

INTERNAL AUDIT DIVISION

REPORT 2015/181

Audit of waste management in the United Nations Interim Force in Lebanon

Overall results relating to the effective management of waste were initially assessed as partially satisfactory. Implementation of five important recommendations remains in progress

FINAL OVERALL RATING: PARTIALLY SATISFACTORY

17 December 2015 Assignment No. AP2015/672/05

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AUDIT REPORT

Audit of waste management in the United Nations Interim Force in Lebanon

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of waste management in the United Nations Interim Force in Lebanon (UNIFIL).

2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure: (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.

3. Waste management in UNIFIL is governed by the Department of Peacekeeping Operations/Department of Field Support (DPKO/DFS) environmental policy and guidelines for United Nations field missions and UNIFIL standard operating procedures on waste management.

4. The Environmental Management Unit is responsible for coordinating and advising senior management on the Mission's activities relating to environmental and waste management. The Engineering Support Section is responsible for building and maintaining wastewater infrastructure and equipment and the Contracts Management Unit is responsible for monitoring the performance of waste disposal contractors. The Water and Sanitation Unit of the Engineering Support Section is responsible for the installation and maintenance of water and sanitation facilities. The UNIFIL Environment and Greening Committee is responsible for reviewing and monitoring environmental strategies and actions of the Mission.

5. The Environmental Management Unit, headed by an Environmental Officer at the P-3 level, has six approved posts comprising of one international and five national staff. The Water and Sanitation Unit is headed by a Chief at the P-4 level and has 14 approved posts comprising of 1 international and 13 national staff. The UNIFIL operational budget for waste management for the financial year 2014/15 was \$2 million.

6. Comments provided by UNIFIL are incorporated in italics.

II. OBJECTIVE AND SCOPE

7. The audit was conducted to assess the adequacy and effectiveness of UNIFIL governance, risk management and control processes in providing reasonable assurance regarding the **effective management of waste in UNIFIL**.

8. The audit was included in the 2015 risk-based work plan of OIOS because of the operational, health and reputational risks relating to the management of waste in UNIFIL.

9. The key control tested for the audit was regulatory framework. For the purpose of this audit, OIOS defined this key control as the one that provides reasonable assurance that policies and procedures: (i) exist to guide the management of waste in UNIFIL; (ii) are implemented consistently; and (iii) ensure the reliability and integrity of financial and operational information.

10. The key control was assessed for the control objectives shown in Table 1.

11. OIOS conducted this audit in June and July 2015. The audit covered the period from January 2014 to June 2015 and focused on the management of wastewater and organic waste. The audit was conducted in UNIFIL headquarters and field visits were made to: 13 of 53 UNIFIL positions with wastewater disposal facilities (six wastewater plants and seven septic tanks); 18 of 53 UNIFIL positions for solid organic waste collection; one of the two waste disposal sites; and two of six Maritime Task Force vessels.

12. OIOS conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key control in mitigating associated risks. Through interviews and analytical reviews, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

III. AUDIT RESULTS

13. The UNIFIL governance, risk management and control processes examined were initially assessed as **partially satisfactory**¹ in providing reasonable assurance regarding the **effective management of waste in UNIFIL**. OIOS made five recommendations to address issues identified. UNIFIL developed an environmental action plan containing the Mission's environmental objectives and appointed an environmental officer and focal points. The Mission had 13 plants for the treatment of wastewater. However, UNIFIL needed to: (a) include specific actions and targets in its environmental plans, ensure the Environment and Greening Committee convenes quarterly and responsible staff regularly report environmental activities and incidents to senior management; (b) establish a monitoring mechanism to ensure that treated wastewater meets quality standards prior to discharge; (c) review and up-date its procedures for separating the treatment of grey water from black water; (d) request clarification from DFS on the maintenance and testing of septic tanks; and (e) ensure that the waste collection and disposal contractor uses approved waste disposal sites and methods.

14. The initial overall rating was based on the assessment of the key control presented in Table 1. The final overall rating is **partially satisfactory** as implementation of five important recommendation remains in progress.

	Key control	Control objectives						
Business objective		Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules			
Effective	Regulatory	Partially	Partially	Partially	Partially			
management of	framework	satisfactory	satisfactory	satisfactory	satisfactory			
waste in UNIFIL								
FINAL OVERALL RATING: PARTIALLY SATISFACTORY								

Table 1: Assessment of key control

¹ A rating of "**partially satisfactory**" means that important (but not critical or pervasive) deficiencies exist in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Regulatory framework

Monitoring and reporting of environmental matters needed improvement

15. The DPKO/DFS Environmental Policy requires UNIFIL to develop an environmental action plan containing its environmental objectives, targets and contingency plans, and for the Director of Mission Support to develop environmental policies and procedures and appoint an Environmental Officer to regularly report and advise senior management on environmental issues. UNIFIL Information Circular on the Environment and Greening Committee requires the Committee to convene quarterly to review and monitor environmental issues, including waste management.

16. A review of environmental documents and reports showed that UNIFIL developed an environmental action plan, contingency plan and various guidelines and standard operating procedures on the management of wastewater and organic waste. An Environmental Officer and focal points were appointed to assist in the management of waste.

17. However, the review showed that UNIFIL did not include in its environmental action and contingency plans: targets needed to achieve the Mission's environmental objectives; and actions needed to mitigate environmental risks. The Environment and Greening Committee convened twice during the period from January 2014 to September 2015. The monthly and quarterly progress reports prepared by environmental focal points included statistics on waste management; but they did not contain information on environmental activities and incidents, and the reports were not submitted to management for review.

18. The above resulted because the Mission did not have an adequate monitoring and reporting structure or mechanism on environmental management. As a result, there was inadequate monitoring of waste and environmental matters, and issues relating to follow up on test results and maintenance of septic tanks, discussed in paragraphs 24 and 31 below, were not reported to senior management for resolution.

(1) UNIFIL should implement an action plan to ensure: (a) the Mission's environmental action and contingency plans contain detailed actions and targets on waste management; (b) the Environment and Greening Committee convenes regularly; and (c) environmental activities and incidents are systematically reported to senior management.

UNIFIL accepted recommendation 1 and stated that the action plan for 2016 would include detailed actions and targets. UNIFIL would review the membership of the Environment and Greening Committee, which will reconvene after confirmation, and environmental reports would be prepared and reported to senior management on a quarterly basis. Recommendation 1 remains open pending receipt of: a copy of the 2016 action plan, minutes of the Environment and Greening Committee meetings and quarterly environmental reports submitted to the senior management.

An adequate monitoring system for following up on results of wastewater testing was required

19. The DFS policy directive on wastewater management requires UNIFIL to regularly inspect wastewater treatment plants to ensure proper operation and discharge of adequately treated wastewater. UNIFIL standard operating procedures on water and sanitation require annual testing of treated wastewater against a set of standards established by local authorities.

20. UNIFIL had 13 wastewater treatment plants for onsite treatment of wastewater. A review of the maintenance log for all 13 wastewater treatment plants for 6 of the 18 months reviewed indicated that UNIFIL conducted regular maintenance and inspections of the plants. A review of wastewater test results

indicated that a Mission contractor conducted 17 quality tests of treated wastewater (12 in 2014 and 5 in 2015) covering all 13 plants. However, UNIFIL did not take any corrective action although the test results showed that all 13 plants failed to meet quantitative standards established by local authorities. UNIFIL was discharging treated wastewater from 2 plants into the ocean, and for the remaining 11 plants treated wastewater was discharged into soak pits and leach fields. The Mission advised that quality standards established by local authorities were only relevant in instances where treated wastewater was disposed into water bodies and there were no international or local standards for treated wastewater discharge into soak pits or leach fields. UNIFIL was also of the view that discharging treated wastewater into the ocean posed minimal risk.

21. The lack of corrective action on non-achievement of local standards resulted as there was inadequate monitoring by the Mission to follow up and take action regarding the quality of treated wastewater prior to discharge. As a result, there was an increased risk of environmental contamination and health and reputation risks resulting from inadequately treated wastewater being discharged into the ground and the ocean.

(2) UNIFIL should establish a monitoring mechanism to ensure that treated wastewater meets quality standards established by local authorities prior to discharge.

UNIFIL accepted recommendation 2 and stated that it established monitoring mechanisms for the two locations where wastewater was discharged into water bodies. In the absence of local or international standards for discharging treated wastewater into an absorption or soakage system, UNIFIL implemented a monitoring system to test raw water quality of nearby wells. Recommendation 2 remains open pending receipt of evidence that an adequate monitoring mechanism is in place to follow up and take action when treated wastewater does not meet established quality standards.

Requirements on separating grey and black water needed to be reviewed

22. UNIFIL standard operating procedures on water and sanitation require separate treatment of grey water² from black water³. The procedures require UNIFIL to use oil separators and grease traps for car washing and kitchens respectively and soakage trenches for final disposal. The DPKO/DFS environmental guidelines require missions to ensure that grey water containing oil and water from car washing is not drained directly into a treatment system to ensure effective functioning of the system.

23. Visits to 13 (25 per cent) of 53 Mission positions indicated that at UNIFIL headquarters, a local village sewage pipe that was connected to the Mission's wastewater treatment plant disposed sewage water containing both grey and black into the plant without passing through a grease trap. At all 13 positions, grey water was comingled with black water that flowed into treatment plants and septic tanks with no separation. At four positions, wastewater from car washing was disposed onto the concrete surface without the use of oil separators and soakage trenches.

24. The above happened because the Engineering Support Section was of the opinion that the separation of grey from black water and the use of soakage trenches for car washing was not necessary since it would not result in direct environmental damage as plants could process grey water. However, UNIFIL had not revised its procedures on the need to separate grey and black water. Additionally, no requirements were established for connection of the local village sewage to the UNIFIL wastewater plant.

² Grey water is water generated from domestic activities such as laundry, dish washing and bathing

³ Black water is water containing fecal matter and urine

There was a risk that grease and oil from the local village and grey water from the Mission could hamper proper operation of water treatment plants.

(3) UNIFIL should review and update its requirement on separate treatment of grey and black water and take appropriate actions to ensure that grey water from the local village and the Mission does not hamper the operation of wastewater treatment plants.

UNIFIL accepted recommendation 3 and stated that its consultation with DFS confirmed that there was no requirement for separation of grey and black water. UNIFIL amended its standard operating procedures and submitted to DFS for their comments. It would also construct a grease trap for wastewater from the local village. Recommendation 3 remains open pending receipt of promulgated standard operating procedures and confirmation of measures taken on wastewater from the local village.

Controls over septic tanks systems needed improvement

25. The DFS policy directive on wastewater requires: (a) field missions to regularly maintain and inspect septic tanks, soak pits and leach fields; and (b) UNIFIL facilities in the vicinity of local communities to treat wastewater to minimum reuse levels. UNIFIL standard operating procedures on water and sanitation require the Engineering Support Section to properly treat and remove sludge. International best practices suggest that septic tank wastewater be tested, and the Environmental Management Unit of UNIFIL suggests testing of soil conditions to verify the ability of the soil to absorb wastewater.

26. Visits to 6 (16 per cent) of 37 UNIFIL positions with septic tank systems indicated that: (a) at four of the six positions, the Engineering Support Section did not adequately maintain septic tanks and remove sludge; (b) at one position, located in close vicinity of a local community, wastewater was not treated to reuse levels; and (c) at all positions, UNIFIL did not test soil conditions and wastewater from septic tanks.

27. The above resulted as the Engineering Support Section was of the opinion that regular maintenance of septic tanks was not needed since they operated autonomously. The Section advised that it inspected the tanks during sludge removal and conducted repairs when a problem was reported. However, the Section had not requested clarification from DFS that this process was satisfactory. As a result, wastewater from septic tanks was discharged into the ground without confirmation of compliance with the DFS instruction, increasing the risk of environmental contamination.

(4) UNIFIL should seek clarification from DFS on specific requirements on the maintenance and testing of septic tanks.

UNIFIL accepted recommendation 4 and stated that DFS confirmed that the Mission's practice was acceptable. It revised its standard operating procedures to incorporate relevant clarifications and instructions, and submitted the updated procedures to DFS for review. Recommendation 4 remains open pending receipt of clarifications provided by DFS and a copy of the revised standard operating procedures on the maintenance and testing of septic tanks.

Closed positions were handed over in accordance with UNIFIL environmental requirements

28. The UNIFIL standard operating procedures on the management of Mission positions requires kitchens and food storage areas of vacated positions to be emptied of all food items and thoroughly cleaned before handover to local authorities. The procedures also require the Environmental Management

Unit to conduct an inspection of vacated positions. A review of 2 out of 10 vacated positions in 2014 and 2015 indicated the positions were well cleaned and inspected by the Environmental Management Unit before handover to local authorities. OIOS concluded that adequate controls were in place for the handing over of closed positions to local authorities.

Inadequate monitoring of waste disposal sites and contractor disposal practices

29. The UNIFIL contract for solid waste collection and disposal requires the contractor to dispose of waste only at disposal sites approved by the landlord and UNIFIL. The contract also stipulates that the contractor should not dispose of garbage by burning.

30. A review of records for the two landfill sites used by the contractor showed that prior to June 2015, both sites were approved by the landlord and UNIFIL. In June 2015, the contractor changed sites as local authorities prohibited the previously used sites for waste dumping and disposal. The contractor obtained the landlord's approval but started using the new sites without informing and obtaining approval from UNIFIL and local authorities. During the audit, the contractor obtained approval from local authorities for one year starting June 2015. A visit to one of the two landfill sites observed that the contractor disposed of the Mission's waste by burning. The contractor in July 2015 informed the Contracts Management Unit that it discontinued the practice of burning waste. However, this had not yet been verified by the Unit.

31. The above resulted because the Mission did not have a mechanism to regularly monitor the contractor's disposal sites and practices. Also, the waste collection and disposal contract did not require the contractor to obtain approvals from local authorities because the authorities had not established such a requirement. Inadequate disposal of waste at unapproved sites increased environmental and reputational risks.

(5) UNIFIL should amend contractual requirements for waste disposal and put in place monitoring procedures to ensure that the contractor uses only approved disposal sites and methods of disposal.

UNIFIL accepted recommendation 5 and stated that it would amend the terms of the waste disposal contract upon the next renewal of the contract. It would also implement a quarterly monitoring programme to ensure the contractor uses approved disposal sites and methods. Recommendation 5 remains open pending receipt of amended contract terms on the approval of disposal sites by local authorities and evidence of monitoring procedures in place.

Policies and procedures on segregation and disposal of waste could not be implemented due to the current environment in Lebanon

32. The DPKO/DFS environmental policy requires UNIFIL to collect and separate solid organic waste from other types of waste.

33. Visits to 18 (34 per cent) of 53 positions indicated that UNIFIL had separate garbage bins for the collection of organic waste and other solid waste to ensure separation of waste at source. However, in 10 locations organic and solid waste were mixed in the same bins. In one location, hazardous waste such as paint was placed inside an organic waste bin. Further, at all locations, the waste disposal contractor collected both organic and other waste in the same vehicles and disposed of them without separation.

34. The above resulted, as UNIFIL did not put in place measures to enforce the requirement to separate organic waste from other waste. Also, UNIFIL did not specify in the solid waste disposal

contract that the contractor was responsible to separately collect and dispose of organic waste from other solid waste. As a result, staff health and the environment were not adequately protected.

35. In this instance; however, OIOS did not make a recommendation considering the recent crisis situation in Lebanon over its mounting garbage and waste disposal problems. The Government was experiencing difficulties in reaching an agreement with municipalities on the location of sufficient garbage disposal sites and separation of organic from non-organic waste. Due to this, it was difficult to obtain contractors to implement DPKO/DFS and UNIFIL policies and procedures. The Mission continued to monitor the situation.

Maritime Task Force environmental facilities were in compliance with international regulations

36. The International Convention for the Prevention of Pollution by Sewage from Ships permits disposal of: (a) treated wastewater within 12 nautical miles of the coast line; and (b) untreated wastewater and organic waste beyond the 12 nautical miles from the coast line. A review of documents and visits to two out of six Maritime Task Force vessels indicated that the vessels had properly functioning water treatment facilities on board and only disposed treated wastewater. The vessels also disposed organic waste into the sea beyond the 12 nautical mile limit. OIOS concluded that adequate controls were in place over the disposal of wastewater and organic waste by Maritime Task Force vessels.

IV. ACKNOWLEDGEMENT

37. OIOS wishes to express its appreciation to the management and staff of UNIFIL for the assistance and cooperation extended to the auditors during this assignment.

(*Signed*) David Kanja Assistant Secretary-General for Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Recom. no.	Recommendation	Critical ⁴ / Important ⁵	C/ O ⁶	Actions needed to close recommendation	Implementation date ⁷
1	UNIFIL should implement an action plan to ensure: (a) the Mission's environmental action and contingency plans contain detailed actions and targets on waste management; (b) the Environment and Greening Committee convenes regularly; and (c) environmental activities and incidents are systematically reported to senior management	Important	0	Receipt of a copy of the 2016 action plan, next quarter meeting minutes of the Environment and Greening Committee and next quarterly environmental reports submitted to the senior management.	01 May 2016
2	UNIFIL should establish a monitoring mechanism to ensure that treated wastewater meets quality standards established by local authorities prior to discharge.	Important	0	Receipt of evidence that an adequate monitoring mechanism is in place to follow up and take action when treated wastewater does not meet established quality standards.	01 July 2016
3	UNIFIL should review and update its requirement on separate treatment of grey and black water and take appropriate actions to ensure that grey water from the local village and the Mission does not hamper the operation of wastewater treatment plants.	Important	0	Receipt of promulgated standard operating procedures and confirmation of measures taken on wastewater from the local village.	01 July 2016
4	UNIFIL should seek clarification from DFS on specific requirements on the maintenance and testing of septic tanks.	Important	0	Receipt of clarifications provided by DFS and a copy of the revised standard operating procedures on the maintenance and testing of septic tanks.	28 February 2016
5	UNIFIL should amend contractual requirements for waste disposal and put in place monitoring procedures to ensure that the contractor uses only approved disposal sites and methods of disposal.	Important	0	Receipt of amended contract terms on the approval of disposal sites by local authorities and evidence of monitoring procedures in place.	01 August 2016

⁴ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

⁵ Important recommendations address important (but not critical or pervasive) deficiencies in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

 $^{^{6}}$ C = closed, O = open

⁷ Date provided by UNIFIL in response to recommendations.

APPENDIX I

Management Response

UNITED NATIONS



NATIONS UNIES

FORCE INTERIMAIRE AU LIBAN

INTERIM FORCE IN LEBANON

Office of the Director of Mission Support

CONFIDENTIAL

15 December 2015

To:

Ms. Eleanor T. Burns, Director Internal Audit Division, OIOS

From: Major General Luciano Portolano Head of Mission and Force Commander, UNIFIL

Subject: Draft report on an Audit of Waste Management in UNIFIL (Assignment No. AP2015/672/05)

1. I refer to your memorandum on the above subject, reference No. IAD: MO151201 dated 01 December 2015. Please find attached, UNIFIL's response to the recommendations contained in the subject Draft Report including action plan with target dates and responsible individuals.

2. In following the usual procedure, copies of supporting documents will only be provided to MERAO based at UNIFIL HQ and will not be transmitted to you with this Mission's response.

Thank you and best regards.

Cc: Mr. Effendi Syukur, Chief Audit Response, Risk Management and BOI Unit, UNIFIL Ms. Cynthia Avena-Castillo, Professional Practices Section, Internal Audit Division, OIOS

Management Response

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNIFIL should implement an action plan to ensure: (a) the Mission's environmental action and contingency plans contain detailed actions and targets on waste management; (b) the Environment and Greening Committee convenes regularly with appropriate membership and functions; and (c) environmental activities and incidents are systematically reported to senior management.	Important	Yes	Officer in Charge Environmental Management Unit	01 May 2016	UNIFIL concurs with the recommendation. Point (a) - The mission is reviewing the existing Action Plan to incorporate the detailed actions and targets. Point (b) - the membership of the Environment and Greening Committee is being reviewed and once confirmed, the committee will be reconvened Point (c) - A quarterly Environmental report is currently being consolidated for review by senior management. The target date for completion is 15 December 2015
2	UNIFIL should establish a monitoring mechanism to ensure that treated wastewater meets quality standards established by local authorities prior to discharge.	Important	Yes	Water and Sanitation (WATSAN) Engineer with Chief Engineering Support Services (CESS)	01 July 2016	A monitoring mechanism for regular testing of treated waste water to ensure that it is meeting quality standards established by local authorities in locations where it is being discharged into the sea and to test for any contamination of nearby water wells in locations where it is being discharged into the ground has been established by Engineering Support Services in coordination with the Environmental Management

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Management Response

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						Safety Unit. The initial tests will be conducted in December 2015 and follow up testing will be done every six months from then on.
3	UNIFIL should review and update its requirement on separate treatment of grey water and black water and take appropriate actions to ensure that grey water from the local village and the Mission does not hamper the operation of wastewater treatment plants	Important	Yes	WATSAN Engineer with CESS	01 July 2016	UNIFIL has contacted United nations Headquarters (UNHQ, NY) to confirm that there is no compulsory requirement for separation of grey and black water (Evidence Provided to Auditors). The UNIFIL Water & Sanitation Unit Standard Operating Procedures (SOP) has been amended and sent to UNHQ for their comments (Evidence Provided to Auditors). Once reviewed and approved by UNHQ, the revised SOP shall be forwarded to mission senior management for final approval and promulgation. Further, the construction of a grease trap for Naqoura village influent is currently underway to trap excessive grease and protect the plant from any unacceptable type of influent waste.
4	UNIFIL should seek clarification from DFS on specific requirements on the maintenance and testing of septic tanks.	Important	Yes	WATSAN Engineer with CESS	28 February 2016	The mission has already contacted UNHQ, NY for clarification on the issues raised issues relating to septic tanks and it was found that the mission practices are acceptable (Evidence Provided to Auditors). The clarifications and instructions provided were incorporated in the revised water & sanitation SOPs

Management Response

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
5	UNIFIL should amend contractual	Important		Chief		which have been forwarded to UNHQ for review and approval (Evidence Provided to Auditors). The current contract for waste
	requirements for waste disposal and put in place monitoring procedures to ensure that the contractor uses only approved disposal sites and methods of disposal.	Inportant		Contracts Management Unit		disposal/ removal is inclusive of provisions for monitoring and sets out the relevant key performance indicators. However, upon renewal of the contract in July 2016, UNIFIL will highlight to the contractor the critical importance of using only UNIFIL approved dumping locations and methods of disposal. All disposal sites must be agreed to in advance by UNIFIL. In this regard, UNIFIL will conduct regular monitoring on a quarterly basis to ensure that the contractor is using approved disposal sites and methods of disposal and maintain records to evaluate contractor performance and adherence to terms.