

fact that only primary producers have been identified in this study and so there will be other facilities such as processing plants which would merit inspection. This means that Beck's estimate of 150 schedule 2 plants is a reasonable starting point for such calculations, with 200 being an intuitive upper limit for such facilities.

Inspection Frequency for Schedule 2 Plants

Both papers take an average inspection frequency of once every 18 months for these plants. This seems to be too great an interval between inspections; annual inspection would be more appropriate. There is also an obligation for an initial visit by inspectors, followed by the development of facility attachments for each site before the random but routine inspections commence on a regular basis related to the required declarations. This means that each facility may have to be visited twice in the first year for information purposes before a regular frequency can be set for each location. In this paper, it is assumed that each schedule 2 plant may be inspected twice in the first year and annually thereafter. This does not include visits for either the installation or maintenance of equipment or seals required on-site by the inspectorate.