

accounting vouchers concerning the various other uses of the raw materials. In the context of a normal routine inspection conducted on the basis of the current "rolling text", such information might not have been provided, especially as some of the other uses relate to a subsidiary in which the company owning the inspected site does not have a majority holding.

In the case studied, one of the raw materials being common to the manufacture of several other substances in larger amounts, the normal imprecision in the measurement of mass flows could have led to considerable uncertainty as to the quantity of that raw material actually used for the manufacturing operation inspected. In that event, the possibility of deliberately under-evaluated production could not have been ruled out. In fact, the uncertainty was dispelled by means of a check of the uses of the other raw materials employed in the process.

The question arises, therefore, whether such complementary or indirect checks will always be possible. On a more complex site, for example, where other raw materials too might have had multiple uses, the uncertainty could not have been dispelled, unless the inspectors had had access to documents that are normally unavailable for the inspection.

Another question that arose was whether, bearing in mind the principle of medical secrecy, the inspectors should be granted the right to visit the site sick-bay and consult the treatment records. Such a visit might also have enabled them to verify the existence of special medical equipment.

(d) Inspection of areas, equipment and operation procedures

The inspectors went into each of the manufacturing shops and into the storage areas connected with the facility. They were able to establish, thanks in particular to photographs taken with an instant camera during the initial visit and kept on the site, that no change had apparently been made to any part of the facility.

They did not judge the facility to be technically suited to the manufacture of products listed in schedule [1], for the following reasons:

The safety equipment is not adequate for that purpose;

Access to the shops is not controlled;

One of the shops is in the open air.

These remarks only apply, of course, to the facility described in the specific agreement.

At the request of the inspection team, the site officials took samples of products at the sampling points normally used for industrial monitoring. These samples were analysed in the presence of an inspector by the staff employed in the site laboratory and compared with a reference sample brought by the team of inspectors.