

#### 4(b) Agreement on inspection procedures

A preliminary inspection plan was sent to the facility two days before the inspection. The plan states the main inspection procedures and the information which should be available for the inspectors at the working room.

During the inspection it was pointed out by the facility management that if the facility attachment is used to guide the work of the inspectors in a very detailed manner, the facility personnel very soon realizes, for example, which records and which sampling points have to be modified if illegal production is planned. It is essential to leave some flexibility to the inspections.

#### 5. Type of facility inspected

The facility inspected could be characterized as a modern, completely automated, multipurpose facility being part of a complex. Multipurpose in this context means that the facility can produce structurally closely related carbamates. The process is a multistep batch process. A new batch can be started before finishing the previous one. The products are solid.

#### 6. Type of declared activity at the facility

As neither of the two produced chemicals are on the lists, the more abundantly produced carbamate, phenmediphame, was included in Schedule [2] for the purpose of the inspection while the less abundantly produced carbamate, desmediphame, was included in Schedule [1]. The NTI took place when phenmediphame was produced as declared.

#### 7. Actual activity at the facility

The actual activity at the facility at the time of the inspection was in conformity with the declarations. The purpose of the inspection was to verify by sampling and analysis whether there had been any "illegal" (for the purpose of the inspection) production of desmediphame.

### B. DETAILED APPROACH

#### 1. Inspection mandate

A broad inspection mandate was negotiated between the facility management and the inspection team. The mandate did not limit the access to any part of the facility. The inspection team decided to inspect the process of phenmediphame synthesis only and leave the synthesis of one of the precursors uninspected as the precursor is used for the production of both carbamates.