Your company and the Chemical Weapons Convention: A guide to OPCW inspections
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Executive Summary

This detailed guide is intended for use by industrial facilities in the UK that are subject to inspections under the Chemical Weapons Convention (CWC). The information provided covers all phases of the inspection process, from initial notification to on-site activities and post-inspection procedures and should assist plant site personnel in planning and preparing for an inspection.

The Department for Business, Energy and Industrial Strategy (BEIS) is the Government Department with the responsibility for facilitating all CWC inspections conducted in the UK. BEIS’s objective is to demonstrate the UK’s compliance with the CWC by ensuring, with the company’s help, that all the requirements of an inspection are met in an efficient and timely manner, whilst minimising the disruption to the day-to-day operations of the inspected plant site.

Further information and guidance can be provided by BEIS on request, contact details are included at the back of this guide.
Introduction

The CWC is an international arms control treaty, administered by the Organisation for the Prohibition of Chemical Weapons (OPCW) based in The Hague, Netherlands. The CWC introduced a verifiable ban on an entire class of weapons of mass destruction by prohibiting the development, production, acquisition, stockpiling, transfer, and use of chemical weapons. It also requires the destruction of existing chemical weapons stockpiles, and the destruction or conversion of former chemical weapons production plants and storage facilities.

One of the ways in which the OPCW achieves its objectives is by monitoring the peaceful and legitimate use of dual-use industrial chemicals that are covered by the CWC, in order to prevent the possibility of their diversion into weapons that can be designed to kill and maim. The CWC’s provisions apply to most activities that involve toxic chemicals and their precursors.

Each CWC State Party has the right, subject to the provisions of the Convention, to develop, produce, otherwise acquire, retain, transfer and use toxic chemicals and their precursors for purposes not prohibited under the Convention (e.g. for industrial, agricultural, research, medical and pharmaceutical uses).

The CWC entered into force in the UK on 29 April 1997 following intensive consultations with the UK chemical industry. The CWC UK National Authority (UKNA), which is based in BEIS, is responsible for the implementation of the CWC throughout the UK, and in the UK’s Crown Dependencies and Overseas Territories. BEIS’s powers to do this are contained in the Chemical Weapons Act 1996 which translates the provisions of the CWC into UK law.

Who is inspected and why?

Each year the UK is required by the CWC to submit detailed declarations on plant sites undertaking activities that involve certain chemicals. The OPCW carries out a number of initial and repeat inspections globally each year to check first hand a State Party’s declarations and most but not all declared industrial facilities in each State Party are eligible for inspection.

The verification process serves as a confidence-building measure that each and every State Party is meeting its obligations under the Convention, and is intended to have a deterrent effect on any intention to contravene the Convention's provisions. The aim of an OPCW inspection is essentially to verify the accuracy of the information provided in the plant site’s declaration and to confirm that activities carried out are consistent with the CWC.

The toxic chemicals and their precursors monitored under the CWC are listed in three Schedules, roughly based on the degree of commercial use and relevance to chemical warfare, as shown in the table overleaf. Plant sites producing unscheduled discrete organic chemicals (DOC’s) are also subject to declaration and inspection, their versatile production capabilities making them relevant.
<table>
<thead>
<tr>
<th>Schedule of Chemical</th>
<th>Risk to the CWC</th>
<th>Verification Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Schedule 1</strong></td>
<td>Chemicals that have been developed, produced, stockpiled and / or used as chemical weapons and have little to no use for purposes not prohibited by the CWC.</td>
<td>Any declared production facility is subject to inspection.</td>
</tr>
<tr>
<td><em><em>Schedule 2 - divided into subcategories of 2A, 2A</em> &amp; 2B</em>*</td>
<td>Toxic chemicals and their precursors that have limited commercial use and are capable of being used as chemical weapons.</td>
<td>A declared plant site is subject to inspection if one or more plants produced, processed or consumed in any of the three previous calendar years, or anticipates producing, processing, or consuming in the next calendar year, in excess of: 10 kilograms of a 2A* chemical, 1 metric ton of a 2A chemical or 10 metric tons of any 2B chemical.</td>
</tr>
<tr>
<td><strong>Schedule 3</strong></td>
<td>Chemicals and their precursors that have been used as chemical weapons but which are used in large quantities for non-prohibited commercial purposes.</td>
<td>A declared plant site is subject to inspection if one or more plants produced during the previous calendar year, or anticipates producing in the next calendar year, in excess of 200 metric tons aggregate of any Schedule 3 chemical.</td>
</tr>
<tr>
<td><strong>Other Chemical Production Facilities (OCPF)</strong></td>
<td>Plant sites producing DOCs are subject to inspection on the basis of their production plant’s capability to produce toxic chemicals and their precursors.</td>
<td>A declared plant site is subject to inspection if it produced by synthesis during the previous calendar year more than 200 aggregate metric tons of one or more DOCs or more than 200 metric tons of an individual DOC containing the elements phosphorus, sulphur or fluorine (PSF).</td>
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</tbody>
</table>
When and how companies are notified that they are being inspected?

The UKNA will notify the company’s designated representative (usually the person who submits the CWC declaration to the UKNA) by telephone the moment it receives notification from the OPCW. It will follow up in writing immediately thereafter to confirm the following:

- The date and estimated time of arrival at the plant site;
- Names of the OPCW inspectors and members of the UKNA escort team;
- The company’s designated representative during the inspection and their contact details;
- What is required of the site and the focus of the inspection;
- The transport to be used by the OPCW inspectors and UKNA escort team;
- Whether any of the OPCW inspectors or UKNA escorts has any specific requirements, e.g. dietary.

The UKNA will assemble a small team to attend each inspection to escort and work with the OPCW inspectors and to help the company representatives with the requirements of the inspection. The length of notice of an OPCW inspection varies and is dependent on the schedule of chemicals and whether the site will be subject to sampling and analysis. Timeframes for OPCW inspection notifications are as below.

<table>
<thead>
<tr>
<th>Schedule of Chemical</th>
<th>Notification by the OPCW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Schedule 1</td>
<td>Not less than 24 hours prior to arrival at the UK’s point of entry (POE)</td>
</tr>
<tr>
<td>Schedule 2</td>
<td>Not less than 48 hours prior to arrival at the plant site to be inspected</td>
</tr>
<tr>
<td>Schedule 3</td>
<td>Not less than 120 hours prior to arrival at the plant site to be inspected</td>
</tr>
<tr>
<td>Other Chemical Production Facilities (OCPF)</td>
<td>Not less than 120 hours prior to arrival at the plant site to be inspected</td>
</tr>
</tbody>
</table>
How long does an inspection last?

There is no time limit on the duration of an inspection at a Schedule 1 facility. An inspection of a Schedule 2 plant site may last for up to 96 hours, and inspections of Schedule 3 and OCPF plant sites may last up to 24 hours. In all cases, up to a further 24 hours is allowed at the end of the inspection activities to enable the OPCW inspectors to produce an inspection report.

Once an inspection starts the inspectors could, under the terms of the CWC, ask to work around the clock, however they do not work this way and will endeavour to adhere to the plant site’s normal working hours as much as possible. An inspection period may be extended, if required, by agreement.

How often is a company inspected?

The frequency of inspections is determined by the OPCW using algorithmic selection systems. These take into account the perceived risk that a particular plant site presents to the object and purpose of the Convention by analysing its declaration data, and whether and when it was last inspected. From the UK’s experience of inspections received so far, on average, Schedule 1 sites are inspected every 2-3 years and Schedule 2 sites every 3-4 years. A large number of factors affect the selection of Schedule 3 and OCPF sites and it is impossible to give an indication of frequency.

What is a Challenge Inspection?

The CWC provides for the possibility of a Challenge Inspection at any plant site in any CWC State Party, whether or not it has been declared. A Challenge Inspection may be initiated by any CWC State Party in order to address concerns it may have about another’s compliance with the Convention. Only 12 hours’ notice will be given, and an inspection may last up to 84 hours and involve a larger team of inspectors working around the clock at the site.

No State Party has yet initiated or received a Challenge Inspection. The UK, along with some other States Parties, has mounted practice Challenge Inspection exercises in collaboration with the OPCW to ensure its preparedness for such an event.

Who are the inspectors?

The inspectors are full-time, technically qualified and trained members of the OPCW’s Inspectorate Branch and are based at the OPCW’s HQ in The Hague. They are nationals of countries that have ratified the CWC and each inspector participating in an OPCW inspection in the UK has been accepted by the UK Government for this purpose. Their approach is to work in close collaboration with the UKNA escort team and the inspected plant site representatives to fulfil the inspection mandate with the minimum necessary burden on the site.
The size of an Inspection Team (IT) may vary, and is determined by the OPCW, based upon its assessment of the requirements of a particular inspection. For initial or repeat inspections, an IT will usually comprise of two to four inspectors but could be up to six for inspections that include Sampling and Analysis procedures (see section on Sampling and Analysis procedures on page 17).

**What assistance is provided by the UKNA?**

The UKNA facilitates all OPCW inspections in the UK and its main objectives are to ensure that:

- All the legitimate requirements of the IT are fully satisfied in an efficient and timely manner;
- Minimum disruption is caused to the normal activities of the inspected plant site;
- Confidential company information is safeguarded;
- The IT stays within the boundaries of the Convention.

The UKNA makes preliminary visits to all newly declared Schedule 2 plant sites that have exceeded the relevant Annual Past and/or Annual Anticipated declaration threshold, and Schedule 3 plant sites that have exceeded the 200 tonne inspection threshold. It guides the site management and other company personnel through the declaration and inspection processes and procedures, as well as their legal obligations. If necessary and on request, particularly for OCPF plants sites, this preliminary visit can be carried out after notification of, and prior to, an inspection by the OPCW.

The UKNA will liaise with the plant site representatives as soon as the plant site is notified of the inspection to advise them on the requirements, help with the preparations and generally be on hand to answer any queries and address any particular issues.

The UKNA escort team will also be on-site throughout the duration of the inspection. Usually this will consist of two officials from BEIS and one technical advisor from the Defence Science and Technology Laboratory (Dstl) Porton Down. The UKNA will seek clarification on any matter, at any time, during the inspection on behalf of the plant site and will work with the plant site representatives to provide the information required by the inspectors. It will also help to address any issues that may arise in the course of an inspection, help protect commercial confidentiality and advise on the implementation of any managed-access procedures.

As well as liaising with the plant site to be inspected, the UKNA works closely with a range of agencies to ensure that the inspection runs as smoothly as possible. These include personnel at the UK’s designated POE, the UK Border Agency, the police and the UKNAs designated travel provider.
What happens during an inspection?

Inspection activities consist of:

- POE procedures;
- A pre-inspection briefing (PIB) at the plant site;
- An initial tour of the plant site (if required) and an inspection plan;
- A physical inspection of the plant site;
- Verification of the company’s declaration(s) through a records review
- Post-inspection procedures, including production of the inspection report.

POE procedures

Under the Convention, the IT must be transported to plant site within 12 hours of arrival at the POE and so the IT will usually arrive in the UK at the closest designated POE to the plant site(s) to be inspected. The UK’s designated POEs are all airports: Belfast International, Durham Tees Valley, Edinburgh, Manchester, Southampton and London Stansted. At the POE, the following procedures occur:

- The IT is met by the UKNA escort team on their arrival in the UK and the OPCW’s inspection mandate is handed to the UKNA escort team leader, this is opened, checked for accuracy and the OPCW Director-General’s signature. The inspection mandate is similar to the OPCW inspection notification and will contain the following information:

  1. Name of the Inspected State Party (ISP);
  2. Name and location of the plant site to be inspected;
  3. Name of the POE;
  4. Name of OPCW IT Leader and other team members;
  5. Inspection type and aims;
  6. Any special / operational instructions;
  7. Reference to a list of approved equipment that may be used during the inspection.

Although the mandate will vary depending on the type of inspection, it generally sets out that the IT’s objectives are to verify:

  1. The consistency of the sites declaration data;
  2. The absence of undeclared Schedule 1 chemicals, especially their production (except at Schedule 1 facilities);
  3. That scheduled chemicals are not being diverted for prohibited purposes.

Once the inspection mandate has been read the UKNA conducts a number of preliminary checks to confirm that the inspectors and their equipment are in accordance with the inspection mandate and the IT’s equipment list(s).

The UKNA technical advisor, with a member of the IT, will check the IT’s equipment against the mandate and the list(s) of OPCW approved equipment for the inspection. The IT’s equipment arrives in sealed holdalls to maintain the integrity of the
equipment during transit. The seals are broken to access the equipment and new seals may be applied before onward transportation to the plant site.

The UKNA and UK Border Force officials will also check the IT’s United Nations passports against the inspection notification and mandate.

Initial discussions will be held with the inspectors and cover anything that the plant site has drawn to the UKNA’s attention such as: health & safety requirements; personnel availability; record checks and plant operations; site administration arrangements; and logistical arrangements during their stay in the UK.

On conclusion of the POE procedures the UKNA will escort the IT to the plant site and notify the plant site representative of the estimated time of arrival.

**Pre-inspection Briefing (PIB)**

On arrival at the plant site, a company representative will need to provide the PIB and facilitate any necessary health and safety briefing or site induction.

The PIB is the first official activity at the plant site and it is important that it should be informative and set a positive and cooperative atmosphere for the inspection. Prior to visiting the company, the IT has little, if any, knowledge of the plant site and its manufacturing processes as this information is not declared to the OPCW. A thorough and accurate PIB supported by the provision of key documents will therefore help to ensure that the company, plant site, and plant(s) information is explained to the IT, and that subsequently it is accurately reflected in the inspection report. It will also proactively demonstrate the plant site’s compliance with the CWC, which will help to start the inspection on the right basis and could potentially lead to the inspectors completing their work more quickly and thereby reducing the length of the inspection.
Under the terms of the Convention a PIB must last no more than three hours, though one hour is usually sufficient, and should focus on the necessary site-specific issues including:

- company and plant site history;
- general plant site activities;
- physical layout of the plant site, including a map;
- declared areas;
- basis of the plant site’s declaration;
- production location and annual quantities of the declared chemicals related to the inspection;
- any other non-inspection related scheduled chemicals used or kept on-site;
- health and safety regulations;
- details of supporting infrastructure on site such as laboratories, waste treatment facilities, workshops and warehouses.
- administrative and logistic arrangements for the inspection;
- availability of staff and documents;
- any particular concerns about commercial confidentiality.

It is also helpful at this stage to provide the IT and UKNA with copies of any presentations used during the PIB, a detailed map of the site, copies of any health and safety regulations and any other relevant information that may be of help, such as organisation charts and company brochures.

On completion of the PIB, the IT will wish to set up their equipment in preparation for starting the inspection and will require:

- a lockable room large enough to accommodate the IT and their equipment (laptops, printers etc.) for the duration of the inspection. The room will be locked and sealed by the IT each time it is unoccupied, including overnight. This is to ensure that the OPCW’s equipment and the information provided to the IT by the plant site are not compromised. If the room needs to be accessed for any reason (e.g. fire or security issue), whilst the IT is not present, it is important that a site representative informs the UKNA escort team leader as soon as possible, 24/7, to raise the issue so that the IT can be informed and, if necessary, return to the plant site;
- a telephone line (with international access) in the room if possible;
- sufficient power points for the use of computers and printers;
- an accessible fax line for faxing situation reports to the OPCW Headquarters at the end of each day and an accessible shredder.

It will also be helpful if a room can be made available for the UKNA, close to where the IT are located, so that they are available to handle any enquiries and questions from the IT, in consultation with the inspected plant site representatives as required.
Site tour and inspection plan

Once the IT has set up their equipment they may, if required, undertake a guided tour of the plant site before the actual inspection begins, which should be facilitated by plant site personnel. A site tour, alongside the PIB, enables the IT to better understand the layout of the plant site and will help to formulate the inspection plan by focusing on the specific areas of relevance to the inspection.

An inspection plan will be provided to the UKNA and plant site representatives either verbally or in writing before the inspection takes place; it will indicate the areas of the plant site that the IT wish to inspect and the proposed order and provisional timings for the inspection. The inspection plan will be discussed and agreed by all parties and can be amended at any time as necessary e.g. the order of plants to be inspected could change if certain plant managers are only available on certain days or times. The inspection plan may be updated or revised as the inspection proceeds, but this very rarely occurs.

On some inspections, depending on the size and complexity of the site, the IT may decide to divide into two sub-groups to undertake their work. The IT may also decide not to conduct a site tour and proceed with the physical inspection directly after the PIB. In all cases the IT, UKNA, and plant site representatives will discuss and agree the most practicable approach.

Physical Inspection

The IT and UKNA will comply with the plant site’s health and safety regulations at all times. The IT’s equipment will contain items of Personal Protective Equipment (PPE) such as lab coats, hard hats, safety shoes, protective glasses, etc. and the UKNA team will also be equipped with some PPE such as safety shoes. Any specific or additional PPE that may be required will need to be provided by the plant site.

The plant site will need to ensure that staff are available to escort the IT and UKNA around the site during the inspection and that personnel are available on-site to explain processes and procedures. Ideally, these should be people who are knowledgeable about the areas of the plant site to be visited, such as plant and laboratory managers, who will be asked by the IT about their activities as necessary.

The IT should, subject to any confidentiality concerns, be granted full and unimpeded access to the areas of the site (and to the staff working in these areas) that they wish to visit to enable them to undertake their activities and fulfil the inspection mandate. This may require locked buildings to be opened or visiting areas of the site that are no longer in use, such as decommissioned production plants. Areas of the plant site which the IT typically asks to visit are:
plants where declared chemicals are manufactured, processed or consumed;
plant control rooms;
pilot plants;
disused plants;
waste treatment facilities;
maintenance workshops;
laboratories;
warehouses and storage areas for raw materials and finished products;
medical facilities or first aid rooms and equipment;
fire Stations;
security offices.

The IT also has the right to inspect relevant documents and records as they move around the site. The IT will not operate any of the site’s equipment but may wish to observe particular operations being performed by site personnel, such as sample- and stock-taking.

**Verification of the plant site declaration**

On conclusion of the physical inspection the IT undertakes a desk-based exercise to verify the accuracy of the plant site’s declaration(s). This involves a visual inspection of the original data and records used to support and complete the declaration(s). For Schedule 1 and 2 sites, the IT will verify the declarations for the three previous calendar years and records up to the date of the inspection, but can go back further with agreement. For Schedule 3 and OCPF sites the IT will verify the declaration for the previous calendar year only, and records up to the date of the inspection. The IT and UKNA will each have copies of all the relevant declarations for their use during the inspection.

During this exercise, the IT will expect the plant site to explain and demonstrate its procedures and processes for completing its CWC declaration(s) and will then work out the accuracy of the information declared. For Schedule 1, 2 and 3 sites, the IT will need to perform a mass balance based on 1-3 years (or more) of chemical production, processing, consumption, imports, exports, UK purchases and sales, off-site waste transfers and on-site losses. For OCPF sites the IT will need to verify the aggregate amount of declared chemicals that were produced during the previous calendar year. To complete this exercise, the IT will need to view all relevant electronic and paper records that are used to complete the declaration(s) such as SAP or SAGE systems, production records, import and export records, sales orders and invoices, delivery notes, stock takes etc.

Specific preparatory guidance on the information required for Schedule 2, Schedule 3 and OCPF sites can be found at the back of this guide on pages 23 – 31.
Post-Inspection Procedures

Within 24 hours of completing the inspection activities, the IT will produce a Preliminary Findings Report (PFR). The PFR summarises the findings of the IT and the cooperation of the UKNA and inspected plant site. It is a factual account of the activities conducted by the IT and the declaration data it has verified, containing only information that is relevant to compliance with the CWC. A template of the PFR used on inspections of OCPF plant sites can be found at the back of this guide on pages 32 – 42 as an example.

The IT will present the UKNA and plant site personnel with a draft version of the PFR to review. Any inaccuracies and/or sensitive business information in the report can be discussed by the UKNA and plant site representatives who, in cooperation with the IT, can suggest amendments to the report as appropriate. Once the draft PFR has been agreed the IT will issue a final PFR in two copies, both of which will be signed and kept by the OPCW and UKNA, a copy of the signed report will also be provided to the inspected plant site. Before finalising, the classification of the PFR will need to be agreed by the plant site in order to ensure that it is handled and stored at the OPCW’s headquarters in accordance with their regulations governing the handling and storage of confidential information. It is recommended that the classification of the PFR is consistent with that of the plant sites declarations(s).

Once the reporting activities have been concluded, the UKNA will undertake a series of procedural checks of the IT’s equipment to ensure that all computer hard drives are erased and that the IT do not take any information or documentation off-site, unless it has the full consent of the plant site. The IT will then be escorted by the UKNA to the POE to return to The Hague.

What does the company need to do?

To help facilitate and minimise the impact of a CWC inspection, the UKNA encourages all declared facilities to prepare well in advance. It is advisable that companies appoint a liaison officer to act as a focal point both during the preparations for, and during the inspection itself.

Although inspections take place relatively infrequently, plant sites should have a contingency plan so that personnel involved are aware of what to expect and are prepared to help the IT fulfil their inspection mandate. The most important steps to be taken in preparation for an inspection are:

- understand and verify the site’s declaration(s);
- develop a comprehensive PIB;
- ensure knowledgeable personnel are available for the site tour, inspection of the declared plant(s), and verification of the declaration(s);
- identify any confidential business information that is not relevant to the inspection;
- have available any electronic records used to complete the declaration(s) (SAP, SAGE etc.);
• have available all the records used to complete the data in the declaration(s) (import and export records, sales invoices, delivery notes etc.);
• have documentation available to show the legal owner and operator of the plant site (e.g. Companies House records, environmental permits, ISO certification);
• Identify separate office space for the IT and the UKNA.

As an inspection can last between 24 and 96 hours, depending on the type of plant site inspected, the more time the IT can remain on-site to work the more efficiently the process can be completed and burden to the site reduced. The inspected plant site is therefore requested to provide lunches for the IT and UKNA for the duration of the inspection. If this is not possible then the UKNA will make alternative arrangements.

What is Sampling and Analysis (S&A)?

S&A is an additional OPCW verification tool that permits an IT to test for the presence of scheduled chemicals and/or support a conclusion of absence of scheduled chemicals. It is only used occasionally and predominantly during inspections at Schedule 2 plant sites though the OPCW also conducts S&A at Schedule 3 and OCPF sites.

If S&A is to take place, then the UKNA will liaise with the OPCW as soon as it has been notified of the inspection to ensure that the OPCW transports all the equipment to be used directly to and from the plant site. Equipment checks will then be carried out by the UKNA at the plant site rather than at the POE. The IT will, in agreement with the plant site and the UKNA, explain the equipment that it proposes to use and agree where and when samples may be taken. Any samples required by the IT will be taken by site personnel under observation of the IT and UKNA. Two inspectors are usually added to the OPCW inspection team to carry out the S&A activities.

Analysis will be performed on-site if facilities exist, or off-site if they do not. In extremis, if an off-site alternative cannot be found then samples may be removed from the plant site for analysis at laboratories designated by the OPCW, as agreed by the UKNA.

In order for an IT to use its approved equipment to conduct on-site analysis, they will require laboratory space measuring approximately 20 square metres, ideally located on or in close proximity to the plant site. The laboratory should be equipped with sufficient desk space, electrical power, a water supply and preferably a fume cupboard or space for the IT to set up its own. Due to the nature of S&A, the IT may also require its equipment to remain switched on for long periods, including overnight.
If S&A is to take place, then the UKNA will discuss and agree the requirements and arrangements with the inspected plant site and OPCW. If the plant site does not have the facilities to accommodate S&A, or has any significant concerns, then the UKNA will work with all parties to alleviate these concerns or make alternative arrangements, though CWC States Parties cannot refuse to accept S&A or an OPCW inspection.

**How is confidential information protected?**

The CWC, and internal OPCW policy, stipulates that only information that is strictly necessary and relevant for the conduct of the inspection should be sought by the IT and that access within the OPCW to commercially sensitive information is allowed solely on a need-to-know basis.

The Chemical Weapons Act 1996 makes the unauthorised disclosure in the UK of information obtained under the Act – with exceptions only in certain clearly-defined circumstances – a criminal offence. Companies have the right to take measures to protect commercially confidential information and data of no relevance to the CWC. They may do so by means of managed access. The UKNA will work with the inspected plant site to ensure that any confidentiality concerns are met whilst still enabling the IT to fulfil their objectives.

Access to information may be managed in a number of ways, including:

- Removing sensitive and unrelated papers from offices;
- Shrouding unrelated displays, stores and equipment;
- Shrouding sensitive pieces of equipment unrelated to the inspection, such as computer or electronic systems;
- Limiting the number of inspectors given access to particularly sensitive areas of the site;
- Logging off unrelated computer systems and turning off data indicating devices;
- Using the “Random Selective Access” technique. (Under this, the IT may, for example, be allowed to choose a particular building for inspection, or identify for review a certain filing cabinet or a selection of documents that may be edited to safeguard confidential information unrelated to the inspection.)

It is however important that these mechanisms are used sparingly and only when absolutely necessary to protect commercially confidential information. Their use on a routine basis will cause suspicions that the plant site may not be in compliance with the CWC and lead to additional requests for information. Moreover, the use of managed access procedures does not absolve a company from the requirement to demonstrate that the activities carried out on its plant site are fully compliant with the CWC.
What happens at the end of an inspection?

Once the IT has completed the inspection and reporting activities and returned to The Hague, the IT leader will debrief his or her supervisors on the findings. At this time, the IT leader may then modify the report to reflect these discussions. A Final Inspection Report (FIR) will then be issued, usually within two weeks, and forwarded to the UKNA. The UKNA will provide the plant site with a copy of the FIR which should be cross checked against the PFR by both parties for accuracy.

Any key issues will already have been identified during the inspection and discussed between the IT, UKNA and plant site representatives and so the FIR should be consistent with the findings of the PFR. The UKNA and plant site both have the opportunity to comment on the FIR and suggest amendments to the report, though the latter seldom happens.

It is common for there to be minor differences between what the plant site has declared and what the IT has verified and these will be recorded in both reports. The OPCW has three specific markings for such discrepancies as follows:

Gather further information

The IT will record any differences between the information provided by a plant site in its annual declaration(s) and the information verified by the IT on-site. These differences typically include: the name of the plant site; its owner and/or its address; the number of plants producing DOC chemicals; the number of PSF plants and corresponding production ranges; the product group codes used and the aggregate production range for the DOCs that were produced. These minor discrepancies are common, particularly on initial inspections and at OCPF plant sites. The OPCW will usually recommend that the plant site makes the required changes the next time it submits a CWC declaration.

Issue requiring further attention (IRFA)

An IRFA records inaccuracies or omissions in the information provided by a plant site in its annual declaration(s) that are identified during an inspection. An IRFA could concern, amongst other things, a plant or plants that are conducting declarable activities but have not been declared, the non-declaration of declarable activities with scheduled chemicals other than those declared, or considerably inaccurate production, processing or consumption levels. These are open issues that usually occur at Schedule 2 and Schedule 3 sites and require further action by the plant site and UKNA such as correcting and resubmitting the relevant annual declarations to the OPCW. The number of IRFAs recorded globally each year is relatively low but nonetheless highlight the importance of submitting accurate declaration data.

Uncertainty

An uncertainty could be recorded if the IT cannot perform a material mass balance to verify a plant site’s CWC declaration because of the unavailability (or withholding) of adequate records at the site, or because the IT has not been granted sufficient
access to buildings or areas in order to verify the absence of Schedule 1 chemicals, especially their production. Such unresolved discrepancies are very rare but receive a high profile as they suggest to all CWC States Parties that the inspected State Party receiving an uncertainty is not compliant with the CWC; this is because the non-diversion of declared Schedule 1, 2 or 3 chemicals for prohibited purposes, or the absence of production of Schedule 1 chemicals, cannot be confirmed at a plant site on its territory. In the UK a plant site would be in breach of Section 22 of the Chemical Weapons Act 1996 and liable to prosecution for not meeting the legal requirement to keep adequate records and/or in breach of Section 25, and liable to prosecution, for not allowing sufficient access to the inspection team.

Assuming that the UKNA or plant site has no comments or pending actions, the FIR, incorporating any observations, will be passed to the OPCW Director-General within 30 days of the end of the inspection and both the OPCW and UKNA will close their respective files on the inspection. The UK receives, on average, ten OPCW inspections each year and is regarded by the OPCW as providing first-class cooperation. Inspections are mostly completed without incident or unresolved issues, largely because of the experience of the UKNA and excellent preparation and cooperation by the inspected plant sites.

**UKNA Contact details**

For further information about any aspect of the Chemical Weapons Convention please contact:

CWC UK National Authority  
Department of Business, Energy & Industrial Strategy  
Area 2A, 2nd Floor  
3 Whitehall Place  
London  
SW1A 2AW

Email: cwcna@beis.gsi.gov.uk  
Tel: 0300 068 5939/5925/5941

Website:  
[https://www.gov.uk/chemical-weapons-convention-guidance](https://www.gov.uk/chemical-weapons-convention-guidance)

A list of CWC scheduled chemicals can be found on the OPCW website:  

The OPCW’s website is:  
[www.opcw.org](http://www.opcw.org)
Glossary of Terms


CWC UK National Authority (UKNA) — Located within BEIS and responsible for implementation of the CWC and the Chemical Weapons Act 1996 in the UK, Crown Dependencies and the Overseas Territories. Officials from the UKNA will accompany and assist the inspectors for the duration of an inspection.

Chemical Weapons Act 1996 — The UK’s national primary legislation which translates the provisions of the CWC into UK law.

Final Inspection Report (FIR) – Final report by the OPCW issued approximately two weeks after conclusion of the inspection.

Initial Inspection — The first inspection of a Schedule 1 or Schedule 2 facility or plant site.

Inspector — An individual designated by the OPCW to carry out an inspection in accordance with the CWC.

Inspection Mandate — The instructions issued by the Director-General of the OPCW to the inspection team for the conduct of a particular inspection.

Inspection Team (IT) — The group of international inspectors from the OPCW sent to conduct an inspection.

Organisation for the Prohibition of Chemical Weapons (OPCW) — The international organisation, located in The Hague, Netherlands, that administers the CWC.

Other Chemical Production Facility (OCPF) — A plant site producing unscheduled discrete organic chemicals

Plant — (a production facility or workshop) A relatively self-contained area, structure or building containing one or more units with auxiliary and associated infrastructure, such as:

- small administrative area;
- storage/handling areas for feedstock and products;
- effluent/waste handling/treatment area;
- control/analytical laboratory;
- first aid service/related medical section;
- records associated with the movement into, around, and from the site, of declared chemicals and their feedstock or product chemicals formed from them, as appropriate.
**Plant site** — (a works or factory) The integration of one or more plants, with any intermediate administrative levels, which are under one operational control, and includes common infrastructure, such as:

- administration and other offices;
- repair and maintenance area;
- medical room;
- utilities;
- analytical laboratory;
- research and development laboratories;
- effluent and waste treatment area;
- warehouse storage.

**Pre-Inspection Briefing (PIB)** — A presentation given by a company representative to the IT, providing an overview of the company, declared activities and the declared plant(s) / plant site prior to the start of the inspection.

**Preliminary Findings Report (PFR)** — Draft report of the inspection activities by the OPCW inspectors on conclusion of the inspection.

**Point of Entry / Exit (POE)** — The airport that has been officially designated for the in-country arrival and departure of OPCW inspection teams.

**Routine Inspection** — At Schedule 1 and Schedule 2 facilities, this term refers to all inspections conducted after the initial inspection. For declared Schedule 3 and DOC plant sites, this term refers to all inspections conducted.

**State Party** — A country that has signed and ratified or acceded to the CWC.

**Unit** — A unit (production or process) is the combination of items and equipment, including vessels, necessary for the production, processing or consumption of a chemical.
Inspection Preparation Advice for Schedule 2 Declarers

This brief document outlines the most commonly requested information pertaining to inspections by OPCW inspectors. Therefore, it is advised that access arrangements are made for the relevant areas and the following documentation and information is readily available.

Documents – Pre-Inspection Briefing

- Copies of presentations given during the briefing;
- Site maps/diagrams showing the site perimeter and declared facilities;
- Organisation charts, showing the role of the key individuals introduced to the team and with whom the team is likely to come into contact;
- List of plants, including those declared, with the approximate annual production range of each plant;
- Readily available PR material such as site brochures, catalogues, advertising material and website information;
- List of products produced on-site;
- List of any undeclared Schedule 1, 2, 3 or DOC/PSF chemicals held on-site;
- Site health and safety policy;
- A list of COSHH assessments relating to the handling of toxic chemicals, especially highly toxic chemicals, if numbers make this practical.

Documents – Inspection

- Records, with supporting documentation, explaining the basis of the declaration;
- Schedule 2 production, processing and/or consumption records for the last three calendar years, to date, from which the declarations were derived for each plant, possibly broken down by monthly, weekly or batch figures;
- Relevant Schedule 2 sales records, sales invoices, credit notes;
• Schedule 2 import and/or export records for the last three calendar years, to date, from which the declarations were derived;

• Basic process flow information, including block flow diagrams and P and I diagrams;

• Standard operating procedures;

• Raw material (particularly any Schedule 2 chemicals) purchase/utilisation records for the last calendar year;

• Product dispatch records for the last calendar year;

• Downtime/maintenance records for the last calendar year;

• Material safety data sheets;

• COSHH assessments;

• Product Group Codes will be assessed from product literature - site brochures, catalogues, advertising material and website information;

• List of products produced off-site using the declared Schedule 2 chemicals;

• List of chemicals held on-site;

• Waste effluent records - in particular disposal of Schedule 2 effluent (Environmental Licences etc.);

• Official documentation proving site owner, operator and address (ISO certificates, Companies House registration, rental/lease agreements, council tax bill, telephone bill etc.)

**Access – Inspection**

• Declared production plants;

• Product filling areas;

• QC lab - any special safety features, detectors, fume cupboard filtration etc. Consistency of instrumentation with stated requirements;

• R&D facility - any special safety features, detectors, fume cupboard filtration etc.;
- Warehouses & workshops – any special safety features, detectors, air filtration etc.;

- Waste water treatment facilities;

- Emergency facilities and any on-site first aiders - qualifications of staff, equipment and medicines available.

**Information – Inspection**

- Declared production plants:
  - Materials of construction;
  - Temperature and pressure ranges of operation;
  - Single or multi-purpose configuration;
  - Batch or continuous process;
  - Control rooms, manual or computer control;
  - Vapour filtration systems;
  - Safety equipment available;
  - Any vapour detectors;
  - High security fencing etc.;

- Number and capacities of stainless steel and corrosion resistant (e.g. glass-lined or Hastelloy) reactors (plant specific);

- Processing methods e.g. crystallisation/distillation;

- Extraction/ventilation filters in laboratories and plants;

- Name and address of nearest hospital to site.
Inspection Preparation Advice for Schedule 3 Declarers

This brief document outlines the most commonly requested information pertaining to inspections by OPCW inspectors. Therefore, it is advised that access arrangements are made for the relevant areas and the following documentation and information is readily available.

Documents – Pre-Inspection Briefing

- Copies of presentations given during the briefing;
- Site maps/diagrams showing the site perimeter and declared facilities;
- Organisation charts, showing the role of the key individuals introduced to the team and with whom the team is likely to come into contact;
- List of plants, including those declared, with the approximate annual production range of each plant;
- Readily available PR material such as site brochures, catalogues, advertising material and website information;
- List of products produced on-site;
- List of any undeclared Schedule 1, 2, 3 or DOC/PSF chemicals held on-site;
- Site health and safety policy;
- A list of COSHH assessments relating to the handling of toxic chemicals, especially highly toxic chemicals, if numbers make this practical.

Documents – Inspection

- Records, with supporting documentation, explaining the basis of the declaration;
- Schedule 3 production records for the last calendar year from which the declaration was derived for each plant, possibly broken down by monthly, weekly or batch figures;
- Relevant Schedule 3 sales records, sales invoices, credit notes;
• Schedule 3 import and/or export records for the previous calendar year, to date, from which the declaration was derived;
• Basic process flow information, including block flow diagrams and P and I diagrams;
• Standard operating procedures;
• Raw material (particularly any Schedule 3 chemicals) purchase/utilisation records for the last calendar year;
• Product dispatch records for the last calendar year;
• Downtime/maintenance records for the last calendar year;
• Material safety data sheets;
• COSHH assessments;
• Product Group Codes will be assessed from product literature - site brochures, catalogues, advertising material and website information;
• List of products produced off-site using the declared Schedule 3 chemicals;
• List of chemicals held on-site;
• Waste effluent records - in particular, disposal of Schedule 3 effluent (Environmental Licences etc.);
• Official documentation proving site owner, operator and address (ISO certificates, Companies House registration, rental/lease agreements, council tax bill, telephone bill etc.)

Access – Inspection

• Declared production plants;
• Product filling areas;
• QC lab - any special safety features, detectors, fume cupboard filtration etc. Consistency of instrumentation with stated requirements;
• R&D facility - any special safety features, detectors, fume cupboard filtration etc.;
• Warehouses & workshops – any special safety features, detectors, air filtration etc.;

• Waste water treatment facilities;

• Emergency facilities and any on-site first aiders - qualifications of staff, equipment and medicines available.

Information – Inspection

• Declared production plants:
  - Materials of construction;
  - Temperature and pressure ranges of operation;
  - Single or multi-purpose configuration;
  - Batch or continuous process;
  - Control rooms, manual or computer control;
  - Vapour filtration systems;
  - Safety equipment available;
  - Any vapour detectors;
  - High security fencing etc.;

• Number and capacities of stainless steel and corrosion resistant (e.g. glass-lined or Hastelloy) reactors (plant specific);

• Processing methods e.g. crystallisation/distillation;

• Extraction/ventilation filters in laboratories and plants;

• Name and address of nearest hospital to site.
Inspection Preparation Advice for OCPF Declarers

This brief document outlines the most commonly requested information pertaining to inspections by OPCW inspectors. Therefore, it is advised that access arrangements are made for the relevant areas and the following documentation and information is readily available.

Documents – Pre-Inspection Briefing

- Copies of presentations given during the briefing;
- Site maps/diagrams showing the site perimeter and declared facilities;
- Organisation charts, showing the role of the key individuals introduced to the team and with whom the team is likely to come into contact;
- List of plants, including those DOC/PSFs declared, with the approximate annual production range of each plant;
- Readily available PR material such as site brochures, catalogues, advertising material and website information;
- List of products produced on-site;
- List of any undeclared Schedule 1, 2 or 3 chemicals held on-site;
- Site health and safety policy;
- A list of COSHH assessments relating to the handling of toxic chemicals, especially highly toxic chemicals, if numbers make this practical.

Documents – Inspection

- DOC/PSF production records for the last calendar year from which the declaration was derived for each plant, possibly broken down by monthly, weekly or batch figures;
- Basic process flow information, including block flow diagrams and P and I diagrams;
- Standard operating procedures;
- Raw material (particularly any PSF chemicals) purchase/utilisation records for the last calendar year;
- Product dispatch records for the last calendar year;
- Downtime/maintenance records for the last calendar year;
- Material safety data sheets;
- COSHH assessments;
- Product Group Codes will be assessed from product literature - site brochures, catalogues, advertising material and website information;
- List of products produced off-site using the declared DOC/PSFs;
- List of chemicals held on-site;
- Waste effluent records - in particular, disposal method of effluent (Environmental Licences etc.);
- Official documentation proving site owner, operator and address (ISO certificates, Companies House registration, rental/lease agreements, council tax bill, telephone bill etc.).

**Access – Inspection**

- Declared production plants;
- QC lab - any special safety features, detectors, fume cupboard filtration etc. Consistency of instrumentation with stated requirements;
- R&D facility - any special safety features, detectors, fume cupboard filtration etc.;
- Warehouses & workshops – any special safety features, detectors, air filtration etc.;
- Waste water treatment facilities;
- Emergency facilities and any on-site first aiders - qualifications of staff, equipment and medicines available.
Information – Inspection

- Declared production plants:
  - Materials of construction;
  - Temperature and pressure ranges of operation;
  - Single or multi-purpose configuration;
  - Batch or continuous process;
  - Control rooms, manual or computer control;
  - Vapour filtration systems;
  - Safety equipment available;
  - Any vapour detectors;
  - High security fencing etc.;

- Number and capacities of stainless steel and corrosion resistant (e.g. glass-lined or Hastelloy) reactors (plant specific);

- Processing methods e.g. crystallisation/distillation;

- Extraction/ventilation filters in laboratories and plants;

- Name and address of nearest hospital to site.
This document is the preliminary findings referred to in paragraph 60 of Part II of the Verification Annex to the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on Their Destruction. Inspection OCPF/XXX/YY was conducted in accordance with paragraph 6 of Article VI, and Part IX of the Verification Annex, of the Convention.

Inspected State Party: [name]

Inspected Plant Site: [name, as it appears on the mandate]

Plant Site Code [code]

Inspection Start: DD Month YYYY

Inspection End: DD Month YYYY

CONTENTS

1. On-site activities and factual findings
2. Pending issues
3. Report of any incidents in relation to the inspection activities
4. Cooperation of the inspected State Party
5. List of annexes
6. Signatures

ANNEXES
ON-SITE ACTIVITIES AND FACTUAL FINDINGS

Pre-inspection briefing
The IT was / was not\(^1\) briefed in accordance with paragraph 37 of Part II of the VA.

A site tour was provided as a part of the PIB / inspection period\(^2\).

A verbal /written\(^3\) inspection plan was discussed and agreed upon.

**Inspection activities and factual findings**

**Description of plant site**

[Text]

*It is recommended that this table is used to describe the main features of the plant site. Additional narrative may be used to complement the information included in the table, if deemed necessary. Include a plant site diagram when judged valuable to delineate the plant site, to define the scope of the inspection and/or to report it easily.*

**General information of the plant site**

<table>
<thead>
<tr>
<th>Ownership or company operating the plant site</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>POE</td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td></td>
</tr>
<tr>
<td>Situated within</td>
<td></td>
</tr>
<tr>
<td>Security features</td>
<td></td>
</tr>
<tr>
<td>Number of personnel</td>
<td>Area of the site</td>
</tr>
<tr>
<td>Plant site operation hours</td>
<td></td>
</tr>
<tr>
<td>Accredited certificates</td>
<td></td>
</tr>
<tr>
<td>Main chemical products</td>
<td></td>
</tr>
<tr>
<td>Schedule 3 plants (list)</td>
<td>Schedule 2 plants (list)</td>
</tr>
<tr>
<td>Other plants and facilities</td>
<td></td>
</tr>
<tr>
<td>PPE</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) Delete as appropriate.

\(^2\) Delete as appropriate.

\(^3\) Delete as appropriate.
DOC plants

[Text]

*It is recommended to use the tables below or similar tables to describe the main features of the plants, if the IT believes they are appropriate for the situation on site. Supplement information in the tables with narrative, if necessary. If the DOC plants have many things in common, a general description for all of them may be included in this section. Of particular note, is that the description of the plant should include the directly associated infrastructure. Delete blank table(s) if not used.*

Plant description

<table>
<thead>
<tr>
<th>Plant name</th>
<th>Type of chemical activities</th>
<th>Type of reaction</th>
<th>Process description</th>
<th>Technical features (including equipment)</th>
<th>Plant Structure</th>
<th>Operation mode</th>
<th>Directly associated infrastructure</th>
</tr>
</thead>
</table>

4 This table may be used for plant sites with small number of plants. Delete/add rows as appropriate.

5 Include a brief description of the associated infrastructure below the table, if required.
Plant description

<table>
<thead>
<tr>
<th>Plant name</th>
<th>Type of chemical activities</th>
<th>Type of reaction</th>
<th>Process description</th>
<th>Technical features (including equipment)</th>
<th>Plant structure</th>
<th>Operation Mode</th>
<th>Directly associated infrastructure</th>
</tr>
</thead>
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<td></td>
</tr>
</tbody>
</table>

This table may be used for plant sites with large number of plants. Delete/add rows as appropriate.

Include a brief description of the associated infrastructure below the table, if required.
[Name] (indicate whether this is a PSF plant)

[Text]

[Description of individual plants in this section if more appropriate than the use of tables for the specific plant site.]

Plant site common infrastructure

[Delete headings that do not apply and add headings, where appropriate.]

Storage and warehousing

[Text]

[Include tank farms, open areas and buildings.]

Waste treatment

[Text]

[Include waste water treatment facilities, separation systems, treatment of organics and incinerators (liquid, solid, vapours).]

Maintenance

[Text]

[Include electrical, instrument and mechanical maintenance.]

Utilities

[Text]

[List the type of utilities available on site such as boilers, cooling water system, nitrogen, steam, etc.]

Laboratories

[Text]

[Include types of laboratories, such as QA, QC, R&D.]

Medical centre

[Text]

[Describe the main features of the medical centre.]

Other

[Text]

[Describe additional plant site common infrastructure which is not covered above.]

Other

[Text]

[Describe additional facilities or non-DOC plants such as formulation plants, new plants in construction, shutdown plants, etc.]
Review of relevant records

[Text]

[Describe the material accounting system and the activities carried out by the IT, such as cross-checking, reviewing, etc. List the items reviewed and returned to the ISP such as list of chemicals handled on site, production records, business registration, certificates, etc.]

Records reviewed

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

Mandated aims and operational instructions

Verify that activities are consistent with the information to be provided by the inspected State Party in declarations

Reference is made to the latest declaration update provided by the ISP for the year YYYY.

The name of the plant site (remains unchanged. / changed to) ___________________ on mm/yyyy.

Precise location, address, geographical coordinates

<table>
<thead>
<tr>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of the owner or company operating the plant site</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
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<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Geographical coordinates</th>
<th>Declared</th>
<th>Verified</th>
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<td></td>
<td></td>
<td></td>
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</tbody>
</table>

Technical data

<table>
<thead>
<tr>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main activities that make the site declarable (product group codes)</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>[as declared/correction]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Aggregate amount of production of DOCs (code of production range)</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>[as declared/correction]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Approximate number of DOC plants, including PSF-plants</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>[as declared/correction]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of PSF-plants</th>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>[as declared/correction]</td>
</tr>
</tbody>
</table>

8 Include also original name, if appropriate.
9 Include any dates pertaining to the documents reviewed.
10 Remarks: use this column to specify if a document or item has been left on site in a joint sealed container, or has been taken off site. In these cases, include the item ID or DCN and the confidentiality classification.
Production of more than 200 tonnes of an individual PSF-chemical?

<table>
<thead>
<tr>
<th>Declared</th>
<th>Verified</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Yes / No]</td>
<td>[as declared/correction]</td>
</tr>
</tbody>
</table>

Number of PSF-plants producing:

(a) 30-200 t / (b) 200-1,000 t / (c) 1000-10,000 t / (d) > 10,000 t

<table>
<thead>
<tr>
<th>(a) =</th>
<th>(b) =</th>
<th>(c) =</th>
<th>(d) =</th>
</tr>
</thead>
<tbody>
<tr>
<td>[as declared/correction]</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Verify the absence of any Schedule 1 chemical, especially its production, except if in accordance with Part VI of the Verification Annex of the Convention.

Undertake sampling and analysis in accordance with paragraph 19 of Part IX of the Verification Annex to check for the absence of undeclared scheduled chemicals.

Gather any further information to be provided in declarations.

PENDING ISSUES

REPORT OF ANY INCIDENTS IN RELATION TO INSPECTION ACTIVITIES
COOPERATION OF THE INSPECTED STATE PARTY

[Text]

[Provide information as to the manner in which the inspected State Party cooperated with the inspection team, in accordance with paragraph 62 of Part II of the Verification Annex.]
LIST OF ANNEXES
Annex A: Administrative Data
  A.1: List of inspectors
  A.2: ISP representatives
  A.3: Sequence of events
Annex B: List of Buildings, Structures, and Areas Accessed or Inspected
Annex C: Sampling and Analysis
Annex D: Equipment-Related Details
  D.1: Inspection team equipment used during the inspection
  D.2: Equipment provided by the ISP
  D.3: Equipment requested to be left behind/destroyed by the inspection team / ISP
Annex E: List of Interviews Conducted
Annex F: Comments from the ISP
Annex G: List of acronyms

SIGNATURES
These preliminary findings have been printed in duplicate on [date] in English.

Inspection Team Leader: ________________________________
(Signature)

Notice taken
In accordance with the provision of paragraph 60 of Part II of the verification Annex

Representative of the inspected State Party: ________________________________
(Signature)
ANNEX A: ADMINISTRATIVE DATA

A.1 List of Inspectors

<table>
<thead>
<tr>
<th>Nº</th>
<th>Name</th>
<th>UNLP No.</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Inspection team leader</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Inspection team member</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Inspection team member</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

A.2 ISP Representatives

<table>
<thead>
<tr>
<th>Nº</th>
<th>Name</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

A.3 Sequence of Events

<table>
<thead>
<tr>
<th>Nº</th>
<th>Event</th>
<th>Date GMT</th>
<th>Time GMT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Arrival of Inspection Team at the POE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Arrival at inspection site</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Beginning of pre-inspection briefing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Completion of pre-inspection briefing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Beginning of inspection activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Extension requested / granted(^a)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Completion of inspection</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Beginning of post-inspection procedures</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This was the [first / second] inspection in a sequential mission.\(^b\)

The time difference between the location of the NA office and GMT is [+- XX] hours.

The time difference between POE and GMT is [+- XX] hours.

The time difference between the inspection site and GMT is [+- XX] hours.

---

ANNEX B: LIST OF BUILDINGS, STRUCTURES, AND AREAS ACCESSED OR INSPECTED

<table>
<thead>
<tr>
<th>Nº</th>
<th>Name(^c)</th>
<th>Function</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

ANNEX C: SAMPLING AND ANALYSIS

List of samples and results

<table>
<thead>
<tr>
<th>Sample ID</th>
<th>Sampling point</th>
<th>Date/Time of the Sampling</th>
<th>Result</th>
<th>Obtained Date/Time</th>
<th>Confidentiality Classification</th>
<th>Off Site Y/N</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>/</td>
<td></td>
<td>/</td>
<td>/</td>
<td></td>
<td></td>
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<tr>
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<td>/</td>
<td>/</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

ANNEX D: EQUIPMENT-RELATED DETAILS

D.1 Inspection team equipment used during the inspection

[List equipment used during the inspection, including the PPE such as masks, etc. It is not required to list here typical PPE such as safety boots, safety glasses and helmets.]

\(^a\) Fill in only if an extension was requested

\(^b\) Delete if not a sequential mission.

\(^c\) Include the original name or abbreviation, if appropriate
**D.2 Equipment provided by the ISP**

<table>
<thead>
<tr>
<th>Nº</th>
<th>Equipment Type</th>
<th>Equipment ID</th>
<th>No. of Units</th>
<th>Remarks</th>
</tr>
</thead>
</table>

1.
2.
3.

**D.3 Equipment requested to be left behind / destroyed by the inspection team / ISP**

<table>
<thead>
<tr>
<th>Nº</th>
<th>Equipment Type / Part</th>
<th>Equipment ID</th>
<th>Remarks</th>
</tr>
</thead>
</table>

1.
2.
3.

**ANNEX E: LIST OF INTERVIEWS CONDUCTED**

<table>
<thead>
<tr>
<th>Interview ID</th>
<th>Interviewee</th>
<th>Interviewers</th>
<th>Date / Time</th>
<th>Type of Recording</th>
<th>Confidentiality Classification</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Interview ID</th>
<th>Interviewee</th>
<th>Interviewers</th>
<th>Date / Time</th>
<th>Type of Recording</th>
<th>Confidentiality Classification</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Interview ID</th>
<th>Interviewee</th>
<th>Interviewers</th>
<th>Date / Time</th>
<th>Type of Recording</th>
<th>Confidentiality Classification</th>
<th>Remarks</th>
</tr>
</thead>
</table>

**ANNEX F: COMMENTS FROM THE INSPECTED STATE PARTY**

[Text]

**ANNEX G: LIST OF ACRONYMS**

<table>
<thead>
<tr>
<th>11. Acronym</th>
<th>12. Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>CWC</td>
<td>Chemical Weapons Convention</td>
</tr>
<tr>
<td>DCS</td>
<td>Distributed Control System</td>
</tr>
<tr>
<td>DH</td>
<td>Declarations Handbook</td>
</tr>
<tr>
<td>DOC</td>
<td>Discrete Organic Chemical</td>
</tr>
<tr>
<td>HQ</td>
<td>Headquarters</td>
</tr>
<tr>
<td>PPE</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>ISP</td>
<td>Inspected State Party</td>
</tr>
<tr>
<td>IT</td>
<td>Inspection Team</td>
</tr>
<tr>
<td>ITL</td>
<td>Inspection Team Leader</td>
</tr>
<tr>
<td>NA</td>
<td>National Authority</td>
</tr>
<tr>
<td>OCPF</td>
<td>Other Chemical Production Facilities</td>
</tr>
<tr>
<td>PGC</td>
<td>Product Group Code</td>
</tr>
<tr>
<td>PIB</td>
<td>Pre-Inspection Briefing</td>
</tr>
<tr>
<td>PLC</td>
<td>Programmable Logic Controller</td>
</tr>
<tr>
<td>POE</td>
<td>Point of Entry</td>
</tr>
<tr>
<td>QA</td>
<td>Quality Assurance</td>
</tr>
<tr>
<td>QC</td>
<td>Quality Control</td>
</tr>
<tr>
<td>R&amp;D</td>
<td>Research and Development</td>
</tr>
<tr>
<td>TS</td>
<td>Technical Secretariat</td>
</tr>
</tbody>
</table>

14 Add in the list any acronym specifically related to this inspection.
FLOW DIAGRAM OF THE OPCW INSPECTION PROCESS

1. Inspection notification received by UKNA
2. UKNA notifies plant site to be inspected
3. UKNA and plant site make the necessary arrangements
4. IT and UKNA leave POE and arrive at the plant site
5. Inspection mandate given to UKNA and POE checks made
6. OPCW IT arrives at POE and is met by UKNA
7. Site induction and PIB
8. Site tour (if required)
9. IT provides inspection plan
10. Preparation of PFR
11. Verification of plant site’s declaration(s) and absence of Schedule 1
12. Physical inspection of plant site
13. UKNA and plant site check the PFR
14. Final PFR is prepared and signed by OPCW and UKNA team leaders
15. UKNA check all OPCW equipment and computer hard drives erased
16. UKNA and plant site check FIR and take forward any actions
17. FIR prepared by OPCW and sent to UKNA
18. IT leave plant site for POE and return to OPCW
19. OPCW and UKNA inspection files closed