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**GUIDE FOR ANALYSTS APPOINTED UNDER THE  
*ENVIRONMENT PROTECTION ACT 1970***

Environment Protection Authority  
State Government of Victoria

February 2000

GUIDE FOR ANALYSTS APPOINTED UNDER THE *ENVIRONMENT PROTECTION ACT 1970*

Environment Protection Authority  
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Southbank Victoria 3006  
Australia

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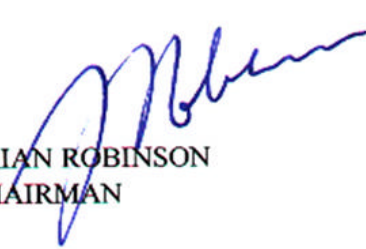
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## FOREWORD

One way EPA protects the environment, ensuring that it is safe and ecologically sustainable, is by enforcing the *Environment Protection Act 1970* which prohibits pollution, littering and the creation of environmental hazards, and facilitates the clean-up of pollution where it presents an immediate threat to the environment. To fulfil this task, it is often necessary to take physical samples for analysis. Such samples are analysed by competent analysts, following guidelines established by the Authority from time to time.

The *Environment Protection Act 1970* provides for the appointment of analysts whose work, when presented in a certificate of analysis, may be accepted as evidence in court without the analyst being required to attend in person if the certificate is not disputed. This provision allows an efficient use of the analyst's time.

In administering the *Environment Protection Act 1970*, EPA is also responsible for ensuring that the work of appointed analysts is of sufficiently high standard to maintain the confidence of the legal system in the certificates they produce. This publication is intended to provide guidance on the duties, responsibilities and obligations of appointed analysts. As such, it is an important step in ensuring that the operation of the system of appointed analysts is efficient as well as providing a valuable quality assurance tool to appointed analysts and the laboratories in which they work.



BRIAN ROBINSON  
CHAIRMAN

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## 1. INTRODUCTION

Victorian legislation allows for the recognition, appointment or approval of “analysts” for the purposes of providing analytical evidence under a number of Acts of Parliament. The *Environment Protection Act 1970* (the Act) provides for the appointment of analysts by EPA, preparation of certificates of analysis and the submission of such certificates as evidence in court.

In 1987, the Department of Premier and Cabinet issued guidelines for the appointment of analysts under all the relevant Acts, to ensure that there was some uniformity of appointment and approval procedures

However, until now, the duties and obligations of analysts appointed under the *Environment Protection Act 1970* have not been spelt out. The purpose of this Guide is to provide appointed analysts, and people intending to apply for appointment, with information on:

- (i) The qualifications required
- (ii) The duties and obligations of analysts
- (iii) How to conduct analyses and deal with samples
- (iv) How to report analytical results in certificates of analysis.

Individual analysts may be appointed or approved under a number of Acts besides the *Environment Protection Act 1970*. This Guide is not intended to provide information on the requirements for providing analytical results for the purposes of any other Act. An analyst should contact the responsible government agency for information on the requirements of any other Act under which he or she may be appointed or approved.

## 2. BACKGROUND

EPA appoints analysts for two reasons. Firstly, so that analytical data produced from investigations of alleged breaches of the Act can be presented in certificates of analysis and, secondly, so that it can be sure that competent and experienced people undertake analyses for

use in court proceedings. Under the provisions of the Act, an appointed analyst need not appear in court unless the analytical evidence in a certificate is challenged, and the defendant requests that the analyst attend.

Section 57(1) of the Act addresses the appointment of analysts. It states:

*The Authority may appoint any person to be an authorized officer, environmental auditor or analyst for the purposes of this Act.*

Section 57A(1) addresses the preparation of a certificate of analysis. It states:

*Where an analyst carries out an analysis the analyst may prepare and sign a certificate in writing of the analysis.*

Section 58 addresses how a certificate of analysis may be used in legal proceedings. It states:

- (1) *There is to be served with every summons to answer a charge of an offence against this Act a copy of any report or certificate provided for in this Act which the Authority intends to use in the proceedings for the offence.*
- (2) *Service of a copy of a report or certificate with a summons to answer to a charge may be proved in any manner in which service of the summons may be proved.*
- (3) *If the defendant does not give at least seven days' notice in writing before the hearing that the defendant requires the person giving the report or certificate to be called as a witness the report or certificate is sufficient evidence of the facts stated therein.*

When hearing charges brought before it under the Act, a court needs to be convinced beyond reasonable doubt that the charges are proved. Evidence in the form of a certificate of analysis provides the court with information by which it can assess the impact of an incident on the environment.

Hence, it is essential that the information presented in a certificate of analysis be

scientifically sound, based on proven analytical methods, and supported by established laboratory procedures for quality assurance.

### **3. APPLICATIONS FOR APPOINTMENT**

In the first instance, intending applicants should contact the Manager Environmental Chemistry within EPA, stating their qualifications, relevant analytical experience, the scope of analytical work (chemical or microbiological) for which the appointment is sought, other Acts under which the applicant is recognised as an approved or appointed analyst, professional memberships, publications, and the names and addresses of two referees. An example of the application form is included in the 1987 guidelines for appointment (Appendix 1).

Applicants will be advised in writing of the time, date and venue of their interview with the Assessment Panel.

### **4. ASSESSMENT OF ANALYSTS**

As required by the guidelines for appointment, nominations for appointments as analysts under the Act are assessed by an Approved Analysts Assessment Panel, which makes recommendations to EPA. The panel consists of an independent convenor, an EPA representative and an outside expert. There is also provision for a representative of the candidate's laboratory to be present.

Candidates are assessed for appointment based on the following criteria:

- Professional qualifications (the original certificate of qualifications must be produced for the Panel)
- Relevant experience
- Evidence of knowledge of, and expertise in, the relevant analyses
- Referees' reports

- Working knowledge of *A Guide to the Sampling and Analysis of Air Emissions* (EPA Publication 440) or *A Guide to the Sampling and Analysis of Water, Wastewater, Solids and Wastes* (EPA Publication 441), depending on the nature of the appointment
- Knowledge of the Act and appreciation of the responsibilities of an appointed analyst
- Demonstrated ability to give evidence clearly, concisely and accurately.

### **5. APPOINTMENT OF ANALYSTS**

Following the interview, the panel submits its recommendation to EPA, which then formally determines whether or not to appoint the applicant as an analyst pursuant to section 57 of the Act.

Candidates are advised in writing of EPA's decision, including advice of the category of analyses (if any) for which they have been appointed. Unsuccessful candidates are counselled by a member of the Assessment Panel to ensure that the process is open, and to allow them to address deficiencies should they wish to re-apply for appointment at a later date.

Appointment as an analyst is independent of a laboratory's accreditation by the National Association of Testing Authorities (NATA) or the appointment of any analyst as a signatory under the NATA accreditation.

### **6. MAINTENANCE OF APPOINTMENT**

Appointed analysts must maintain their professional expertise by performing analyses on a regular basis. Where an appointed analyst has not undertaken analyses for a period in excess of 12 months, EPA should be advised so that the appointment may be reviewed.

If an appointed analyst leaves the laboratory that employed them at the time of appointment,

EPA should be advised in writing within 28 days so that the appointment can be reviewed. EPA may also review the appointment for other reasons, as set out in section 7 below.

## **7. REVIEW OF APPOINTMENT AS AN ANALYST**

The Authority may conduct a review of an analyst's appointment, with a view to considering whether the appointment should be suspended or revoked. Such a review may occur if any matter or circumstance which casts doubt on the fitness of an person to carry out the functions of an appointed analyst comes to the attention of EPA.

Without limiting the power of review, the Authority will ordinarily institute a review of the appointment of an analyst where:

- (i) A review of a certificate of analysis or an analytical report raises serious concerns about the analyst's expertise or methods
- (ii) A certificate of analysis or analytical report is considered by EPA to be unsatisfactory
- (iii) The analyst has issued an incorrect certificate of analysis or analytical report
- (iv) An analyst behaves fraudulently or deceptively
- (v) A complaint is received, and appropriately verified, about any other form of unprofessional conduct by an analyst
- (vi) An analyst is expelled or suspended from membership of a professional body for unprofessional conduct
- (vii) An analyst is found guilty of a serious criminal offence
- (viii) An analyst is removed from appointment or approval under another Act providing for the appointment or approval of analysts, or
- (ix) The analyst has not met the requirements for maintenance of the appointment.

## **8. ANALYSIS OF SAMPLES**

### **8.1 Sampling**

If court proceedings are likely to result from the analysis of samples, in most cases the sampler will be an EPA officer.

To issue a certificate of analysis, an appointed analyst must ensure that samples are taken, handled, treated and analysed according to the requirements of the latest edition of either *A Guide to the Sampling and Analysis of Air Emissions* (EPA Publication 440) or *A Guide to the Sampling and Analysis of Water, Wastewater, Solids and Wastes* (EPA Publication 441), as appropriate.

To ensure conformity with the guides to sampling, the analyst and sampler should discuss the following prior to sample collection and delivery, where possible:

- The methods to be used for sampling.
- The sample containers to be used and the mode of preservation (if any) to be employed.
- Arrangements for transport of the samples to the laboratory.

In some circumstances, it is also advisable for the sampler to brief the analyst on the context in which samples are taken so that the analyst may come to an informed view of the appropriate analytical methods and procedures to be followed. This may impact on the preservation methods to be employed or the choice of analytical method.

## 8.2 Receipt of samples

Samples should be received by the appointed analyst and placed in secure storage. Where it is not possible for samples to be delivered to the appointed analyst personally, the chain of custody must be documented (see 8.3 below).

A signed receipt for the samples should be provided. The receipt is usually a copy of the sample submission sheet. The laboratory should also provide each sample with a unique laboratory number, which should be quoted with the analytical report.

In order to determine blanks, empty containers and the reagents added to samples (where appropriate) should also be delivered for analysis.

Where samples are not collected or treated in accordance with the relevant EPA guide an analytical report should be prepared, containing a statement describing the variations from the procedures in the guide, and how these may have affected the analytical result.

## 8.3 Chain of custody

In providing analytical evidence, traceable possession and custody of samples is essential.

It is necessary to identify and document the people in possession or custody of samples, and the time and date of each transfer. A person has custody of a sample if it is in their possession or view, or stored in a designated secure area to which that person has access.

The preferred situation is when the person taking the sample hands it directly to the appointed analyst. In these circumstances, the sample submission sheet is sufficient evidence to verify the chain of custody, if both people have signed the sheet. If the sample is handled by people other than the appointed analyst and the sampler, it is necessary to document the chain of custody from the time of collection of the sample to the completion of its analysis. The documentation should be completed at the time of each transfer.

Each person in possession or control of samples should ensure that the samples are stored in a secure place where they cannot be tampered with by a third party. They should also be stored at all times as required by the appropriate EPA guide to sampling and analysis.

If samples are split, and sub-samples sent to another laboratory or handed to other analysts within the same laboratory, this must also be documented. In cases where samples or sample batches are divided, this should be noted on the chain-of-custody document. For each batch so generated, a unique set of sample number(s) should be given to the split sample(s) and documentation for the new chain of custody should be produced.

An example of the documentation required to establish the chain of custody is presented as Appendix 2.

## 8.4 Use of couriers

Commercial couriers should not be used to transport samples unless all the following conditions can be met:

- The chain of custody can be documented
- Each person is available to attend court to attest to their possession of the sample
- The sample container can be verified as tamper-proof
- The conditions of the sample (temperature, etc) can be maintained, and each person has records made at the time that these conditions were maintained.

The person taking samples should seek the opinion of an appointed analyst regarding the appropriateness of using a commercial courier to transport samples. An appointed analyst should verify that the above conditions can be satisfied before advising that a commercial courier can be used. In particular, it is important that the sampler verify that the samples will be kept in custody during transportation.

## 8.5 Analysis

All samples taken from an incident for investigation, the analysis of which may form the basis of evidence in court, should be analysed by an appointed analyst or, where this is not practicable, by an analyst working under the direct supervision of an appointed analyst.

The analytical methods used should be those stipulated in *A Guide to the Sampling and Analysis of Water, Wastewater, Solids and Wastes* (EPA Publication 441) or *A Guide to the Sampling and Analysis of Air Emissions* (EPA Publication 440), whichever is appropriate.

All tests should be undertaken in accordance with the quality assurance system existing within the laboratory.

Where another analyst working under supervision handles any part of the procedure, the appointed analyst must be satisfied that correct procedures have been followed. The appointed analyst should physically check workbooks and other documentation used to generate data for the certificate of analysis that they sign. This will enable the appointed analyst to testify in court, if required, that the level of supervision was adequate.

An adequate level of supervision includes:

- Ensuring that the analytical methods and procedures used are appropriate
- Ensuring that the analyst under supervision is experienced and competent in those analytical methods and procedures
- Checking that chain of custody documentation, sample holding time and sample preservation requirements have been complied with
- Checking that adequate quality assurance procedures have been followed, and that the results of such analysis is satisfactory
- Signing the workbooks of the analyst under supervision as evidence of having checked their work.

Where samples are analysed under supervision, the requirements for chain of custody documentation, as described in 8.3 above, should be followed.

## 9. REPORTING OF RESULTS

### 9.1 Certificates of analysis

A certificate of analysis should be used to present analytical results which represent objectively verifiable data.

Interpretation of results is permitted where the interpretation method can be referenced to a recognised and reliable source. This includes appropriate use of recognised statistical methods, or the use of established criteria for the interpretation of results, as described in some standard methods of analysis.

The certificate should be self-explanatory and unambiguous, with units and limits of detection fully explained. No abbreviations should be used unless defined somewhere in the certificate. Results should not be qualified in any way.

If there is any need to qualify analytical data, then a certificate of analysis should not be used. The results and the qualification should be included in an analytical report. In these circumstances, the analyst should expect to attend court to support their analytical report (see 9.2 below).

The samples to which the certificate applies should be identified, including the date of sampling and the identity of the sampler. The documentation demonstrating the chain of custody should also be attached to the certificate.

An example of a certificate of analysis is reproduced as Appendix 3, showing the information required to be provided.

## 9.2 Analytical reports

While the purpose of appointing analysts is to allow the preparation of certificates of analysis, there may be circumstances where this is not possible, in which case the results will be presented in a conventional analytical report.

A conventional analytical report should be used in the following situations:

- To present results which need to be qualified in any way
- Where the presentation of the results requires the expression of a professional opinion on the part of the analyst (such as interpretation of results without reference to a recognised procedure for interpretation)
- Where the results cannot be presented as objectively verifiable data.

Some examples of a qualification of results include:

- Where the samples were not treated according to the relevant EPA guide to sampling and analysis, but the analysis was performed regardless (see 8.1 above)
- Where the analysis was done by an analytical method which has not been validated against a standard method.

## 10. APPEARANCE IN COURT

Preparation of a certificate of analysis does not automatically eliminate the need for an appointed analyst to give evidence in court. Section 58(3) of the Act provides for the defendant to give at least seven days' notice in writing, requiring the appointed analyst who produced the certificate of analysis to be called as a witness. If such notice is not given, the certificate is deemed to be sufficient evidence of the facts stated within it.

Evidence in court is given under oath or affirmation.

An appointed analyst may be required to provide details of the analysis. In these circumstances, the appointed analyst may ask the permission of the court to refer to notes to refresh their memory. It is therefore important that laboratory notes are detailed and taken at the time of the analysis.

In presenting evidence, the appointed analyst should ensure that their replies relate directly to the questions asked. The analyst should speak clearly and concisely, and explain technical terms in a way that can be understood by the court.

An appointed analyst giving evidence may be recognised by the court as an expert witness, if their expertise in a particular area can be established to the satisfaction of the court. In this case, the analyst can offer opinions, but it is important to ensure that such opinions are confined to the area of expertise established. If asked to offer an opinion outside that area of expertise, it is necessary to inform the court that this is not possible.

**APPENDIX 1: GUIDELINES FOR THE APPOINTMENT OF  
ANALYSTS PURSUANT TO VICTORIAN  
LAW**

DEPARTMENT OF PREMIER AND CABINET

APPROVED ANALYSTS ASSESSMENT PANEL

FOR APPOINTMENT OF ANALYSTS PURSUANT TO VICTORIAN LAW

Victorian Law allows for the recognition, appointment or approval of “Analysts” under a number of Acts and in a variety of ways for the purposes of providing analytical evidence. Most “Analysts” so approved are employed within the Public Service, but employees of private laboratories may be approved for the purposes of particular Acts.

In the main, the intention of the statutory provisions is to enable certificates of analysis produced by an “Analyst” to be used in court as prima facie evidence. This is a very useful measure as it greatly reduces the amount of time “Analysts” are required to spend in analytically unproductive pursuits. It avoids the necessity for an “Analyst” to appear in court unless the analytical evidence is challenged. Without this device many more “Analysts” would have to be employed in the Public Service and in private laboratories and as such it is important that the system be safeguarded.

However, the criteria employed in the recognition, approval or appointment of “Analysts” varies from Act to Act as does the mechanism. In some cases no criteria are specified other than approval or appointment under a particular Act. To, ensure that abuse of the system, which would thereby bring it into disrepute, does not occur, the Premier has agreed that a common or similar approach be adopted to the approval of “Analysts” in all Victorian legislation.

- (i) An assessment panel has been established to review the suitability of applicants or nominees for appointment or approval as “Analysts” under Victorian legislation. This panel consists of a Chairman [originally Co-ordinator, State Laboratories (Chairman) or in his absence his nominee] being a nominee of the Department of Premier and Cabinet, a senior scientific officer from the Department responsible for administering the legislation for which the appointment is to be made or the approval given and a senior scientific officer from a department not connected with that legislation, and not employing the applicant or nominee. The Chairman may also invite a specialist officer as an assessor to assist him, and a representative of the employing laboratory may be invited to be present.
- (ii) The assessment panel is convened by the Chairman at the request of the Chief Administrator or Secretary of the relevant Department or Agency. Departments administering legislation pursuant to which approvals of “Analysts” are given or appointments made should submit details of candidates to the Secretary of the Panel on the appropriate form- (see attachment).
- (iii) The panel makes recommendations, based on an examination of evidence presented by the candidate and assessed against an established set of criteria, to the Chief Administrator or Chairman or Secretary of the originating Department or Agency.
- (iv) The normal criteria against which a candidate's suitability to be appointed an “Analyst” is assessed are as follows:-
  - (1) Professional qualifications and experience to meet the requirements for corporate membership of the Royal Australian Chemical Institute or in the case of non-chemical analysis equivalent professional body.
  - (2) Two years or more relevant experience except in cases (such as blood alcohol analyses) where the appointment or approval is limited to a single determination or is in a narrow field. In this case evidence of adequate training and expertise should be produced.

- (3) Evidence of knowledge of and expertise in the analyses for which appointment or approval is requested.
- (4) Reports as to the applicant's competence and character from two referees competent in the field of analyses applied for.
- (5) Knowledge of the relevant Act and appreciation of the responsibilities of an "Analyst" appointed or approved under that Act.
- (6) Demonstrated ability to give evidence clearly, concisely and accurately.

In particular the candidate is questioned on:

- (i) chain of evidence and integrity of samples;
- (ii) quality assurance in respect of analyses;
- (iii) knowledge of analyses and tests for which a certificate may be required to be produced; and
- (iv) scientific background and theory behind analyses and tests, including scientific instruments used.

The panel may recommend approval for all activities, analyses or tests applicable under legislation or may recommend approval only for a specified type of analyses or specified field of analysis, eg. microbiological examination of water.

The following Victorian Acts contain references to the appointment or approval of "Analysts".

Agricultural Chemicals Act 1958	No. 6257	Ss. 3, 13, 17B
Animal Preparations Act 1987	1987/12	S. 29
Drugs, Poisons and Controlled Substances Act 1981	No. 9719	S. 120
Environment Protection Act 1970	No. 8056	Ss. 4, 57, 59A
Fertilizers Act 1974	No. 8604	Ss. 3, 15, 22
Fisheries Act 1968	No. 7780	S. 65
Food Act 1984	No. 10082	S. 30
Health Act 1958	No. 6270	Ss. 3, 274
Health (Fluoridation) Act 1973	No. 8506	S. 11
Margarine Act 1975	No. 8720	Ss. 3, 16
Road Safety Act 1986	1986/127	S. 57

Other legislation may require analyses to be carried out for effective administration but does not make formal provision for appointment of analysts. Such legislation includes:

Stock Foods Act 1958\*  
Stock Medicines Act 1958\*  
Sheep Branding Fluids Act 1963\*  
Aerial Spraying Control Act 1966  
Stock Diseases Act 1968  
Fruit and Vegetables Act 1958

Departments are encouraged to ensure that persons performing analyses under such Acts also meet the above criteria.

\* Soon to be replaced by the Animal Preparations Act 1987.

**APPROVED ANALYST DATA SHEET**

To Department or Ministry

For appointment under

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**ASSESSMENT PANEL**

(to be completed by candidate)

Department's nominee  
(to be completed by Department)

Name of Candidate:

Home Address:

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Telephone: \_\_\_\_\_

Telephone: \_\_\_\_\_

Name and Address of Employer:

Other Panel members

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Telephone: \_\_\_\_\_

**PANEL RECOMENDATION**

(to be completed by candidate)

Candidate should be  
  
should not\* be

Other legislation under which  
  
is already an approved analyst.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(Chairman)

\_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_\_\_

Date: \_\_\_\_\_

See comments attached.

---

**FOR DEPARTMENT OR MINISTRY USE ONLY**

Approved by: \_\_\_\_\_ Certificate No: \_\_\_\_\_

Date: \_\_\_\_\_

Assessment Notes

Professional Qualifications (give dates)

Relevant Experience (give dates)

(If space insufficient, attach additional sheet)

Other Relevant Information

(Attach publication list where appropriate)

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Membership of professional bodies (give dates)

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Names and addresses of two persons to provide references of professional ability and character.

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## APPENDIX 2: EXAMPLE CHAIN-OF-CUSTODY RECORD SHEET

### Chain of Custody

This form is to be completed for all samples. It must remain with the person having control of samples. In cases where samples or sample batches are divided, a copy of this form as completed to the time of division must accompany all samples.

Sample numbers	Action	Name (print)	Location (Laboratory or organisation)	Time	Date	Comment	Signature
	Samples taken by:						
	Received by:						
	Received by:						
	Received by:						
	Received by:						
	Received by:						
	Received by:						
	Received by:						
	Received by:						

**ENVIRONMENT PROTECTION ACT 1970**

**CERTIFICATE OF ANALYSIS**

[Identification of the laboratory]

[Certificate or report number]

I [FULL NAME], an analyst duly appointed under section 57 of the *Environment Protection Act 1970*, do hereby declare that the following analytical results were produced by me, or under my direct supervision, using methods normally used in my profession. I further declare that on [date] I received samples from [name of person delivering samples] labelled as shown below. These samples were each given a unique laboratory sample number, as also shown, to ensure that all samples could be tracked in the laboratory process.

Sample numbers	Date of sampling	Sampled by	Sampling Location	Laboratory numbers

[Present a description of each sample.]

The following methods were used for the analyses:

[Insert name of analyte]                      [Insert method reference]                      [Insert date analysis started]

[Insert name of analyte]                      [Insert method reference]                      [Insert date analysis started]

[Insert name of analyte]                      [Insert method reference]                      [Insert date analysis started]

**Results**

[Present results with units and limits of detection fully explained. No abbreviations should be used unless defined somewhere in the report. Results should not be qualified in any way. Results should be reported against sample numbers not laboratory numbers. Include batch QC data.]

**Quality Control**

[Complete a statement that all the relevant QC data were generated, and that satisfactory results were obtained. Complete a statement that the requirements of the relevant EPA guide to sampling and analysis have been complied with.]

**References**

*[List any references relevant to the analysis.]*

Signed: [Signature]

Name: [Full name in block letters]

Date: [date]

[NATA stamp, if applicable]