

INTERNAL AUDIT DIVISION

REPORT 2016/028

Audit of waste management and selected environmental activities in the United Nations Mission in Liberia

Overall results relating to the effective management of waste and environmental activities were initially assessed as unsatisfactory. Implementation of one critical and four important recommendations remains in progress

FINAL OVERALL RATING: UNSATISFACTORY

31 March 2016 Assignment No. AP2014/626/08

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AUDIT REPORT

Audit of waste management and selected environmental activities in the United Nations Mission in Liberia

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of waste management and selected environmental activities in the United Nations Mission in Liberia (UNMIL).

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. The Director of Mission Support, under the direction of the Head of Mission, is responsible for ensuring compliance with relevant policies and procedures governing waste management and environmental issues. The Occupational Health, Safety and Environmental Unit and the Engineering Section in the Office of the Director of Mission Support are responsible for oversight and coordination of waste and environmental management activities, and the installation and maintenance of waste management equipment, facilities and infrastructure, respectively.

4. The Occupational Health, Safety and Environmental Unit is headed by a staff at the P-3 level and has one United Nations volunteer and one national staff. The budget for staff cost in the Unit was \$316,000 and \$309,000 for the 2014/15 and 2015/16 fiscal years, respectively. The 2014/15 and 2015/16 budgets for contractual services for the collection and disposal of garbage were \$91,000 and \$103,000, respectively.

5. Comments provided by UNMIL are incorporated in italics.

II. OBJECTIVE AND SCOPE

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

7. The audit was included in the 2015 risk-based work plan of OIOS due to the operational, health and reputational risks related to the management of waste and environmental activities in UNMIL.

8. 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: (a) exist to guide waste and environmental management activities in UNMIL; (b) are implemented consistently; and (c) ensure the reliability and integrity of financial and operational information.

9. The key control was assessed for the control objective shown in Table 1. One control objective shown in Table 1 as "Not assessed" was not relevant to the scope defined for this audit.

10. OIOS conducted this audit from September to December 2015. The audit covered the period from 1 January 2014 to 30 June 2015. The audit team visited 19 out of 65 Mission sites located in

Monrovia, Gbarnga and Zwedru to inspect waste management facilities, practices and waste disposal sites.

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

III. AUDIT RESULTS

12. The UNMIL governance, risk management and control processes examined were initially assessed as **unsatisfactory**¹ in providing reasonable assurance regarding the **effective management of** waste and environmental activities. OIOS made five recommendations to address the issues identified.

13. UNMIL had adequate policies and guidelines for managing waste and environmental activities and provided regular briefings to staff on the subject. UNMIL also: constructed septic tanks and soak pits to treat black and grey water; acquired and installed seven wastewater treatment plants to treat its wastewater on site; and trained technicians to operate the plants. However, to strengthen controls, UNMIL needed to: (a) ensure proper disposal of solid waste at authorized sites; (b) ensure that untreated wastewater was not discharged into the environment; (c) establish monitoring mechanisms to confirm that the Mission and waste disposal contractors complied with waste management requirements and environmental standards; (d) improve preventative measures to minimize contamination of soil from fuel; and (e) ensure that environmental clearance certificates are obtained for all vacated sites.

14. The initial overall rating was based on the assessment of the key control presented in Table 1. The final overall rating is **unsatisfactory** as implementation of one critical and four important recommendations remains in progress.

			Control o	objectives				
Business objective	Key control	Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules			
Effective management	Regulatory	Partially	Partially	Not assessed	Unsatisfactory			
of waste and	framework	satisfactory	satisfactory					
environmental								
activities								
FINAL OVERALL RATING: UNSATISFACTORY								

Table 1:Assessment of key control

¹ A rating of "**unsatisfactory**" means that one or more critical and/or pervasive important deficiencies exist in governance, risk management or control process, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

Regulatory framework

Mission-specific environmental policies and procedures were developed

15. The DPKO/DFS environmental policy and guidelines require UNMIL to set environmental performance goals, develop policies, standards and procedures for waste management.

16. UNMIL established and monitored environmental performance goals for 2013/14 and 2014/15 and took action where necessary. A review of the Mission waste management guidelines and standard operating procedures indicated that they were consistent with the DPKO/DFS environmental policy and guidelines. OIOS concluded that UNMIL implemented adequate controls to guide its waste and environmental management activities.

Waste and environmental briefings were provided to personnel during induction training and on-site visits

17. The DPKO/DFS environmental policy requires UNMIL to provide staff with adequate briefings on waste and environmental matters including applicable policies and instructions on environmental objectives and policies.

18. A review of training records and field visits to 19 out of the 65 contingent camps indicated that the Environmental Officer provided environmental and waste briefings to staff during induction training and regular on-site visits to various Mission locations. The Environmental Unit also issued general broadcasts to staff on effective waste management practices. OIOS concluded that adequate controls were in place to regularly brief staff on waste and environmental matters.

There was a need for proper disposal of solid waste in all locations

19. The DPKO/DFS environmental policy and guidelines and UNMIL waste management guidelines and standard operating procedures require waste to be disposed at authorized and controlled waste management facilities, and prohibit the burning of garbage in open air.

20. Visits to 19 sites indicated that at 7 sites, Mission personnel were disposing solid waste in unauthorized dugout pits and routinely burned their garbage although there were approved dumping sites in these locations. This was because there was no dedicated garbage collection vehicle or contractual arrangement in place for solid waste collection and disposal in these regions. Inappropriate disposal of solid waste increased health and environmental risks.

(1) UNMIL should provide regional locations with a dedicated garbage collection vehicle or put in place contractual arrangements to ensure solid waste is properly disposed of at authorized sites.

UNMIL accepted recommendation 1 and stated that a new solicitation exercise for garbage collection and disposal for all six regional locations that would be operation beyond June 2016 was ongoing. The new contract would be in place by the end of May 2016. Recommendation 1 remains open pending receipt of evidence that contractual arrangements are in place for proper solid waste disposal in all locations.

Action was needed to ensure that untreated wastewater was not discharged into the environment

21. The DPKO/DFS environmental policy requires UNMIL to ensure that untreated wastewater was not directly discharged into streams, rivers or other bodies of water.

22. The 19 locations visited showed that black water² from all sites was discharged into septic tanks and later transported in trucks for treatment at UNMIL wastewater treatment facilities. The treated wastewater was discharged underground through soak pits, with the exception of the treatment plant in Monrovia that discharged the treated wastewater into rain water drains. Also, due to a technical fault, the wastewater treatment plant in one location had been out of operation for over a year. In the meantime, UNMIL disposed untreated black and grey water³ at a location approved by local authorities

23. At 5 of the 19 locations, due to inadequate plumbing, cracked septic tanks or unavailability of soak pits, untreated grey water was not adequately contained. For example: (a) grey water from a contingent's kitchen flowed into rain water drains that discharged into a local community adjacent to the camp; (b) two contingents were discharging untreated grey water from laundry activities into the environment; (c) at one contingent location, untreated grey water from kitchen activities was directly discharged into an adjacent field; and (d) at one location, the Mission's septic tanks used to store both grey and black water were situated outside the camp in an unprotected area next to the community.

24. Additionally, due to the lack of wastewater treatment facility in one sector, UNMIL was dumping untreated black and grey water into a pit dug on private property as approved by the landlord and local authorities. UNMIL was in the process of installing a wastewater treatment plant that was expected to be completed in April 2016. Improper disposal of untreated black and grey water posed health and environmental risks.

(2) UNMIL should: (a) construct and/or repair septic tanks and soak pits; (b) correct the plumbing works in existing septic tanks to ensure that wastewater is not discharged into the environment; and (c) fence off unprotected septic tanks situated outside the camps.

UNMIL accepted recommendation 2 and stated that it was making significant efforts to strengthen its wastewater management capacity by introducing additional septic tanks and enhancing plumbing and repair works in camps. UNMIL will redraw an existing fence to keep the septic tank within camp infrastructure. Recommendation 2 remains open pending receipt of evidence and OIOS verification of actions taken to prevent the discharge of untreated wastewater into the environment and evidence that septic tank located outside is fenced.

There was a need to improve the inspection and testing of wastewater treatment plants

25. The DPKO/DFS environmental guidelines and policy directives require UNMIL to: (a) regularly inspect its wastewater treatment plants and municipal wastewater treatment facilities when used by the Mission; (b) ensure wastewater treatment plants are operated by trained and qualified United Nations staff; and (c) regularly monitor and test the quality of treated wastewater effluent.

26. UNMIL had seven wastewater treatment plants located in seven sector locations. Visits to three of the seven locations and discussions with plant operators and relevant staff indicated that the plants were operated by trained and qualified personnel. However, UNMIL did not conduct the required biochemical oxygen demand tests on the quality of final effluent from six of the seven treatment plants.

² "Black water" is water containing fecal matter and urine.

³ "Grey water" is wastewater generated from domestic activities such as laundry, dish washing and bathing.

UNMIL discharged untreated wastewater from the plants into soak pits and/or the environment via rain water drains. Also, UNMIL did not maintain records on the results of inspections of the treatment plants.

27. Additionally, sewage from one of the UNMIL locations in Monrovia was discharged directly into the municipal mains and ultimately disposed of at a Government-owned treatment plant. However, UNMIL did not obtain assurances and could not confirm that waste was properly treated at the municipal wastewater treatment facility.

28. The above lapses were caused by inadequate supervision and monitoring by the Water and Sanitation Unit. As a result, there was an increased risk of improperly treated wastewater being discharged into the environment.

(3) UNMIL should establish a monitoring mechanism to ensure: (a) regular assurance is obtained that waste was properly treated at municipal wastewater treatment plants; and (b) inspections and testing of the Mission's wastewater treatment plants and effluent are regularly conducted and documented.

UNMIL accepted recommendation 3 and stated that it requested the Liberian Water and Sewage Corporation to provide assurance that their wastewater treatment operations were in full compliance with national standards but had not yet received a response. UNMIL had begun enforcing the collection of samples and biological oxygen demand testing every three months for all UNMIL-installed wastewater treatment plants. Samples had been collected in four locations for testing. Recommendation 3 remains open pending receipt of evidence that: regular assurance is obtained from local authorities on the proper treatment of waste at municipal facilities, and the Mission is conducting regular inspection and testing of its wastewater treatment plants and effluent.

Preventive measures to avoid contamination of soil needed to be improved

29. The DPKO/DFS environmental guidelines require UNMIL to take preventive measures to avoid contamination of soil by fuel and oil.

30. Visits to 17 out of 117 UNMIL energy-generating sites showed contamination of soil around generators as some generator sites did not have impermeable concrete surfaces, and oil spill prevention kits were not used in 15 of the 17 locations. Also, in 15 sites: (a) the connection points between tanks and fuel lines were not fitted with drip pans to collect hydrocarbons; and (b) peat moss type absorbent powder designed to collect oils, fuels and solvents had not been put in place between the equipment and the ground.

31. The above resulted because UNMIL had not implemented procedures to adequately monitor the adequacy of preventative environmental measures. As a result, there was increased environmental risk due to soil contamination.

(4) UNMIL should: (a) install concrete slabs under generators and implement other preventative measures to minimize the contamination of soil from fuel; and (b) considering that the Mission is drawing down, take action to clean the contaminated soil.

UNMIL accepted recommendation 4 and stated that it would focus on preparing hardstand/crushed rock bases for generator locations. As part of camp closure clean-up activities, UNMIL would treat contaminated soil in accordance with approved procedures before the land was returned to the Government of Liberia. Recommendation 4 remains open

pending receipt of evidence that preventive measures have been instituted to minimize the contamination of soil from fuel and of the efforts done to clean the contaminated soil.

Environmental clearance certificates were not obtained for some vacated sites

32. The UNMIL standard operating procedures for handover of land and properties require the Mission to obtain, for each vacated site, an environmental clearance certificate signed by a representative of the Liberian Environmental Protection Agency.

33. A review of the camp closure process indicated that UNMIL closed and vacated 20 governmentowned and 2 private property sites from January 2014 to October 2015. UNMIL obtained the required certificates for all government-owned sites but not the two privately owned properties. This was because UNMIL conducted inspections of the two privately leased sites without involving the Environmental Protection Agency as the owners were of the view that the Agency's involvement was not required. UNMIL explained that all contractual obligations were fulfilled to the satisfaction of the private property owners prior to the handover. However, the handover documents did not include signed release of liability forms.

34. The lack of environmental clearance certificates from the Environmental Protection Agency for privately owned sites posed a risk that, in the event such sites did not meet local environmental standards, the United Nations could be subject to claims.

(5) UNMIL should implement a process that involves the Liberian Environmental Protection Agency in all camp closure inspections to ensure that the Mission obtains an environmental clearance certificate for all vacated sites.

UNMIL accepted recommendation 5 and stated that with regards to privately-owned property, the lease agreements would be amended to include a standard release of liability clause that entails acceptance by the custodian of the property and this would be part of the handover documents. Recommendation 5 remains open pending receipt of evidence that a process has been implemented to ensure that the environmental condition of privately owned properties vacated by the Mission is fully documented and a release liability form signed by both parties.

Monitoring and reporting of waste contractor disposal activities needed improvement

35. The DKPO/DFS environmental guidelines require UNMIL to conduct regular monitoring of waste contractors' disposal practices. UNMIL waste contractors were required to use government-approved dumpsites.

36. A review of UNMIL monitoring activities of the contractors handling the Mission's waste (general garbage and oil and fuel waste products) indicated that the Mission was not monitoring contractors' waste disposal practices and did not periodically conduct no notice inspections to ensure the contractors were complying with the practices agreed to in the contract. The Engineering Section advised that contractors were not only servicing UNMIL, and their waste was being comingled with others. UNMIL was therefore, relying on payment receipts issued by the government as evidence that its waste was being dumped in government-approved sites. UNMIL also confirmed that they would ensure that these payment receipts were systematically verified for reasonableness to provide a certain level of assurance that contractors were systematically using government-approved sites. Based on the information provided and the additional action being taken, OIOS did not make a recommendation.

IV. ACKNOWLEDGEMENT

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

(Signed) Eleanor Burns Director, Internal Audit Division, OIOS

STATUS OF AUDIT RECOMMENDATIONS

Recom. no.	Recommendation	Critical ⁴ / Important ⁵	C/ O ⁶	Actions needed to close recommendation	Implementation date ⁷
1.	UNMIL should provide regional locations with a dedicated garbage collection vehicle or put in place contractual arrangements to ensure solid waste is properly disposed of at authorized sites.	Important	0	Receipt of evidence that contractual arrangements are in place for proper solid waste disposal in all locations.	1 July 2016
2.	UNMIL should: (a) construct and/or repair septic tanks and soak pits; (b) correct the plumbing works in existing septic tanks to ensure that wastewater is not discharged into the environment; and (c) fence off unprotected septic tanks situated outside the camps.	Important	0	Receipt of evidence and OIOS verification of actions taken to prevent the discharge of untreated wastewater into the environment and evidence that septic tank located outside is fenced.	30 June 2016
3.	UNMIL should establish a monitoring mechanism to ensure: (a) regular assurance is obtained that waste was properly treated at the relevant municipal wastewater treatment plants; and (b) inspections and testing of the mission wastewater treatment plants and effluent are regularly conducted and documented.	Critical	0	Receipt of evidence that: regular assurance is obtained from local authorities on the proper treatment of waste at municipal facilities, and the Mission is conducting regular inspection and testing of its wastewater treatment plants and effluent.	30 June 2016
4.	UNMIL should: (a) install concrete slabs under generators and implement other preventative measures to minimize the contamination of soil from fuel; and (b) considering that the Mission is drawing down take action to clean the contaminated soil.	Important	0	Receipt of evidence that preventive measures have been instituted to minimize the contamination of soil from fuel and of the efforts done to clean the contaminated soil.	30 June 2016
5.	UNMIL should implement a process that involves the Liberian Environmental Protection Agency in all camp closure inspections to ensure that the Mission obtains an environmental clearance certificate for all vacated sites.	Important	0	Receipt of evidence that a process has been implemented to ensure that the environmental condition of privately owned properties vacated by the Mission is fully documented and a release liability form signed by both parties.	31 March 2016

⁴ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

⁵ Important recommendations address important deficiencies or weaknesses in governance, risk management or internal 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 UNMIL in response to recommendations.

APPENDIX I

Management Response



United Nations

Nations Unies

UNMIL

Office of the Special Representative of the Secretary-General And Coordinator of United Nations Operations in Liberia

Date: 28 March 2016

To: Ms. Muriette Lawrence-Hume Chief, New York Audit Service Internal Audit Division, OIOS

From: Antonio Vigilante Officer-in-Charge, United Nations Mission in Liberia

Subject: Assignment No. AP2014/626/08 – UNMIL's response to the draft report on the follow-up audit of waste management at the United Nations Mission in Liberia

Thank you for providing us with the opportunity to comment on the above-referenced audit.

Please see the comments of the mission to the audit in the attached matrix, as requested in your memorandum dated 2 March 2016. The annexes referenced therein have been provided to the Chief Resident Auditor in soft copy.

Regards.

Cc: Mr. Erich Ball, Officer-in-Charge, Mission Support, UNMIL

Ms. Denise Wilman, Chief of Staff, UNMIL

Major General Salihu Zahaway Uba, Force Commander, UNMIL

Mr. Gregory Hinds, Police Commissioner, UNMIL

Mr. Kuldeep Malik, Chief, Service Delivery, UNMIL

Ms. Moya Magilligan, Audit Focal Point, UNMIL

Mr. James Suglo, Chief Resident Auditor, UNMIL

Ms. Cynthia Avena-Castillo, Professional Practices Section, Internal Audit Division, OIOS

APPENDIX I

Management Response

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1.	UNMIL should provide regional locations with a dedicated garbage collection vehicle or put in place contractual arrangements to ensure solid waste is properly disposed of at authorized sites.	Important	Yes	Chief, Facilities Management Unit	1 July 2016	The new solicitation for garbage collection and disposal is ongoing for the locations to be retained beyond June 2016 (5+1 hubs). The vendors are expected to submit their bids on 24 March and the new contract should be in place by the end of May 2016. The new contract will explicitly cover disposal of solid waste at authorized dumping sites in each sector.
2.	UNMIL should: (a) construct and/or repair septic tanks and soak pits; (b) correct the plumbing works in existing septic tanks to ensure that wastewater was not discharged into the environment; and (c) fence off unprotected septic tanks situated outside the camps.	Important	Yes	Chief, Water and Sanitation Unit / Chief, Facilities Management Unit	30 June 2016	UNMIL has made significant efforts to strengthen its liquid waste management capacity by introducing additional septic tanks and enhancing plumbing and repair works. UNMIL has specifically addressed the examples cited in paragraph 25: (a) The construction of an additional septic tank was finalized in the Nepal FPU camp in Monrovia on 15 February 2016. (b) Leakages from ablutions and grease traps were fully contained at the Ukrainian Aviation Unit RIA

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						camp in December 2015, and in the Jordan FPU camp on 22 January 2016. (c) The sewage problem in BanDen was cleaned and contained; an intense environmental clean-up will be conducted prior to camp closure in April 2016. (d) The wastewater from the Chinese Engineering compound in Zwedru has been fully diverted to a septic tank on 19 January 2016. Efforts are being made for the segregation of black and grey water with emphasis on camps retained beyond 30 June 2016. The wastewater treatment plant in Greenville was finalized on 7 March 2016. The plant connections were fully re-installed to cope with the lack of sewage trucks in the sector. The plant is now equipped to treat and dispose of sewage in an ecologically acceptable manner in full compliance with UN guidelines (para 24). The installation of the wastewater treatment plant in Harper is expected to be finished by the end of April 2016 (para 26).

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						The responsible individual for the above is the Chief, Water and Sanitation Unit.
						Efforts will be made to redraw the existing fence to keep the septic tank as part of camp infrastructure. The responsible individual is the Chief, Facilities Management Unit.
3.	UNMIL should establish a monitoring mechanism to ensure: (a) regular assurance is obtained that waste was properly treated at the relevant municipal wastewater treatment plants; and (b) inspections and testing of the mission wastewater treatment plants and effluent are regularly conducted and documented.	Critical	Yes	Chief, Water and Sanitation Unit	30 June 2016	UNMIL requested the Liberian Water and Sewage Corporation ("LWSC") for their continued assurance that wastewater treatment operations are in full compliance with Liberian standards. Official communications have been sent to this effect through the Acting Managing Director and the Operations Manager on 11 March 2016 and 7 March 2016, respectively. Receipt of the letters was acknowledged by LWSC on 21 March 2016, however no responses have been received to date. UNMIL is enforcing the collection of samples and biological oxygen demand testing every three months for all UNMIL-installed wastewater treatment plants as per the UN guidelines. UNMIL flies the samples from the sectors to its one testing

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						facility in Monrovia to conduct testing within 20 hours of sample collection. A specific logistics plan was established for this purpose, it involves precise coordination between the Monrovia lab and the plant operators and sector engineers as well as MOVCON staff on both sides. In March 2016, samples were collected in four locations (Monrovia, Zwedru, Gbarnga, and Buchanan) and two more samples are expected by the end of March 2016. The next inspection and testing is scheduled for mid-June 2016, unless an unfavorable result is encountered in which case the cause of that unfavorable result will be investigated and the test will be repeated until the problem is rectified.
4.	UNMIL should: (a) install concrete slabs under generators and implement other preventative measures to minimize the contamination of soil from fuel; and (b) considering that the Mission is drawing down take action to clean the contaminated soil.	Important	Yes	Chief, Facilities Management Unit	30 June 2016	Efforts will be focused on preparing hardstand/ crushed rock bases for generator locations retained in the hubs beyond 30 June 2016. As part of camp closures and clean-up activities, contaminated soil is always treated as per procedures approved by the Liberian Environmental

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						Protection Agency ("EPA") and which is documented in the handover certificates.
5.	UNMIL should implement a process that involves the Liberian Environmental Protection Agency in all camp closure inspections to ensure that the Mission obtains an environmental clearance certificate for all vacated sites.	Important	Yes	Chief, Facilities Management Unit	31 March 2016	The Liberian EPA is involved in the closures of all camp sites on Government-owned property. The lease agreements between UNMIL and private landlords will be amended to include a standard release of liability clause that entails acceptance by the custodian of the property and this will comprise part of the handover documents.