

# **The Capacity-Building Support Needs of States with Small Quantities Protocols**

Kalman A. Robertson, Jaime Vidaurre-Henry, and Mizuki Hirai\*  
Japan Atomic Energy Agency (JAEA)  
Tokai-mura, Naka-gun, Ibaraki-ken, Japan

**INMM 58<sup>th</sup> Annual Meeting, July 2017**

## **Abstract**

Each non-nuclear-weapon State party to the Nuclear Non-Proliferation Treaty is required to conclude a comprehensive safeguards agreement (CSA) with the International Atomic Energy Agency (IAEA). However, more than half of all non-nuclear-weapon States do not have significant inventories of nuclear material or nuclear facilities. Most of these States have concluded small quantities protocols (SQPs) to their CSAs. The original standard text for an SQP holds most of the procedures in Part II of the CSA in abeyance. Original SQPs significantly restricted the IAEA's access to information about SQP States, limiting the Agency's capability to verify the absence of undeclared nuclear activities in those States. In 2005, the Board of Governors approved a revised text for SQPs, changing the eligibility criteria for an SQP and reducing the number of safeguards measures held in abeyance. Since 2005, the IAEA has encouraged States with Original SQPs to revise or rescind these protocols as a means of strengthening safeguards. As of October 2016, 38 States still have Original SQPs in force, while 56 have Revised SQPs. Many of these States have also concluded additional protocols (APs) to their CSAs. Many SQP States have little experience maintaining a State system of accounting for and control of nuclear material (SSAC), and limited government resources and technical capabilities available to do so. This paper discusses the unique capacity-building support needs of SQP States seeking to implement APs and Revised SQPs. The Integrated Support Center for Nuclear Nonproliferation and Nuclear Security (ISCN) of the Japan Atomic Energy Agency (JAEA) provides capacity-building support to States, primarily in Asia. Since 2011, the ISCN has hosted an annual Regional Training Course on SSACs for 33 States, including 12 SQP States. This paper describes how the ISCN has helped to address the needs of SQP States through training, often alongside other States. Since each SQP State only has a small number of individuals responsible for administering the SSAC, this paper finds that careful scheduling and tailoring of training opportunities may also be useful in meeting the capacity-building support needs of SQP States, highlighting the importance of coordination among regional training providers.

## **Introduction**

More than half of all non-nuclear-weapon States parties to the *Treaty on the Non-Proliferation of Nuclear Weapons* (NPT) have small quantities protocols (SQPs) to their comprehensive safeguards agreements (CSAs). Many of these States still have SQPs based on the "original"

standard text, which holds in abeyance almost all of the procedures in CSAs. Many States with SQPs have little, if any, experience maintaining a State system of accounting for and control of nuclear material (SSAC), making reports to the IAEA, or facilitating inspector access. As a result, the IAEA has very limited ability to verify the absence of undeclared nuclear activities in these States. The IAEA has identified the revision or rescission of SQPs as a priority for ensuring the effectiveness of safeguards. However, many States still lack the capacity to effectively implement either the revised text of an SQP or a full CSA. Optimizing the availability and delivery of capacity-building support for States with SQPs can help to address this challenge. The ISCN of the IAEA has considerable experience providing capacity-building support to States in Asia, including a number of States with SQPs. This paper studies the good practices of the ISCN and suggests four approaches to the design of regional/international training for States with SQPs.

### **Defining “SQP States”**

Each non-nuclear-weapon State party to the NPT is required to conclude a CSA with the IAEA based on Information Circular 153. An SQP is a protocol appended to a safeguards agreement that holds in abeyance some of the procedures in Part II of the safeguards agreement provided that the State meets certain conditions, including not exceeding the exemption limits on quantities of nuclear material in paragraph 37 of INFCIRC/153. For the purposes of this paper, an “SQP State” is a State that has an operational SQP covering its territory.<sup>1</sup> By contrast, a “Full CSA State” is a State that has a CSA in force and that does not have an operational SQP. Most, but not all, Full CSA States have nuclear facilities. Table 1 contains a complete list of SQP States, as well as a list of Full CSA States that do not have any nuclear facilities, as of 2016.

### **Original SQPs and Additional Protocols**

An Original SQP (State) is (a State with) an SQP based on the original standard text submitted to the Board of Governors in the early 1970s. An Original SQP holds in abeyance most of the procedures in Part II of the CSA, including IAEA inspections, as long as the State meets the eligibility criteria: having little or no nuclear material and no nuclear material in a facility.<sup>2</sup> The main obligations of a State with an Original SQP include establishing an SSAC, providing annual reports on any imports or exports of nuclear material consistent with paragraph 34 of INFCIRC/153, and providing design information at least 180 days prior to nuclear material being introduced into a nuclear facility. The Original SQP created weaknesses in the safeguards system that were only partially addressed by the Model Additional Protocol (INFCIRC/540), approved by the Board in 1997.

The safeguards strengthening process of the 1990s generated an expectation that the IAEA should seek to verify the absence of undeclared nuclear materials and activities in States with CSAs.<sup>3</sup> For a State with an Original SQP and no additional protocol (AP), the IAEA has very limited tools available to verify the absence of undeclared nuclear activities and confirm that the State meets or continues to meet the requirements for having an operative SQP.<sup>4</sup> Furthermore, an SQP

State could construct a nuclear facility without alerting the IAEA while its Original SQP was operating, provided that the State did not introduce nuclear material into the facility. This was at variance with the modifications to Code 3.1 of the model subsidiary arrangements approved by the Board in 1992, which require early provision of design information for new facilities.<sup>5</sup> These weaknesses were particularly problematic because inspectors' experiences in Iraq, Iran, Libya, and elsewhere had demonstrated that a State could conduct nuclear activities of proliferation concern with small quantities of nuclear material.<sup>6</sup> These experiences also demonstrated the value in ensuring effective safeguards coverage in all States to prevent the development of clandestine transnational procurement networks.

If an SQP State begins operating a nuclear facility (or exceeds the prescribed limit on quantity of nuclear material), its SQP ceases to have operational effect and the State becomes subject to all of the procedures and obligations under the CSA. For example, some States concluded SQPs when they first established CSAs but subsequently rescinded their SQPs as they developed nuclear facilities. Other States have Original SQPs still appended to the text of their CSAs even though these SQPs became non-operational by the time these States began operating reactors.<sup>7</sup> This does not solve the problem that an SQP State could, in principle, have undeclared nuclear activities. Original SQPs created a chicken-and-the-egg-type problem for safeguards: in order to verify that a State still met the conditions of its SQP, it would first be necessary to apply safeguards procedures, but in order to apply most safeguards procedures, it would first be necessary to show that the SQP had become non-operational by the State breaching its conditions.

For an Original SQP State that is implementing an AP, the IAEA has the benefit of the State's AP declarations on nuclear-related activities and the right of complementary access. In particular, AP article 2(a)(vii) requires the SQP State to provide information on the quantities, uses, and locations of any nuclear material in the State. However, APs do not cover certain basic safeguards obligations (e.g., detailed nuclear material accountancy, early provision of facility design information, and facilitation of IAEA inspections), and therefore do not necessarily provide an adequate basis for verifying that States continue to meet the eligibility criteria for SQPs.<sup>8</sup>

### **The Importance of Revising SQPs**

Based on reports about SQPs by the IAEA Director General, the Board recognized in 2005 that Original SQPs "constituted a weakness in the safeguards system".<sup>9</sup> In September 2005, the Board decided that the standard text of SQPs should be revised in accordance with the Director General's recommendations.<sup>10</sup>

A Revised SQP (State) is (a State with) an SQP based on this revised text approved by the Board in 2005, which changes the eligibility criteria and reduces the number of procedures held in abeyance.<sup>11</sup> The revision effectively creates a basic set of reporting obligations and inspection procedures. In the interests of maintaining an effective safeguards system without any gaps, the Secretariat wrote to all SQP States, encouraging each State to conclude an exchange of letters

giving effect to a Revised SQP. If a State has decided to construct a nuclear facility, then it is not eligible for the Revised SQP so the IAEA encourages the State to move to the full CSA (i.e. rescind its Original SQP).

Although the IAEA regularly reminds Original SQP States to revise or rescind their SQPs,<sup>12</sup> 38 States still have Original SQPs in force as of October 2016 (see Table 1). In addition, 12 non-nuclear-weapon States parties to the NPT have yet to conclude CSAs with the IAEA; these States are likely to qualify for Revised SQPs for their anticipated CSAs.

### **Support Needs of States Associated with Adopting Revised SQPs**

All States with CSAs, including those with Original SQPs, are required to establish SSACs (or equivalent regional systems). However, some States have not yet done so.<sup>13</sup> Many SQP States require capacity-building assistance with establishing operational SSACs and ensuring that their authorities responsible for safeguards implementation have the necessary resources, technical capabilities, and legal authority.<sup>14</sup> Even for an SQP State that has an SSAC, the transition to a Revised SQP is likely to create new support needs.

Under a Revised SQP, the State authority must make a correct and complete initial inventory report on all nuclear material subject to safeguards. As of March 1, 2016, 13 Revised SQP States have not yet made their initial reports.<sup>15</sup> In order to meet its reporting obligations (and ensure that it is able to facilitate IAEA inspections), the State may find it useful to set up a national system of permits/licenses for possession, use, and import/export of nuclear material. State authorities in SQP States may benefit from training in establishing legal frameworks; locating/identifying all equipment, industries, and research activities that may use nuclear material subject to safeguards; and conducting outreach to entities that will become subject to the new national system of regulatory control. (Training in these areas may also be a good opportunity to cultivate effective communication between officials in the IAEA Department of Safeguards and the SQP State's point of contact.)

The IAEA seldom conducts inspections or complementary access in SQP States but it has a right to do so under Revised SQPs and APs respectively. In 2015, the IAEA only conducted inspections in two SQP States (Croatia and New Zealand) and complementary access in one SQP State (the United Arab Emirates).<sup>16</sup> These activities accounted for just 0.25% of the IAEA's total calendar-days in the field for verification. In training, SQP States should be made aware of the importance of maintaining readiness to facilitate IAEA access.

Some SQP States may face rescission or non-operation of their SQPs in the near future as they develop nuclear facilities. Since these States will move to the full CSA, they should be treated as Full CSA States for the purposes of assessing their capacity-building support needs.

## **Support Needs of SQP States Associated with Additional Protocols**

The obligations under an AP are the same for an SQP State as they are for a Full CSA State. In most cases, it should be possible to assist SQP States with implementing APs by providing training alongside Full CSA States. SQP States with large industrial bases may have numerous entities affected by their APs, such as sites of locations outside facilities (LOFs), uranium mines/mills, fuel-cycle-related research, and industries that export/import Annex II commodities. Implementing an AP may require changes to the State's legal/regulatory framework and a considerable outreach effort by the State authority to communicate regulations and responsibilities to AP-affected entities. Sometimes, an SQP State will benefit from specialized training/consulting on a bilateral basis. For example, in July 2016, the ISCN cohosted the Additional Protocol Commodity Identification Training Course in Nay Pyi Taw with the US Department of Energy, the IAEA, and the Department of Atomic Energy of Myanmar.

Compared with Full CSA States, SQP States are much more likely to fail to submit their AP declarations on time. For example, in 2013, there were 62 Full CSA States with APs in force and 55 SQP States with APs in force. Of the 55 SQP States with APs in 2013, 89% failed to submit at least some of their AP declarations on time.<sup>17</sup> In other words, the overwhelming majority of SQP States with APs failed to meet their obligations under articles 2 and 3. More importantly, 42% of SQP States did not submit any of their AP declarations on time.<sup>18</sup> By contrast, the majority of the 62 Full CSA States with APs managed to submit all of their AP declarations on time in 2013. The comparatively poor performance of SQP States in this regard is probably due to a lack of resources, conflicting priorities, or a lack of awareness of the importance of AP implementation. This suggests that basic training on AP declarations should be a priority for SQP States.

### **Providing Assistance to Small Offices**

Most States with SQPs probably have only a small number of officials responsible for safeguards implementation. (In a small State with limited resources, there may only be one official.) The State authority may be an office of a government department that is also responsible for a variety of other regulatory or foreign affairs issues. An SQP State may require training for its regulatory authority as a whole, particularly if it is preparing to make its initial report under a Revised SQP. Other SQP States may already have a few officials with safeguards experience but they may require assistance with knowledge management and succession when those officials retire. A small safeguards authority with low turnover may only hire new staff once every few years, meaning that training may only be required intermittently.

Due to the small size of their regulatory authorities, SQP States may only be able to send one participant for training at a time in order to avoid being short-staffed at home. Training providers should coordinate the scheduling of training opportunities to minimize scheduling clashes, thereby ensuring that each State has an opportunity to send at least one staff member to participate in each training course that could be useful to it.

## **Four Approaches to Regional/International Training**

In principle there are four approaches to providing training for SQP States as part of regional or international courses. First, SQP States can be invited to the same regional or international training courses as Full CSA States. Since 1996, the JAEA has hosted Regional Training Courses on SSACs for a total of 370 participants from 54 countries including 13 countries that either currently have SQPs in force or have only recently rescinded their SQPs. Since its establishment in 2010, the ISCN of the JAEA has hosted the two-week Regional Training Courses on SSACs annually, and on average 20% of the participants have come from SQP States. During these courses, care is taken to cover the operation of SQPs (including rescission/end of operation) early in each course. This approach has the advantage that participants from SQP States can interact with participants from Full CSA States, maximizing exposure to the broader IAEA safeguards system and potentially assisting all participants to develop the knowledge required to provide policy advice on nuclear non-proliferation issues to their respective governments. This approach also recognizes for instance that the format of the IAEA's form for the initial report under a Revised SQP is roughly analogous with a physical inventory listing (PIL) report, making it possible to train participants from SQP States and Full CSA States on completion and submission of these forms in a single course module. Also participants come out of training better prepared to support IAEA inspectors if an ad hoc inspection takes place in their State.

Second, a training provider could establish a regional or international training course on SSACs directed solely toward SQP States. This approach allows for targeted training specifically addressing the needs of SQP States. For example, instead of visiting a nuclear reactor during the course, participants could visit a LOF. In general, SQP States have little need for training in maintaining facility records, preparing inventory change reports, completing design information questionnaires, or conducting non-destructive assay. By removing these safeguards topics from SSAC training for SQP States, this approach may have the advantage of shortening the duration of the course. This is significant because a participant from an SQP State may be responsible for many regulatory or foreign affairs issues in her/his home country, making it difficult for the participant to be out of the office for more than a few days at a time. However, for training providers that are responsible for training both Full CSA States and SQP States, this approach requires that the provider has sufficient resources to run two separate training courses. Since an SQP State may only seek training intermittently, a training provider may need to invite participants from many SQP States if it wishes to ensure a class size of 20 to 30 participants.

Third, a training provider could establish a separate regional or international training course specifically for SQP States that covers both safeguards topics and security topics, with the latter including graded approaches to security for small quantities of nuclear material and radioactive sources, security during transit, and security recommendations on material out of regulatory control. This approach recognizes that the synergy between security and safeguards may be particularly important in some SQP States. Due to the small size and limited resources of

regulatory authorities/offices in SQP States, individuals working in safeguards may also be responsible for security. Some SQP States may wish to use existing hazard management regulation systems, particularly nuclear security and radiation protection infrastructure, to help implement their SSACs at minimal additional cost. For example, some SQP States may conduct national safeguards audits/inspections of LOFs at the same time as security/safety inspections. Consequently, this approach to training could assist SQP States to find inexpensive ways to maintain readiness to facilitate IAEA inspections at their LOFs.<sup>19</sup>

Fourth, a training provider could design a single training course for both SQP States and Full CSA States but schedule parallel sessions within the course for some of the modules. For sessions that are relevant to participants from all States (such as fundamentals of the nuclear non-proliferation regime, AP declarations, etc.), all of the participants would attend and participate together. For other sessions, the class could be split in two, so that participants from Full CSA States and participants from SQP States each receive training that is relevant to their situation. For example, participants from Full CSA States could attend a session on nuclear accountancy reports and design information. At the same time, participants from SQP States could attend a session on reporting requirements under SQPs. This needs-oriented approach could provide the advantage of tailoring the training to meet the needs of both SQP States and Full CSA States, while minimizing the additional instructors and resources required to do so. In principle, this approach would ensure that participants from SQP States do not have to sit through presentations that are only relevant to Full CSA States (and vice versa).

In choosing from the approaches to training presented here, a training provider should consider the needs of SQP States and coordinate with other providers. Some SQP States do not have established points of contact with the IAEA.<sup>20</sup> Regional training centers should also take an active role in reaching out to these SQP States in their respective regions. To assist coordination among regional training providers, the ISCN has conducted surveys on behalf of the Asia-Pacific Safeguards Network examining both States' training needs and training providers' offerings.<sup>21</sup>

## **Conclusion**

Ensuring that each State has the capacity to implement its safeguards agreement is an essential precondition for the effectiveness of safeguards. SQP States are a large and diverse group where capacity building remains a priority area for strengthening safeguards. The ISCN provides a model for training SQP States alongside Full CSA States in regional courses, with specialized bilateral consultations also available. Alternative approaches include holding international training courses specifically for SQP States. In choosing from among the approaches to training presented in this paper, training providers should consider (a) the unique safeguards obligations of SQP States, (b) the specific challenges of transitioning from an Original SQP to a Revised SQP, (c) the limited experience that many SQP States have in implementing SSACs, and (d) the resource limitations on regulatory authorities/offices in SQP States.

**Table 1:** Safeguards status of each non-nuclear-weapon State party to the NPT that has an SQP in force as of October 7, 2016 or that has zero nuclear facilities as of December 31, 2015.<sup>22</sup> The table categorizes each State based on whether or not it has a CSA, an Original SQP, a Revised SQP, and/or an AP in force. For each State with an AP, the table shows whether or not the State has received the broader conclusion and, if so, whether or not it has integrated safeguards as of December 31, 2015.

<b>Status of CSA and SQP</b>	<b>Integrated safeguards implemented</b>	<b>Broader conclusion but no integrated safeguards</b>	<b>AP in force but no broader conclusion</b>	<b>No AP in force</b>
<b>Full CSA in force (zero nuclear facilities but no SQP in force)</b>	Cuba Ireland Luxembourg Malta Uruguay	Albania Botswana	Azerbaijan Bosnia and Herzegovina Cyprus Liechtenstein Marshall Islands Niger Turkmenistan	Côte d'Ivoire Sri Lanka Tunisia
<b>CSA and Revised SQP in force</b>	Burkina Faso Croatia Ecuador Holy See Iceland Madagascar Mali Monaco Palau Seychelles Singapore TFYR Macedonia	Andorra Kuwait Mauritius New Zealand UR Tanzania	Afghanistan Angola Antigua and Barbuda Bahrain Burundi Cambodia Central African Republic Chad Comoros Congo, Republic of the Costa Rica Djibouti Dominican Republic El Salvador Gabon Gambia Guatemala Kenya Lesotho Malawi Mauritania Montenegro Mozambique Nicaragua Panama Republic of Moldova Rwanda Saint Kitts and Nevis Swaziland Togo Uganda Vanuatu	Bahamas Honduras Lebanon Qatar San Marino Senegal Zimbabwe



<b>CSA and Original SQP in force</b>			Cameroon Fiji Haiti Kyrgyzstan Mongolia Namibia Paraguay United Arab Emirates	Barbados Belize Bhutan Bolivia, Plurinational S. Brunei Darussalam Dominica Ethiopia Grenada Guyana Kiribati Lao PDR Maldives Myanmar Nauru Nepal Oman Papau New Guinea Saint Lucia St. Vincent & Grenadines Samoa Saudi Arabia Sierra Leone Solomon Islands Sudan Suriname Tonga Trinidad and Tobago Tuvalu Yemen Zambia
<b>No CSA in force</b>	Benin, Cabo Verde, Equatorial Guinea, Eritrea, Guinea, Guinea-Bissau, Liberia, Micronesia, Palestine, Sao Tome and Principe, Somalia, Timor-Leste			

## Notes and References

\* This paper represents the views of the authors. It does not represent the views of any institution.

<sup>1</sup> Note that it is also possible for an SQP to apply to a minor outlying territory of a State, as for instance the SQPs applying to outlying territories of France, the Netherlands, the United Kingdom, and the United States pursuant to Protocol I of the Treaty of Tlatelolco. Since each of these States has multiple nuclear facilities on the mainland of its territory, this paper does not consider the capacity-building support needs of these States.

<sup>2</sup> IAEA Doc GOV/INF/276/Annex B (August 22, 1974).

<sup>3</sup> Russell Leslie, John Carlson and Annette Berriman, “Ensuring Effective Safeguards Coverage of States with Small Quantities Protocols” (Paper presented at 48<sup>th</sup> INMM Annual Meeting, Tucson, July 2007).

<sup>4</sup> The available tools include open source information analysis and consistency checks with reports on imports/exports by other States. See IAEA, “Safeguards Statement for 2004” (2005), para 18.

<sup>5</sup> See “Subsidiary Arrangement to the Agreement between the Government of [...] and the International Atomic Energy Agency for the Application of Safeguards in Connection with the Treaty on the Non-Proliferation of Nuclear

---

Weapons” IAEA Doc SG-FM-1170 (original March 12, 1974, 5th revision, November 2, 2011) <<https://www.iaea.org/safeguards/assistance-for-states/guidance-and-assistance/guidance-documents>>.

<sup>6</sup> Kalman A. Robertson, *IAEA Safeguards: Coping with Uncertainty in International Verification* (PhD thesis, Strategic and Defence Studies Centre, Australian National University, 2014).

<sup>7</sup> These States include Malaysia, see INFCIRC/182, and the Syrian Arab Republic, see INFCIRC/407. These non-operational SQPs have no legal effect. Even if one of these States verifiably closed down all of its nuclear facilities, the State could not reactivate its Original SQP. The text of each Original SQP (specifically the phrase, “until such time as” in paragraph 1) makes it clear that the SQP is completely terminated when the State introduces nuclear material into a facility (or exceeds the exemption limits in para 37 of INFCIRC/153). The SQP is not merely suspended. Consequently, a non-operational SQP cannot be revived after a State shuts down its nuclear program. In the future, if a Full CSA State completely decommissioned all of its nuclear facilities for safeguards purposes (and reduced its stocks of nuclear material to below the exemption limits), then it may be possible for that State to then apply for a new Revised SQP. Notably, Lithuania concluded a CSA and an SQP with the IAEA in 1992 (INFCIRC/413), even though Lithuania had two operational power reactors on its territory at the time. Lithuania was an exceptional case and its SQP can be considered non-operational from the beginning.

<sup>8</sup> Most SQP States that have achieved the broader conclusion, did so while applying both a Revised SQP and an AP. However, a handful of SQP States first received the broader conclusion before 2005, at a time when they had Original SQPs, see IAEA, “Safeguards Statement for 2003” (2004), para 12.

<sup>9</sup> “Record of the 1131<sup>st</sup> Meeting: Held at Headquarters, Vienna, on Friday, 17 June 2005”, IAEA Doc GOV/OR.1131 (September 2005) p. 13 <<http://cns.miis.edu/nam/>>. See also, John Kinney, “Safeguards Implementation for States with Small Quantities Protocols” (2016) 44(2) *Journal of Nuclear Materials Management* 33-38.

<sup>10</sup> On the Board’s deliberations and the Secretariat’s consultations with States leading up to the revision, see J.N. Cooley and J. Hillerman, “Strengthening Safeguards Implementation in States with Small Quantities Protocols” (Paper presented to 47th INMM Annual Meeting, Nashville, July 2006).

<sup>11</sup> IAEA Doc GOV/INF/276/Mod.1 and Corr.1 (February 21, 2006). A Revised SQP is sometimes referred to as a “Modified SQP” or an “Amended SQP”.

<sup>12</sup> See, e.g., IAEA, “Safeguards Statement for 2015” (2016), para 49.

<sup>13</sup> IAEA, “Safeguards Statement for 2015” (2016), para 48.

<sup>14</sup> “Record of the 1136<sup>th</sup> Meeting: Held at Headquarters, Vienna, on Tuesday 20 September 2005”, IAEA Doc GOV/OR.1136 (December 2005) pp. 16-17 <<http://cns.miis.edu/nam/>>.

<sup>15</sup> “The Safeguards Implementation Report for 2015: Report by the Director General”, IAEA Doc GOV/2016/22 (May 3, 2016) p. 28 (“SIR 2015”) <<https://armscontrollaw.files.wordpress.com/2016/10/iaea-2015-sir.pdf>>.

<sup>16</sup> SIR 2015, Appendix II.

<sup>17</sup> “The Safeguards Implementation Report for 2013: Report by the Director General”, IAEA Doc GOV/2014/27 (April 23, 2014), Section B.7 and Appendix II, <<https://armscontrollaw.files.wordpress.com/2014/06/iaea-2013-sir.pdf>>

<sup>18</sup> Presumably, some of the late declarations are “null” declarations in the sense that the State has no activities to declare. However, the State should still file a declaration to this effect on time.

<sup>19</sup> Such inspections also provide an opportunity for the authority and the regulated entity to discuss procedures for reporting specific activities under national law. See *Safeguards Implementation Practices Guide on Establishing and Maintaining State Safeguards Infrastructure*, IAEA Services Series 31 (2015) pp. 27-28.

<sup>20</sup> For example, as of February 2016, there are 28 States that are not members of the IAEA, including 16 SQP States. Of the remaining 12 States, 11 have not yet concluded CSAs but each one is likely to qualify for a Revised SQP.

<sup>21</sup> See 宮地紀子 [Noriko Miyaji], “第7回アジア太平洋保障措置ネットワーク(APSIN)会合におけるトレーニング調査結果紹介” [Training survey results at the 7<sup>th</sup> Asia-Pacific Safeguards Network (APSIN) meeting] (January 2017) *ISCN Newsletter* No. 238, pp. 30-31 <[https://www.jaea.go.jp/04/iscn/npn\\_news/index.html](https://www.jaea.go.jp/04/iscn/npn_news/index.html)>.

<sup>22</sup> Using IAEA, *Annual Report 2015*, Additional Annex Information (2016) <[https://www.iaea.org/sites/default/files/16/09/gc60-9\\_annexinfo.pdf](https://www.iaea.org/sites/default/files/16/09/gc60-9_annexinfo.pdf)> and “Safeguards Status List” (October 7, 2016) <[https://www.iaea.org/sites/default/files/16/10/sg\\_agreements\\_comprehensive\\_status\\_list.pdf](https://www.iaea.org/sites/default/files/16/10/sg_agreements_comprehensive_status_list.pdf)>. This table does not include SQPs covering minor outlying territories of France, the Netherlands, the United Kingdom, and the United States. An entry in this table does not imply the expression of any opinion concerning the legal status of any territory or of its authorities, or concerning the delimitation of its frontiers.