1. Sampling and analysis

At present there are two different views on the necessity to verify the declarations by sampling and analysis:

1. Sampling and analysis is not necessary since the results of the analysis do not change anything; the facility will be destroyed in all cases. Difficult situation might arise if no signs of former production, ceased e.g. 20 years ago, could be found. The declarations may thus remain unverified.

2. Verification of the declarations can only be done by analytical methods including unambiguous identification of the compounds.

If sampling and analysis would be considered necessary, monitoring of known chemicals could be used to detect the chemicals, and unambiguous identification would be required. If undeclared chemicals were to be found, their structures have to be elucidated. Analysis for the degradation products could be feasible even a long time after the production has ceased.

It was felt that the analytical facilities may be poor or non-existent at the facility. A mobile laboratory could be brought on-site for rapid results. On the other hand, production that has ceased long ago may be difficult to unambiguously identify on-site.

The samples might be very diluted and accordingly, analyses should be made in accredited laboratories with the most sophisticated techniques (HRMS, MS/MS, GC-MI-FTIR).

The same diversity of views was expressed on the need for sampling and analysis in the filling facilities which are not directly connected to any production facility.

2. Process monitoring

Although the current rolling test (CD/952 p. 91, para B.2) states that process control equipment should be closed down as part of the cessation of the production process, it might be noted that continued function and recording of some process control instruments in conjunction with any other tamper indicating