



Australian Government

Australian Safeguards and Non-Proliferation Office

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# The Chemical Weapons Convention

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INSPECTION INFORMATION FOR PRODUCERS  
AND USERS OF CHEMICALS  
2014



## DOES THE CWC AFFECT YOU?

If you produce or use chemicals listed in the Chemical Weapons Convention (CWC), namely, CWC-Scheduled chemicals, or produce unscheduled discrete organic chemicals above certain threshold quantities, you will need to:

- Report annually on quantities produced and used; and
- Allow inspections by designated government and international officials.



## CWC SNAPSHOT

The Chemical Weapons Convention (CWC) is an international disarmament treaty that bans the development, production, possession and use of chemical weapons. The CWC also requires the complete and verifiable destruction of existing chemical weapon stockpiles.

A number of chemicals produced or used for normal industrial, medical or research purposes can also be used to produce chemical weapons. To provide assurance to the international community of compliance with treaty obligations, each CWC Member Country must:

- (i) **declare** information on certain chemical activities to the Organisation for the Prohibition of Chemical Weapons (OPCW) - the international organisation responsible for verifying compliance with the CWC. Such declarations include information on the production and use of CWC-Scheduled chemicals, and the production of unscheduled discrete organic chemicals.
- (ii) permit the OPCW to **inspect** declared chemical facilities to confirm that on-site activities are consistent with declarations, and the facility is not being used to produce chemical warfare agents or undeclared CWC-Scheduled chemicals. OPCW inspectors sign confidentiality agreements with the OPCW, and follow strict procedures to ensure commercially-sensitive information is protected.

The CWC is principally implemented in Australia through the Chemical Weapons (Prohibition) Act 1994, administered by the Australian Safeguards and Non-Proliferation Office within the Department of Foreign Affairs and Trade.

# The Chemical Weapons Convention

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## INSPECTION INFORMATION FOR PRODUCERS AND USERS OF CHEMICALS

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## INTRODUCTION

The Chemical Weapons Convention (CWC) is an international treaty that seeks to eliminate chemical weapons in a verifiable manner, and to prevent their re-emergence. The Convention requires that all existing stockpiles of chemical weapons be destroyed. It also requires that certain industrial and research activities involving dual-use chemicals for peaceful and legitimate purposes are subject to verification measures to provide assurance to the international community that such chemicals are not being diverted into weapons.

As a CWC Member Country since 1997, Australia implements its CWC obligations primarily through the *Chemical Weapons (Prohibition) Act 1994* (the Act) and associated regulations. The Act bans chemical weapons, and provides for both facility reporting on certain chemical activities required for Australia's declarations, and inspections by officials from the Organisation for the Prohibition of Chemical Weapons (OPCW). These inspections aim to verify that on-site activities are consistent with the information in declarations, and that the facility is not engaging in activities prohibited by the Convention. Normal plant operations should not be affected.

Each CWC Member Country has the right, subject to the provisions of the CWC, 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, pharmaceutical or any other peaceful purposes).

## KEY STAKEHOLDERS

### **The Organisation for the Prohibition of Chemical Weapons (OPCW)**

The OPCW is an international organisation based in The Hague, the Netherlands, and is responsible for implementing the CWC at the international level. OPCW inspectors are chemical and chemical engineering professionals drawn from a range of CWC Member Countries. They are employed full-time by the OPCW and work under strict rules governing the protection of confidential information. OPCW inspectors (usually two or three) constitute the *Inspection Team*.

### **The Australian Safeguards and Non-Proliferation Office (ASNO)**

ASNO (within the Department of Foreign Affairs and Trade) is Australia's National Authority for ensuring that Australia meets its obligations under the CWC. During an OPCW inspection, ASNO officials act as an intermediary between the OPCW inspection team and the site representatives to ensure Australia's international treaty obligations are met, while protecting the rights of the facility and the confidentiality of its information. ASNO representatives (usually two) facilitating OPCW inspections are referred to as the *Escort Team*.

### **Facility representatives**

Representatives of the inspected facility prepare and present the pre-inspection briefing, lead the site tour, provide access to relevant areas of the facility and associated chemical production records, and should be available to answer the Inspection Team's questions.

Together, **ASNO** and the **inspected facility** are the **Inspected State Party**.

## SELECTION OF SITES FOR INSPECTION

The OPCW selects facilities for inspection from amongst eligible declared sites, taking into account their relevance to the Convention. Annex 1 provides a description of the CWC-Scheduled chemicals and unscheduled discrete organic chemicals (DOCs) produced or used at these facilities. Given the risk posed by Schedule 1 and 2 chemicals, facilities producing or using these chemicals are inspected within a year of their initial declaration, and thereafter according to a risk assessment made during the initial inspection. Schedule 3 facilities are selected randomly for inspection.

Facilities producing above threshold quantities of DOCs are included in the verification regime due to the potential risk posed by their production equipment (or plant capabilities), which could be used to manufacture toxic chemicals or their precursors, rather than any risk posed by the DOCs.

DOC facility inspections are ideally targeted at those most relevant to the Convention, such as multi-purpose facilities with batch reactors. In accordance with the Convention, the OPCW also aims to distribute inspections equitably among Member Countries, after taking into account the size of their chemical industries. Within a country, several factors influence the probability a site will be selected for inspection:

- the total number of DOC plants at the facility;
- the type and quantity of DOCs produced;
- the presence of plants producing DOCs containing one or more of the elements phosphorus, sulphur or fluorine (PSF-DOCs); and
- whether or not the facility has been inspected during the previous ten years.

The site-selection algorithm favours PSF-DOC facilities as many chemical warfare agents contain phosphorus, sulphur or fluorine, and could be more readily produced at sites designed to handle PSF-containing DOCs.

Not all declared facilities are eligible for OPCW inspection. Table 4 in Annex 2 compares the activity thresholds at which Australian facilities require a permit or must make annual notifications under the Act with the thresholds at which they become subject to inspection by the OPCW.

## INSPECTION AIMS

During an inspection, the OPCW Inspection Team aims to verify that activities conducted at the site are consistent with the information declared by Australia for that facility, including the absence of any CWC Schedule 1 chemicals. The specific objectives for each inspection are detailed in the **inspection mandate** that the Inspection Team must adhere to during the inspection.

Inspection aims for each type of declared facility are specified in the Convention and summarised in Table 1.

Declared facilities producing the higher risk Schedule 1 chemicals (many of which are chemical warfare agents) are subject to the most intense inspections, with the effort reducing with increasing Schedule number. Inspections of DOC facilities are the least intense.



**TABLE 1: Inspection Aims**

<b>Facility Type</b>	<b>Specific Objectives</b>
<b>Schedule 1<sup>1</sup></b>	To verify that: <ul style="list-style-type: none"> <li>• no non-declared Schedule 1 chemicals are produced;</li> <li>• quantities of Schedule 1 chemicals produced, processed and consumed are correctly declared; and</li> <li>• Schedule 1 chemicals are not diverted or used for other than the declared purpose.</li> </ul>
<b>Schedule 2</b>	To verify: <ul style="list-style-type: none"> <li>• that on-site activities are consistent with declared information;</li> <li>• that Schedule 2 chemicals are not diverted for prohibited activities; and</li> <li>• the absence of Schedule 1 chemicals</li> </ul>
<b>Schedule 3</b>	To verify: <ul style="list-style-type: none"> <li>• that on-site activities are consistent with declared information; and</li> </ul>
<b>DOC Facilities<sup>2</sup></b>	<ul style="list-style-type: none"> <li>• the absence of Schedule 1 chemicals.</li> </ul>

<sup>1</sup> The only facility that is currently inspectable by the OPCW is the Defence Science and Technology Organisation, which is Australia's only declared Schedule 1 facility for Protective Purposes.

<sup>2</sup> 'DOC Facilities' is the term used to describe facilities producing unscheduled discrete organic chemicals, including those containing phosphorous, sulphur or fluorine (PSF-DOCs).

## CONFIDENTIALITY

OPCW inspectors sign confidentiality agreements with the OPCW. The Confidentiality Annex of the CWC permits the Inspected State Party to take measures to protect confidential information, provided that it can demonstrate compliance with the CWC.

## THE ROLES OF ASNO, THE OPCW AND THE FACILITY

### **THE ROLE OF ASNO**

- assisting the facility in preparing for the inspection, including advising on the pre-inspection briefing and visiting the facility before the inspection begins to help finalise pre-inspection arrangements and to clarify the inspection process;
- organising accommodation and travel arrangements for the inspectors;
- checking that the OPCW inspection mandate and inspection equipment are consistent with CWC requirements;
- facilitating the inspection by ensuring inspectors are able to fulfil their mandate while protecting commercially-sensitive information – for example, by negotiating with inspectors to clarify requirements under the CWC or to provide alternative means of demonstrating compliance;
- accompanying the inspectors during on-site activities, records review and being present for all interviews between the OPCW and facility personnel; and
- ensuring, in collaboration with facility personnel, that information in the Preliminary Findings Report is accurate and has the agreed confidentiality classification.

## **THE ROLE OF THE OPCW INSPECTORS**

- ensuring that inspection activities are consistent with the mandate;
- inspecting the site, checking relevant records, interviewing site personnel, communicating with OPCW headquarters (if necessary) and preparing the Preliminary Findings Report;
- conducting the inspection in the **least intrusive manner possible** consistent with the effective and timely accomplishment of their mission; and
- observing safety regulations at the inspected facility.

## **THE ROLE OF THE FACILITY**

- providing site personnel who understand the facility's obligations under Australian legislation and the CWC, and are able to liaise with the OPCW inspection team;
- preparing and presenting the pre-inspection briefing, and leading the site tour;
- answering questions and providing access to relevant information;
- providing access to all declared areas of the facility; and
- not delaying or otherwise hindering the exercise of the Inspection Team functions.

## **THE INSPECTION PROCESS**

The boxed text below provides an overview of the inspection process. Figure 1 provides a schematic timeline for the inspection process and areas of responsibility. The following sections provide further information on various aspects of the inspection process.

### **OVERVIEW**

1. ASNO is notified of an OPCW inspection and immediately informs the facility.
2. ASNO and the facility each prepare for the inspection.
3. ASNO meets the Inspection Team at the airport, receives and checks the inspection mandate and checks the inspection equipment.
4. Upon arrival at the inspected facility, facility representatives provide a pre-inspection briefing and site tour.
5. The OPCW Team Leader presents an inspection plan.
6. Inspection activities commence.
7. The Inspection Team prepares a Preliminary Findings Report which is reviewed by the Escort Team and facility representatives before signing.
8. Post inspection activities are conducted and inspectors leave Australia.
9. ASNO receives a copy of the Final Inspection Report (within 10 days) from the OPCW. ASNO and facility representatives review the report and provide comments, if any, to the OPCW.
10. The Final Inspection Report is stored in a secure archive at the OPCW.

## **Notification Arrangements**

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ASNO receives approximately five days' notice of an impending OPCW inspection. Once notified, ASNO immediately informs the facility and provides logistical details such as the names and nationalities of the inspectors, the names of the ASNO officials who will make up the Escort Team, and the expected arrival time at the site.

Australia accepts sequential inspections by the OPCW. If a second inspection is scheduled to occur either in Australia or in another Member Country, ASNO will inform the Australian facility/ies. However, the identity of both facilities is protected, and OPCW inspectors ensure that any facility information in their possession remains confidential.

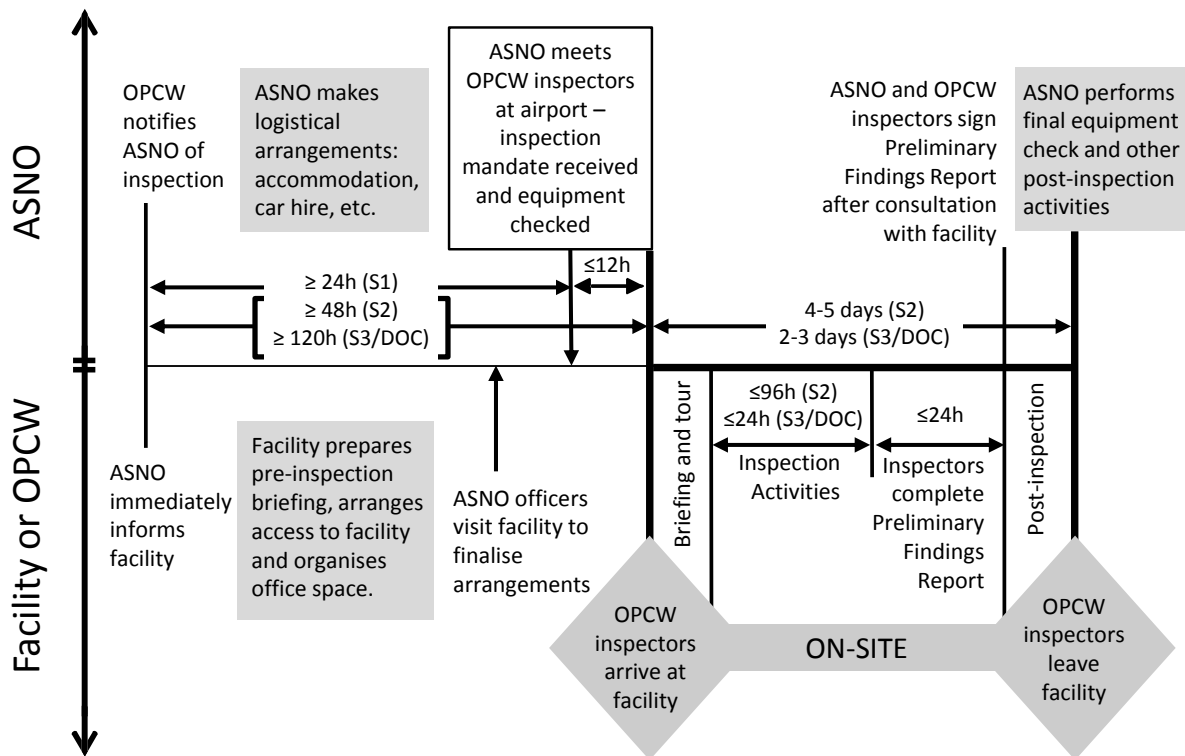


Figure 1: Facility Inspection Timeline

## On-Site Preparation

Once the site has been notified, the facility operator will need to prepare for the inspection. This involves the following (refer to Annex 3 for a checklist):

- preparing a pre-inspection briefing;
- ensuring that relevant facility personnel are aware of the information needed to meet the inspection aims, e.g., they understand the purpose of the inspection and the inspection process and the role of ASNO and the OPCW Inspection Team;
- ensuring ready access to all relevant areas of the declared facility (e.g., availability of plant managers, keys, etc.);
- ensuring relevant records and documents are available and easy to access;
- identifying any information or equipment relevant to the inspection which may be commercially sensitive;
- ensuring a secure work space is provided for inspectors (e.g., a lockable office) and where possible, a separate work area for the ASNO escort team;
- advising ASNO of any safety equipment required by its officers or by OPCW inspectors (note that OPCW inspectors bring their own personal protective equipment including safety shoes, safety goggles, hard hat and coveralls);
- ensuring that a fax machine is available; and
- arranging for a shredding machine or other method to dispose of confidential documents belonging to the facility.



## **Pre-Inspection Briefing of OPCW Inspectors**

Facility representatives are required to provide a briefing to the OPCW Inspection Team prior to the conduct of the inspection. The pre-inspection briefing sets the tone of openness and transparency for the inspection and provides the framework for all verification activities to be conducted. It orients the Inspection Team to the facility and provides critical input to the Preliminary Findings Report. It should describe the activities conducted at the site, include a site tour and last no longer than three hours in total.

Facility operators should be aware that the information declared by Australia to the OPCW provides little detail about activities taking place at the facility. With this in mind, the pre-inspection brief should include:

- introduction of key facility personnel, in particular those who will interact with the inspectors;
- an overview of the company (i.e., ownership, company structure and a brief history of the facility) highlighting any changes since any previous OPCW inspection;
- activities carried out on-site and the chemicals produced, emphasising the declared activities;
- physical layout of the facility, identifying all plants (declared and undeclared), common infrastructure including quality control and research and development laboratories, boundaries, location of entrances, and surrounding neighbourhood (provide site maps and aerial photographs, if available);
- list of plants and production units/lines specific to declared activities;
- an overview of the production chemistry at each of the declared plants;
- a brief description of the plant technological processes (including, for example, simplified process flow diagrams);
- a description of waste handling;
- annual production data of declared plants (as a handout), including any updates or revisions to the data since the most recent report to ASNO;
- a description of how the regulated production/processing data is collected and recorded;
- facility safety procedures (OH&S) whilst on-site, including first aid facilities available at the facility and the location of nearby medical facilities or hospitals;
- logistical and administrative arrangements for the inspection; and
- a site tour.

## **The Inspection**

### ***OPCW INSPECTION EQUIPMENT***

The OPCW Inspection Team is permitted under the CWC to bring certain approved equipment to an industry inspection. This includes: a portable GPS, camera, tape measure, secure voice telephone, computer, USB sticks, printer, seals, flammability/explosive/air-quality monitor and personal protective equipment. ASNO representatives check these items beforehand (usually at the airport on arrival) to ensure that only approved equipment is brought to the inspection site.

## **DURATION**

The maximum duration for inspection activities is specified by the CWC and shown in Figure 1. A Schedule 2 facility inspection may not exceed 96 hours in total, while Schedule 3 and DOC facility inspections are limited to 24 hours. These times may be extended on request if both ASNO and the facility representatives agree. Note that Schedule 1 facility inspections have no pre-set length.

Inspectors at Schedule 3 and DOC facility inspections may be on-site for 2-3 working days in order to complete the inspection activities and the Preliminary Findings Report. Inspectors usually adhere to the site's normal working hours unless agreed otherwise.

## **ON-SITE ACTIVITIES**

The OPCW Inspection Team generally consists of two or three inspectors who may split into two groups. If this occurs, a facility and ASNO representative will need to accompany each group. OPCW inspectors are entitled to use a range of means to satisfy the inspection aims. Depending on the facility and circumstances, on-site activities may include: physical access to the declared plant and related infrastructure; reviewing relevant facility records; interviewing site personnel; sampling and analysis of chemicals and taking photographs. Further details are provided below.

### **a) Inspectable Areas**

Table 2 lists areas that may be inspected by the OPCW Inspection Team, as specified under the CWC. In each case, the declared plant is the focus of the inspection, but the Inspection Team may request access to other areas of the facility (e.g. analytical laboratories, medical facilities, central warehouse, etc.) to meet the inspection aims and verify the absence of undeclared Schedule 1 chemicals.

<b>Activities/Systems</b>	<b>Areas and Items Relevant to the Inspection, if applicable</b>
<b>Delivery, Storage, Packaging and Handling of Chemicals</b>	<ul style="list-style-type: none"><li>• Delivery of raw materials, intermediates and products - storage packaging and handling areas.</li><li>• Areas where manipulative processes are performed upon reactants prior to addition to the reaction vessel(s).</li></ul>
<b>Production/ Processing of Chemicals</b>	<ul style="list-style-type: none"><li>• Feed lines, as appropriate, from the storage areas to the reaction vessel together with any associated valves, flow meters, etc.</li><li>• Lines from reaction vessels to storage or to equipment for further processing of the declared chemical.</li><li>• Production and ancillary equipment, e.g. reactors, purification systems, condensers, heat exchangers, collection vessels, fume hoods, ventilation, filters, piping, valves, sensors and alarms.</li></ul>
<b>Control Systems</b>	Control system(s) associated with the relevant production/processing equipment.
<b>Ventilation and Exhaust Systems</b>	Ventilation, exhaust ducts, scrubbers, filters and fume hoods associated with declared production units and laboratories.
<b>Waste Management</b>	Equipment and areas for waste handling and treatment, and for disposal of chemicals which do not meet quality requirements.
<b>R&amp;D/QC</b>	Analytical/quality control laboratories supporting the declared facility.
<b>OH&amp;S</b>	Protective equipment, breathing apparatus, first aid and medical facilities.
<b>Administration, Utilities, Security and Maintenance</b>	Areas associated with the operation and security of the declared plant(s) including the administrative building, the mechanical workshop and utilities.

### ***b) Review of Records***

Inspectors will need to review documentation and records relevant to the inspection aims, namely to verify that activities are consistent with those declared and the absence of Schedule 1 chemicals. The intensity and scope of a records review depends on the type of facility being inspected (Table 3). Inspectors may choose to view a selection of monthly records and extrapolate from those findings, rather than viewing records from an entire year.

Details of the records viewed during the inspection are not included in the Final Inspection Report. Rather, for Schedule 3 and DOC facilities the Report will confirm that records were checked and production ranges were consistent with those declared.

*Inspectors should not need access to commercially-sensitive information.*

**TABLE 3: Records Which May be Reviewed During OPCW Inspections**

<b>Facility Type</b>	<b>Scope of Records Review</b>
<b>Schedule 1</b>	<ul style="list-style-type: none"><li>• A material balance is conducted to verify non-diversion of declared Schedule 1 chemicals since the last OPCW inspection.</li><li>• No limit on scope or intensity of record review.</li><li>• Relevant records include chemical inventories, batch records/operator logs, waste disposal and decontamination records, purchase and sales records, and safety regulations and records.</li></ul>
<b>Schedule 2</b>	<ul style="list-style-type: none"><li>• A material balance is conducted to verify non-diversion of declared Schedule 2 chemicals since the last OPCW inspection.</li><li>• Relevant records include batch records/operator logs, shipping/receiving/inventory records, analytical data, and waste disposal records.</li><li>• List of chemicals held on site.</li></ul>
<b>Schedule 3 DOC Facilities<sup>1</sup></b>	<ul style="list-style-type: none"><li>• Monthly production records during the previous calendar year and daily production records for selected months (at inspector's discretion).</li><li>• List of chemicals held on site.</li></ul>

<sup>1</sup> Records review is less intensive as the OPCW Inspection Team must verify production ranges as declared, rather than specific quantities.

### ***c) Interviewing Site Personnel***

Over the course of the inspection, the inspectors will gather relevant information through conversation with facility personnel. However, they may also formally interview site personnel to establish facts relevant to the inspection aims. An ASNO representative must be present during an interview to ensure the OPCW Inspection Team is satisfied with the information provided and to protect commercially-sensitive information not relevant to the inspection.

### ***d) Sampling and Analysis***

The CWC permits sampling and analysis to test for the presence of undeclared CWC-Scheduled chemicals. This is required at Schedule 2 facility inspections, and *may* be undertaken at Schedule 3 and DOC facilities at the inspectors' request, although the OPCW has not yet commenced this practice. Samples are collected by facility representatives in the presence of the inspectors, or if agreed in advance, the Inspection Team may take the samples. Where possible, sample analysis is done

on-site using approved equipment brought by the Inspection Team.

### **e) Taking Photographs**

The CWC allows inspectors to request photographs be taken by facility or ASNO representatives (in accordance with the safety requirements of the facility). However, no such requests have been made in Australia thus far.

ASNO usually requests to take photographs and will only do so if the facility has given its prior approval. This is done for the purposes of publishing in its annual report, without attributing the photo to a particular facility.

## **The Inspection Report**

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The Inspection Team prepares a draft Preliminary Findings Report. ASNO and facility representatives review the Report to ensure its accuracy. The facility confirms the level of confidentiality assigned to the report and determines whether any other material may be taken off-site (e.g., pre-inspection briefing), if requested by the Inspection Team. The report is then finalised and co-signed by the leader of Inspection Team and by ASNO on behalf of the Inspected State Party. Copies of facility information used by the inspectors are returned to the facility or destroyed.

Within 10 days of the inspection, the inspectors complete a Final Inspection Report (FIR) which is forwarded to ASNO for comment. After consulting with facility representatives, ASNO communicates any comments or concerns to the OPCW. These must be received no later than 60 days after the inspection. Unless issues requiring further action are raised at this point, the FIR and comments are submitted to the Director-General of the OPCW and the inspection file officially closed. The FIR and accompanying documentation are stored in the OPCW's secure archive in accordance with OPCW confidentiality procedures.

Overall, ASNO has facilitated an average of four OPCW inspections a year since the CWC entered into force in 1997. On each occasion, declared information was verified and there have been no issues requiring further attention.

## **ANNEXES**

- Annex 1: Chemicals Relevant to the CWC
- Annex 2: Facilities Eligible for Inspection and Inspection Frequency
- Annex 3: Facility Preparation Prior to Inspection: Check List and Pre-Inspection Briefing
- Annex 4: CWC Definitions Relevant to Declarations





## CHEMICALS RELEVANT TO THE CWC

The following chemicals are relevant to the Chemical Weapons Convention as they pertain to facility reporting and declarations to the OPCW.

### CWC-Scheduled Chemicals

Under the CWC, certain toxic chemicals (including chemical warfare agents) and key precursors are grouped into three Schedules according to the scale on which they are used for peaceful purposes, and the verification measures applied. Toxic chemicals are listed in Part A of each Schedule, and precursors in Part B.

- **Schedule 1** chemicals are the most toxic of the CWC-Scheduled chemicals. They consist primarily of chemical warfare agents, including the nerve agents - sarin, soman, tabun and VX - as well as and blister agents such as sulphur mustard. Under the Convention, these may be produced or used only for research, medical, pharmaceutical or protective purposes. Legitimate use of these chemicals in Australia is very limited.
- **Schedule 2** includes toxic chemicals (2A) and precursors (2B) to Schedule 1 chemicals. These have no large-scale industrial application, but may have legitimate small-scale uses. Examples include dimethyl methylphosphonate, a nerve agent precursor also used as a flame retardant, and thiodiglycol, a sulphur mustard precursor widely used as a solvent in inks.
- **Schedule 3** also includes toxic chemicals (3A) and precursors (3B) to Schedule 1 chemicals. Two of the former – phosgene and chloropicrin - were used as chemical weapons in World War I. This group has legitimate large-scale industrial uses - for example, phosgene is now used in the manufacture of plastics, and chloropicrin as a fumigant.

### Discrete Organic Chemicals

Any chemical belonging to the class of chemical compounds consisting of all compounds of carbon, except for its oxides, sulfides and metal carbonates, identifiable by chemical name, by structural formula, if known, and by Chemical Abstracts Service (CAS) registry number, if assigned. Certain facilities are exempt from reporting requirements and inspections – those that produce polymers with no single structural formula, those that exclusively produce hydrocarbons or explosives, as well as breweries, distilleries and wineries.

### PSF-DOC

Discrete organic chemical containing phosphorus, sulphur or fluorine.

## FACILITIES ELIGIBLE FOR INSPECTION AND INSPECTION FREQUENCY

Not all declared facilities are eligible for OPCW inspection. Activity thresholds apply to Schedule 1, Schedule 2 and Schedule 3 facilities, and to producers of discrete organic chemicals (DOCs). Table 4 compares the thresholds at which Australian facilities require a permit or must make annual notifications under the *Chemical Weapons (Prohibition) Act 1994*, with the thresholds at which they become subject to inspection by the OPCW. Table 4 also includes the likely frequency of OPCW inspections at each type of facility, based on Australia's past inspection experience.

**TABLE 4: Thresholds Triggering Regulation or OPCW Inspections and Inspection Frequency in Australia**

Chemical	Activity	Threshold		Inspection Frequency in Australia
		Permit (P) or Notification (N) Required	Inspectable by OPCW	
<b>Schedule 1<sup>1</sup></b>	Production	Zero (P)	100 grams	The number, intensity and duration depend on the types of chemicals and activities carried out, ~ every 2-3 years.
<b>Schedule 2B<sup>2</sup></b>	Production Processing Consumption	1 tonne (P)	10 tonnes <sup>3</sup>	Frequency depends on risk as assessed during the initial inspection, ~ every 3 years.
<b>Schedule 3</b>	Production	30 tonnes (P)	200 tonnes <sup>4</sup>	Randomly selected for inspection, ~ every 3-4 years.
<b>PSF-DOC</b>	Production	30 tonnes (N)	200 tonnes <sup>5</sup>	Randomly selected for inspection - no more than four per calendar year.
<b>DOC</b>	Production	200 tonnes (N)	200 tonnes	

<sup>1</sup> Where the Schedule 1 chemical is to be used for research, medical or pharmaceutical purposes – no such "Research" facilities have been declared in Australia. Australia has one declared facility for Protective Purposes.

<sup>2</sup> Schedule 2A chemicals have different requirements but are not produced or used commercially in Australia.

<sup>3</sup> The Schedule 2 inspection threshold applies to the quantity produced, processed or consumed in any of the three previous calendar years, or anticipated for production in the next calendar year.

<sup>4</sup> The Schedule 3 inspection threshold applies to the quantity produced during the previous calendar year, or anticipated for production in the next calendar year.

<sup>5</sup> The quantity threshold for inspections (200 tonnes) refers to total production of all DOCs at the site, including PSF-DOCs, as compared with the notification threshold (30 tonnes) which refers to a single PSF-DOC.

## FACILITY PREPARATION PRIOR TO INSPECTION: CHECK LIST

<b>Prepare pre-inspection briefing (PIB) and handouts (see below)</b>	
<b>Arrange site tour to follow the PIB</b>	
<b>Prepare facilities to be used during inspection</b>	
conference/briefing room for pre- and post-inspection briefing	
working space for inspectors (preferably lockable) and if possible for ASNO officers	
fax and shredding machines	
<b>Identify documents possibly relevant to the inspection including:</b>	
production/processing records, site maps and company registration, etc.	
permit reports or DOC notifications under the <i>Chemical Weapons (Prohibition) Act 1994</i>	
procedures for purchases and storage of materials	
<b>Identify sensitive information:</b>	
check company policy regarding on-site photography	
remove sensitive material from office spaces	
cover sensitive displays, stores and equipment (computer or electronic systems)	
<b>Prepare procedures for entering facility</b>	
Permits, any specific mandatory training, identity badges for site personnel, etc.	
<b>Identify facility equipment that may be needed during an inspection</b> (for sampling and analysis inspections only)	
prepare analytical equipment (calibrate etc.)	
ensure that trained personnel are available to operate relevant analytical instruments	

## PRE-INSPECTION BRIEFING SHOULD INCLUDE:

<b>Overview of company, including:</b>	
company structure (including names and positions of those involved in the inspection)	
date facility established and brief history of facility activities	
any changes in facility ownership	
number of personnel	
<b>Layout of plant site</b>	
site map identifying declared plants	
sketch of plants to be inspected	
<b>Overview of current activities</b>	
overview of chemicals and products produced (including toll manufacturing)	
overview of the chemistry at each declared plant	
brief description of technological process used (e.g., process flow charts)	
data recording processes and electronic data management systems	
any anticipated changes in chemical production or number of declared plants	
brief description of the waste treatment and disposal procedures, medical capabilities (location of nearest hospital) and purpose of on-site laboratories	
<b>OH&amp;S rules and procedures, and other safety measures</b>	
<b>Handouts</b> – copies of the pre-inspection briefing, business cards and site map	
production/processing data for declared chemicals (monthly) and list of chemicals on-site	

## CWC DEFINITIONS RELEVANT TO DECLARATIONS

The following CWC definitions may assist when preparing for an OPCW inspection.

**Facility** means any of the industrial sites as defined below ("plant site", "plant" and "unit").

- (a) **"Plant Site"** (works, factory) means the local integration of one or more plants, with any intermediate administrative levels, which are under one operational control, and includes common infrastructure, such as:
- (i) administration and other offices;
  - (ii) repair and maintenance shops;
  - (iii) medical centre;
  - (iv) utilities;
  - (v) central analytical laboratory;
  - (vi) research and development laboratories;
  - (vii) central effluent and waste treatment area; and
  - (viii) warehouse storage.
- (b) **"Plant"** (production facility, workshop) means a relatively self-contained area, structure or building containing one or more units with auxiliary and associated infrastructure, such as:
- (i) small administrative section;
  - (ii) storage/handling areas for feedstock and products;
  - (iii) effluent/waste handling/treatment area;
  - (iv) control/analytical laboratory;
  - (v) first aid service/related medical section; and
  - (vi) 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.
- (c) **"Unit"** (production unit, process unit) means the combination of those items of equipment, including vessels and vessel set up, necessary for the production, processing or consumption of a chemical.

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