

## The CWC: a Unique OSI Framework

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Whoever first uttered the phrase “the devil is in the details” might well have been a veteran of the Chemical Weapons Convention (CWC) negotiations. When faced with the labyrinthine task of ridding the world of poison gas weapons, the international community rose to the occasion and developed an equally complicated solution. The CWC — officially the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction — is the result of over a decade of negotiations at the Conference of Disarmament (CD) in Geneva. Although the treaty itself spans some fifty pages, the inclusion of annexes on verification and confidentiality boosts the total length to nearly two hundred pages. Contained therein are provisions covering everything from sampling procedures to inspector immunity.

The expansive goals of the CWC are not without precedent, as other arms control agreements have had related missions or incorporated similar tools. The Biological Weapons Convention banned an entire class of weapons and the Nuclear Non-Proliferation Treaty sent international inspectors from the International Atomic Energy Agency (IAEA) to industrial facilities. Thus, some elements of the CWC mandate have been part of the arms control world for some time already. What sets the CWC apart from these agreements, however, is the vigour with which the treaty embraces those goals and takes them one step further. The CWC pushes the envelope by banning production, stockpiles and use of chemical weapons and by introducing on-site inspections more widely into the chemical industry. These revolutionary provisions prompted one former Director General of the IAEA to comment:

The CWC provides for verification by on-site inspections — both routine and challenge; it provides for investigation of alleged violations and for inspection of both military and civilian facilities; and it contains specific provisions for multilateral verification of destruction of chemical weapons production facilities. It marks a considerable achievement in arms control and disarmament. Successful implementation of the CWC will have an impact beyond the scope of the Treaty.<sup>1</sup>

One key element that differentiates the CWC from the rest of its arms control colleagues is its unique on-site inspection framework. Based on data declarations filed by member states with the CWC’s implementing body, inspectors routinely venture to both military and industrial facilities on an unparalleled scale. In the event that concerns about compliance arise, states can call for a challenge inspection, a short-notice process governed by rules that balance the international community’s interests in ensuring compliance and the inspected state’s needs to protect confidential information. This paper will address the important elements of this unique on-site inspection construct, examining

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their structure as outlined in the CWC and their implementation during these first years of the Convention. Also examined are areas of concern that have emerged during the early stages of implementation, which could conceivably undermine the agreement if left unattended.

## Establishing a Global Chemical Database

With the 29 April 1997 entry into force of the CWC, the world began the arduous process of rolling back the threat of chemical weapons. The treaty requires the destruction of chemical weapons arsenals and production facilities over a ten-year period. Commercial facilities fall into the CWC fold as well because of their activities with dual-use chemicals that can potentially be diverted to manufacture chemical weapons. By March 1999, the treaty could boast 121 members from all corners of the globe.

The CWC is simultaneously an extraordinarily broad and an exceptionally rational agreement. Implicit in the treaty is recognition that various chemicals and facilities pose diverse risks and thus must be monitored differently by the CWC's verification mechanisms. Since a kilogram of the nerve agent sarin is deadlier than an equivalent amount of a commercial chemical with dual-use applications, it makes sense that these substances and facilities handling them be monitored with varying degrees of intensity.<sup>2</sup> Similarly, the reporting obligations, allowances for facilities and dual-use chemical production, the frequency of inspections and the

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duration of inspections also vary depending on the dangers associated with the controlled chemicals and the purposes for which they are being used.

The broad goals of verification in the context of the CWC are: to detect non-compliance with treaty provisions; to deter violations from occurring in the first place by raising the likelihood that inspectors would discover such activity; and to build confidence among member states that all are upholding its provisions. That sweeping mandate translates into several specific verification responsibilities: to monitor existing chemical weapons stockpiles; to ensure the destruction of declared chemical weapons; to identify and oversee the destruction of existing chemical weapons production facilities; and to monitor the peaceful application of dual-use chemicals and safeguard against their diversion.<sup>3</sup> In order to fulfil those obligations, negotiators developed a two-prong verification regime comprised of national declarations and on-site inspections.

The foundation of CWC verification is the set of declarations of past and present activities that each member is required to file with the Technical Secretariat.<sup>4</sup> When considered in the aggregate, these declarations allow the international inspectorate to assemble a reasonably comprehensive picture of chemical weapons capabilities and of facilities handling dual-use chemicals in member states. Information on military and industrial facilities heretofore sequestered from the eyes of all but those operating these plants must now be deposited with the Technical Secretariat on an annual basis. On-site inspections in turn grow out of the data in the declarations.

All industry facilities are subject to inspections, but for practical purposes only those that cross the high-use threshold automatically receive inspections. Those sites are considered to be of greater proliferation risk. Reporting is designed to describe whether certain chemicals are being produced or consumed at a given facility, as well as the quantities involved. (Table 1 summarizes these declaratory and inspection threshold quantities.) Through constant tracking of activities with dual-use chemicals, the inspectorate ostensibly can piece together use patterns of these substances

Table 1. Thresholds for annual data declarations and routine inspections

Type of facility	Type of activity to be reported for previous calendar year and anticipated for next calendar year	Annual production threshold for reporting	Threshold for inspections
Schedule 1	Production, processing, consumption, acquisition, import and export data	100g	100g
Schedule 2	Production, processing, consumption, import and export data	1kg benzilate 100kg (Amiton, PFIB) 1 metric ton for other Schedule 2 chemicals	10 kg benzilate 1 metric ton (Amiton, PFIB) 10 metric tons for other Schedule 2 chemicals
Schedule 3	Production, import and export data	30 metric tons	200 metric tons
Other chemical production facilities	Production data for previous calendar year only	30 metric tons for discrete organic chemicals containing phosphorus, sulphur or fluorine	200 metric tons

Source: Chemical Weapons Convention, Verification Annex, Part VI, para. 10, 11 and 28; Part VII, para. 3 and 12; Part VIII, para. 3 and 12; Part IX, para. 1 and 9.

that might signal diversion toward chemical weapons development. Even though inspectors will not set foot in every plant declared to be involved with scheduled chemicals, the Technical Secretariat retains a font of information on a broad spectrum of facilities.

Despite the illusion given by the mountains of declaration information received already, states have actually been slow to submit their declarations. As of 9 March 1999, the Technical Secretariat had received declarations from only 91 of the 121 states parties, not all of which are complete submissions. States failing to meet the declaration requirements are in violation of the treaty's clear deadlines for submission. These violations, however "technical" they may be, in fact translate into real implementation problems, since no routine inspections can occur without the declarations. What remains to be seen is the reaction of treaty members over coming months to this shirking of CWC obligations. What, if any, action will states take to urge violators to uphold the treaty's terms? Especially during this early phase of treaty implementation, member states should take care to demonstrate commitment to the agreement. Otherwise, states parties could develop bad habits, routinely missing deadlines or not taking seriously their obligations under the CWC. If straightforward requirements, such as filing declarations, are left unattended, treaty members run the risk of starting down a slippery slope where states pick and choose the treaty provisions they care to uphold.

### Update on Activities of the Technical Secretariat

During the CWC's early years, the Technical Secretariat's field efforts have been extensive. From entry into force to 9 March 1999, some 430 routine inspections had taken place in close to thirty countries. By and large, these inspections unfolded smoothly.<sup>5</sup> Thus far, the majority of the

missions have focused on chemical weapon-related sites because they are considered to be of higher risk. The CWC requires that they be inspected first and more frequently than commercial facilities. After meeting the initial deadlines, the inspectorate began to look at industrial sites as well. As chemical weapon arsenals are destroyed over the coming decade, the focus will gradually shift from military to industrial facilities, a transition that is already evident. For example, in the first year of operations, 90% of the just over 200 inspections that unfolded occurred at military sites. By 9 March 1999, that distribution had shifted to 67% occurring at military sites and 33% at industrial locations. Table 2 offers a more detailed breakdown of the inspection distribution.

Table 2. Inspections under the CWC (through 9 March 1999)

Chemical weapons-related facilities ...	289
Schedule 1 .....	44
Schedule 2 .....	83
Schedule 3 .....	314
TOTAL .....	430

Of the approximately 480 positions filled within the Technical Secretariat by the end of January 1999, nearly 200 were inspectors. The individuals comprising the inspectorate hail from some sixty countries. Some have decades of professional experience in analytical and industrial chemistry, as well as backgrounds in chemical and conventional munitions. In preparation for fieldwork as inspectors, these specialists augmented their professional skills with an additional five months of treaty-related training. The CWC inspectors spend upwards of 120 days per year in the field in conditions that are often difficult and stressful.<sup>6</sup>

In the 1999 budget approved in November 1998 by the Conference of States Parties, verification costs are budgeted at approximately \$38 million, or 55% of the near \$69 million total annual budget of the Organisation for the Prohibition of Chemical Weapons (OPCW).<sup>7</sup> Some 300 inspections are anticipated during 1999, a slight increase over the activities of the previous year.<sup>8</sup> The costs of running on-site inspections have been less than originally expected.<sup>9</sup> In 1998, inspections were budgeted at just over \$32 million, decreasing to \$30 million in 1999. The drop in cost is largely the result of innovative inspection planning and greater than expected operational efficiency on the part of the inspectorate. Inspections have been conducted with fewer inspectors than originally thought necessary. The use of sequential inspections has also lowered costs, allowing inspectors to conduct multiple inspections at different facilities during a single trip. Such steps contribute to improved overall long-term operational efficiency that some might consider uncharacteristic of an international agency.

### The CWC's More Intrusive Arm: On-Site Inspections

If declarations form one leg of the CWC verification framework, then on-site inspections — both routine and challenge — form the other. Routine inspections follow the initial declarations and are designed to confirm that the information provided by states is indeed an accurate reflection of the activities taking place at a given site. Challenge inspections pick up where routine visits leave off, being called upon only in instances of credible suspicions of non-compliance.

Once all the initial declarations are filed, thousands of military and industrial facilities will be eligible for inspection under the CWC. However, the actual incidence of inspections will vary from facility to facility according to the nature of activities taking place at the site. That is, facilities housing chemical warfare agents found on Schedule 1 will be watched most closely. On the other hand, inspectors will visit less frequently sites where Schedule 2 and Schedule 3 chemicals are present.<sup>10</sup>

The treaty stipulates that inspectors are to be granted “unimpeded access” to the site,<sup>11</sup> provided that their business is conducted expeditiously and with as little inconvenience to the inspected state as possible.<sup>12</sup> The Technical Secretariat gives inspected states anywhere from 36 to 120 hours advance notice of a routine inspection, depending on the type of facility being visited and whether it is the first time a site is being inspected. Prior to each inspection, the inspectorate engages in several weeks of preparation including preliminary evaluation of data from declarations, preparation of the inspection plan and mandate, assignment of the inspection team members, assembly of travel documents and equipment, and briefings to inform inspectors about the location they are to visit.

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Procedurally, standards and guidelines exist for application during inspections at all facilities.<sup>13</sup> Upon arriving at the designated point of entry, inspectors are escorted to the site within twelve hours. There they spend a maximum of three hours being briefed by staff on specifics of the facility’s activities and safety requirements. Once on site, the inspectors proceed within the parameters delineated in the treaty itself and in the facility agreement, if applicable. Inspectors have the right to examine records and interview personnel. They may also visit relevant parts of the facility, including chemical production, storage and waste treatment areas. If necessary, inspectors can ask to take photographs or samples. In addition, they can place seals and tags on munitions. Within twenty-four hours of completion of the visit, inspectors brief host personnel on their preliminary findings. Back at The Hague, inspectors review field results with Technical Secretariat analysts. A final report that includes comments from the inspected party is prepared within thirty days.<sup>14</sup>

The description of these inspections as “routine” is somewhat of a misnomer. True, they are less contentious and politically charged than the more intrusive challenge inspection. True, inspected states parties are notified in advance of the arrival of Technical Secretariat personnel. True, step-by-step procedures on how to conduct the inspections — including time allotments for briefings and approved equipment — are laid out in the CWC’s Verification Annex, subsequent Conference of States Parties decisions and facility agreements. But given the tremendous variety of facilities that fall under the umbrella of the CWC, each visit reflects the unique nature and activities of that particular location. Inspections are not cookie-cutter field trips; they are opportunities to develop a clearer picture of a state’s military and industrial chemical activities. As one veteran of the nuclear safeguards experience noted, “... every inspection is the opportunity to discover.”<sup>15</sup> In short, even routine inspections can turn up unexpected activities at declared sites.<sup>16</sup>

Although the routine inspection process has run smoothly, a few potholes have emerged along the way. One area of concern grows out of the protection afforded inspectors and the notebooks they use during inspections. The CWC provides the most stringent of protections for its inspector corps, incorporating key provisions of the Vienna Convention on Diplomatic Relations. Inspectors, their papers and correspondence are considered inviolable.<sup>17</sup> Such fundamental protections enable inspectors to be frank in their field analysis, take notes and make assessments based on the evidence before them, free from risk that their private materials will be confiscated. Although this protection is central to inspection activities, controversy over its application has surfaced among member states as to whether inspector notebooks are indeed inviolable. Some treaty members have argued that inspected states retain the right to make copies of all materials amassed by inspectors during the course of their visits.<sup>18</sup> Others maintain that notebooks are off-limits, fearing that inspectors might be hesitant to pen critical assessments if they knew that their private papers were liable to be made available to inspected parties.<sup>19</sup> The treaty includes such immunities specifically to ensure frank inspector assessments. Removing those protections runs contrary to the spirit of the agreement.

Transparency among member states has also arisen as a sensitive topic, with members not wanting information gleaned from declarations and routine inspections to be shared with others. Such restrictions on flows of information undermine the confidence-building and reassuring role of routine inspections. With time, however, that sensitivity may wane for several reasons. First, as the routine inspections continue, states may become more comfortable with the on-site visits. The procedures for guiding inspectors through sites and providing them with the necessary information will grow more familiar as routine visits continue during the coming years. Second, states may also become more confident in the Technical Secretariat's ability to protect sensitive information. These first years have proven that the treaty's inspection system indeed works if treaty members let it: proprietary data can be guarded as inspectors conduct their duties according to the highest professional standards.

### Upping the Ante: Challenge Inspections

While other arms control agreements include an on-site activity described as "non-routine",<sup>20</sup> those inspections have very limited effectiveness because inspected states have the right to refuse an inspection request or only declared installations are eligible for on-site visits. The "anywhere, anytime" foundation of the CWC challenge inspection framework establishes a rigorous framework that does not fall prey to the same shortcomings.

A challenge inspection can fill the information void that routine visits simply cannot address, namely at undeclared facilities. Challenge visits are geared to examine substantive accusations raised by one member state about another and are more narrowly focused, designed to play an investigative role regarding a specific question or set of questions. To guard against capricious challenge inspection requests, inspectors cannot be dispatched simply at the hint of a frivolous allegation.<sup>21</sup> Rather, the

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requesting party must show good cause for suspicions of non-compliance.<sup>22</sup> If the Executive Council decides by a three-quarters vote that the inspection is not merited, the request will be rejected. The inspections unfold on extremely short notice, with inspectors arriving at the challenged state's designated point of entry in as little as twelve hours from the time the Director-General provides notice of the inspection. Strict time guidelines govern the challenge visit, as shown in Figure 1. Despite concerns before the CWC's entry into force, no abuse of the challenge inspection mechanism

has occurred. In fact, none have actually transpired.<sup>23</sup>

Although challenge inspections at declared sites are indeed possible, prohibited activities are more likely to occur at undeclared facilities, away from the eyes of inspectors conducting routine visits. Consequently, inspectors on a challenge visit will need to bring a full suite of equipment (for example, a gas chromatograph/mass spectrometer and non-destructive evaluation equipment) in order to be prepared to handle a full range of contingencies. Due to their sensitive nature, challenge inspections would proceed based upon "managed access" wherein inspectors negotiate sufficient access to address the core issues of the challenge without exposing confidential materials of the inspected party. Inspected states must take steps to demonstrate compliance, but they need only present information absolutely necessary to do so. They are not required to reveal sensitive information unrelated to the challenge inspection mandate. The managed access concept bridges the gap between states' interests in shielding legitimate secrets and inspectors' needs to confirm or dismiss suspicions.<sup>24</sup> A challenged facility can shroud equipment, shield key documents and log off computers. Inspectors



retain their rights to use approved equipment and collect documentation, photographs and samples, insofar as that information is relevant to the ongoing compliance investigation.

Upon conclusion of the challenge visit, the inspection team would file a fact-based report conveying the data accumulated during the on-site mission and commenting on the degree of cooperation afforded them by the host state. The Technical Secretariat files a report with the Executive Council, which is later disseminated to all states parties. The Executive Council reviews the information in the report and makes recommendations to the Conference of States Parties.

That the challenge inspection provision has not yet been called into action inspires both relief and uneasiness on the part of CWC observers. One of the oft-cited arguments against the inclusion of this tool in the CWC structure was that it would be a cover for “fishing expeditions” in member states for proprietary information. No such abuse has occurred during these initial months, perhaps an indication that the message that a challenge inspection was to be only a last resort option indeed made it through to states parties. However, an absence of challenge visits does not automatically signify that concerns about compliance do not exist. Only a handful of member states have exercised their right to review declarations, yet rumours of incomplete submissions exist. If members have legitimate compliance concerns but are hesitant to make use of the treaty’s tools to address them, inevitable questions arise as to whether the treaty is actually working as designed. Furthermore, since the challenge inspection provision is not being used, the Technical Secretariat runs the risk of being ill-prepared when the time comes for a real challenge inspection — a situation that is virtually guaranteed to be both highly stressful and highly politicized. In light of that, additional training exercises could well play a valuable role in ensuring that future challenge inspection missions run as smoothly as possible.

## Conclusion

All things considered, the CWC’s first two years have proceeded relatively smoothly. The inspectorate has set into motion a complex arms control verification system, visiting hundreds of military and commercial facilities and analyzing thousands of pages of declarations. The inspection process has unfolded more efficiently than originally envisioned. No earth-shattering clashes have emerged among member states. That being said, the time for celebration has not yet arrived, as the treaty remains in the early stages of implementation. With the treaty still so young, the world should refrain from issuing final judgement on either the CWC’s achievements or shortcomings. Areas of concern certainly exist, be they related to declarations or on-site inspections. Treaty observers indeed should be aware of the sticking points that are emerging and act to ensure that they do not grow into larger problems. Only time will tell whether these contentious issues — which are not treaty-threatening at the moment — develop into more sizeable rows.

What is certain, however, is that the CWC has taken arms control into uncharted territory.

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The treaty’s breadth and the tools used to implement it go further than previous disarmament agreements. The coupling of routine and challenge on-site inspections offer member states a unique way both to demonstrate their upholding of the treaty’s provisions and to address their suspicions of non-compliance. The novel on-site inspection framework of the CWC sets a precedent that balances fairness and a high degree of intrusiveness, providing tangible steps to help translate the goal of chemical disarmament into reality.

## Notes

- <sup>1</sup> Hans Blix, Statement to the First Session of the Conference of the State Parties of the Organisation for the Prohibition of Chemical Weapons (OPCW), 8 May 1997.
- <sup>2</sup> The CWC establishes three lists, or schedules, that categorize chemicals according to their toxicity. Schedule 1 chemicals are military agents and super toxic chemicals that have little or no commercial use. Schedule 2 includes substances that have limited commercial applications but are considered high risk chemicals because they are direct chemical weapons precursors. Schedule 3 chemicals are used in large quantities commercially, but are also precursors. Some Schedule 3 chemicals — phosgene, for instance — have even previously been used on the battlefield. See the Chemical Weapons Convention, Annex on Chemicals.
- <sup>3</sup> Thomas Stock, History of the Negotiations on the CWC — Short Overview, SIPRI-Saskatchewan-Frankfurt Research Group on Effective Implementation of the Chemical Weapons Convention, Paper 13, 1995, p. 41.
- <sup>4</sup> To implement its provisions, the CWC created the Organisation for the Prohibition of Chemical Weapons (OPCW), based in The Hague, The Netherlands. The OPCW is comprised of three parts: the Technical Secretariat (the inspectorate that carries out the CWC's verification activities); the Conference of the States Parties (the oversight body that meets annually and is composed of all states parties, each of equal vote); and the Executive Council (the forty-one member executive arm that meets several times a year to more closely oversee the inspection activities). See the Chemical Weapons Convention, Article VIII.
- <sup>5</sup> One survey conducted during the early stages of implementation rated the level of cooperation on the part of inspected parties as above average in 90% of the completed missions. Progress in The Hague: Quarterly Review No. 21, The CBW Conventions Bulletin, No. 39, March 1998, p. 18.
- <sup>6</sup> Inspectors "will be expected to undertake extensive travel under less than typical business trip conditions with a high likelihood of unpredictability and involving the physical and mental stresses of an inspection atmosphere." Preparatory Commission for the Organisation for the Prohibition of Chemical Weapons, Note by the Executive Secretary: Recruitment and Training of Technical Personnel and Support Staff, PC-IV/6, 21 September 1993.
- <sup>7</sup> Assuming 2 Dutch Guilders (NLG) to the U.S. dollar. OPCW, C-III, a Round of Intense Discussions, OPCW Synthesis, Issue 1/99, p. 8. For a full breakdown of the 1999 budget, refer to Organisation for the Prohibition of Chemical Weapons: Programme and Budget 1999, document C-III/DEC.16, 23 November 1998.
- <sup>8</sup> From April to December 1997, approximately 125 inspections took place. During 1998 that number increased to around 250.
- <sup>9</sup> One analyst opposing the treaty gauged the total number of inspectors needed to implement the CWC to be close to 500, boosting estimated annual labour costs to \$145 million. That figure did not include travel, equipment or other administrative expenses. See Kathleen Bailey, Problems With a Chemical Weapons Ban, Orbis, Spring 1992, p. 245.
- <sup>10</sup> The frequency of visits to Schedule 2 sites will be determined based on a risk assessment garnered during the facility's initial inspection, which is to take place within three years of the treaty's entry into force. Chemical Weapons Convention, Verification Annex, Part VII, para. 16 and 18. Schedule 3 facilities outnumber the others but are considered to be of lower risk. Thus, inspections will occur there even less frequently, with each state receiving no more than twenty per year. Chemical Weapons Convention, Verification Annex, Part VIII, para. 16.
- <sup>11</sup> Chemical Weapons Convention, Verification Annex, Part II, para. 45.
- <sup>12</sup> Chemical Weapons Convention, Verification Annex, Part II, para. 40.
- <sup>13</sup> These steps are outlined in the Chemical Weapons Convention, Verification Annex, Parts II–IX. For a more inside account of on-site inspections, see OPCW, Through the Eyes of an Inspector: Preparations, Reporting, Debriefing, OPCW Synthesis, Issue 1/99, p. 9.
- <sup>14</sup> The tight chain of custody for inspection reports and the strict confidentiality requirements governing much of the information contained in them put the Technical Secretariat under real time pressure to get complete and final reports ready within the thirty-day window.
- <sup>15</sup> Statement by David A. Kay in Administering the Chemical Weapons Convention: Lessons from the IAEA, Amy E. Smithson, ed., Occasional Paper no. 14, The Henry L. Stimson Center, Washington, DC, March 1993, p. 23.
- <sup>16</sup> For example, routine inspections by the IAEA at the Democratic People's Republic of Korea's seven nuclear facilities unearthed discrepancies between what activities they admitted to pursuing and what the inspectors actually saw.
- <sup>17</sup> Chemical Weapons Convention, Verification Annex, Part II, para. 11 and 12.
- <sup>18</sup> Chemical Weapons Convention, Verification Annex, Part II, para. 50.
- <sup>19</sup> For more detailed examination of the immunity issues, see Amy E. Smithson, Rudderless: The Chemical Weapons Convention at 1½, Report No. 25, The Henry L. Stimson Center, Washington, DC, September 1998, p. 30–32.
- <sup>20</sup> Examples include the unannounced inspections of the IAEA's safeguards system and the short-notice inspections

under the Intermediate-Range Nuclear Forces Treaty.

- <sup>21</sup> Information in support of a challenge inspection request can include: the nature of the suspected activity, the types and amounts of chemicals or munitions thought to be involved, and time frame in which the treaty violations are thought to have occurred.
- <sup>22</sup> The request originates with the state party. The Director-General then relays the challenge to the Executive Council. Should the Executive Council decide *ex post facto* that the right to call for a challenge inspection has been abused, the requesting party can be assessed the costs of the inspection. Chemical Weapons Convention, Article IX, para. 23.
- <sup>23</sup> In February 1998, a challenge inspection exercise held in the United Kingdom gave participants the opportunity to test out procedures for guarding confidential proprietary information while still managing to address the concerns of the challenger. The exercise proved a useful endeavour, as it underscored the need for inspectors to gain field experience with equipment and procedures prior to an actual challenge visit. Consequently, the Director-General urged the addition of similar exercises to the 1999 budget. Progress in The Hague: Quarterly Review No. 22, The CBW Conventions Bulletin, June 1998, no. 40, p. 11.
- <sup>24</sup> The inspectors' access is limited to only the areas of a facility or the equipment that is crucial to addressing the challenger's allegations. Chemical Weapons Convention, Verification Annex, Part X, para. 44.