

C 5.3 Duration of the analysis

In general, preference will be given to an inspection period of one day, which will also mean that on-site analysis should, preferably, be performed within the same period. This will generally be feasible for samples of raw materials and end or intermediate products, but may be difficult to achieve for samples of reactive mixtures and waste materials.

C 5.4 Validation of method of analysis

During an on-site analysis, the inspectors should satisfy themselves that the method of analysis has been validated and/or that the analytical equipment has been calibrated using standard substances. If necessary, they should provide their own standard substances. Validation of this sort takes time, and the necessary equipment needs to be installed and/or adjusted. A similar approach may be required for the calibration/installation of equipment which the inspectors provide themselves.

C 5.5 Conclusion

It will be apparent from the above that the analyses may be complex, and that the various parameters (samples, compounds, analysis equipment and verification aims) may be closely interdependent, with the result that the laboratory performing the analysis may require extensive analytical equipment as well as personnel with considerable experience in the field. For these reasons, a number of practical problems may be expected when analysing mixtures of substances on-site using standardised methods which have been prescribed, if at all available, by the Inspectorate.

C 6. The need to specify category 1 of Schedule [2]

The facility that was the subject of our national trial inspection was chosen because it is used to process triphenylmethylphosphonium bromide (TMPB), a compound that falls under category 1 of Schedule [2]. On careful consideration, we have come to the conclusion that TMPB is a very unlikely precursor of Schedule [1] compounds.

For the purpose of a national trial inspection this conclusion had no immediate relevance, but under a CW Convention an attempt to verify the use of TMPB would be a most ineffective investment of the Inspectorate's time and money. We therefore suggest that TMPB be excluded from Schedule [2]. The same applies to diphenylmethylphosphineoxide.

This could be accomplished by limiting the definition of category 1 of Schedule