

CONCLUSIONS

The conclusions drawn from this second trial inspection may be summarized as follows:

1. The régime of systematic routine on-site inspections is worth while only in so far as it allows checks of the accuracy of the declarations made by industry through the national authority. In this it contains a dissuasive element which should be invoked with care. However, it may be of limited effectiveness in practice, depending in particular on the reliability and the nature of the information or data supplied.
2. Preservation of confidentiality is vital - in particular the most confidential information collected during the initial visit and the inspection must be kept on the inspected site, and the information supplied must be strictly limited in accordance with the need to know.
3. The national authority is called upon to play a major role at all stages in the verification process (declarations, initial visit, inspection, etc.). Specifically, for the purposes of the initial declaration it must help the manufacturer to determine whether schedule [1] chemicals may be manufactured on the site.
4. A detailed initial visit to the facility is of decisive importance for the proper conduct of the inspection. As far as possible, the subsequent inspection should be carried out by the same team of inspectors.
5. Plants manufacturing schedule [2] chemicals should be placed under a clear obligation to use a standardized materials and utility management system.
6. There is a need to study and then develop detection, identification and measurement equipment which is reliable and specifically adapted for inspection in an industrial environment, in the form of mobile laboratories where appropriate.
7. The composition of the inspection team is of great importance. In particular, the availability of a wide range of expertise will be conducive to effective verification. Nevertheless, the team responsible for verification should be limited to a reasonable number of inspectors, if only for security reasons.