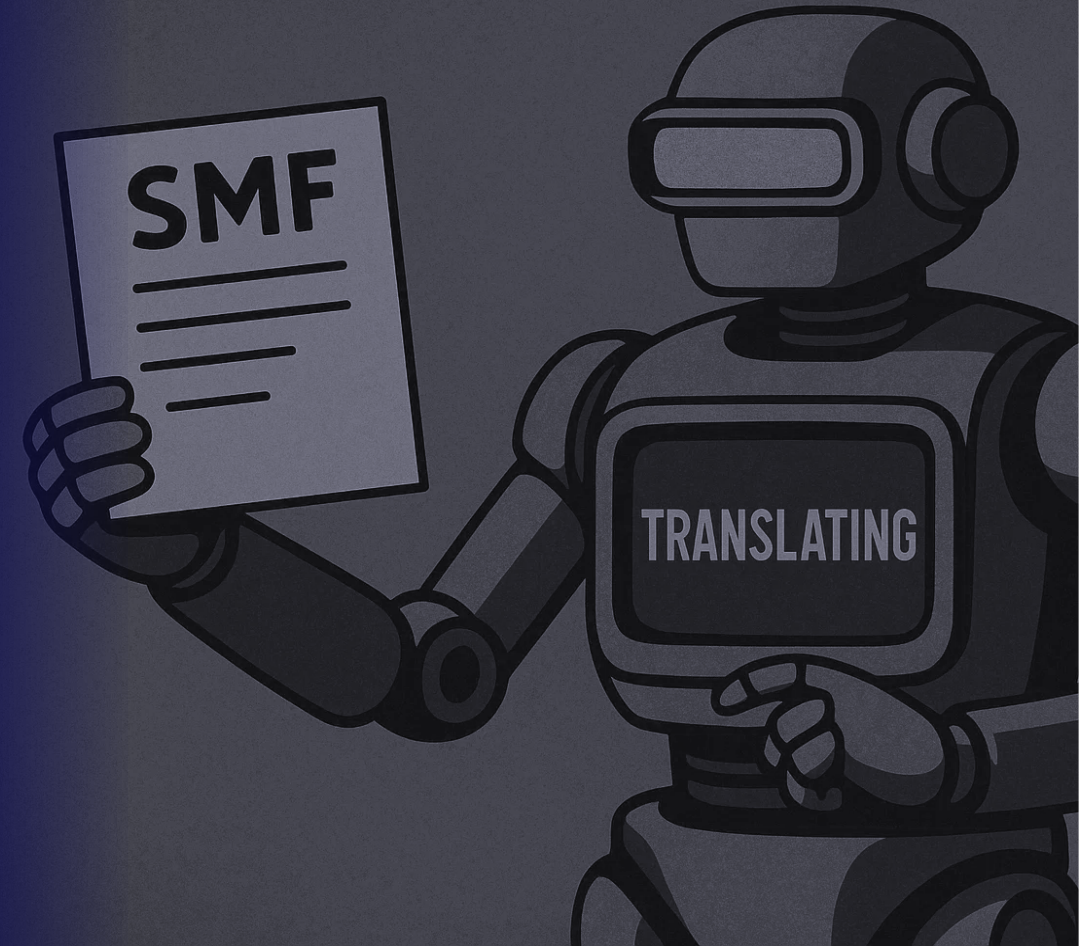
Audit Tip:

- Don't put individuals on the spot in front of their boss.
- Frame findings as **systemic** rather than personal ("How does the procedure ensure consistency?" instead of "Why did you fail to...?").
- Give positive feedback where it's due — builds trust and balance.

AI to summarize the Site Master File

- and other documents sent as preparation for the audit

- I don't do it
- Non-disclosure and legal reasons
- Only with a secure internal AI
- This is where I want to spend my preparation hours, in the details



AI during the audit execution

“Liberating your brain”

Cognitive overload



Remote audits

If client allows – turn recording and transcription on

We are managing deviations according to SOP.

- Be sure to summarize findings before going to a new subject
- Have AI turn the transcription into a narrative – But review!

On-site audits

Currently, very little help – I don't use AI here today, but you could:

- Use phone where possible for recording – transcription
- AI glasses – future possibility, but with limitations



AI during reporting

Writing the report



- Formalities
- Narrative
- Findings/non-conformities
- Conclusion

**Spend as little time as possible
Use AI and the auditee**

**Spend as much time
as possible**

Beware of seductive AI lying or hallucinating!

When using HVAC for Cleanrooms in aseptic processing in the pharmaceutical industry is it advisable to have separate HVAC-systems for cleanrooms of different grades or could one HVAC-system provide air for more than one cleanroom-grade. Please present any references or proof you find for either of these options.

1. EU GMP Annex 1 (2022)

Correct Annex, correct chapter

Key paragraphs on HVAC systems:

- 5.2 Premises design:

"There should be an appropriate flow of materials and personnel to minimise the risk of contamination."

- 5.3 Air supply systems:

"Air supply systems should be designed to minimise the risk of contamination of the product... The quality of air in clean areas should meet the appropriate classification (e.g., Grade A, B, C, D)."

- 5.6 & 5.7 Airlocks and interconnecting areas:

"If areas of different classifications are adjacent, the air handling system should be designed to prevent cross-contamination."

- 5.19–5.20 (HVAC):

"HVAC systems must be designed so that the air quality of higher classified areas is not compromised by adjacent lower-classified areas. Where possible, separate air supply systems are recommended for areas of differing grades."

✓ Interpretation:

- Annex 1 recommends separate HVAC systems for cleanrooms of different grades when cross-contamination could be a risk.
- It does **not mandate** separate systems in all cases; the requirement is risk-based. You can have a single system if the design ensures proper airflows, differential pressures, and filtration so that contamination cannot flow from lower to higher grades.

5.2 etc. exists but ...

5.19-20 does not exist!

What would've happened if I were in a hurry or didn't know my Annex 1?

Where are we headed?

- The technology evolves fast
- Assistance during the execution
- Translation – live and documents
- IP security needs to be addressed/solved
- The auditor role is not easily replaced!

Thank you!

Questions at the end!



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