

C 3. Declaration and notification under article VI, annex 2

According to the annex to article VI [2] certain information should be given on each facility that produced, processed or consumed, or will produce, process or consume more than (...) of a Schedule [2] chemical. The experience obtained during our national trial inspection has led us to the conclusion that a few amendments to the current text (p. 73-75 of CD/881) should be considered and that possibly even a thorough review of the concept of routine verification of non-production under article VI is called for (see para C4).

C 3.1 Definition of "facility"

A comparison of the results of national trial inspections proves that there is no agreed definition of the word "facility". A clear definition is essential for determining the scope of inspections (see para 4).

C 3.2 Capability to produce Schedule [1] or other Schedule [2] chemicals

According to the current rolling text (p. 74 of CD/881) information has to be provided as to:

"(v) Whether the facility can readily be used to produce a Schedule [1] chemical or another Schedule [2] chemical. Relevant information should be provided, when applicable."

In our view, this question is too loosely worded to elicit meaningful answers. Consideration should be given to making the question more specific (see para 4).

C 3.3 Special advance notification

According to p. 75, para 3 (b) of the rolling text (CD/881) notification "of any production, processing or consumption planned after the submission of the annual notification under paragraph 3 (a), not later than one month before the production or processing is anticipated to begin" shall "include the information specified under paragraph 3 (a)". As such a "special advance notification" will usually concern production in the same year, the words "coming calendar year" should be deleted in the formulation taken over from para 3 (a). The words "above thresholds" should be inserted at the appropriate place.

C 3.4 Preventing unnecessary bureaucracy

According to the rolling text (p. 75 of CD/881), annual and special advance notifications should include more or less the same information as the initial declaration. Consideration should be given to limiting the amount of information required in these advance notifications to the following: