

- reference to the initial declaration
- new information

C 4. Optimizing the scope of routine verification

C 4.1 Weakness of the current regime

The principle underlying verification of non-production in the chemical industry is that facilities that are considered most relevant have to be declared and will be inspected (Schedule [2]) or at least monitored (Schedule [3]).

This principle raises two basic questions:

- How should we deal with non-production in non-declared facilities?
- How can we assure that the scope of routine verification of declared facilities is most effective i.e. to encompass those facilities that, from an objective point of view, are most relevant?

The first question is left aside in this paper. (It has been tackled by the United Kingdom in its proposal on ad hoc inspections (CD/909). To answer the second question, a distinction should be made between chemicals and equipment.

As far as relevant chemicals are concerned it seems that the envisaged Schedules [2], [2b] and [3] come close to directing inspection efforts efficiently at monitoring the most relevant chemicals.

It is, however, very questionable whether a verification regime that is based on monitoring the most relevant chemicals will automatically also cover the most relevant production installations. In the Netherlands' view this is not necessarily the case. Two hypothetical examples might illustrate this:

1. A production installation that processes a non-toxic Schedule [2] compound would fall under the on-site inspection regime, even though the characteristics of the installation (containment, safety measures etc.) are such that the installation is clearly not capable to produce chemical warfare agents.
2. A large scale high containment production installation with extensive safety features that does not produce, process or use a scheduled chemical would not have to be declared under the currently envisaged regime, even though such a plant might be able to produce chemical warfare agents.

Another problem with regard to the scope of routine on-site verification has been touched upon in the introduction of the present paper: should verification be limited to the declared facility (i.e. a single production unit plus associated equipment) or should it encompass the whole production complex?