



Statement of Opinion on the Peers' Report forming part of the:

**reaccreditation by the Foundation for
the Accreditation of Study Programmes in Germany
(GAC) for programme and system accreditation**

**renewal of membership of the
European Association for Quality Assurance in
Higher Education (ENQA)**

**renewal of membership of the
European Quality Assurance Register for
Higher Education (EQAR)**

Last revision: 30.05.2016

Table of Contents

A Statement of Opinion on the European Standards and Guidelines (ESG)	3
Criterion 2.1: Consideration of internal quality assurance	3
Criterion 2.2: Designing methodologies fit for purpose	3
Criterion 2.3: Implementing processes	5
Criterion 2.4: Peer-review experts	7
Criterion 2.5: Criteria for outcomes	9
Criterion 2.6: Reporting	9
Criterion 2.7: Complaints and appeals	10
Criterion 3.1: Use of external quality assurance procedures for higher education	12
Criterion 3.2: Official status	12
Criterion 3.3: Independence	12
Criterion 3.4: Thematic analysis	15
Criterion 3.5: Resources	16
Criterion 3.6: Internal quality assurance and professional conduct	16
Criterion 3.7: Cyclical external review of agencies	17
B Statement of opinion with regard to the observation of supplementary criteria of the Accreditation Council	18

A Statement of Opinion on the European Standards and Guidelines (ESG)

Criterion 2.1: Consideration of internal quality assurance

Evaluation of the peers:

„Insofar as criteria catalogues of third party organisations can also be used, it has been assured that the only catalogues that come into consideration are those that comply with the ESG, meaning that they observe Part 1 of the ESG. However, this is not yet sufficiently clear to outsiders.“

ASIIN takes on board the peers' proposal that the conditions under which a list of criteria can be used for evaluations according to type 1 need to be clarified in a more transparent way for third parties.

Criterion 2.2: Designing methodologies fit for purpose

Documentation

„However, the certification committee, which is part of ASIIN Consult, only has representatives of universities, universities of applied sciences and representatives of professional practice.“

Following an activities evaluation performed by the Certification Committee, ASIIN plans to reform this area in the future and the remarks made by the peer team will be taken into account.

Evaluation of the peers

„The criteria for certification of modules and courses are based on the quality control loop (Plan-Do-Check-Act). [...]However, this is not yet assumed without doubt based on the corresponding criteria document. Instead, reading the document (Annex 6, p. 6) may give the impression that the applicants can freely choose which external reference source the review is done by.“

The peers are right in their assumption that the plan-do-check-act (PDCA) control cycle represents a fundamental instrument covering all activity areas of ASIIN, whereby particu-

lar importance should be attributed to C and A of this quality control cycle. In ASIIN's criteria document this is recognisable in the following places: The wording on page 6 of the aforementioned criteria document only refers to the extra option embedded there to perform an allocation to another qualifications framework, such as a national qualifications framework or professional guidelines, in addition to the mandatory examination of certification criteria per se as well as the equally mandatory allocation to a level of qualification within the European Qualifications Framework. It is only in this respect that the applicant has the opportunity to select an external reference source prior to the commencement of proceedings. We are happy to specify the formulations in the criteria document more precisely.

Evaluation of the peers

„Indeed the agency has already taken steps towards a better “mixing” of the committees and expert groups and showed concern for the matter during the on-site visit. The experts However, found that the findings from the last reaccreditation procedure in 2011, that the members of the committees and expert groups showed a great deal of homogeneity with regards to subject disciplines, age and gender, were confirmed once again.“

The concern of the peer team meets fully with the intensive efforts that have been ongoing for years on the part of ASIIN to optimise their pool of peers, the most important resource of any agency, whereby all those party to the system fight for a limited reserve of peers who are prepared to participate in the process.

For years now ASIIN has been taking advantage of **every available opportunity** to broaden and diversify its pool of peers through exchanges with faculty and departmental associations, both domestic and overseas, through talks with the DAAD and the GIZ and other scientific organisations.

The peers' findings in detail:

ASIIN's committees reflect the gender situation in the corresponding departments and faculties of universities and universities of applied sciences and therefore also social reality. Nevertheless, it is encouraging to note that it has been possible in recent years to significantly increase both the number of women in the ASIIN committees and also the number of female peers. These efforts will continue to be pursued in the future. With a view to the disciplines, the ASIIN committees are very well established, insofar as this is deemed appropriate. In the Accreditation Commission for Degree Programmes, all fields covered by ASIIN are represented by several people. ASIIN's Technical Committees orientate themselves naturally towards a corresponding discipline in its selection of members, but cover the entire range of topics within that scientific discipline. In the audit teams a mix of disciplines is only desirable to a lesser extent as higher education institutions in the

mathematics, computer science, natural sciences and technology disciplines do not accept peers outside the subject areas concerned.

With regard to the age structure of the committees, it is to be noted that only a very small proportion of the members is already in retirement. In recent years ASIIN's committees have made successful efforts overall to "rejuvenate" the members. The current situation is that only a few remaining committee members are in retirement and they retired from working life during their current term of office. However, the peer team has correctly assessed that the committees' age structure is reflected in higher education institutions and thus only a few really young people – with the exception of students – are represented in the committees. This is also not offset by industry representatives as, according to ASIIN's requirements profile, they need to demonstrate practical experience with university graduates and can therefore not be right at the beginning of their careers.

All things considered, we share the opinion of the peers that it is a sensitive topic that should be pursued by the whole system; in our opinion, this includes public recognition of the peer review system as well as legal questions on exemption for peer review activities or the tax treatment of compensation of expenses.

Criterion 2.3: Implementing processes

Evaluation of the peers

The outline of the procedures is also transparent for (type 1) evaluations through the representation on the agency's homepage. Follow-up processes are naturally designed in a less formal way here than in accreditation procedures. However, the agency should initiate the implementation of recommendations and/or offer to assist in their implementation. On-site visits should also generally take place and principles should be established which state in which cases on-site visits are not necessary. The experts moreover see a deviation of the agency from their own internal guidelines. As at least in the use of evaluation results for programme accreditation in Slovenia, ASIIN did not employ any predominantly new expert groups, although it provides for this even in its policy paper on the separation of consultation and accreditation for study programme-related and subject-related evaluations.

The correct information from the peers is consistent with ASIIN's current practice: With regard to follow-up processes and the possible waiving of audits, it is common practice that the concept of evaluations according to type 1 works on the basic approach of an audit. Only in the type-2 evaluations can an audit be waived at the request of the higher

education institution and possibly depending on the subject of an evaluation, insofar as this is deemed appropriate.

It is also correct that, in the proposal, ASIIN regularly offers applicants a follow-up in line with the evaluation concept. This offer has so far been gladly accepted by higher education institutions (e.g. feedback/analysis workshops in Slovenia, follow-up evaluations at the University of Kiel, subsequent award of the ASIIN System Seal including requirements and recommendations in Slovenia and Austria).

ASIIN's corresponding policy on the separation of consulting and accreditation determines that the peer team must comprise a majority of people for the accreditation process who were not already peers in the preceding evaluation. The re-deployment of a minority of peers from an evaluation to a subsequent accreditation procedure on the same subject is possible for the purpose of improving the information basis. If a peer was already involved in an evaluation where the results are the fundamentals of a subsequent accreditation procedure, this must be made transparent to all those participating in the procedure.

In the case of the subsequent accreditation procedure reported by peers at the University of Ljubljana, Slovenia, there was a deviation from this principle and the peer team was identical to that of the previous evaluation procedure.

ASIIN continues to follow the approach stated in our policy that, in a degree programme or subject-specific evaluation under the umbrella of ASIIN, an accreditation procedure related to the same degree programme can take place only if the majority is made up of new peers and the underlying evaluation report is not more than two years old. Furthermore, if the submitted evaluation report provides an adequate basis of information in relation to the criteria accreditation according to the responsible committees, the accreditation procedure can be simplified, e.g. an audit can be waived. These principles will continue to remain in place and be followed by ASIIN for subsequent accreditation procedures.

Criterion 2.4: Peer-review experts

Documentation

„It was not possible to clarify which preparatory measures the agency arranges for experts of the evaluation procedures.“

We would like to provide further explanations on this here: Since the peers for the evaluation procedures predominantly come from the pool of peers of the programme and system accreditation, an identical training offer by ASIIN is also made available to them.

Another key indication is that part of the fixed components of the evaluation offers is that a briefing module is carried out with the peers (analogous to the preparation for the accreditation system). In addition to a first acquaintance, this briefing module, which takes place either at a meeting or by telephone/video conference, focuses on the clarification of the assignment, criteria security, the role of the peers and a discussion of outstanding issues, amongst other things.

Evaluation of the peers

„Through discussions with foreign contractors during the on-site visit it was also established that students and representatives of professional practice were not included in the evaluation and accreditation procedures in Slovenia in all cases.“

First of all, it should be mentioned that the peer's findings refer to a very specific, singular process, which is virtually a doubly subsequent evaluation. At the University of [...], an evaluation of the quality management system was first carried out in four faculties. In coordination with the university, all stakeholders were to be represented in these peer teams, since in this first evaluation, fundamental issues regarding the structure (here: the ability to study, involvement of students and the consideration of their interests as well as cooperation with the industry) were already to be clarified for subsequent procedures. The competence of the students and industry representatives was deemed of key importance here. Owing to the scope of the evaluation being limited to only one faculty, the degree programmes on offer could be assessed already at this stage and concrete observations were made to some extent to the following peer teams. ASIIN even managed to adequately replace a student peer who had fallen ill three days before the audit, in order to ensure the participation of students in all procedures. The subsequent certifications directly recognised the results of the systemic evaluation, meaning the perspective of both the students and the industry were sufficiently taken into consideration, in our opinion.

Evaluation of the peers

„For another thing, a suitably large expert group for the number of study programmes to be assessed is needed not just for procedures in the jurisdiction of the Accreditation Council (where it is established through special regulations that the expert groups are sufficiently large for bundle procedures) but also for bundle procedures abroad.“

The peers' comments are valuable and are in line with the philosophy of all ASIIN criteria to deploy sufficiently large peer teams. Even at the risk of substantial competitive disadvantages, as, according to feedback "from the market", ASIIN in general plans much larger teams, we remain true to this philosophy. Our principles are taken into account especially in cluster formation in procedures abroad. The Technical Committees have to give their approval to the groupings and to the intended peers within the scope of the proposal. Here the same discussions take place as during an accreditation procedure in Germany. This means it is agreed with the Technical Committees which degree programmes can sensibly be grouped together and which peer profiles are necessary for this.

Evaluation of the peers

„. However, the pool of experts should be expanded to include more foreign experts. This also applies to procedures for system accreditation, but not only these.“

Many thanks for this remark. Extending the pools of peers with experience in different education systems is one of the most important strategic objectives of ASIIN in connection with the expansion of our international activities. We are currently involved in exchanges on the issue with our partner DAAD, with GIZ, with chambers of commerce, academic institutions, foreign offices and our industrial partners in order to be able to recruit the best foreign peers.

Evaluation of the peers

„However, measures should be taken to improve the professional diversity and other differences in the expert groups“

We would like to thank you for the peer remarks, but at this point, we can only point out that we have actually never seen any evidence from our systematic customer satisfaction surveys that there is criticism of the professional composition of our peer teams; the opposite is the case, to our delight. It is particularly the technical expertise and adequacy of the peer teams which are highly regarded unanimously by our higher education institution customers and which play a key role in our being commissioned.

Evaluation of the peers

„The experts consider participation in structured preparatory briefings of experts by contrast not just in system accreditation, but also in programme accreditation to be desirable due to its central significance for quality of procedures.“

The training of peers in the programme area is not only a permanent subject for discussion within ASIIN. The Accreditation Council has also run an analysis of the training concepts of the different agencies and has several times discussed the possibilities of "compulsory training". In all of these discussions the argument goes that, owing to the structure of the German accreditation system in the programme area (key aspects here are: volunteer activities, duration and cost of the procedures, number of procedures to carry out in total), compulsory training does not appear feasible. Even the need can be questioned, since the active peers mostly know their role very well from other peer activities (internal higher education institution reviews, German Research Foundation peers, etc.). We are convinced that with our concept (regular training offers, check-lists and information in advance; preliminary discussion, composition of the peer teams with experienced and inexperienced peers) we sufficiently fulfil the demand and the objective.

Evaluation of the peers

For (type 1) evaluations [...] However, the process through appointment by the head of office has so far not been formalised or transparent. There are also mandatory stipulations lacking for the preparation of the expert groups.

For the preparation of peers, see the above comments. The process for assigning peers will soon be revised.

Criterion 2.5: Criteria for outcomes

No further comments (cf. criterion 2.1).

Criterion 2.6: Reporting

Evaluation of the peers

„However, during the on-site visit the expert team found it problematic that the agency associated evaluation procedures with accreditation procedures abroad in such a way that to begin with a (type 1) evaluation procedure was carried out based on the ASIIN criteria for the programme seal or for the system seal, However, the awarding of the corresponding seal was only requested subsequent to it because of the positive result of the evaluation procedure. In these cases the reports on the accreditation decisions that re-

sulted from them lacked any clear identification that the accreditations were declared based on a previous evaluation procedure.“

As explained in the audit, ASIIN has learnt from their initial experiences with subsequent certifications. Although the context of the procedure was clear both internally and also for the applicant higher education institution, we had to realise that this is not clearly identifiable for others. Therefore, the concept for the following evaluations and subsequent procedures for the award of the ASIIN System Seal has already been changed and the peer reports follow a new structure. In addition, the evaluation report is published in direct connection with the report on certification. The new representation can be viewed on ASIIN's website: <http://www.asiin-ev.de/pages/de/asiin/akkreditierung-systeme-institutionen/akkreditierte-systeme-institutionen.php>

We expect that this captures the suggestions put forward by the peers.

Criterion 2.7: Complaints and appeals

Documentation

The documentation for application contains no information on how the agency handles complaints.

Here we would like to add that it is the standard process in all evaluations that the applying institution submits the report for a statement of opinion. If the evaluation report contains false information, for example, it is possible to correct this before creating the final version. In substantive assessments by the peers a feedback loop with them is, of course, necessary.

Evaluation of the peers

„In the area of certifying modules and courses, by contrast, the object, procedures and terms of the appeals procedure are not regulated so as to be sufficiently binding. The general reference in the criteria document is just as insufficient as the naming of formal requirements and terms in the letter to the applicant.

[...]

However, the agency should make the public aware of the option to submit complaints.“

The peers' comments will be included in the proposed reform of the certification area.

In terms of the second point raised by the peers, it is the perspective of ASIIN that especially in the area of complaints, the potential party causing the complaint must be suffi-

ciently informed about the available possibilities and the procedure. Information provided to the public appears to play a minor role in this, since they are not directly entitled to complain.

Criterion 3.1: Use of external quality assurance procedures for higher education

Evaluation of the peers

Following up this definition, the agency should clearly define how “type 2” evaluations differ from “type 1”. This difference has not been sufficiently clear to the expert team. The second step requires a transparent distinction and outline for third parties (in particular via the homepage). The term “evaluation” should no longer be used for type 2.

We are happy to take up the comments of the peer team to make the distinction between the two types of evaluation even clearer. The complete absence of the word "evaluation" seems difficult for us, at worst infeasible, as many applicants use exactly this term internally and in their calls for tenders without making a claim for an ESG-compliant evaluation. This term is used in many ways, especially in German-speaking countries, not least in teaching evaluations, project evaluations, etc.

Criterion 3.2: Official status

No further comments.

Criterion 3.3: Independence

Evaluation of the peers

However, the subject of the independence of the experts deployed by the agency was raised during the on-site visit. As they were entered into the pool of experts on the suggestion of the member organisations or other institutions relevant to the field (see ESG standard 2.4), there is a potential danger from the perspective of the expert group of influence being exerted by these organisations.

As made clear by the discussion of these issues during the audit, the theoretical reasoning of the peer team ("the potential risk of influence") meets with incomprehension and bafflement of all parties, as we were given no indication in the audit that the theoretical construct of a blanket bias would even begin to be proven.

Against this background, we want to explain again in detail our position at this point, both in terms of the understanding of our committee members and also our principles of peer selection and understanding of the role.

Neither the committee members nor the ASIIN peers (be they faculty associations, departmental associations, technical and scientific associations, trade associations or member organisations) serve as representatives of the institutions eligible to submit proposals. This is clear from the principle that all committee members are elected in their personal capacity and not for their function. This means that if a committee member decides to give up a position in another institution during his/her term of office, his/her term of office within ASIIN remains unaffected. The only exceptions here are the members of the Board, who act as representatives of an organisation, but have no influence on the accreditation/certification processes. It should be noted in this context that unlike most players in the system, ASIIN does not accept any individual memberships of higher education institutions in its membership structure, specifically to exclude any exertion of influence.

As regards the legitimacy of ASIIN peers, the proposals come from a wide range of stakeholders from the academic, scientific and economic fields.

Self-nominations are not possible at ASIIN and all peers undergo a screening process of their suitability to be a peer before being officially appointed.

Merely for the sake of completeness: all peers sign a statement of independence in their activities and we have no reason to believe that they do not feel obliged by it.

Through the composition of the peer teams with representatives from universities, universities of applied sciences and industry it is also theoretically impossible to see how some kind of "organisational influence" could take place. Why a membership of a faculty or departmental association would already justify the assumption that there would be a risk of undue influence is incomprehensible as each peer in the system has a specific organisational involvement or professional background; at the same time, it is completely impractical to use only peers who are not engaged in other institutions.

If there were cases of peer misconduct, the multi-phase ASIIN system of checks and balances in peer selection would anyway be suited to an extraordinary degree to provide corrections, if this were necessary.

All things considered, we have no evidence of a structural problem concerning a possible independence of peers. If there were, it would have to be proven to have a basis for any possible pursuance. On the contrary, we believe that the complex ASIIN peer selection

system with its checks and balances at all levels is one of the great strengths of our organisation and is a national and international role model.

Evaluation of the peers

During the on-site visit, the expert group also raised the problem of committee members who were active as experts in a procedure not being entitled to vote, but taking part in the consultations in the committees. The agency representatives by contrast took the view that the committee members concerned could provide valuable input and report on the procedures "first hand". The expert group is critical of this. This is because being present at the consultations means that the committee member concerned can have an influence on the discussion.

We see our approach as a good working practice to obtain information first-hand if required. In addition, the committee members have practical experience in the accreditation process, which is helpful in the development of criteria and procedures. ASIIN's practices were already addressed during the previous accreditation process of ASIIN by the Accreditation Council and were assessed as being "not problematic"¹.

Furthermore, we would like to point out the following aspects which speak in favour of us maintaining our principle:

- The introduction of the rapporteur principle: owing to the fact that for almost two years the reports have always been assigned to a group of AC members, an intensive examination of the report by several AC members is guaranteed. For this reason, any influence can be virtually ruled out.
- Discussions in several committees: for the most part, the reports are submitted to more than one Technical Committee for discussion, which make quite differing recommendations to the Accreditation Commission. This ensures an analysis comprising different points of view.
- Limiting the committee members in a process: during appointment care is taken to ensure that a maximum of one committee member will be involved in any given process.

Contrary to the fears of the peer team, we expect a positive impact on the process when a direct rapporteur is on site. In this context, there were several situations in

¹ Original text from the previous audit: "The possible combination of committee membership and membership of a peer team mentioned in the application rationale (page 20f.) is not problematic with respect to the AC programmes and the Technical Committees, despite the fundamentally different roles of peer teams and committees, since the independence of these committee members is ensured by the provisions in the Bye-Laws, which state that members of committees who worked in a consultative process as a peer do not participate in the corresponding vote."

which the discussion about the process was interrupted to be able to consult again with the speaker of the peer team.

Criterion 3.4: Thematic analysis

Evaluation of the peers

„The annual meetings held regularly by ASIIN, along with the performance of ASIIN’s work, indeed serve the analysis of current problems and issues of quality assurance, however, as far as can be seen, they do not serve the analysis of findings ascertained by ASIIN in its own work. Also, no elaborate meeting documentation with summary analyses is published, but instead just presentations.“

We agree with the analysis by the peers that continuous analysis of the overall system is of key importance. Thematic analyses were and are therefore the focus of our own strategy development. Only from knowing the interdependencies of the system can one ascertain any approach at all for process optimisation and the adaptation of an agency to the needs of the market; it is thus one of the "survival strategies" to consider this.

Whether this is best done by conference proceedings or by continuous further development of one’s own portfolios or of applicable instruments remains to be seen.

In any case, ASIIN sees itself as a system player and there are three quick examples from the recent past to prove this. First was our "System conference" (impact of QA) organised a few weeks ago in Berlin for exactly this purpose, to promote the missing impact assessments in the overall system and we are delighted to have gained the GAC as a partner in achieving these goals. Our international networks are also of key importance in the treatment of system issues, as only together we can optimally realise this. In the CEENQA network, ASIIN is significantly involved in the organisation of systemically important workshops (a few weeks ago there was one on the topic of "accreditation of joint degrees" and also recently, at the level of EASPA, the third global meeting of professional accreditation agencies took place with its main focus on the effectiveness of academic and professional mobility).

On the "micro level", it is the systematic evaluation (via regular employee meetings, annual conferences, peer and customer satisfaction surveys, etc.) of our accreditation activities/results, which find their way into the selection of main topics for our newsletter, members' information, selection of conference topics or adjustments to our instrumentation.

Criterion 3.5: Resources

Evaluation of the peers

However, as 16 programme accreditations per year, each taking [...] working days, is already enough to exhaust the annual working time contingent, the expert group asked whether cross-departmental tasks that accumulate at the consultant level are taken into account for the calculation of the working days.

First, we would like to point out that not all process supervisors execute [...] programme accreditation procedures per year. In 2015 about [...] procedures were executed, meaning that on average each process supervisor completed [...] procedures. Second, a further [...] working days would also be available for cross-sectional tasks in the supervision of [...] procedures. The [...] procedures per year are merely for calculation and as a warning that a process supervisor may be over-burdened and that the workload needs to be balanced. It is also key to note that each process supervisor has the option to pass a process to colleagues on a central list to prevent an overload (this is often the case during peak times in May/June and October/November).

Criterion 3.6: Internal quality assurance and professional conduct

Evaluation of the peers

The designation of those responsible for processes is also only in planning. A new QM structure should show the core processes and contain a clear assignment of responsibilities.

We can already at this point document the further development of the new system. Enclosed is the assignment of responsibilities.

Evaluation of the peers

It should also, in accordance with the recommendation of the last reaccreditation of the agency, discuss the results of these analyses with committee members, employees and experts.

The discussion of the results of the customer and peer survey is one of the recurring discussion points in the regular meetings and committee meetings. After inspection by the peer team the current report was completed and will now be discussed in the upcoming committee sessions in June this year. We enclose the report as an annex.

Criterion 3.7: Cyclical external review of agencies

No further comments.

B Statement of opinion with regard to the observation of supplementary criteria of the Accreditation Council

On criterion 2.1.1

No further comments.

On criterion 2.1.2

No further comments.

On criterion 2.2.1

Documentation

According to this, the cost for such a procedure is [...] EUR. However, during the on-site visit prices twice as high were stated.

The numbers contained in the report are correct. We are not aware that other numbers were mentioned during the procedure. Possibly this is the result of a misunderstanding.

On criterion 2.2.2

Evaluation of the peers

According to the rules of procedure it is not guaranteed that students will also contribute to the appointment of experts in the Programme AC and the System AC. The appointment of experts however is pursuant to Cl. 1.1.3 of the “Rules for the Accreditation of Study Programmes and for System Accreditation²” one of the elementary tasks of the agency.

First we would like to make the distinction between the nomination and the appointment of peer teams for the programme area. Our procedure is dichotomous. The peers' proposals for representatives from higher education institutions and industry

² Resolution of the Accreditation Council in the version adopted on 20 February 2013

regularly come from the Technical Committees; the proposals for the student representatives are (almost exclusively) received from the student accreditation pool whose suggestions are always taken into account. The inclusion of students in nominating peers has thus already been ensured. In addition, the Appointing Commission of the Accreditation Commission for degree programmes was supplemented already some time ago by a de facto student representative. The decision in principle to expand the Appointing Commission will continue to apply.

In the system area the nomination of peers for a process is done as a separate agenda item at a meeting in connection with the permission of a higher education institution for system accreditation. At that moment, the Accreditation Commission knows the profile of the higher education institution and, based on this knowledge, can determine the necessary peer profile. This way, all members of the Accreditation Commission are involved in the nomination of peers. During the proposal process at least one replacement candidate is proposed and the required profile is outlined as accurately as possible. For the nomination of student representative, the Accreditation Commission for quality management systems has always relied on the proposals of the student accreditation pool.

On criterion 2.2.3

No further comments.

On criterion 2.2.4

No further comments.

On criterion 2.2.3

No further comments.

On criterion 2.3.2

No further comments.

On criterion 2.3.3

No further comments.

On criterion 2.4

No further comments.

On criterion 2.5

No further comments.

On criterion 2.6

No further comments.

On criterion 2.7

No further comments.

Düsseldorf, 30 May 2016

Dr. Iring Wasser
(Managing Director)