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Case No: 78358  
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Decision No: 087/18/COL

EFTA SURVEILLANCE  
AUTHORITY

Icelandic Ministry of Industries and Innovation  
Skulagata 4  
150 Reykjavík  
Iceland

Dear Sir or Madam,

**Subject: Letter of formal notice to Iceland concerning requirements for disposal of certain animal by-products**

## 1 Introduction

From 9 to 13 September 2013, the EFTA Surveillance Authority ('the Authority') carried out a veterinary mission to Iceland ('the 2013 mission') to evaluate the implementation of EEA requirements concerning animal by-products ('ABPs').<sup>1</sup> At the time of that mission, those requirements were laid down in *Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption*,<sup>2</sup> as amended and as adapted to the Agreement on the European Economic Area ('EEA Agreement') by the sectoral adaptations referred to in Annex I to that Agreement ('Regulation (EC) No 1774/2002').

The report from this mission (Doc No 690400) ('the 2013 mission report')<sup>3</sup> noted that Iceland did not ensure that adequate arrangements were in place or that sufficient infrastructure existed to ensure that ABPs were disposed of in accordance with Regulation (EC) No 1774/2002. More specifically, it noted, *inter alia*, that:

- A number of ABPs, including Category 1, 2 and 3 material dispatched from slaughterhouses and fallen stock<sup>4</sup> categorised as Category 1 material (containing

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<sup>1</sup> Pursuant to Article 3(1) of Regulation (EC) No 1069/2009, the term '*animal by-products*' means '*entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen*'.

<sup>2</sup> The Act previously referred to at point 9b in Part 7.1 of Chapter I of Annex I to the Agreement on the European Economic Area

<sup>3</sup> [http://www.eftasurv.int/media/reports/690400\\_Final-report--EFTA-Surveillance-Authority\\_s-Mission-to-Iceland-on-animal-by-product.pdf](http://www.eftasurv.int/media/reports/690400_Final-report--EFTA-Surveillance-Authority_s-Mission-to-Iceland-on-animal-by-product.pdf)

<sup>4</sup> 'Fallen stock' means any animal that has died of natural causes or disease on a farm or that has been killed on a farm for reasons other than human consumption.

specified risk material ('SRM'))<sup>5</sup>, were directly disposed of in landfills, without prior processing.

- Burial of fallen stock on farms was common practice.
- There was no national system for collection of home slaughter<sup>6</sup> waste or fallen stock, subject to exceptions in a few areas with dense animal populations. There was also very limited focus of official controls on disposal of such ABPs, except in the case of disease outbreaks.

Regulation (EC) No 1774/2002 has since been repealed and replaced by *Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002*,<sup>7</sup> as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement ('Regulation (EC) No 1069/2009') and *Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive*,<sup>8</sup> as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement ('Regulation (EU) No 142/2011') (together referred to as 'the new EEA ABP legislation'). The new EEA ABP legislation entered into force in Iceland on 21 July 2017.

In light of subsequent correspondence and discussions with the Icelandic Government since the 2013 mission and the Authority's findings from a mission in Iceland undertaken from 11 to 20 June 2018 to verify that official controls related to ABPs were carried out in accordance with EEA legislation ('the 2018 mission') (details of which are set out in Section 2. of this letter), the Authority has reached the conclusion that the Icelandic Government is in breach of the new EEA ABP legislation by failing both to maintain a system of official controls and to ensure that an adequate system is in place on its territory to ensure that fallen stock, home slaughter waste and slaughterhouse waste are disposed of in accordance with the requirements of that legislation.

## 2 Correspondence

By letter dated 16 December 2015 (Doc No 784263) ('the pre-Article 31 letter'), the Authority informed the Icelandic Government that it had decided to open an own initiative investigation (Case No 78358) concerning the finding from the 2013 mission that fallen stock and slaughterhouse waste were directly disposed of in landfills, without prior processing, contrary to Articles 3(1), 4(2), 5(2) and 6(2) of Regulation (EC) No

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<sup>5</sup> Pursuant to Article 3(23) of Regulation (EC) No 1069/2009, the term '*specified risk material*' means '*specified risk material as defined in Article 3(1)(g) of Regulation (EC) No 999/2001*'.

<sup>6</sup> 'Home slaughter' means the slaughter of a livestock animal by the animal's owner, on their property, for their own personal consumption or that of members of their immediate family living there.

<sup>7</sup> The Act referred to at point 9b. in Part 7.1 of Chapter I of Annex I to the EEA Agreement

<sup>8</sup> The Act referred to at point 9c. in Part 7.1 of Chapter I of Annex I to the EEA Agreement

1774/2002. The Icelandic Government was invited to submit its observations on the content of the letter by 29 January 2016.

By email dated 8 March 2016 (Doc No 796505), the Authority informally reminded the Icelandic Government of the deadline for response to its pre-Article 31 letter and requested the Icelandic Government to inform it when it could expect to receive a reply. No response was received from Iceland.

By letter dated 27 April 2016 (Doc No 801215), the Authority issued a letter of formal notice to Iceland for failure to fulfil its obligations under Article 3 of the EEA Agreement and under Articles 2 and 6 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and Court of Justice ('SCA') in relation to its failure to reply to the pre-Article 31 letter. Iceland was requested to submit its observations on the letter within one month of receipt. No response was received from Iceland prior to that deadline. However, on receipt of the letter from Iceland dated 7 June 2016 (Doc No 807209, mentioned below), the Authority decided not to pursue this action for failure to reply further.

The case was discussed at the package meeting in Iceland on 1 June 2016. At the meeting, the Icelandic Government indicated that progress had been made insofar as:

- A Working Group consisting of representatives of the Ministry of Industries and Innovation, the Icelandic Food and Veterinary Authority ('MAST'), local competent authorities and stakeholders had been set up to address disposal of ABPs and it had been emphasised that direct disposal of the relevant ABPs at landfills would not be tolerated.
- Concerning disposal of ABPs from slaughterhouses, the Icelandic Environment Agency had confirmed that a proposal for small incinerators to be placed on site at slaughterhouses was acceptable without any need for additional environmental permits, provided that these incinerators did not receive waste from other businesses.
- There was also one incinerator in Iceland (Sorpeyðingarstöð Suðurnesja in the Keflavík area, operated by Kalka ('the Kalka incineration plant')) currently licensed to receive ABPs from other operators.
- The Icelandic Government referred to a relevant recent meeting on 3 May 2016 between the Ministry of Industries and Innovation and local competent authorities.
- The Ministry of Industries and Innovation undertook to send a letter to the involved competent authorities with an update concerning the on-site incinerator situation and how to address the disposal of fallen stock (which on-site incinerators were not permitted to receive) which was still being considered.

By letter dated 7 June 2016 (Doc No 807209), the Icelandic Government:

- provided copies of minutes of the meeting of 3 May 2016 between the Ministry of Industries and Innovation and local competent authorities referred to in the package meeting; and

- attached a copy of a letter sent to local competent authorities requesting their feedback on several relevant issues, including the number of incinerators in operation.

By follow-up letter to the 2016 package meeting dated 20 June 2016 (Doc No 809081), the Authority informed the Icelandic Government that it was assessing the information attached to the Icelandic Government's letter of 7 June 2016 and would revert for further follow-up as necessary.

At the package meeting in Iceland on 8 June 2017, the Icelandic Government informed the Authority that:

- Incorporation of the new EEA ABP legislation into Icelandic national law was in the process of being finalised and the legislation was expected to enter into force in June 2017.
- The issue of fallen stock would be addressed through derogations in such national legislation for disposal of dead animals in remote areas, as permitted by the EEA ABP legislation in certain circumstances.
- On site incinerators were in place at all but one slaughterhouse, with the remaining slaughterhouse sending ABPs to the Kalka incineration plant.
- Iceland committed to provide the Authority with further information in writing on disposal of ABPs, in particular regarding on-site incinerators, fallen stock and the division of tasks between competent authorities.

By follow-up letter to the package meeting dated 7 July 2017 (Doc No 861943), the Authority invited the Icelandic Government to provide it with the further information mentioned in the package meeting by 1 August 2017.

By email dated 20 December 2017 (Doc No 890208), the Authority reminded the Icelandic Government of the deadline for response to its follow-up letter of 7 July 2017 and requested it to provide the Authority with the relevant information without further delay.

By letter dated 21 March 2018 (Doc No 902015), the Authority again requested a response to its follow-up letter of 7 July 2017.

By letter dated April 25 2018 (Doc No 914924), the Icelandic Government requested that the Authority grant it an extension of the deadline to respond to the Authority's letter of 21 March 2018 until 8 May 2018.

By letter dated 2 May 2018 (Doc No 911330), the Authority refused to extend this deadline on the basis that the request for extension had been received by the Authority after the deadline for reply to the Authority's letter dated 21 March 2018.

At the package meeting in Iceland on 5 June 2018, the Icelandic Government acknowledged the ongoing issue concerning fallen stock and slaughterhouse waste and confirmed that different options to resolve it were still being considered. More specifically:

- In relation to disposal of fallen stock, reference was made to the work of a cross Ministry and stakeholder Working Group set up by Ministry of Environment. It was explained that a costs analysis was being undertaken by the Working Group of either establishing a mobile incinerator or installing and licensing permanent incinerators in more municipalities to enable disposal in accordance with EEA legal requirements. As part of considering these options, the municipalities needed to be consulted. The Icelandic Government hoped to reach a conclusion on how to resolve this issue by the end of the year. It confirmed that it was now less clear that national legislation permitting disposal by burial or burning in remote areas and defining such areas would be adopted, although this was not completely ruled out. The Icelandic Government confirmed that the Kalka incineration plant would soon cease incinerating fallen stock.
- As regards slaughterhouse waste, the installation of on-site incinerators had been completed. However, the sustainability of this arrangement as a long term solution was now in doubt following complaints and legal challenges by residents in the vicinity of the incinerators concerning the smell created.

Following the package meeting, the Authority carried out the 2018 mission from 11 to 20 June 2018. As noted in the Draft mission report (Doc No 915946), the Authority found, *inter alia*, that:

- There has been insufficient progress towards resolving the ABP disposal issues highlighted in the 2013 mission report as further explained below. Iceland and respective competent authorities continue not to take necessary measures to control, monitor and verify compliance with ABP disposal requirements, contrary to Article 4(3) of Regulation (EC) No 1069/2009 and Article 32 of Regulation (EU) No 142/2011 and to ensure that an adequate system is in place for disposal of ABPs in accordance with the requirements of Regulation (EC) No 1069/2009, contrary to Article 4(4)(b) of Regulation (EC) No 1069/2009.
- Iceland has not defined any remote areas where ABPs could be disposed of by burning, burial on site or by other means under official supervision in accordance with Article 19 of Regulation (EC) No 1069/2009.
- In some municipalities, fallen stock and home slaughter waste (including in both cases Category 1 SRMs) are collected in dedicated containers in collection centres, and then transported to a landfill for direct disposal without prior processing, contrary to Articles 12(c), 13(c) and 14(c) of Regulation (EC) No 1069/2009. In other municipalities, these ABPs are disposed of by on site burial on farms, contrary to Articles 12, 13 and 14 of Regulation (EC) No 1069/2009. Information provided by Iceland in its reply to the pre-mission document confirmed that burial of fallen stock (including Category 1 material) on farms remains common practice. There remains very limited focus of official controls on disposal of fallen stock and home slaughter waste, except in the case of disease outbreaks, contrary to Article 4(3) of Regulation (EC) No 1069/2009 and Article 32 of Regulation (EU) No 142/2011.
- Regarding disposal of Category 1 SRMs from slaughterhouses, the mission team noted that the situation has improved since the 2013 mission. SRMs are now collected and burned in on-the-spot incinerators in slaughterhouses or transported

for burning to the Kalka incinerator plant in accordance with Article 12(a) of Regulation (EC) No 1069/2009.<sup>9</sup>

- However, ABPs generated at slaughterhouses other than Category 1 SRMs are still directly disposed of at landfill sites on a regular basis, contrary to Articles 13(c) and 14(c) of Regulation (EC) No 1069/2009. At one slaughterhouse visited, blood was released directly into the nearby river (MAST officials being aware of this but taking no action).

By follow-up letter to the package meeting dated 4 July 2018 (Doc No 919041 and 918708), the Authority informed the Icelandic Government that it was considering next steps in light of the significant delays by the Icelandic Government in resolving the relevant ABP disposal issues.

By email dated 7 September 2018 (Doc No 929261), Iceland submitted to the Authority a table of corrective actions to be taken by the Icelandic authorities on the basis of the Authority's recommendations in its Draft 2018 mission report. In that table, Iceland notes that *'the whole system of ABPs in Iceland needs to be reviewed considering the results of the mission and it will be directed to the Icelandic Authorities (government) to find a solution for the disposal of ABPs'*. The relevant estimated compliance date indicated by Iceland is end 2019.

### 3 Relevant national law

#### Incorporation of Regulation (EC) No 1069/2009

Regulation (EC) No. 1069/2009 is incorporated into Icelandic legislation by reference method through *Regulation No 674/2017 on animal by products and related products that are not intended for human consumption (Reglugerð um heilbrigðisreglur að því er varðar aukaafurðir úr dýrum og afleiddar afurðir sem ekki eru ætlaðar til manneldis)*.<sup>10</sup>

#### Incorporation of Commission Regulation (EU) No 142/2011

Commission Regulation (EU) No 142/2011 is also incorporated into Icelandic legislation by reference method through *Regulation No 674/2017 on animal by products and related products that are not intended for human consumption (Reglugerð um heilbrigðisreglur að því er varðar aukaafurðir úr dýrum og afleiddar afurðir sem ekki eru ætlaðar til manneldis)*.<sup>11</sup>

<sup>9</sup> Article 12(a) of Regulation (EC) No 1069/2009:  
'Category 1 material shall be:

(a) disposed of as waste by incineration:

(i) directly without prior processing; or

(ii) following processing, by pressure sterilisation if the competent authority so requires, and permanent marking of the resulting material'.

<sup>10</sup> Article 1(a) of Regulation No 467/2017 states:  
'On the basis of the decisions of the Joint Committee the following EU legislation is enforced in Iceland: Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002.' Regulation (EC) No 1069/2009 is translated into Icelandic and attached as Annex I to the Icelandic Regulation.

<sup>11</sup> Article 1(b) of Regulation No 467/2017 states:

#### 4 Relevant EEA law

Article 7(1) of Regulation (EC) No 1069/2009 states that:

*‘Animal by-products shall be categorised into specific categories which reflect the level of risk to public and animal health arising from those animal by-products, in accordance with the lists laid down in Articles 8, 9 and 10.’*

##### Category 1

###### *Category 1*

Article 8(b)(i) and (ii) of Regulation (EC) No 1069/2009 state that the animal by-products ‘specified risk material’ and ‘entire bodies or parts of dead animals containing specified risk material at the time of disposal’ shall be considered as Category 1 material (being the highest risk category of animal by-products).

This includes SRMs from slaughterhouses or home slaughter waste and fallen stock containing SRMs.

###### *Category 2*

Article 9 of Regulation (EC) No 1069/2009 states, *inter alia*, that the following ABPs should be considered as Category 2 material:

*‘animal by-products collected during the treatment of waste water required by implementing rules adopted under point (c) of the first paragraph of Article 27...from slaughterhouses other than those covered by Article 8(e)’ (Article 9(b)(ii));*

*‘animals and parts of animals, other than those referred to in Article 8 or Article 10,...that died other than by being slaughtered or killed for human consumption, including animals killed for disease control purposes’ (Article 9(f)(i)); and*

*‘animal by-products other than Category 1 material or Category 3 material’ (Article 9(h)).*

This includes fallen stock and slaughterhouse waste not containing SRMs.

###### *Category 3*

Article 10 of Regulation (EC) No 1069/2009 states, *inter alia*, that the following ABPs should be considered as Category 3 material:

*‘carcasses and parts of animals slaughtered or, in the case of game, bodies or parts of animals killed, and which are fit for human consumption in accordance with Community*

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*‘On the basis of the decisions of the Joint Committee the following EU legislation is enforced in Iceland: Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive.’ Commission Regulation (EU) No 142/2011 is translated into Icelandic and attached as Annex II to the Icelandic Regulation.*

legislation, but are not intended for human consumption for commercial reasons' (Article 10(a));

*'carcasses and the following parts [listed in Article 10(b)(i) to (v)] originating...from animals that have been slaughtered in a slaughterhouse and were considered fit for slaughter for human consumption following an ante-mortem inspection...'* (Article 10(b));

*'blood of animals which did not show any signs of disease communicable through blood to humans or animals obtained from the following animals that have been slaughtered in a slaughterhouse after having been considered fit for slaughter for human consumption following an ante-mortem inspection in accordance with Community legislation:*

*(i) animals other than ruminants requiring TSE testing; and*

*(ii) ruminants which have been tested with a negative result in accordance with Article 6(1) of Regulation (EC) No 999/2001'* (Article 10(d)); and

*'adipose tissue from animals which did not show any signs of disease communicable through that material to humans or animals, which were slaughtered in a slaughterhouse and which were considered fit for slaughter for human consumption following an ante-mortem inspection in accordance with Community legislation'* (Article 10(o)).

This includes home slaughter waste or slaughterhouse waste other than SRMs.

#### Disposal of relevant ABPs by burial in landfill or on site

Articles 12, 13 and 14 of Regulation (EC) No 1069/2009 establish a limited list of permitted methods of disposal of each Category of ABPs.

#### *Burial in landfill*

Regulation (EC) No 1069/2009 provides that certain ABPs, including fallen stock, slaughterhouse waste and home slaughter waste, may be disposed of by burial in landfill, subject to such ABPs first having been processed.

More specifically, Article 12(c) of Regulation (EC) No 1069/2009 provides that Category 1 material, other than material referred to in Article 8(a)(i)<sup>12</sup> and (ii)<sup>13</sup> and catering waste from means of transport operating internationally,<sup>14</sup> may *'be disposed of by processing by pressure sterilisation, permanent marking of the resulting material and burial in an authorised landfill'*.

<sup>12</sup> Article 8(a)(i) of Regulation 1069/2009:

*'entire bodies and all body parts, including hides and skins, of...:*

*(i) animals suspected of being infected by a TSE in accordance with Regulation (EC) No 999/2001 or in which the presence of a TSE has been officially confirmed;'*

<sup>13</sup> Article 8(a)(ii) of Regulation 1069/2009:

*'entire bodies and all body parts, including hides and skins, of...:*

*(ii) animals killed in the context of TSE eradication measures;'*

<sup>14</sup> Article 12(d) of Regulation 1069/2009 provides that catering waste from means of transport operating internationally may be *'disposed of by burial in an authorised landfill'* (i.e., without first having been processed).



Similarly, Article 13(c) of Regulation (EC) No 1069/2009 provides that Category 2 material may be *‘disposed of in an authorised landfill, following processing by pressure sterilisation and permanent marking of the resulting material’*.

Article 14(c) of Regulation (EC) No 1069/2009 provides that Category 3 material may be *‘disposed of in an authorised landfill, following processing’*.

#### *Burial on site*

Articles 12, 13 and 14 of Regulation (EC) No 1069/2009 do not include burial on site as a permitted method of disposal of ABPs. By way of derogation from Articles 12, 13 and 14, however, Article 19 of Regulation (EC) No 1069/2009 permits burning or burial of certain ABPs (including fallen stock and home slaughter waste)

- in specific circumstances (for example, in remote areas, for emergency disposal in disease control situations or where access is not practically possible or presents a risk to health and safety of collection personnel); and
- where authorised by the competent authority and subject to the conditions established in Sections 1 and 2 of Chapter III of Annex VI of Regulation (EU) No 142/2011 as per Article 15 of the same Regulation.

Article 20 of Regulation (EC) No 1069/2009 provides a procedure for authorisation of alternative methods of disposal of ABPs.

#### Official controls of requirements concerning ABPs

Article 4 of Regulation (EC) No 1069/2009 states that:

*‘2. Operators shall ensure at all stages of collection, transport, handling, treatment, transformation, processing, storage, placing on the market, distribution, use and disposal within the businesses under their control that animal by-products and derived products satisfy the requirements of this Regulation which are relevant to their activities.*

*3. Member States shall monitor and verify that the relevant requirements of this Regulation are fulfilled by operators along the entire chain of animal by-products and derived products as referred to in paragraph 2. For that purpose, they shall maintain a system of official controls in accordance with relevant Community legislation.*

*4. Member States shall ensure that an adequate system is in place on their territory ensuring that animal by-products are:*

- (a) collected, identified and transported without undue delay; and*
- (b) treated, used or disposed of in accordance with this Regulation.’*

Article 32(1) of Regulation (EU) No 142/2011 states that:

*‘The competent authority shall take the necessary measures to control the entire chain of collection, transport, use and disposal of animal by-products and derived products, as referred to in Article 4(2) of Regulation (EC) No 1069/2009.’*

## 5 The Authority's assessment

On the basis of the correspondence and discussions with the Icelandic Government since the 2013 mission and the findings of the 2018 mission (described in Section 2. of this letter), the Authority notes that:

- Insufficient action has been taken by the relevant Icelandic competent authorities to address the breach of the requirements for disposal of fallen stock, slaughterhouse waste or home slaughter waste identified in the 2013 mission report.
- Fallen stock, home slaughter waste and slaughterhouse waste other than Category 1 slaughterhouse waste (SRMs) continue to be directly disposed of in landfills in Iceland, without prior processing, contrary to Articles 12(c), 13(c) and 14(c) of Regulation (EC) No 1069/2009.
- Fallen stock and home slaughter waste (including Category 1 SRMs) continues to be buried on site without prior authorisation contrary to Articles 12, 13 and 14 of Regulation (EC) No 1069/2009.

The Directorate notes that whilst Iceland's above-mentioned table of corrections to the Draft 2018 mission report (Doc No 929261) acknowledges the problem of disposal of ABPs and provides an indicative compliance date of end 2019, it does not provide details of a solution.

## 6 Conclusion

Accordingly, as its information presently stands, the Authority concludes that Iceland has failed to fulfil its obligation under Article 4(3) of Regulation (EC) No 1069/2009 and Article 32(1) of Regulation (EU) 142/2011 to maintain a system of official controls and under Article 4(4)(b) of Regulation (EC) No 1069/2009 to have an adequate system in place on its territory:

- to ensure that fallen stock, slaughterhouse waste (other than Category 1 SRMs) and home slaughter waste is disposed of in landfills only after prior processing (in accordance with the requirements of Articles 12(c), 13(c) and 14(c) of Regulation (EC) No 1069/2009); and
- to ensure that fallen stock or home slaughter waste is not buried on site, except where specifically authorised in accordance with Articles 19 or 20 of Regulation (EC) No 1069/2009, in accordance with Articles 12, 13 and 14 of Regulation (EC) No 1069/2009.

In these circumstances, and acting under Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice, the Authority requests that the Icelandic Government submits its observations on the content of this letter *within two months* of its receipt.

After the time limit has expired, the Authority will consider, in the light of any observations received from the Icelandic Government, whether to deliver a reasoned

opinion in accordance with Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice.

For the EFTA Surveillance Authority,

Bente Angell-Hansen  
President

Frank J. Büchel  
College Member

Högni Kristjánsson  
Responsible College Member

For Carsten Zatschler  
Countersigning as Director,  
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*This document has been electronically authenticated by Bente Angell-Hansen, Catherine Howdle.*