

Norway North East Arctic cod offshore (>12nm) fishery MSC Notice of Objection

1 Introduction

The MSC Objection Procedure is included in the [MSC Disputes Process v1.0](#).

The MSC Objection Procedure provides an orderly, structured, transparent and independent process by which stakeholder or client objections to the Final Draft Report and determination of a certifier (or Conformity Assessment Body) can be resolved.

The Objection Procedure is not intended to review the fishery against the MSC Fisheries Standard, but to determine whether the certifier (CAB) made an error of procedure, scoring, or condition setting that is material to the determination or the fairness of the assessment.

[Learn more about MSC objections >](#)

Please complete all unshaded fields. All grey boxes containing instructions may be deleted, e.g. the 'Introduction' section. All notes and guidance indicated in *italics*, please delete and replace with your specific information.

The MSC Notice of Objection Template should be completed and sent to objections@msc.org. Please ensure you will complete Sections 2.1 and 2.2 from this template. Depending on the selected objection category in Section 2.3, complete Section(s) 2.4-2.7 accordingly.

Information on objection costs and the MSC Objection Fee Cost Waiver Form can be found in the appendices.

2 Marine Stewardship Council Notice of Objection

2.1 Your details

Table 2.1.1 – Contact details

1	Contact name	
	First*	Last*
	Philipp	Kanstinger
2	Title	
	Dr.	

Table 2.1.1 – Contact details

Contact name	
First*	Last*
Fredrik	Myhre
Title	

Table 2.1.2 – Organisation details

1	Organisation*
	- Please enter the legal or registered name of your organisation or company.
	WWF (WWF-Norway and WWF-Germany)
2	Description
	Please provide a short description of your organisation.
	The World Wide Fund for Nature (WWF) is an international non-governmental organization founded in 1961, working in the field of wilderness preservation, and the reduction of human impact on the environment. WWF is the world's largest conservation organization with over five million supporters worldwide, working in more than 100 countries, supporting around 1,300 conservation and environmental projects. WWF aims to "stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature
3	Phone
	FM: +47 414 51 739 ; PK: +49 151 18854956

4	- Email*
	fmyhre@wwf.no ; philipp.kanstinger@wwf.de

Table 2.1.3 – Assessment details

1	Fishery name*
	Norway North East Arctic cod offshore (>12nm) fishery
2	CAB*
	DNV
3	The following objection is being lodged on behalf of the above-named organisation(s) and I am authorised to make this submission on their behalf*
	<ul style="list-style-type: none"> - Date - Signature*
	<p>14.04.2021</p> <p></p> <p>P. Kanstinger</p> <p></p> <p>F. Myhre</p>

2.2 Objecting party's involvement

Table 2.2.1 – Prior involvement

Please indicate your prior involvement with this assessment	
Fishery client – MSC Disputes Process v1.0, 5.4.1.a	No
Written stakeholder submissions - MSC Disputes Process v1.0, 5.4.1.b	Yes
Meetings attended - MSC Disputes Process v1.0, 5.4.1.b	No
Participation prevented or impaired - MSC Disputes Process v1.0, 5.4.1.c	No

Table 2.2.2 – Evidence

1	Supporting evidence of prior involvement in the assessment
	- Provide evidence and/or outline details to support this classification.
	Final Report for 2nd Reassessment of the Norway North East Arctic cod offshore (>12nm) fishery page 205-241
2	Background
	- State here your interest in the fishery and its certification.
	<p>WWF actively engages as a stakeholder in a number of Marine Stewardship Council (MSC) fishery assessments to improve fisheries sustainability.</p> <p>Bycatch reduction, habitat protection, and precautionary seafloor management remain a challenge for the Norwegian offshore fleet and the other similar cod fisheries in the Barents Sea, due to their use of heavy demersal gear (otter trawls equipped with rockhoppers), combined with the frequent occurrence of long-living, slow recovering deep-sea species and habitats in the fishing areas. The management systems in the region are slowly progressing, but to this day, they still lack the establishment of protection zones for most of these vulnerable marine ecosystems (sponge grounds, sea pens, soft corals, and coral gardens). The destructive effects of the gear used by these fisheries are scientifically documented, as well as modern mapping and underwater ground-truthing have proven an ongoing significant overlap between the fishing activity of the trawler fleets and known VMEs. WWF actively engages with national governments, fleets, and markets to stop further degradation of these important and unique ecosystems in the Barents sea.</p> <p>WWF believes that the MSC standard requirements should be implemented in a precautionary way and that they should provide a playing level field for fisheries. We, therefore, disagree with the assessment team findings. I) the endangered and protected fish species Golden Redfish should be classified as ETP species; II) the systematic non-compliance with reporting requirements of fishing regulation J-10-2021 should be sanctioned III) condition 1 regarding benthic habitat impact (PI 2.4.1) cannot fundamentally be fulfilled within the certification period.</p>

2.3 Your objection

Table 2.3.1 – Objection category

Are you objecting on the basis that, in your opinion: (please select any that apply)	
There was a serious procedural or other irregularity in the fishery assessment process that was material to the fairness of the assessment (MSC Disputes Process v1.0, 5.9.2.a). Complete Section 2.4.	Yes
The CAB review of the Client Action Plan cannot be justified because the conditions fundamentally cannot be fulfilled within the allocated time frame (MSC Disputes Process v1.0, 5.9.2.b). Complete Section 2.5.	Yes
The score given by the certifier (CAB) in relation to one or more of the Performance Indicators cannot be justified, and the effect of the score in relation to one or more of the particular Performance Indicators in question was material to the determination (MSC Disputes Process v1.0, 5.9.2.c). Complete Section 2.6.	Yes
Additional information not forming part of the record (MSC Disputes Process v1.0, 5.8.5.a) that is relevant to the circumstances at the date of determination has not been considered (MSC Disputes Process v1.0, 5.9.3). Complete Section 2.7.	No

2.4 Process

Objection in line with MSC Disputes Process v1.0, 5.9.2.a.

Please ensure you have filled in your [contact details \(Section 2.1\)](#) and [objections category \(Section 2.3\)](#) before filling in this section.

Table 2.4.1 - Content

1	Procedural issues
	<p>- State here the procedure(s) that you or your organisation believes were omitted or incorrectly followed by the certifier in the conduct of this assessment, in relation to the version of the FCP used.</p>
	<p>The assessment team did not follow the procedures to identify ETP species (MSC FS v2.01, SA3.1.5.1) and misclassified Golden redfish (<i>S. norvegicus</i>) as bycatch species and not as ETP species.</p> <p>SA3.1.5 The team shall assign ETP (endangered, threatened or protected) species as follows: SA3.1.5.1 Species that are recognized by national ETP legislation</p> <p>The Norwegian government and management authorities recognize Golden Redfish as endangered and protection measures are laid out in the Integrated Management Plan for the Norwegian Sea and Norway's National Biodiversity Action Plan:</p> <p><i>"The stocks of blue ling and golden redfish have declined since 2009. Both species are classified as endangered in the 2015 Norwegian Red List, and recruitment to the stocks has been weak for the past ten years. ICES has recommended that no catch of these species should be permitted, and that a formal management and rebuilding plan should be established for golden redfish. The fisheries authorities have introduced a prohibition on fishing specifically for these species and have taken further steps to reduce bycatches. A need to further reduce bycatches in trawl fisheries has been identified."</i> Update of the integrated management plan for the Norwegian Sea 2016—2017</p> <p><i>"Norway has a knowledge-based fisheries management regime, which is intended to ensure that the framework for commercial fisheries is as sustainable as possible. Directed fisheries for threatened species including European eel, blue ling and golden redfish have been closed. Most of the other threatened fish species are sharks, skates and rays. Although no direct fishery is permitted for these species, bycatches in other fisheries are a threat to several of them."... "Protection by regulations under the Nature Diversity Act is a suitable way of safeguarding species of plants, fungi and invertebrates that are mainly threatened by harvesting or other removal. However, most such species are already protected under the existing regulations. Wildlife species, salmonids and freshwater fish and marine species that are threatened by harvesting will be safeguarded by means of stricter restrictions on harvesting and on the use of fishing gear and other equipment, or if necessary by prohibiting harvesting, until their stocks recover. For example, no fishing is currently permitted for European eel, blue ling or golden redfish (see Chapter 6.4.1)." Norway's National Biodiversity Action Plan</i></p> <p>However, the CAB classified Golden redfish as non-ETP and argues "Golden redfish is not recognised as ETP by Norwegian legislation, instead regulation of this stock is under the Act of Marine resources."</p> <p>While we acknowledge that "MSC recognise that there is currently lack of clarity in CR v1.3/FCR v2.0 on designating ETP species, including interpretation of the terms: "recognised", "national" and "ETP legislation"(MSC interpretation log,) we strongly believe that the CAB's interpretation does not comply with existing interpretation guidance, IA rulings, and MSC requirements.</p> <p>The MSC interpretation log entry" Should species that are listed under the prohibitions set out in EU Fisheries Regulations be regarded as ETP species? (CR v1.3 - Annex CB, FCR v2.0 - Annex SA PI 2.3.1, SA 3.1.5)" states that "As ETP species include 'protected' species (not just endangered/threatened), there may be instruments other than those created specifically for protection of wildlife/endangered species where this protection is provided. For example EC Regulation 104/2015 (see hyperlink) setting fishing opportunities for 2015 lists "prohibited species" such as certain sharks, skates and rays (Article 12). The intent of prohibiting these species (or setting a '0' TAC for them as done prior to 2015) is clarified in the introduction to this document as being particularly because these species have a poor conservation status and that discarding will be beneficial for them due to their high survivability..... This being the case, the MSC recommends that the assessment team</p>

consider the listing of species as prohibited in Article 12 of EC Regulation 104/2015 as equivalent to being recognised by national ETP legislation.”

The ETP status of a threatened fish species managed with fishing regulations was also subject in a recent objection. The IA decided that “*Fisheries management agencies for many national jurisdictions are charged with the protection and management of ETP species and this fact should not exclude fish species from MSC ETP classification*” §22. Remand decision- Objections to the proposed certification of the Australia Orange Roughy – Eastern Zone Fishery”.

The CAB correctly classified Golden redfish as ETP and raised a condition (#6) in their previous assessment. “*Under normal circumstances, therefore, it would be appropriate to discuss both of these species the same as any other retained species. In this instance, however, both species are named on the Norwegian Redlist (Gjøsæter et al., 2010) 106 (S. mentella – vulnerable; S. norvegicus – endangered and must be considered in this context..... Thus, whether viewed purely as an exploited fish or as an ETP species, it is clear that stronger, more effective management measures need to be put in place than is currently the case. the continuing poor status of the stock justify treating S. norvegicus as an ETP species.*”

Condition 6 was closed during the 4th surveillance audit although the Golden Redfish stock status severely worsened between 2015-2020 and although the UoAs significantly contribute to the total mortality of this species.

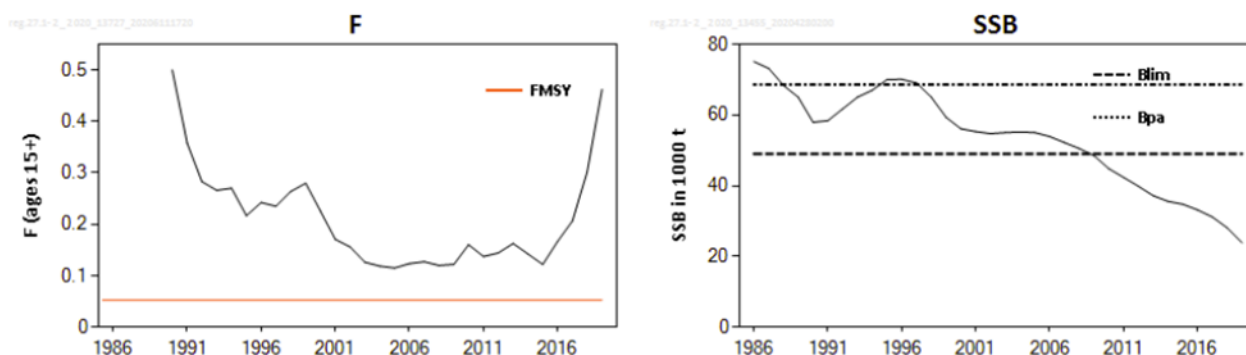


Figure 1 Golden redfish in subareas 1 and 2. Summary of the stock assessment (weights in thousand tonnes). Recruitment

<https://www.ices.dk/sites/pub/Publication%20Reports/Advice/2020/2020/reg.27.1-2.pdf>

The 4th surveillance audit report did not provide evidence to demonstrate that the direct effects of the fishery on the golden redfish are highly unlikely to create unacceptable impacts to this ETP species. Instead, the assessment team state that the classification of the golden redfish was inappropriate because Golden redfish is not recognised as ETP by Norwegian legislation. However, closing an existing condition based on a new and less precautionary “CAB interpretation” of an unchanged requirement without having a new information base and no new evidence (e.g. actually the stock status worsened) is not compliant with Section 7.28.16 of the FCR V2.1. “e.g. Examine relevant objective evidence”

In conclusion, we strongly believe that the CAB did a procedural error by declassifying Golden Redfish from the ETP category,

2 Other

- State here any other irregularity in the fishery assessment process that you or your organisation believes was material to the fairness of the assessment.

3 Effect on the determination

- Please state why you or your organisation believes that the failure of the CAB to follow procedures has significantly affected the result of the determination such that the determination should be altered.

	Due to the poor stock status of golden redfish and the unacceptably high fishing mortality (including bycatch of the UoAs) a condition would be expected if this threatened and protected species is classified as ETP.
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2.5 CAB review of client action plan

Objection in line with MSC Disputes Process v1.0, 5.9.2.b.

Please ensure you have filled in your [contact details \(Section 2.1\)](#) and [objections category \(Section 2.3\)](#) before filling in this section.

Listing the conditions placed on the relevant Performance Indicator(s) and, using the template below, please clearly identify:

- a. The reason(s) why you or your organisation believes that the condition assigned to the Performance Indicator(s) and CAB review of the Client Action Plan within the Final Draft Report cannot be justified because it cannot fundamentally be fulfilled within the allocated time frame; and
- b. Your supporting justification, making reference to the particular parts in the Client Action Plan that cannot fundamentally be fulfilled within the allocated time frame.

Please repeat the table below as needed for each Performance Indicator and condition to be included in the objection.

Table 2.5.1 - Conditions

1	Performance Indicator
	- Please enter the Performance Indicator. E.g.: PI 1.1.2, Stock Rebuilding
	2.4.1
2	Condition
	- Enter the condition, as stated in the Final Draft Report.
	Condition 1 (applies to UoA 1: bottom trawlers) The Client shall provide evidence that the UoA 1 fishery (trawl) is highly unlikely to reduce structure and function of the vulnerable biotopes to a point where there would be serious or irreversible harm, i.e. are highly unlikely (<30th %ile) to cause in the potential VME habitats to below 80% of their current status
3	Reason
	- Enter reason(s) in line with (a) above.
	<p>We welcome very much the initiative of the Norwegian fleet to harmonize mitigation measures with other fleets and to analyze their trawl footprint concerning VMEs. However, we have severe concerns that condition 1 cannot be fulfilled within the allocated time frame.</p> <p>We would like to highlight that the Client Action Plan for PI 2.4.1 misses any plans to implement mitigation measures if the analysis detects a significant impact on VMEs. Actions 1-3 and milestones year 1-3 are only related to the analysis of overlap, the adjustment in research design, and data presenting. Milestones do not cover planning and/or implementation of mitigation measures if a footprint reduction is needed. It is reasonable to expect that mitigation measures would need longer than 1 year to be implemented and their effects measured. In comparison, the recent Murmanseld 2 fishery certification has also a similar condition regarding PI2.4.1. However, their timeline to provide evidence that the UoA is highly unlikely to reduce the structure and function of VME is only 3 years, so there would be sufficient time to decrease their footprint if necessary.</p> <p>Additionally, it is very problematic that the current MSC guidance regarding VME scoring in P.2.4.1 lacks clarity including interpretation of the key terms like “potential VME”, “80% threshold” (cumulative aspects ?), “unimpacted state” etc. and that review and clarifications of these issues are part of the current FSR (An overview of debates and lacking definitions are provided below) A meaningful trawl footprint analysis cannot be conducted without a common understanding of these key terms.</p>

	<p>Clarifications on how to evaluate the fisheries footprint on VMEs are expected to be published in 2022/2023 when the FSR results are approved. This is of course too late.</p> <p>From our perspective, it is, therefore, a prerequisite that the VME impact analysis is conducted in a transparent, multi-stakeholder, and participatory approach similar to RBFs.</p> <p>If such an impact study is done without broader stakeholder discussion and MSC definitions (or common agreements) of key parameters, it becomes likely that the results of this analysis cannot be used in the assessment as a rationale (see Joint demersal fisheries in the North Sea and adjacent waters Public certification report for such a flawed and not useable trawl footprint analysis).</p>
4	Supporting justification
	- Please enter supporting justification for the reason(s) above.
	<p>Interpretations Logs</p> <p>Historical cut off point of VME unimpacted level (FCR v2.0 - Annex SA PI 2.4.1, SA 3.13.4.1)</p> <p>Identification of VMEs (FCR v2.0 - Annex SA PI 2.4.1, 2.4.3, SA 3.13.3, GSA 3.13.3.2)</p> <p>Potential VME (FCR v2.0 - Annex SA PI 2.4.2, SA 3.14.2.2, 3.14.2.3)</p> <p>VME 80% threshold (FCR v2.0 - Annex SA PI 2.4.1, SA 3.13.4.1)</p> <p>Designation of vulnerable marine ecosystems and closed areas (FCR v2.0 - Annex SA PI 2.4.2, SA 3.14.3)</p> <p>Incentive to identify vulnerable marine ecosystems (FCR v2.0 - Annex SA PI 2.4.1, 2.4.2, SA 3.13.3.2, 3.14.2, 3.14.3)</p> <p>IA ruling regarding Murmanseld 2 certification and VME requirement interpretation (Initial assessment of the Murmanseld 2 Barents Sea cod and haddock fishery- Appendix 5.8 IA´ Final Decision)</p> <p>Marine Stewardship Council</p> <p>Consultation topic: Introducing requirements on clarifying the MSC's habitats requirements</p> <p>https://www.msc.org/docs/default-source/default-document-library/stakeholders/consultations/annex-iv---feedback-tables-from-fisheries-standard-review-consultation-online-form---clarifying-habitats-requirements-(july-2020).pdf?sfvrsn=a358f758_4</p>

2.6 Scoring

Objection in line with MSC Disputes Process v1.0, 5.9.2.c.

Please ensure you have filled in your [contact details \(Section 2.1\)](#) and [objections category \(Section 2.3\)](#) before filling in this section.

Listing the conditions placed on the relevant Performance Indicator(s) and, using the template below, please clearly identify:

- a. The reason(s) you or your organisation believes that the score(s) presented within the Final Draft Report cannot be justified; and,
- b. Your rationale and/or evidence in support of a different conclusion, making reference to the particular Performance Indicator in question.

Please repeat the table below as needed for each Performance Indicator and condition to be included in the objection.

Table 2.6.1 - Scoring

1	Performance Indicator
	- Please enter the Performance Indicator. E.g.: PI 1.1.2, Stock Rebuilding
	Compliance and enforcement PI (PI 3.2.3)
2	Reason
	- Enter reason(s) in line with (a) above.
	There is evidence of systematic non-compliance with relevant fisheries regulation (J-208- 2017 / J-10-2021) ¹ (scoring issue d), Sanctions to deal with this non-compliance are not in place (scoring issue b) and the fishery does not provide information of importance to the fishery management (scoring issue c).
3	Supporting rationale and or evidence
	- Please enter here the supporting rationale for the reason(s) above.
	<p>Regulation J-208- 2017 (respectively, J-10-2021 (ERS regulation on position reporting, Section 12, states that Catch notification (DCA) shall contain information specified in blocks A and B of this section, including by-catches of marine mammals, seabirds, live corals and live sponges which shall be entered in kilograms round weight. This goes into effect from 1 kg corals and 1 kg sponges. There is a systematic non-compliance with this regulation as fishermen do not report bycatches of VME indicator species like sponges and corals. WWF highlighted this issue in 2017 and 2020. Sanctions are not in place yet. Therefore the fishery fails to provide information of importance to the effective management of the fishery although it is a legally binding regulation. Similar UoAs (from other nationalities) fishing in the same area frequently find (and report) bycatches of sponges and corals (see assessments FIUN, AGARBA, DFFU etc). According to documents from the fisheries directorate (February 2020, document attached), not a single bycatch was reported by the Norwegian cod & haddock fleet in the Barents Sea between 2014 and 2020 while in the same period, for example, the FIUN fleet voluntarily reported dozens of encounters. The Norwegian authorities have also failed to follow up their national laws by not controlling respectively sanctioning the missing bycatch reports of living corals and sponges.</p> <p>We strongly disagree with the argumentation of the CAB that “the reporting of corals and sponges is but a single item in a long range of requirements within the Norwegian fishery legislation” and that therefore this systematic non-compliance is not important enough to raise a condition.</p>

2.7 Additional information

Objection in line with MSC Disputes Process v1.0, 5.9.3.

Please ensure you have filled in your [contact details \(Section 2.1\)](#) and [objections category \(Section 2.3\)](#) before filling in this section.

Using the template below, please list all additional information not forming part of the record (MSC Disputes Process v1.0, 5.8.5.a) that is relevant to the circumstances at the date of the determination that you feel has not been considered. Be sure to provide the reasons why you or your organisation believes that the information in question:

- a. Was known or should reasonably have been known to any party to the assessment process;
- b. Should reasonably have been made available to the CAB; or,
- c. If considered, could have been material to the determination or the fairness of the assessment.

Table 2.7.1 – Additional information

1	Information
	- Please state here the additional information.
2	Reason why information was known or should reasonably have been known.
	- Enter here the reasons why information was known or should reasonably have been known and should have been made available.
3	Reason why information could have been material to the determination or the fairness of the assessment.
	- State here the reasons why information could have been material to the determination or the fairness of assessment.

3 Appendix 1 – Costs of the adjudication process (the Fee)

Objectors should note MSC Disputes Process v1.0, Section 5.11 in relation to the costs of the adjudication process.

Fee amount and payment details

The cost of the adjudication process is £5,000 or such lesser amount fixed by the independent adjudicator under MSC Disputes Process v1.0, 5.11.5.

The cost of the adjudication process shall be calculated and paid in Great British Pounds.

The MSC will email remittance details for the costs of the adjudication process within 5 days of the date on which the independent adjudicator notifies the parties that the adjudication phase will commence.

Please ensure the bank charges imposed by your own bank are not deducted from the Fee.

All sums, prices, costs, expenses and revenues referred to under the cost of the adjudication process are inclusive of VAT and any other taxes.

As per MSC Disputes Process v1.0, 5.11.3, an objection will not proceed to adjudication unless, within 15 days of the date on which the independent adjudicator notifies the parties that the adjudication phase will commence, the objector(s) has either:

- Paid the costs of the adjudication process to the MSC, or
- Obtained a waiver from the independent adjudicator in accordance with MSC Disputes Process v1.0, 5.11.4 and 5.11.5.

4 Appendix 2 - MSC Objection Fee Cost Waiver Form

4.1 Introduction

This form should be completed in accordance with the MSC Objections Procedure (MSC Disputes Process v1.0).

This form may be completed and emailed to the MSC at objections@msc.org, where it will be forwarded to the independent adjudicator.

All information included here in will be kept strictly confidential between the MSC and the appointed independent adjudicator.

Objectors should note the following excerpts from the MSC Disputes Process v1.0 on submission of a cost waiver request:

- 5.11.4 Objectors may apply to the independent adjudicator for the Fee to be waived (in whole or in part) using the application form in the 'MSC Notice of Objection Template'.
- 5.11.4.1 The objector shall submit the Fee waiver application to the independent adjudicator within 15 days after the date of publication.
- 5.11.4.2 Such an application shall provide the justification as to why a waiver is sought and shall be accompanied by appropriate evidence to demonstrate exceptional circumstances, including, where available, the objector's most recent audited financial report.
- 5.11.5 The independent adjudicator shall decide within 5 days of receiving any waiver application whether to refuse the application or to waive the whole or part of the costs that would otherwise be attributed to the objector.
- 5.11.5.1 A waiver shall only be granted if the independent adjudicator is satisfied that there are exceptional circumstances justifying such a waiver. The onus is on the objector to demonstrate that there are such exceptional circumstances. In determining whether there are exceptional circumstances, the independent adjudicator shall consider:
- Any evidence relating to the financial ability of the objector to meet the costs of the adjudication process.
 - The impact on the objector's other activities of paying the costs of the adjudication process.
 - The ability of the objector to raise funds from external sources, including support from other participants in the assessment process, for the purposes of meeting the costs of the adjudication process.
- 5.11.5.2 If the independent adjudicator fails to decide on the waiver application within the time frame specified in 5.11.5, and such failure is attributable solely to the independent adjudicator, the independent adjudicator shall extend the time frame and inform relevant parties of the extension.

Please note that in case of discrepancies between the text above and the MSC Disputes Process v1.0 on the MSC website, individuals should refer to the MSC Disputes Process v1.0 on the website.

Please complete all unshaded fields. All notes and guidance indicated in *italics*, please delete and replace with your specific information. All grey boxes containing instructions may be deleted, e.g. the 'Introduction' section.

4.2 MSC Objection Fee Cost Waiver Form

4.2.1 Identification detail

Table 4.2.1.1 – Identification details

1	Fishery assessment to which this objection applies
Contact details for objecting party	
2	Organisation(s)

3	Contact person
4	Address
5	Phone number
	- Include country code
	+
6	Email address

The following the following cost waiver is requested on behalf of the above-named organisation(s).

I am authorised to make this submission on the above-named organisations' behalf.

Name: _____

Position: _____

Signed: _____

Dated: _____

4.2.2 Evidence of exceptional circumstances

Table 4.2.2.1 – Evidence of exceptional circumstances

1	Any evidence relating to the financial ability of the objector to meet the costs of the adjudication process (MSC Disputes Process v1.0, 5.11.5.1.a)
2	The impact on the objector's other activities of paying the costs of the adjudication process (MSC Disputes Process v1.0, 5.11.5.1.b)
3	The ability of the objector to raise funds from external sources, including support from other participants in the assessment process, for the purposes of meeting the costs of the adjudication process (MSC Disputes Process v1.0, 5.11.5.1.c)

4.2.3 Appendices

Please include your organisations most recent audited financial report, and any other relevant supporting documentation.

5 Template information and copyright

This document was drafted using the 'MSC Notice of Objection Template v3.1'.

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Template version control		
Version	Date of publication	Description of amendment
1.0	March 2009	Issued with TAB Directive-023 Revised Fisheries Certification Methodology Objections Procedure
1.1	February 2010	Updated in line with release of TAB Directive-023 Objections Procedure v2
1.2	26 October 2012	Updated in line with release Certification Requirements v1.2
2.0	08 October 2014	Updated in line with release of Fisheries Certification Requirements v2.0
3.0	17 December 2018	Release alongside Fisheries Certification Process v2.1
3.1	25 March 2020	Release alongside Fisheries Certification Process v2.2 and MSC Disputes Process v1.0

A controlled document list of MSC program documents is available on the MSC website (msc.org).

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