

(Mr. Houlliez, Belgium)

it is possible to check that no activity prohibited by the convention is taking place in a facility which has legitimately not been declared because in principle it produces none of the substances contained in any of the three schedules in article VI. There was no question of carrying out a challenge inspection, but the scenario involved simulating an on-site inspection to remove certain doubts. For this type of inspection, there are as yet no provisions, and as you know discussion is under way to try to include additional measures as the Conference feels appropriate in the "rolling text". A second aim of this inspection was to obtain information on the level of intrusiveness which this type of inspection might lead to. I will mention four conclusions which seem to us to be of interest. Firstly, the excellent co-operation from the management and staff of the facility. Access was granted to all the parts of the industrial complex, the only restriction being that there should be strict compliance with the safety regulations. All documents relating to production, acquisition and storage of chemicals could be consulted, provided that none of the documents and no copies thereof were removed. The inspectors were able to check inputs and outputs of materials.

Second conclusion: the people in charge prefer sampling to be carried out at the end of the batch process in order not to disturb normal production activities, although the dissuasive effect of a verification system would be enhanced if samples could be taken at any point. The facility made available to the inspectors the competent staff and instrumentation required for sampling, following the instructions and under the control of the inspectors. It was noted that inspectors should be in possession of the wherewithal to seal the samples: it might be necessary to repeat an analysis elsewhere with other instruments if inspectors were to detect anomalies. Moreover, it would be useful if a representative of the host State, who in fact could be a member of the national authority, were to fix a second control seal on the samples. Another suggestion was made: the samples, once taken could be divided into three identical "sub-samples" and sealed in the appropriate manner by an inspector and the representative of the national authority.

Normal procedure would involve an on-the-spot analysis of the samples under the control of an inspector. If there was a problem or disagreement, a second sample could be analysed by an inspector, under the control of the representative of the facility, in another place, for example a university laboratory. The third sample could be used for subsequent analysis in accordance with procedures yet to be defined, if disagreement were to persist. Procedures would also need to be drawn up for the storage and transport of samples. Concerning sample analysis, it was noted that the use of sophisticated, sometimes totally computerized instruments would in theory give an operator scope for "cheating", that is to say producing a totally different spectrum through off-line processing. That is why at least one of the inspectors would have to be an experienced analytical chemist familiar with the use of the principal techniques of analysis.

Third conclusion: we studied the possibility of checking the presence of prohibited substances in the storage area through a check of computer listings. This checking through computer control procedures in fact proved impossible during the inspection because a special coded numbering system is used to introduce the name of the substance being sought. The introduction of