

Developing performance indicators for environmental inspection systems

FINAL REPORT March 2010

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The European Union Network for the Implementation and Enforcement of Environmental Law is an international association consisting of environmental authorities of EU Member States, acceding and candidate countries, and Norway.

The association is commonly known as the IMPEL Network

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on certain of the technical and regulatory aspects of EU environmental legislation. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring more effective application of environmental legislation. It promotes the exchange of information and experience as well as the development of greater consistency of approach in the implementation, application and enforcement of environmental legislation, with special emphasis on Community environmental legislation. It provides a framework for policy makers, environmental inspectors and enforcement officers to exchange ideas, and encourages the development of enforcement structures and best practices.

Information on the IMPEL Network is also available through its website at: www.impel.eu

Title of the report: Developing performance indicators for environmental inspection systems	Number of the report:
	2009/03
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Project Group Members: Peter Schryvers / Inge Delvaux, Flemish Environmental Inspectorate Matthias Weigand, Bavarian Ministry of Environment Meryam Twisk / Koen de Kruif, DMCR environmental protection agency, Port of Rotterdam	Number of pages: Report: 14 Annexes: 7

Executive Summary

The aim of the current project was to define the 10 performance indicators proposed by the 2008 IMPEL project "Brainstorming on an IMPEL Project to develop performance indicators for environmental inspectorates", to assess their strength and weaknesses, and to run a pilot test among a short list of IMPEL members.

On this basis, a revised and as precisely defined as possible list of indicators is proposed, together with a qualitative assessment of each the indicators.

Throughout the project, due to the many political and operational difficulties between Member States, defining EU-wide comparable indicators proved to be of utmost difficulty.

The pilot demonstrated that the comparability is often low, the availability of data variable and the range of answers high.

It was also agreed that the proposed list of indicators does not characterise the effectiveness of the inspectorates. It is a partial assessment of their capacity.

Some recommendations concerning the way to use them are made: in particular, it is better use several indicators than one, and indicators need to be combined with quality-oriented instruments.

It is also proposed that future IMPEL work should focus on the development of outcome indicators at the international level.

This exercise could be linked with a revision of the schemes of the IMPEL Review Initiative, the IRI being able to provide the national context and the qualitative information that must complement the use of outcome indicators.

Disclaimer

This report on (title) is the result of a project within the IMPEL Network. The content does not necessarily represent the view of the national administrations.

INTRODUCTION

This project follows on from three previous IMPEL projects.

The 2007 'Doing the Right Things II Project' developed a step by step guidance book on how to plan and execute inspections. One of the conclusions of the project was that the development of indicators was necessary for the evaluation of the implementation of inspection activities.

The 2007 project 'IMPEL Input to the further development of the RMCEI' gathered the views of IMPEL members on how the RMCEI was working and how it could be further developed in the future. This project coordinated input from IMPEL into the Commission's ongoing review of the Recommendation.

Among the conclusions was the fact that the reporting requirements under the RMCEI were not satisfactory and that alternative reporting systems that would provide simple and comparable data showing the performance of inspection systems should be looked at. For this purpose it was decided to assess the possibility of developing common EU wide indicators which could be used for reporting to the Commission on the implementation of the Recommendation.

This was the starting point of the 2008 project "Brainstorming on an IMPEL project to develop performance indicators" aimed to gather expertise from IMPEL members on the different indicators used in Member States, the experiences from applying these in practice and to produce a list of potential indicators that could be used to structure the reporting to the Commission.

Under this project, a first workshop was held in Wexford, Ireland, on the 26th and 27th June 2008. The workshop was attended by 30 participants from 18 countries.

The workshop developed a long list (250) of potential indicators with some degree of overlap.

In the second workshop held in Antwerp, Belgium in October 2008, participants ranked the list of indicators in the long list in accordance with the agreed selection criteria.

On the basis of this ranking the following short list of 10 indicators that should be further analysed was produced:

INPUT INDICATORS

Number of installations

Number of installations covered by the plan/year

Number of inspectors

Number of complaints received relating to installations

Staff time per installation inspected

OUTPUT INDICATORS

Number of planned inspections carried out versus total planned inspections Number of site visits Number of non routine inspections Number of complaints dealt with

OUTCOME INDICATORS

Number of compliant/non compliant installations

There was agreement that this data collection exercise should be limited to IPPC installations, and that the words have to be understood as defined in the RMCEI (routine and non routine inspections, site visits...) when they are defined in the RMCEI.

The aim of the current project was to define these indicators, to assess their strength and weaknesses, and to run a pilot test among a short list of IMPEL members.

The aim of the project was not to decide on a new reporting system nor to compare practice in Member States, but to provide expertise and background information to be used in the ongoing process on the review of the RMCEI.

METHOD

The project consisted of a questionnaire and a workshop. The outputs are this report and draft terms of reference for a further proposed IMPEL project in 2011.

Following adoption of the terms of reference, a project team was established to organise the work to be carried out. The members of the project team were as follows:

Benjamin Huteau, General Direction of Risk Prevention, France
David Pugh, Environment Agency for England and Wales
Peter Schryvers / Inge Delvaux, Flemish Environment Agency
Matthias Weigand, Bavarian Ministry of the Environment
Meryam Twisk / Koen de Kruif, DMCR Environmental Protection Agency, the Port of
Rotterdam

Eugene Mazur from the OECD was associated to the project team, because of the strong links between this IMPEL project and the OECD project on outcome indicators. His contribution was extremely useful to the project.

The project team coordinated and organised the work by holding several telephone conferences and 4 project team meetings.

The first project team meeting was held in London the 10 March 2009.

It was agreed to use a questionnaire to gather information to test the indicators. The definitions of the 10 indicators were debated, in search for as little ambiguity as possible and a draft questionnaire for the attention of volunteer countries/regions was

prepared. It was agreed to include open questions and supplementary questions in the questionnaire to explore some issues in more detail and to facilitate analysis and debate.

The Project Team also agreed to carry out a "pre-pilot" test among the project team to see if the definitions agreed and discussed are workable.

The second project team meeting was held in Paris the 7 May 2009

The project team discussed the "pre-pilot" test of the questionnaie. This identified major challenges to get available, comparable and meaningful data from various inspectorates. The lessons drawn were used to improve the draft questionnaire.

The project team agreed that the current list of indicators is very basic, and not representative of the performance of the inspectorate. But they reckoned it is a first step on the development of indicators at the EU scale. The meeting discussed concerns about data from the questionnaire being used to compare performance between participants which was not the purpose of the project.

After this meeting, the questionnaire was finalised (Annex 4) and sent to the participating countries/regions: Portugal, France, Flanders, Brussels region, Slovakia, Cologne region, England and Wales, the Port of Rotterdam.

The third project team meeting took place 9 September 2009 in Brussels.

The meeting discussed the answers to the received questionnaires, and prepared for the workshop.

There were two objectives to the workshop:

- discuss the proposed indicators, their strengths, their weaknesses, how they can be used
- think about what comes next : future IMPEL work in this field

The workshop was held in London the 19th and 20th of October, gathering 21 participants.

The discussions among the project team, the debates during the workshop and the lessons learnt from the pilot conducted the project team to refine the definitions of the initial list of indicators. The revised set of indicators is listed in the next part of the report together with an evaluation of their strength and weaknesses.

An additional fourth team meeting was held in Brussels, IMPEL office the 9 November 2009.

The participants discussed the draft report of the project.

TESTED INDICATORS:

Each indicator was accompanied by a definition, and an associated set of questions which are more important than the statistics itself.

INPUT INDICATORS

1) Number of installations

Ques	tions		Definitions	
Total	number	of	The number of permits issued,	as
installations			defined by the directive.	

Do the authorities issue site permits or installation permits?

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Evaluation of the indicator:

The project conclude that the number of installations is not a meaningful indicator, it is only a statistic that can also be used to calculate ratios.

The different approaches to permitting (for example site or installation permits), strongly influence the data and making it difficult to make comparisons.

2) Plan for environment inspection

Questions	Definitions
by the inspection plan per year (inspection plan : as defined by the RMCEI)	An IPPC installation is considered covered by the plan if within one year at least one site visit where one or more permit conditions are inspected is planned.
	Same definition of site visit and of inspection plan as in the previous question.
Number of initially planned site visits which were actually carried out?	As noted at the end of the year

Please explain how the inspection plan is set?

Is it defined according to a risk-based approach? Please give a detailed explanation of your risk-based approach.

Is it multi-annual?

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Feedback from the pilot

All countries in the pilot were able to answer at least the first question. A big difference was observed between farming and non farming facilities (the coverage of the plan was widely more extensive in the non farming case).

For non farming installations, the answers for the coverage of the annual inspection plan ranged from 40% to 100% of the IPPC installations.

Evaluation of the indicator:

This indicator was judged good in term of measurability. However, there were clear indications that the very nature of the plans changes a lot among countries. More than the statistics, it is more important to determine the quality of the plan, how it is generated, whether it is risk based. In particular, this has consequences on the number of inspections and on the detection rate for non compliance.

This indicator should incorporate the number of routine site visits carried out according to a risk-based approach.

Also the plan should not only cover this year site visits: in case all the installations are not visited every year, it should be made possible to report on a multi-year basis.

3) Number of inspectors

Questions	Definitions
	Total number of people who each year visits one or more IPPC site where one or more permit condition(s) are inspected.
hours)	Number of man hours dedicated to IPPC inspection. Support staff and management staff are not included. Preparation and follow up time is to be counted. Training is not included.

How are IPPC inspectors are organized?

How many inspecting authorities are involved? What is their competence? (territory, environment media).

Do inspectors also do the permitting?

Do the inspectors also do labour safety?

Are the numbers given for the whole country, for the national level, for regional levels...

What is the total man-hour dedicated to environment inspection?

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Feedback from the pilot

There were difficulties in answering the questions

The ratio for the man hours dedicated to inspection / number of installations ranged from 5 hours per installation to more than 100.

Evaluation of the indicator:

As for the number of persons, it can be difficult to calculate for countries which don't have dedicated IPPC inspectors. It also raises comparability issues. But it promotes discussion of the notion of critical mass of the inspectorates.

The best measure here is the number of man hours. This might be a good starting point: why are there significant differences between the countries, how different are the inspections?

But there remain some difficulties with interpreting the results. There is no clear answer to the question: is a high number of inspectors a good thing? It does not indicate the effectiveness of inspectorates. We don't know precisely what activities are performed during that time.

It may be difficult for some countries to separate man hours dedicated to IPPC inspections from non IPPC inspections. The reporting for countries with several inspecting authorities also raised serious issues.

It appears relevant to link this indicator with the number of installations, but it does not tell the whole story because of the different kind of installations. The need for local context is fundamental. This indicator could provide interesting information, especially if divided into the number of man hours spent on different types of installation..

OUTPUT INDICATORS

4) Complaints

Questions	Definitions
registered by the inspectorate	Number of complaints concerning IPPC installations registered within one year by the inspectorate. The media used by the plaintiff (phone cal, letter, email) does not matter provided it has been separately registered by the inspectorate.
Number of complaints	Number of complaints where the substance of the complaint has been
dealt with	addressed by action taken by the inspectorate (not just a simple
	acknowledgement to the complainant).

Does the country distinguish between incident reports and complaints?

What their criteria for considering that the complaints have been dealt with?

How do you facilitate the lodging of complaints to the public ?

To which authority can they complain? (national, regional...).

How do the country count multiple complaints for the same incidents?

Are anonymous complaints registered?

Which kind of complaints are registered (written, by phone call...)

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Feedback from the pilot

For the ratio number of complaints registered / number of installations, the answered ranged from 0.005 to 10.

The ratio complaints dealt with / complaints received was more than 75% in all cases, but there were few details given on which criteria were used for considering that the complaints had been dealt with.

Evaluation of the indicator:

Measurability is not the big issue. All register the complaints, although in some cases it is difficult to link the complaint to the installation(s).

It should be made clear in the reporting requirements whether complaints are registered individually or by case.

The number of incidents would also be interesting to measure, and to compare it with the number of complaints. It may be good surrogate indicator to pollution releases. But it is a very different indicator from the number of complaints.

The indicator "number of sites where at least one complaint have been registered within one year" may prevent more comparability issues.

The complaints indicator provides a good example of the difficulty in drawing conclusions from mere figures without understanding the context: what does a large number of registered complaints mean? Perhaps that the country has developed and advertised easy tools for people to lodge a complaint, it can also reveal a cultural background, maybe the performance of the inspectorate in the dealing with complaints encourage people in complaining...

The evaluation of the trend of this measure should probably be preferred as an indicator: a significant increase or decrease shows that something is happening, which has to be investigated. In all cases, there is a big need to put some contexts around these numbers.

If we could get an evaluation of the actions taken after incidents, complaints, or the number of sites visits after those, it could be a good complement to this indicator.

5) Number of site visits

Questic	ns		Definitions
Number	of r	outine	To be based on site visits where one or more permit condition(s) inspected.
IPPC visi	ts		Routine as defined by the RMCEI.
Number	of	non-	To be based on site visits where one or more permit condition(s) inspected.
routine	IPPC	site	Non-routine as defined by the RMCEI. This includes follow up inspections.
visits			
Number	of	sites	To be based on site visits where one or more permit condition(s) inspected.
where a	t leas	t one	Non-routine as defined by the RMCEI. This includes follow up inspections.

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out within one year	

Is sampling included in the number of sites visits? If yes, is it possible to give the number of samplings?

Are Seveso inspections counted in the indicators?

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Feedback from the pilot:

The % of sites visited at least once in the year ranged from 10% to 100%.

The ratio non routine inspections / total number of site visits ranged from 10% to 100%.

Evaluation of the indicator:

A big comparability issue over sampling was raised. It was proposed that sampling and other types of site visits be counted separately, or at least that member states should be asked whether they include sampling visits in the answer, and in the yes case, a quantitative assessment of those.

Some countries only register the inspections-hours rather than the site visits, making it difficult to report the number of site visits. National level reporting will also be a difficult issue in many federal countries like Germany.

These indicators are not very relevant as for the effectiveness (they don't tell anything on what is being inspected), but are coherent for the reporting to the recommendation, and maybe also for the reporting to the public (which like to see the operators are being controlled, even if not all participants to the workshop agreed on this point).

OUTCOME INDICATORS

6) Compliance of installations

Questions	Definitions
installations	Number of installations where in one year at least one site visit report mentions at least one significant non-compliance. Members states should give their own definition of
	significance.

Definition of a significant non compliance?

Further details on national specificities / hypothesis used in the calculations / difficulties with answering

Lessons from the pilot

Concerning the % of sites visited during the year where at least one non compliance was found out, most answers were around 30%. But there were few definitions of "significant non compliance".

Evaluation of the indicator:

All participants of the workshop agreed it is a useful indicator at the operational level for internal targeting, and monitoring by the inspectorate.

Problems of analytical soundness start at the international level as

It does not measure effectiveness.

Alone, this indicator raises big problems of interpretation. Does a higher compliance rate means more or less effectiveness? The more you look, the more you find, especially on risk based targeted inspections. But on the other hand, over time on the same range of installations, a decrease should be observed.

The workshop group that working on this indicator expressed the need for a very tight definition in order to be able to achieve any kind of comparability, especially on the definition of significant non compliance, serious non compliance. Even with this, the use of this indicator should come along with a number of warnings.

During the plenary discussion it was agreed that an EU wide definition is not realistic. Best way is to ask countries their precise definition of non compliance.

It was also agreed that the non compliance ratio should be completed with another outcome, for instance an indicator on recidivism, or on the duration of non-compliance.

Finally, it appears from the OECD presentation during the workshop that the compliance indicator is not necessarily statistically valid: to be so, it would need to rely on accurate self reporting data, or to based on random inspections, or to based on an inspection scheme covering more than 80% of the scope. The numerous compliance indicators examined by the OECD had issues with statistical validity. They were more a measure of the hit rates (success in detecting violation, result of the targeting and a tool to improve it).

If we were to include other installations or directives, this would increase the complexity and the difficulty make comparisons between the member states.

It is also difficult to identify which directive is infringed.

As it is the only outcome indicator left, the participants recommended to keep it, but to attach a number of conditions to its use, related to its definition, and that it should be used in conjunction with other output indicators.

Further break down of this indicator by IPPC categories, or by categories of non compliance (incidents, lack of permits...), as well as the link between noticed non compliance and actions undertaken by the inspectorates would provide interesting information.

CONCLUSION REGARDING THE USE OF THE INDICATORS

- Throughout the project, due to the many political and operational difficulties between Member States, defining EU-wide comparable indicators proved to be of utmost difficulty, especially when considering indicators assessing the effectiveness of inspectorates. The pilot demonstrated that the comparability is often low, the availability of data variable and the range of answers high.
- The proposed list of indicators does not characterise the effectiveness of the inspectorates. It is a partial assessment of their capacity, measuring whether there is a process in place. It tackles most of the items of the RMCEI
- The definitions of the indicators are key. However, better definitions improve comparability, not quality.
- Warnings and limitations in the interpretation of the indicators are to be made clear.
- Only detailed explanations of the national contexts and qualitative assessments can make the statistics valuable, however, trends may be helpful indicators in some instances.
- Better propose several indicators rather than one. No one indicator tells the whole story, but together as a basket they become more meaningful.
- Indicators can help structure the reporting of the countries on the basis of the recommendation. They can help to clarify the systems being used.
- Simple horizontal comparisons of all countries, indicator by indicator is not expected to be meaningful, due to the many political and operational difficulties between Member States.
- Indicators need to be combined with quality-oriented instruments. Only the combination of qualitative and quantitative instruments can show the performance of inspectorates.
- It should be made very clear whether the indicators could be used in the future to non-IPPC installations (probably not for most of them).

FUTURE IMPEL WORK IN THE FIELD OF PERFORMANCE ASSESSMENT

As noted above, the project team felt that the current proposed list of indicators only characterise the capacity of inspectorates, not their effectiveness.

More qualitative outcome indicators have not been accepted by the project, at this stage because it is too difficult to find a common definition and because of the lack of know-how in many countries that don't use outcome indicators at national level.

Also, the importance of quality-oriented assessment tools was constantly stressed during the project.

There are two ways forward.

Firstly this report shows that setting general indicators as a *stand alone* tool with the aim of comparing the performance of inspecting authorities in the EU is not feasible and not meaningful. The discussion on EU wide monitoring of performance of inspectorates leading to comparable findings needs to be broadened; it would be helpful to organise a in depth discussion between IMPEL and the Commission and other relevant parties like the OECD, to further explore what qualitative and quantitative assessment tools like audits, peer reviews (IRI), concrete sector/directive specific output and outcome indicators and combinations of these could be used in this respect.

Secondly it is generally acknowledged that the work of inspecting authorities can improve by developing guidance that would help them monitor the results of their activities against concrete targets that they have set as part of their inspection planning and programming. This is potentially a very important work area for IMPEL. The Doing The Right Things project already provides a good basis to develop such guidance. This work would have to start with a comparison and analysis of current practices. Consequently guidance can be developed, followed by training.

It is envisaged that for these different activities ToR's will be developed to be discussed at the autumn 2010 GA meeting.

Annex 1: agenda of the workshop

Agenda

Monday 19th and Tuesday 20th October 2009

Venue: Jolly Hotel St Ermin's, Caxton St, London, SW1H 0QW

Room: Balcony

Room: Balcony	
Attendees:	
David Pugh – England & Wales, UK	Christof Planitzer – Austria
Howard Thorp – England & Wales, UK	Jitka Zagorova – Czech Republic
John Russon – England & Wales, UK	Philippos Vassiliou - Cyprus
Neil Davies – England & Wales, UK	Onder Gurpinar - Turkey
Terry Shears – England & Wales, UK	Florin Constantin - Romania
Natalie Tye – England & Wales, UK	Horst Buether - Germany
Eugene Mazur - OECD	Simon Bingham – Scotland, UK
Benjamin Huteau – France	Hans Lopatta – European Commission
Nelly Georgieva - Bulgaria	Joanna Piekutowska - Poland
Sylvia Rangelova - Bulgaria	Lukrecija Kireta – IMPEL Secretary
Inge Delvaux – Belgium	

Chairman	for today	Benjamin Huteau	
Time	Number	Session	
12.30	1	Buffet Lunch and Registration	
13.30	2	Introduction: Presentation on the Project and Workshop Agenda	
14.00	3	Workshop 1: 3 groups discussions on the paper - from BH - proposed by the project group • Divide up indicators • 1rst part : Strengths and weaknesses of indicators? (measurability, analytical soundness, policy relevance) • 2 nd part : How can they be used?	
15.00	4	Coffee break	
15.30	5	Plenary session to discuss outcomes of the 1rst part of Workshop 1	
16.30	6	Comfort break	
16.40	7	Plenary discussion to discuss outcomes of the 2 nd part of Workshop 1 : How do we use the set of indicators?	
17.30	8	Close	
19.00	9	Meet in the reception of the hotel to walk to restaurant.	

19.30	10	Evening meal at Shepherd's, Marsham St, London.
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Chairmar	for today	David Pugh	
Time	Number	Session	
09.15	1	Introduction to the Day	
09.30	2	Presentation OECD Indicators project	
10.00	3	Discussion in plenary : should IMPEL start a project on outcome indicators?	
10.45	4	Coffee break	
11.15	5	Presentation of the IMPEL project : "Easy tools"	
11.45	6	Discussion in plenary: do we need to develop EU-wide tools to implement common indicators?	
12.30	7	Final session – conclusions of the Workshop on future work	
12.45	8	Close	
12.45	9	Lunch	

Annex 2: list of participants to the workshop

Attendees:

David Pugh – England & Wales, UK Howard Thorp – England & Wales, UK John Russon – England & Wales, UK Neil Davies – England & Wales, UK Terry Shears – England & Wales, UK Natalie Tye – England & Wales, UK

Eugene Mazur - OECD Benjamin Huteau – France Nelly Georgieva - Bulgaria Sylvia Rangelova - Bulgaria Inge Delvaux – Belgium Christof Planitzer – Austria

Jitka Zagorova – Czech Republic

Philippos Vassiliou - Cyprus

Onder Gurpinar - Turkey

Florin Constantin - Romania

Horst Buether - Germany

Simon Bingham - Scotland, UK

Hans Lopatta – European Commission

Joanna Piekutowska - Poland

Lukrecija Kireta – IMPEL Secretary

Annex 3: questionnaire for the pilot test

2009 IMPEL PROJECT ON PERFORMANCE INDICATORS

PILOT TEST

Background

The Recommendation establishing minimum criteria for environmental inspections (RMCEI) was adopted in 2001. It contains non binding criteria concerning the planning, organisation, carrying out and following up of environmental inspections.

Section X of the recommendation asks member states to inform the Commission of the implementation of the Recommendation, together with details of environmental inspection mechanisms already existing or foreseen.

On the basis of this information and other input from interested parties, the Commission was invited to review the RMCEI.

One of the conclusions of the « IMPEL Input to further developement of the RMCEI project » was that the reporting requirements were not satisfactory and that alternative reporting systems that would provide simple and comparable data should be looked at.

That's why this project aims to obtain input from IMPEL, in order to help the Commission prepare its proposals for the further development of the RMCEI.

It mainly focuses on performance indicators, which are a key element in the whole planning and evaluation process of inspecting authorities.

Two workshops under the project have been held in 2008. The outputs of the first workshop were a list of 200 potential indicators and an initial list of criteria against which to test the potential indicators.

The outcome of the second was a short list of ten indicators.

The 2009 project group has devoted itself to further define the short listed indicators. The purpose was to get non ambiguous, meaningful and simple indicators.

Based on this definition, a questionnaire has been developed, so as to run a pilot test among a small number of member states. The outcomes of this test will be discussed next October during an IMPEL workshop.

Questionnaire

Member states are invited to systematically elaborate on the way they answered the questions (for instance they should always specify which period they referred to). They are also invited to report every difficulties they faced to anwser the questions.

1) Number of installations

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Further details:

2) Number of installations covered by the plan/year

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3) Number of inspectors

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4) Complaints

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Further details:

5) Staff time per installation inspected

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Further details:

6) Inspection plan

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Further details :

7) Number of site visits

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8) Dealing with complaints

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9) Compliance of installations

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