



Labour Inspectorate
Ministry of Social Affairs and Employment

Project fumigated Containers

Report A870



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Foreword

Several millions of import containers are brought in via the (sea) ports of Rotterdam and Amsterdam each year. The products are destined for customers in the Netherlands or continue on to other countries. Import also takes place in much smaller numbers via European countries by road, other ports or inland shipping.

Especially the containers from non-European countries may contain dangerous substances intended to protect goods from contamination by vermin or fungus and to prevent the import of dangerous organisms into Europe. The substances (biocides) used for this are toxic and harmful to human health. Substances other than biocides are now also being encountered. These could be substances used in manufacture that are subsequently released from the products, for example.

There is a potential risk of exposure to these substances, whether or not they have been deliberately introduced to the containers, when workers open and enter the containers. For this reason companies must systematically prevent and manage the risks. Taking proper precautions and complying with the right procedures for opening and entering containers prevents exposure to high concentrations of hazardous substances.

Although only 4 accidents that require official notification have been reported to the Labour Inspectorate over the past 2 years, these accidents do demonstrate that the health effects of high exposure to hazardous substances in containers can be serious.

The Labour Inspectorate carried out inspections once again in 2008 at 405 companies that receive containers from abroad. A spot check at the inspected companies indicated that they received more than 75,000 containers during the inspection period. Inspections could be targeted thanks to careful selection, which also made use of information provided by the VROM [Ministry of Housing, Spatial Planning and the Environment] Inspectorate, Inspectorate for Transport, Public Works and Water Management (IVW) and Customs. It can be concluded from the inspection results that preventing and managing the risk of exposure to hazardous substances is far from common knowledge. Although compliance with the Working Conditions Act had improved slightly compared to the previous inspections in 2005, the degree to which this was the case is cause for concern. During the inspections, companies reported they found it difficult to translate the working conditions regulations to their own situations from a practical perspective.

Businesses will have to become more active in making proper agreements with their suppliers abroad about whether containers are fumigated. This prevents risks from arising here in the Netherlands. There are already examples of businesses that have made sound agreements with their foreign suppliers. As a result they can get by with spot checks for the presence of hazardous substances in these containers and the containers can be unloaded more quickly. These companies can serve as examples for other companies.

I call on the industry organisations in logistics to take an active role in working on this with their members. They can also play an important role by supporting the companies in translating the working conditions regulations to the concrete situation at their companies.

The Labour Inspectorate will continue unabated its inspections at companies that receive and enter import containers in 2009.

Managing director of the Labour Inspectorate,
J.A. van den Bos



1 Summary

The Labour Inspectorate supervises the risks associated with opening and entering spaces (such as containers) that could contain hazardous substances. Article 3.5g of the Working Conditions Decree requires employers to test the space for the presence of hazardous substances before anyone enters such a space and subsequently take measures to reduce concentrations of gas found to exceed the limit to below that level.

In 2008 some 2.8 million loaded import containers entered Rotterdam port¹. Some of these containers were opened in the Netherlands for further processing or distribution. Others remained unopened and were destined for other countries².

Opening and entering containers can entail certain risks because of the possible presence of high concentrations of dangerous gases. These gases may have been deliberately introduced to the container in the country of origin in order to combat insect infestation or may be the result of the evaporation of substances used in the manufacture of the products contained in the shipment. The health effects of exposure to high concentrations of hazardous substances can be very serious. Several accidents involving workers have demonstrated this.

As part of this inspection project, warehouses, distribution centres of wholesale companies, as well as wholesalers and importers who receive containers delivered directly from the ports were once again inspected. In addition, companies involved in goods transport and loading, unloading and transshipment activities were inspected. The companies were selected on the basis of the database of companies that had either been visited by the Labour Inspectorate as part of previous inspection projects and found to be in violation of the Working Conditions Act at the time or companies in these sectors that had not been previously inspected. Finally, reports of fumigated

containers in the ports from the other regulators (VROM [Ministry of Housing, Spatial Planning and the Environment] Inspectorate, IVW [Inspectorate for Transport, Public Works and Water Management] and Customs) also prompted inspections at the recipient companies.

405 businesses were visited in the first round of inspections. Of the companies inspected, 62 demonstrated proper compliance with the Working Conditions Act; an enforcement procedure was instituted at 343 companies (85%). During the follow-up inspection, 95% of companies emerged to satisfy the requirements and comply properly with regulations. A report was filed against the other 5% of companies who had still not complied with the testing requirement and/or the management precautions during the second (inspection) visit. These reports have now been submitted to the public prosecution department.

It emerged that many companies did not start taking measures to tackle this problem until there had been extensive media coverage of the issue. Many companies found it difficult to translate the working conditions regulations to their specific situation from a practical perspective. They therefore hired in external gas measuring experts in order to test for hazardous substances in the containers.

The Labour Inspectorate recommends that companies make agreements on the gassing of containers with their trading partners at the start of the logistics chain. This could prevent risks for workers in the Netherlands when opening and entering containers. The Labour Inspectorate is calling on industry organisations in the logistics chain to set up sample protocols that include clear testing and measuring regimes that companies can use in their specific situations.

1 | Source: www.Portofrotterdam.Com

2 | Rotterdam port has no specification for the distribution of containers opened in the Netherlands or abroad.

Ventilating the containers



Measuring the concentration of methyl bromide in the packaging.



Measuring during testing for product gases in packaging.



2 Project structure and execution

2.1 Reason for the project

In 2005 the Labour Inspectorate carried out the inspection project 'Gegaste containers 2005 – A709' [Fumigated containers 2005 – A709] as a follow up to previous projects. The results of the inspection project in 2005 showed that compliance after the first inspection visit was extremely low (3%). This prompted additional efforts in 2007 for extra information provision: raising awareness at companies that import containers could pose risks for the workers who open and enter containers and clarification of the working conditions regulations and the Labour Inspectorate's inspection method. This resulted in the publication of the brochure 'Behandeling van containers' [Handling containers], articles in trade journals in the logistics sector and the Labour Inspectorate's participation at conferences and symposia held by industry organisations in the logistics sector. It was subsequently decided that this would have to be followed up with new inspections in 2008 to substantially improve compliance.

2.2 Objectives

Inspection of companies that receive containers is aimed at increasing compliance with the Working Conditions Act and preventing and managing the risks of exposure to hazardous substances in import containers. To that end, the inspectors look for the presence of protocols customised for the company's situation in order to properly evaluate the risks of the containers. The inspection also assesses whether concrete management measures have been taken to ensure safe entry of a container that contains gases.

These measures may consist of ventilating the container, placing warning signs, having an expert measure the concentrations, the presence of measuring reports with a 'safe for entry' declaration and if necessary repeat measurements during unloading.

The inspection project aimed to increase knowledge and expertise at both the industry and company level with regard to risk assessment and risk management for hazardous substances in handling fumigated containers.

2.3 Execution

The inspection visits were conducted throughout 2008. Some of the repeat visits at the companies where violations were found took place up to the end of March 2009. If violations were found, employers were required to immediately take measures to prevent exposure to hazardous substances. If the situation resulted in serious danger, work could be halted. Companies were given three months to develop and implement protocols and procedures. Follow-up visits took place after the deadline stipulated.

2.3.1 Initial inspection visits

The first round of inspection visits to companies during this inspection project looked at the systematic approach applied by the particular company to assess and prevent exposure to hazardous substances when opening and entering containers.

Article 3.5g of the Working Conditions Decree applies here, subsections 1 and 2 of which fall under criminal law. It follows from article 3.5g of the Working Conditions Decree that a worker may not enter a space that can be suspected of containing these hazardous substances. Adequate testing must first indicate whether that danger is present. The testing must be carried out in accordance with policy

regulation 3.5g-1. If the testing indicates that there is a danger of poisoning, intoxication, asphyxiation or fire, effective measures must be taken so that workers can enter the particular area or space without danger. The testing must be carried out by experts in this area, who are aware both of the dangers and the applicable measuring methods.

The risk analysis of the joint regulators (VROM Inspectorate, IVW, VWA [Food and Consumer Product Safety Authority], Labour Inspectorate and Customs) set up in summer 2008 indicated that on average 1 in 5 containers contained dangerous gases. It also emerged that there are insufficient distinguishing characteristics for establishing a relationship between the type of goods, country of origin and fumigants used. It was determined that the majority of the over two million containers with measurable concentrations of gas or fumes in the container air that were imported in 2008 came from Asia. The analysis also showed, however, that no strong correlation was found between the type of goods and the concentration of fumigants.

Every container must therefore be viewed as posing potential danger of asphyxiation, intoxication, poisoning or fire. This makes it difficult for companies that receive and open containers to have a selective approach. In this inspection project, information provided by other regulators such as Customs and the VROM Inspectorate was also used.

On the basis of the mandatory container testing, the company can, however, divide the flows of containers into risk categories, depending on the products shipped and the origin of these containers.

- The container is definitely fumigated, the type of gas is known: the risk is present;
- It is unknown whether the container is fumigated and if so, with what, whether substances can be released from the cargo or whether processes in the container can cause substances to be released or if oxygen is removed from the air in the container: the risk is uncertain;
- The container is definitely not fumigated: there is no risk.

A container can only be safely opened and entered immediately after the container has been declared 'gas-free'. However, it is better to use the terminology: 'safe entry certificate'. If any length of time elapses between declaring the container gas-free and entering the container, gas may again have been released from the cargo, once again posing the risk of poisoning, intoxication, asphyxiation or fire.

*A container may only be entered therefore if it has been proved safe by measurements **immediately** prior.*

Interviews with workers were held to test whether they were aware of the risks and the precautions necessary for working safely.

2.3.2 Follow-up visits

During the follow-up inspections at companies that had been found to be insufficiently compliant with the requirements during the first inspection visit, it was assessed whether the company had charted out the risks and whether adequate measures had been taken to prevent exposure. If that was not the case, a report was immediately filed. In order to ascertain the violation or violations, the protocols and procedures were called up and the measures taken checked. Reports had to be shown from the measurements carried out. In addition, checks were carried out on the work site to ascertain whether workers worked in accordance with these procedures while opening and entering containers and whether the measures that the company prescribed were in fact applied.

2.4 Communication

The brochure 'Behandeling van containers' [Handling containers], which was put together in 2007 and disseminated throughout the logistics chain, was accompanied by an announcement of the inspection project in 2008. In order to further increase its reach, the digital version was also sent to the various industry organisations. These organisations devoted attention to the issue via their own avenues of communication and the brochure was referred to on the organisation's website. In order to get the topic on the agenda in an even more direct manner at industries and businesses, the Labour Inspectorate participated in conferences, held talks with social partners and made agreements to improve awareness at companies of the risks in opening and entering containers.

Contacts were established with the industry organisations and the Federation of Netherlands Trade Unions (FNV bondgenoten) to achieve improvement in raising awareness among all the parties involved. The response to this was positive and resulted in the development and provision of courses by the various parties. These parties also organised seminars, sought publicity in the national press and trade journals, set up a platform of experts and put in motion the development of a Working conditions catalogue for the transport sector.

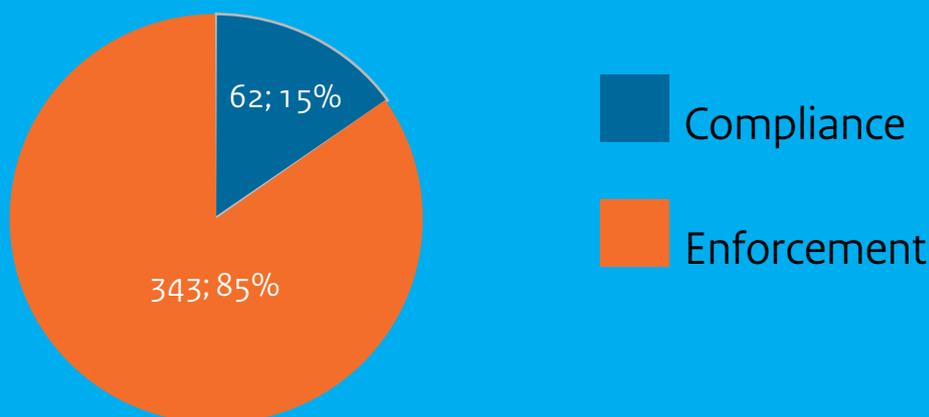
3 Project results

3.1 Total overview

A total of 405 companies were inspected during the first inspection visits in 2008. 62 (15%) of the inspected companies demonstrated proper compliance with the Working Conditions Act with regard to risks in entering spaces which could contain hazardous substances. 343 (85%) of the companies were not in full compliance with the law. Insufficient testing, if any, was conducted into the risks during opening and entering containers with hazardous substances. As a result of that, protocols, procedures and measures were absent or insufficient for managing the risks. The spot check of 192 companies indicated that more than 75.000 containers were received during the inspection period. 37 of these companies reported they did not receive any containers during the inspection period.

The high percentage of enforcement procedures instituted (85%) was due to the fact that companies knew the risks of fumigated containers but did not have a good idea of how to translate the working conditions regulations to their specific company situation. There was a good chance the inspection would encounter containers at the companies inspected, since the address selection of the companies made it virtually certain that these received containers. Finally, an increase was found in the number of containers containing dangerous (evaporant) substances in products other than the added biocides.

Total number of companies: 405



Number of businesses with violation per sector

	Number of businesses	Number of businesses with violation	Enforcement procedure percentage
Commerce	182	155	85%
Transport	126	113	90%
Industry	72	53	74%
Services	21	19	90%
Agriculture	3	2	67%
Construction	1	1	100%
Total	405	343	85%

3.2 Number of businesses with violation per sector

In order to arrive at an effective and efficient selection of businesses, it was decided that companies meeting the criteria below would be inspected:

- Companies that were known to the other regulators (Customs, VROM Inspectorate) as recipients of import containers;
- Companies that were found to be in violation during the previous Labour Inspectorate inspection projects concerning fumigated containers;
- New companies that had not been inspected previously.

3.3 Number of businesses with enforcement procedure after initial inspection visit

Various instruments for enforcement were used during the initial inspection visit. If immediate danger could not be demonstrated, a warning was issued with a term of three months to set up adequate protocols and evaluate the risk through testing. If it emerged during the inspection or from the testing that there may have been a danger of asphyxiation, intoxication, poisoning or fire, precautions had to be taken immediately to prevent exposure. Employees were not permitted to open or enter the containers before this was done. In one case a report was filed immediately in the first phase because of a repeat offence. The company in question had already been reported for the same violation in 2005.

Number of businesses with enforcement procedure after initial inspection visit

Number of businesses with enforcement procedure 1st phase	Agriculture	Industry	Construction	Trade	Transport	Services	Total
Working conditions warning	2	52	1	152	113	18	338
Report filed				1			1
Work halted		1		3			4
Total	2	53	1	156	113	18	343

The work halts consisted of a ban on opening and entering containers and the requirement to first conduct measurements. The basis for this action was the strong suspicion of inspectors from the VROM Inspectorate and Customs that the relevant containers would be unloaded while they could have contained high concentrations of methyl bromide or phosphine.

3.4 Number of businesses with enforcement procedure after the follow-up visit

Fifteen reports were filed during the follow-up visits. Companies had not satisfied the requirements within the term given as stipulated in the warnings issued after the initial inspection visit. It emerged that containers had still been opened and entered without adequate precautions being taken to prevent exposure to dangerous gases.

3.5 Signals and developments

After the conclusion of the first inspection visits in 2008, it emerged there had been a slight improvement in the number of companies in compliance with the regulations for safely opening and entering import containers: from 3% in 2005 to 15% in 2008.

During the follow-up visits, official reports were filed for violations at 15 companies that were still not fully in compliance. That is an increase compared to previous years.

One explanation for this is that the approach of the project in 2008 had been (partially) changed with respect to previous projects, so that official reports could be filed in the follow-up inspection even if the offence was not discovered in its commission. Official reports were also filed now in the event procedures and/or measuring reports were missing. In addition, such reports were filed if no concrete measures, or highly inadequate concrete measures had been taken and the workers had not been informed, or not sufficiently informed, about the risks involved in opening and entering import containers.

3.6 Results monitor

During the inspection visits, the inspectors asked employers questions to gain more insight into their

knowledge and awareness of the risks, their ways of dealing with these risks and the scope of the problem.

This resulted in the following results and insights: Most companies said at first that they had not been informed by their industry organisation about the brochure developed by the Labour Inspectorate. However, many have started efforts in this area because of inspections by government agencies or media coverage. Sending the brochure to the companies known in advance to the Labour Inspectorate who had been selected for this project and were eligible for inspection did not result in the desired preventative attention/policy on the company level.

Most of the companies (between 89% and 96% per sector) did have a risk inventory and evaluation (RI&E), but the risks involved in opening and entering import containers were hardly included in these. It also emerged in the first inspections that a very limited number of companies (16%) had prepared a systematic approach for their own container flows, or a measuring protocol.

Because an inventory of the specific risks is missing, insight into the problem and the systematic approach needed to manage the risks is lacking for the evaluation.

The companies questioned in the spot check said that during the compulsory testing measurements were taken of 10,270 containers from a container flow of more than 75,000 containers. Just 4% of the containers tested contained hazardous substances in concentrations that exceeded the limit. Companies also made a categorisation of the container flow on the basis of the testing. Of the companies asked in the spot check, it emerged that 77% had categorised this flow as 'definitely not fumigated'.

These companies measured their container flow, or part thereof, on the basis of criteria drawn up themselves. These measuring results show that only a very limited percentage emerged to be in excess of the limits. Evaluation of the measuring reports shows that it often involved slight excesses. This does not alter the fact that there is a risk of exposure and with it, risk of damage to the health of those who are exposed. The percentage of containers with values above the limit is of the same order (5 to 16%) as emerged from previous investigations³.

The majority of the companies responded to the first inspection visit by putting a procedure down on paper, investigating the risks involved with opening and entering

³ | Reports from the Labour Inspectorate 2005, RIVM [National Institute for Public Health and the Environment] 2006 and Interdepartmental risk analysis 'container with dangerous gases'.

The container shown next was declared 'safe for entry' after measurements were taken between the seals of the doors. The photograph shows additional measurements being taken inside the cargo itself in order to be on the safe side.



Carrier tubes can be used in the indicative control measurement for the presence of hazardous substances in the container.



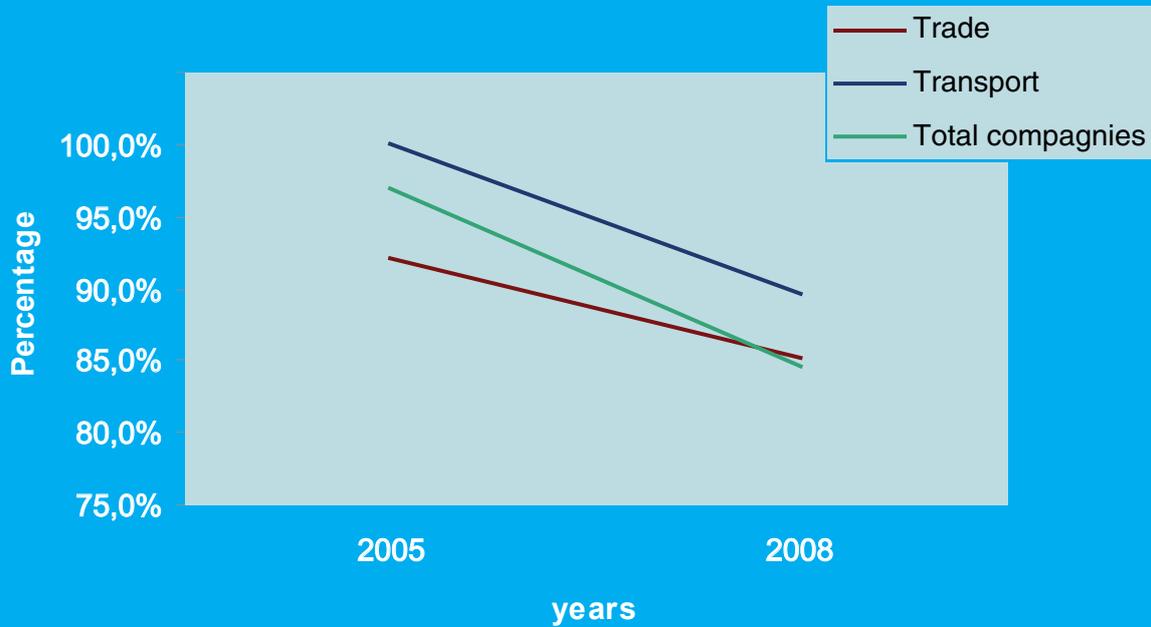
Measuring during testing for product gases in packaging.



containers received and having measurements taken by gas measurement experts or specially trained employees. Still many companies reported they found it difficult to translate the working conditions regulations to their specific situation in practice.

For the practical translation of the working conditions regulations, companies bring in external gas measurement experts to test for hazardous substances in the containers. This is primarily the case for companies that receive smaller numbers of containers. The companies with large container flows often have expertise in house and are more likely to have effective possibilities for making agreements in the chain and as such apply policy at the source. These possibilities are probably more limited for companies who receive far fewer containers

Progress of Enforcement percentage in the sectors Trade (retail and wholesale) and Transport compared to total number of companies:



	A709 - 2005	A709 - 2005	A870 - 2008	A870 - 2008
	Number of businesses	Number of businesses with violation	Number of businesses	Number of businesses with violation
Trade	25	23	182	155
Transport	27	27	126	113
Total companies	64	62	405	343

4 Conclusions and recommendations

4.1 Conclusions

The result of the previous project in 2005 showed that the spontaneous compliance percentage during the initial inspection visits was particularly low (3%). In 2008 spontaneous compliance emerged once again to be low (15%) during the initial inspection visits (1st phase), although this did represent a slight improvement.

The compliance percentage meant that the enforcement percentage was high (85%) during the initial inspection visits. This is related to a number of aspects.

1. A substantial increase in the total number of companies that had not been previously inspected.
2. The failure to adequately translate working conditions regulations into operational management at companies, despite the fact that companies are aware of the problem of fumigated containers because of media coverage and the Labour Inspectorate's information efforts.
3. The use of hazardous substances in products that are produced in countries with emerging economies, such as China, results in the discovery of hazardous substances other than the biocides that are deliberately added to containers for shipping.
4. The insight that has been gained that containers that are initially declared gas-free could once again build up gas concentrations as a result of the evaporation of hazardous substances from or between the cargo has resulted in stricter enforcement by the Labour Inspectorate.

Companies are required to comply with the starting point that containers must be entered immediately after being declared gas-free. A container must therefore be 'safe for entry'. A container that was degassed in the port, in another country or a day earlier is no longer 'safe for entry.'

Re 1. Because of this increase more companies of different sizes were also visited. Especially smaller companies have in general fewer facilities to arrive at a structural and systematic approach via protocols and procedures. These companies must not only take concrete measures, but also provide for a systematic approach via protocols and procedures.

Re 2. Industries and companies were informed well in advance of the risks and the approach of the Labour Inspectorate. The assumption was that increased risk awareness at companies with respect to the problem would result in better compliance during the initial inspection visits. This did not turn out to be the case. Companies evidently have difficulty introducing a systematic approach in their business situation.

Re 3. In the (relatively recent) past attention was primarily devoted to biocides that were used in shipments that are susceptible to deterioration. The use of hazardous substances in products from countries with emerging economies has now resulted in the discovery of other hazardous substances in shipments where this was not necessarily expected. This requires more extensive measurements.

Re 4. Testing as referred to in article 3.5g of the Working Conditions Decree must demonstrate that there is no risk of exposure to hazardous substances in a space. If the container is not unloaded immediately thereafter, but closed for further transport, there is the risk that the atmosphere in the container could once again reach concentrations in excess of the limit. This way of working can provoke a false sense of security, because companies and workers might be misled by the 'guarantee' of a gas-free certificate.

Companies had to adjust to the legal requirements within a short period of time. During the follow-up inspection for the enforcement procedures, most companies were on the right path. During the follow up inspection visits in 2008 and the beginning of 2009 it was ascertained that more than 95% of the companies were in compliance with the applicable requirements for preventing exposure of workers. Where this was not the case, a follow-up procedure was started. In total 15 official reports were filed.

The absence of proper insight into the substances that could possibly be found and the measuring regime tailored to these can result in an inaccurate evaluation of the risk or a misinterpretation of data gathered through (own) measurements. Measurements must be performed by an expert, on the basis of a targeted measuring strategy. Measurements must also be evaluated by an expert. In many cases, this does not occur. The engagement of an expert to provide insight into the risks and the right approach and to set up and implement the right procedures for working safely with containers is essential. Companies appear to have great difficulty in designing a measuring regime that is appropriate for their specific business situation.

The target provisions as laid down in the Working Conditions Act do not provide clarification concerning the measuring regime and the desired level that the expert must satisfy. This results in uncertainty with employers and employee organisations and companies involved with regard to what criteria a measuring regime and gas measurement expert must satisfy.

4.2 Recommendations for the companies and industry organisations

1. The inspections indicated that especially the larger companies achieve a source approach through contractual agreements with suppliers and shippers. A few industry organisations have joined these efforts by advising members to make contractual agreements with the partners in the chain. This should be imitated throughout the sectors. Employers' organisations could make agreements in a broader context with trade partners abroad concerning the manner in which the risks could be better managed at the start of the chain. They can also stimulate their members to make contractual agreements with suppliers.
2. Efforts must be aimed at increasing knowledge and expertise with all parties that are involved in handling fumigated containers. Determine what this knowledge and expertise should look like. Decide what criteria a gas measurement expert must meet.

3. Set up widely available and practical protocols that include testing and measuring regimes on the basis of the agreed criteria. This allows for customisation for individual companies.
4. Provide support to companies that they can rely on when introducing a systematic approach and designing and introducing a measuring regime that is appropriate for their operational management.

4.3 Efforts of the Labour Inspectorate in the coming years

The conclusions show that there are few companies that spontaneously comply with the Working Conditions Act.

The Labour Inspectorate is investigating the possibilities of more effective enforcement via administrative fines in this area in order to be able to more quickly sanction companies that lag behind in future.

The results of the project in 2008 give reason to continue inspections in 2009 of companies that receive import containers. The enforcement will have to be tightened up for companies that are repeat offenders. Companies that are once again lacking effective measures to prevent exposure of workers to hazardous substances will be fined immediately. After the Labour Inspectorate is notified by other regulators about containers containing hazardous substances, the recipient companies will be informed and inspected.

In autumn 2009 the Labour Inspectorate will organise a conference to inform the labour inspectorates from other EU member states about the problems of fumigated containers and how inspection and enforcement takes place in the Netherlands. This is aimed at raising awareness to the risks in other EU member states and harmonising the approach in order to promote a level playing field in the EU member states.

5 Annex: overview of number of businesses in sectors visited

		Number of businesses	Number of businesses with violation
Trade	Wholesale and distributive trade	140	120
	Retail/rep. of consumer goods	29	22
	Cars/motorcycles/petrol stations	11	11
	Accommodation/meals	2	2
	Trade	182	155
Transport	Services for transport	83	74
	Land transport	42	38
	Water transport	1	1
	Transport	126	113
Industry	Textile manufacturing	12	11
	Prod. machines and equipment	8	7
	Food and drink	8	6
	Prod. chemical products	10	5
	Prod. of rubber/synthetics	6	4
	Construction material and glass	4	4
	Prod. furniture/other goods	4	3
	Paper industry	3	2
	Metal products industry	2	2
		Number of businesses	Number of businesses with violation
	Other electric machinery/necessities	2	2
	Medical equipment/optical instruments	4	2
	Prod. means of transport	4	2
	Prod. leather and leather goods	1	1
	Publishing, printing	1	1
	Telecommunication equipment	1	1
	Basic metals industry	1	0
	Office equipment and computers	1	0
	Industry	72	53
Services	Financial institutions	9	8
	Other professional services	8	7
	Property brokering	3	3
	General government administration	1	1
	Services	20	18
Agriculture	Agriculture and hunting	3	2
	Agriculture	3	2
Construction	Construction	1	1
	Construction	1	1
Total		405	343

Colophon

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