

Samples were taken by the operating personnel using normal sampling equipment (used for quality control), according to usual plant procedures and under surveillance of the inspector.

16. Handling of samples

It was suggested that samples would be split up in three identical sub-samples sealed in an appropriate manner by the inspector and the national authority representative.

The normal procedure would be: analysis at the facility under supervision of the inspector; when problems or disagreements arise, a second sample could be analysed by the inspector and under supervision of the facility representative, e.g. at a local university; a third sample could serve for further analysis, under procedures to be developed, if disagreement continues to exist.

A need exists for appropriate procedures to store and transport such samples.

17. Analysis of samples

In this particular case the inspector was not always present during the analysis.

The use of sophisticated instruments, often fully computerised, may, in theory, allow an operator to "cheat", i.e. show a completely different spectrum by working "off line"; therefore at least one of the inspectors ought to be a trained analytical chemist who is familiar with the practice of the main analytical techniques used.

18. Types of analysis

The analysis should indicate a "matching" between the sample and the structural formula on the operating instructions.

With this type of analysis only qualitative data are checked, in accordance with the aim of the inspection.

19. Documentation of the inspection

All specific documents presented by the facility are to be treated as confidential and may not leave the factory, except for a general layout and some general data (not yet specified) on the facility.

20. Evaluation by the inspectors

It was found possible to draw correct conclusions with regard to the actual activities of the plant within the facility. Stating the right of inspectors to take samples everywhere according to established procedures might act as a deterrent.