

Marine Stewardship Council

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## MSC Notice of Objection Form



Version 2.0, 8 October 2014

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## Version Control

Amendments Issued		
Version No.	Date	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	8 October 2014	Updated in line with release of Fisheries Certification Requirements v2.0

This document is to be cited as:

**MSC Notice of Objection Form v2.0**

# Using the MSC Notice of Objection Form

This form should be completed in accordance with the MSC Objections Procedure, found in Annex PD of the MSC Fisheries Certification Requirements (FCR), v2.0. More information on the procedures can be found [here](#).

This form shall be completed, addressed to the independent adjudicator and sent to [objections@msc.org](mailto:objections@msc.org), where it will be forwarded to the assigned independent adjudicator.

Objectors should note the following excerpt from the FCR in relation to how the independent adjudicator will assess the admissibility of an objection:

- |           |   |
|-----------|---|
| PD2.3.4   | The notice of objection must set out clearly and precisely the basis upon which PD2.7.2 is said to apply. It must:  |
| PD2.3.4.1 | Identify the alleged errors in the final report and determination.  |
| PD2.3.4.2 | Explain in sufficient detail why it is claimed that the alleged errors were material to the determination or the fairness of the assessment.  |
| PD2.3.4.3 | Include a summary of the evidence to be relied on in support of the objection.  |
| PD2.3.4.4 | Include only information that existed in final (not draft) form in the public domain at the time the Public Comment Draft Report was published on the MSC website. Information that came into existence after that date cannot be used as a basis for objection (see FCR 7.15.6). |

Objectors should further note that an objection will be dismissed if it is not judged to have a reasonable prospect of success:

PD2.4.2 For purposes of this Section, an objection has a “reasonable prospect of success” if, in the view of the independent adjudicator:

PD2.4.2.1 It is not spurious or vexatious;

PD2.4.2.2 Some evidence is presented on the basis of which the independent adjudicator could reasonably expect to determine that one or more of the conditions set forth in PD2.7.2 are satisfied.

# Marine Stewardship Council Notice of Objection

## 1 Identification Details

Fishery assessment to which this objection applies	Usufuku Honten Northeast Atlantic longline bluefin tuna fishery
Name of conformity assessment body (CAB)	Control Union Pesca Ltd

**Contact details for objecting party**

Organisation(s)	WWF
Contact person	Alessandro Buzzi
Address	WWF Mediterranean Via Po, 25 C 00198 Rome, Italy
Phone Number (including country code)	+390684497443
Fax Number (including country code)	+39 068413886
Email address	abuzzi@wwfmedpo.org

The following objection is being lodged on behalf of the above named organisation(s).

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

Name: Giuseppe Di Carlo

Position: WWF Mediterranean Marine Initiative Leader

Signed:

A handwritten signature in black ink, appearing to read 'G. Di Carlo', with a stylized flourish at the end.

Dated: 15/01/2020

## 2 Objecting Party's Credentials

<p>Please outline your prior involvement with this assessment.</p>	<p>Subject fishery – PD2.3.1.1</p> <p>Written submissions – PD2.3.1.2 x</p> <p>Meetings attended – PD2.3.1.2 x</p> <p>Participation prevented/impaired – PD2.3.1.3</p>
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If you are objecting on the basis that you were a party to the assessment process that made written submissions to the CAB during the fishery assessment process or attended stakeholder meetings (as per PD2.3.1.2 of the objections procedure) or that the failure of the CAB to follow procedures prevented or substantially impaired your participation in the fishery assessment process (as per PD2.3.1.3 of the objections procedure), please provide evidence and/or outline details to support this classification.

Announcement submission

Attendance site visit

PCDR submission

<p>Please state your interest in the fishery and its certification.</p>	<p>WWF has been very active on the conservation of Atlantic bluefin tuna for more than 15 years, and closely engaged with relevant stakeholders such as ICCAT - to which it has a recognized Observer status - fishery industries and seafood markets to work towards robust recovery of the eastern Atlantic and Mediterranean stock.</p> <p>WWF has serious concerns regarding Atlantic bluefin tuna eastern stock status as well as the current management system, as limit/ target reference points and HCRs are not yet defined.</p>
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### 3 Categorisation of Objections

You must complete one or more of Sections 4 to 7 in accordance with your answers to the following questions.

<p>Are you objecting on the basis that, in your opinion, there was a serious procedural or other irregularity in the fishery assessment process that was material to the fairness of the assessment, as per PD2.7.2.1 of the objections procedure?</p>	<p>Yes</p> <p>No     x</p> <p>If YES, complete Section <a href="#">4</a></p>
<p>Are you objecting on the basis that, in your opinion, the setting of conditions by the CAB in relation to one or more performance indicators cannot be justified because the conditions fundamentally cannot be fulfilled, or the condition setting decision was arbitrary or unreasonable in the sense that no reasonable CAB could have reached such a decision on the evidence available to it, as per PD2.7.2.2 of the objections procedure?</p>	<p>Yes     x</p> <p>No</p> <p>If YES, complete Section <a href="#">5</a></p>
<p>Are you objecting on the basis that, in your opinion, the score given by the CAB in relation to one or more 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, as per PD2.7.2.3 of the objections procedure?</p>	<p>Yes     x</p> <p>No</p> <p>If YES, complete Section <a href="#">6</a></p>

<p>Are you objecting on the basis that, in your opinion, additional information not forming part of the record[1] that is relevant to the circumstances at the date of the determination has not been considered, as per PD2.7.3 of the objections procedure?</p>	<p>Yes</p> <p>No     x</p> <p>If YES, complete Section <a href="#">7</a></p>
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## 4 Objection Pursuant to PD2.7.2.1

4.1 Please identify:

- a) the procedure(s) that you or your organisation believes were omitted or incorrectly followed by the CAB in the conduct of this assessment and the relationship of these matters to the MSC's procedural rules, as set out in the version of the FCR that was in force at the time of the assessment:

and/or

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

- 4.2 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.

## 5 Objection Pursuant to PD2.7.2.2

- 5.1 Listing the conditions placed on the relevant performance indicator(s) and using the template below, please clearly:
- a) identify the reason(s) why you or your organisation believes that the condition assigned to the performance indicator within the Final Report cannot be justified because it fundamentally cannot be fulfilled, or
  - b) identify the reason(s) why you or your organisation believes the condition setting decision was arbitrary or unreasonable in the sense that no reasonable CAB could have reached such a decision on the evidence available to it.

<i>Performance Indicator</i>	PI 1.2.2 a) & b)
<i>Condition 1</i>	By Year 4 the client should be able to show that the HCR is able to ensure that the exploitation rate is reduced as the PRI is approached and is likely to be robust to the main uncertainties.

<p><i>a) Reason</i></p>	<p>In the client action plan for Condition 1 the client commits to lobby the Japanese Fisheries Agency (JFA) to work within the International Commission for the Conservation of Atlantic Tunas (ICCAT) to implement a rigorous Harvest Control Rule (HCR) that ensures that the exploitation rate is reduced as the PRI is approached and is likely to be robust to the main uncertainties in the stock assessment. The determination by the CAB that the client fishery can meet this condition under the current client action plan (CAP) is based on the underlying assumption that a certified fishery can effectively exert influence on the management decisions of a Regional Fisheries Management Organization (RFMO) and thereby achieve the milestones necessary to close the condition. However as pointed out by Peer Reviewer 2, the Usufuku Honten Northeast Atlantic longline bluefin tuna fishery, the client fishery is likely to have minimal leverage or influence on the decisions of ICCAT regarding the implementation of a HCR and it is therefore questionable whether this condition can be closed during the certification period.</p> <p>WWF contends that no reasonable CAB would have accepted the client action plan under the requirements of FCR v2.0 7.11.3 because progress on the management strategy evaluation (MSE) and the actual design and implementation of a HCR is the responsibility of ICCAT, the management entity and is thus largely outside the control of the client. Therefore as we explain in the rationale below, the CAB has accepted a client action plan which is not realistic or achievable because the client fishery likely has insufficient means to accomplish this task.</p>
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<p><i>b) Rationale</i></p>	<p>At 7.11.3 FCR v2.0 states that the CAB shall not accept a client action plan if the client is relying upon the involvement, funding and/or resources of other entities (fisheries management or research agencies, authorities or regulating bodies that might have authority, power or control over management arrangements, research budgets and/or priorities) without:</p> <p>7.11.3.1 Consulting with those entities when setting conditions, if those conditions are likely to require any or all of the following:</p> <ul style="list-style-type: none"> <li>a. Investment of time or money by these entities.</li> <li>b. Changes to management arrangements or regulations.</li> <li>c. Re-arrangement of research priorities by these entities.</li> </ul> <p>7.11.3.2 Being satisfied that the conditions are both achievable by the client and realistic in the period specified.</p> <p>ICCAT is a management entity as defined in 7.11.3.3 ("all fisheries management or research agencies, authorities, or regulating bodies that might have authority, power, or control over management arrangements, research budgets and/or priorities"). However there is no evidence presented that ICCAT has been consulted in accordance with 7.11.3.1 on what clearly qualifies as a change to management arrangements or regulations (i.e. the implementation of a HCR). The only letter of support that has been provided in Appendix 9 of the final report (FR p. 428) is from the Japanese Fisheries Agency (JFA) which provides a generic statement of support for the MSE process and considers that it should be</p>
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	<p>'discussed' with high priority.</p> <p>Therefore, 7.11.3.2 – "Being satisfied that the conditions are both achievable by the client and realistic in the period specified" – has not been satisfied such that any reasonable CAB would accept the current client action plan.</p> <p>The single Unit of Assessment put forth by the client fishery consists of a single vessel that is catching 45MT annually out of a Japanese BFT-e quota allocation of 2250MT from a Total Allowable Catch (TAC) for the BFT-e fishery of 32000MT in 2019. The Usufuken UoA is therefore responsible for approximately 0.14% of the total catch. WWF considers it highly questionable whether, given the small fractional contribution of the single UoA vessel to the TAC, the client fishery will have sufficient leverage to influence the process and timeline for the implementation of adequate HCRs that will result in the closure of Condition 1.</p> <p>The CAB has acknowledged the difficulty involved in ICCAT implementing an HCR that ensures that the exploitation rate is reduced as the PRI is approached and is likely to be robust to the main uncertainties in the stock assessment in section 3.3.9 of the Final Report (FR p. 36). The CAB notes that at the most recent ICCAT meeting the MSE process has already been delayed by a year due to numerous technical problems that have arisen in how to condition the models, selectivity assumptions for some fleets, migratory behaviour of spawners, exchange between stocks and some coding issues. The CAB further notes that: <i>"Another issue with using the MSE to apply the current management strategy is that it is technically difficult to produce an operating model which can estimate F0.1 – the agreed target reference point, because estimating F0.1 requires</i></p>
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*information on age composition as part of the model output.” Of critical importance to the Client’s ability to close Condition 1 during the initial certification period the CAB notes that ICCAT predicts that “it might be another 5 years before an operating procedure can be put in place based on F0.1 as a management target.” The CAB’s view in relation to the adoption of HCRs it is also expressed in the response to PEW comments on p. 417 in the FR: [...] “it seems to us highly premature to hope that this MSE process can take over from the current process for bluefin management any time soon, although we applaud the theory and the attempt.” Thus the ability of the client fishery during the initial certification period seems highly questionable.*

Furthermore in regards to the Client’s ability to influence the MSE process in order to fulfill Condition 1, as pointed out by peer reviewer 2, there are no other certified Atlantic BFT fisheries with which the client could form coalitions to increase leverage on ICCAT to implement an HCR sufficient to meet the MSC requirements for PI 1.2.2. WWF doesn’t necessarily advocate for other BFT fisheries to be certified in order to increase the leverage of MSC certified fisheries, however WWF does agree with the point made by PR2 about the limited leverage provided by the client to accelerate implementation of HCRs, or progress the ongoing Management Strategy Evaluation (MSE).

In response to PR2 comments on the limited direct control of the client to close conditions Peer Reviewer 2 states: “*there are no other certified Atlantic BFT fisheries with which the client could form coalitions to increase leverage* page 241 of FR). The CAB response states: “*there is a second fishery in assessment for MSC as detailed in the harmonisation section of this report which as*

	<p><i>the PR notes will help leverage.”</i> WWF considers it highly premature for the CAB to refer to the outcome of an assessment and assumes that a fishery still under assessment (with unknown outcome) will support the closure of the condition set for PI 1.2.2, especially where the client cannot reasonably rely on this for ‘leverage’ in the closing of its own conditions. The CAB does not address this valid point made by Peer Reviewer 2 that the client fishery has no direct control to close Condition 1.</p> <p>In summary, the CAB does not provide an adequate rationale for having accepted the client action plan as required under FCR v2.0 7.11.3 where the condition is not likely to be achievable by the client fishery. Nor has the CAB required the appropriate documentation in the form of a letter of support that the responsible management body (ICCAT) has been consulted on the Client Action Plan as required under FCR v2.0 7.11.3.1.</p>
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<i>Performance Indicator</i>	PI 1.2.3 c)
<i>Condition 2</i>	By Year 4 the client should be able to show evidence that there is good information on all other fishery removals from the stock.
<i>a) Reason</i>	The Client fishery has not consulted directly with ICCAT, the primary entity responsible for the collection of data on other fishery removals in the BFT-e fishery as required under FCR v2.0 7.11.3.1. In addition, analogous to the point of objection to Condition 1, WWF strongly

	<p>questions whether Condition 2 is achievable by the Client given the small fractional contribution of the UoA to catch and the lack of influence that the client may have on the collection of data on other fisheries and IUU removals required for the closure of Condition 2. Under FCR v2.0 7.11.3.2 the CAB should not accept a client action plan without being satisfied that the conditions are both achievable by the client and realistic in the period specified.</p>
<i>b) Rationale</i>	<p>The condition set by the CAB for PI 1.2.3 scoring issue c) requires that the Client fishery should be able to show evidence that there is good information on all other fishery removals from the stock. The Milestone for Year 4 also states that all significant sources of removals from the stock should be quantified in order to obtain a score of 80 by the end of the certification period. However the milestones for Years 1-3 only require the Client to consider how to best support and subsequently provide support for projects that aim to quantify IUU and recreational removals from the BFT-e stock. As such the condition setting by the CAB creates an internal inconsistency between the requirements of interim milestones and the required end result of Condition 2, making it highly likely that the Client will not be able to adequately fulfill the condition. The ability of the Client to fulfill Condition 2 is further complicated by the aforementioned small fractional contribution of the UoA to catch and the lack of influence that the client may have on the collection of data on other recreational fisheries and IUU removals at RFMO level which is the responsibility of ICCAT. WWF objects to the condition set for PI 1.2.3c on the basis that no reasonable CAB should be satisfied that the requirements of Condition are both achievable by a client fishery at the scale</p>

	<p>of Usufuku Honten UoA and realistic in the period specified.</p> <p>It is also clear from the letters of support provided in Appendix 9 of the final report that the CAB has not consulted with ICCAT as required under 7.11.3.1 As stated above under the objection to Condition 1, ICCAT is a management entity as defined in 7.11.3.3 However there is no evidence presented that ICCAT has been consulted in accordance with 7.11.3.1 on what will clearly require investment of time or money by these entities and re-arrangement of research priorities.</p>
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(Note: Please repeat table as needed for each performance indicator and condition to be included in the objection)

## 6 Objection Pursuant to PD2.7.2.3

- 6.1 Listing the relevant performance indicator(s) and using the template below, please clearly identify the reason(s) you or your organisation believes that the score(s) presented within the Final Report cannot be justified, ensuring you link those reasons with the applicable requirements in PD2.7.2.3 (a)-(d) of the objections procedure. Please provide your rationale and/or evidence in support of a different conclusion, making particular reference to the specific scoring guideposts associated with the particular performance indicator(s) in question.

<i>Performance Indicator</i>	1.1.1 a) stock status relative to recruitment impairment
<i>Reason</i>	PD2.7.2.3 b) and d)

	<p>GSA2.2.3.1</p> <p>Score 100 is not justified</p>
<p><i>Rationale</i></p>	<p>WWF agrees with the major concern raised by the MSC technical oversight that it is not clear how SG100 is fully met e.g. high degree of certainty (95th percentile), considering the inherent uncertainties in the BFT-e stock assessment process. There are major uncertainties in the ICCAT assessments, including questions about (a.) the larval BFT index in the Mediterranean, (b.) only a single year of strong recruitment, and (c.) the impact of not including 2016 catches. Stock status in relation to reference points (including PRI/Blim, Bmsy, B0) and the current recovery status are not provided by ICCAT's SCRS. Therefore, even the MSC default proxy indicators for PRI (see GSA2.2.3.1) can not be analytically determined directly. The CAB themselves state that (page 130 FR) "the stock status cannot be determined (B0.1 is not quantified) with a high degree of certainty, with conclusions changed to a significant extent by the choice of model and recruitment scenario, and uncertainties in all the models."</p> <p>Based on the points above, WWF concludes that the 95% degree of certainty determined by the assessment team that the stock is above the PRI is overestimated and can not be accurately extrapolated based on the available data and models. Therefore, a score of 100 is not justified.</p>

<i>Performance Indicator</i>	1.1.1 b) stock status in relation to achievement of MSY
<i>Reason</i>	PD2.7.2.3 a) and d) GSA2.2.4 Score 80 not justified

<p><i>Rationale</i></p>	<p>Due to the absence of Biomass indicators in the BFT stock assessment, GSA2.2.4 Scoring stock status using fishing mortality rate (F) is a prerequisite. "At least an 80 score is justified (B highly likely above the PRI and at or fluctuating around BMSY) if F is likely to have been at or below FMSY for at least two generation times (or for at least four years, if greater)."</p> <p>The Assessment team calculated a Generation time of 11 years. This Generation time differs from the results of other studies regarding Bluefin Tuna e.g. 14 years (Agnew 2011), 17 to 19 years (NOAA 2011), 20 years (ICCAT, see NOAA 2011)..</p> <p>It seems that they used an inappropriate estimate for A that lead to significant lower Generation time. A is the oldest age in an unfished state and the CAB extrapolated the plus 10 age group to 20 years. No further justification for this age (20 years) was provided although reported maximum ages for bluefin tuna in the Atlantic are much higher (ranging from 30-50 years (Hurley 1983, Santamaria 2009, NOAA 2011). The CAB's calculations, and the scoring rationale based on them, are incorrect.</p> <p>With a correctly calculated GT (e.g. 14 years or higher) a score of 80 can not be justified because the stock could not recover for at least two generation times (GSA2.2.4) respectively one generation time when F is reduced to 80% FMSY or 60% FMSY. We would like to highlight that when taking into account a generation time of 14 years the recovery time for BFT would not be 2 generation times. In case the more conservative SS3 model is used, older fish +10 years would not even have one GT to recover. Therefore the assessment team can not demonstrate that F has been low enough for long enough to ensure that the required</p>
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biomass levels are now likely to be met (SA2.2.4.1) and it can not be concluded that stock is at or fluctuating around a level consistent with MSY.

Schirripa, Michael J. "A literature review of Atlantic bluefin tuna age at maturity." Collect Vol Sci Pap ICCAT 66.2 (2011): 898-914.

Santamaria, N., et al. "Age and growth of Atlantic bluefin tuna, *Thunnus thynnus* (Osteichthyes: Thunnidae), in the Mediterranean Sea." Journal of Applied Ichthyology 25.1 (2009): 38-45.

Agnew 2011 CIE review report Status of Atlantic bluefin tuna (*Thunnus thynnus*) under the ESA),

NOAA 2011, Atlantic Bluefin Tuna Status Review Team. 2011. Status Review Report of Atlantic bluefin

tuna (*Thunnus thynnus*). Report to National Marine Fisheries Service, Northeast Regional Office. March 22, 2011. 104 pp.

SCRS/2010/115 Collect. Vol. Sci. Pap. ICCAT, 66(2): 898-914 (2011) 898 A LITERATURE REVIEW OF ATLANTIC BLUEFIN TUNA AGE AT MATURITY Michael J. Schirripa<sup>1</sup>

Hurley, P.C.F. and D.T. Isles, 1983. Age and growth of Atlantic bluefin tuna *Thunnus thynnus* using otoliths. p. 71-75. In E.D. Prince and L.M. Poulos (eds.) Proceedings of the international workshop on age determination of oceanic pelagic fishes: tunas, billfishes, and sharks. NOAA Tech. Rep. NMFS 8.



<i>Performance Indicator</i>	1.2.1 a
<i>Reason</i>	<p>Score 100 not justified</p> <p>PD2.7.2.3 d)</p> <p>GSA 2.4</p>
<i>Rationale</i>	<p>According to GSA 2.4 Key elements of harvest strategies include:</p> <p>the control rules and tools in place, including the ability of the management system to control effort, taking into account issues such as overcapacity and its causes;</p> <p>the information base and monitoring stock status and the responsiveness of the management system and fleet to stock status</p> <p>We would like to highlight that:</p> <ul style="list-style-type: none"> <li>a) The HCR does not ensure that the exploitation rate is reduced as the PRI is approached</li> <li>b) the management plan does not include a specific provision allowing ICCAT to suspend the fishery from one year to the next</li> <li>c) Strictly speaking, the stock status is unknown. The 2017 BFT stock assessment Stock status in relation to reference points and the current recovery status are not provided by</li> </ul>

	<p>ICCAT's SCRS. There are major uncertainties in the assessments, including questions about a) the larval BFT index in the Mediterranean, b) only a single year of strong recruitment, and c) the impact of not including 2016 catches.</p> <p>d) ICCAT's model for the eastern bluefin stock's assessment is unreliable because small tweaks to the input data result in substantial differences in quota advice Collette (2017)</p> <p>e) There are no pre-agreed management actions to be taken by the fisheries managers (ICCAT itself), and the simple review of the plan is not sufficient to conclude that the system is responsive to the state of the stock.</p> <p>f) A Management Strategy Evaluation (MSE) is not yet conducted</p> <p>Due to these shortcomings WWF believes that requirements for 1.2.1a at SG100 is not being met ("The harvest strategy is responsive to the state of the stock and is designed to achieve stock management objectives reflected in PI 1.1.1 SG80</p>
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<i>Performance Indicator</i>	1.2.1 b
<i>Reason</i>	<p>PD2.7.2.3 b), c) and d)</p> <p>GSA 2.4.1</p>

	Score 80 not justified
<i>Rationale</i>	<p>WWF agrees with Peer reviewer 2 that this S.I. does not meet SG80. The most recent data in the assessment is 2015 and if the "harvest strategy" is the management plan agreed to in 2018 and presently being implemented (in 2019), it is hard to say it is achieving its objectives. Increases in TAC over the next few years (including the 2018 and 2019 TACs) are based on projections. Given the uncertainties in the assessment, and uncertainties in the management implementation. It is not clear that the Harvest Strategy is achieving its objectives. The reply of the Assessment team did not sufficiently resolve these concerns. A Management Strategy Evaluation (MSE) has not yet been conducted. The end date of the stock assessment is already a few years behind (2017) and as WWF and PR2 have already clearly stated, the stock models contain large uncertainties. The HCR does not ensure that the exploitation rate is reduced as the PRI is approached and the management plan does not include a specific provision allowing ICCAT to suspend the fishery from one year to the next. GSA2.4.1 states that testing and evaluation in Scoring Issue (b) at the Harvest Strategy level should consider the full interactions between different components of the harvest strategy, including the HCRs, use of information and the assessment of stock status. It should also be noted that the objectives of the recovery plan were never confirmed as achieved. Because of the aforementioned shortcomings of the stock assessment and harvest strategy including HCRs, no evidence exists that it is achieving its objectives and therefore we do not believe that a score 80 is justified.</p>

- 6.2 For each issue identified in question 6.1, please state why you or your organisation believes that the effect of the score in relation to one or more of the particular performance indicators in question was material to the determination such that the determination should be altered.

In general, we do believe that several scorings in P1 are overinflated and cannot be sufficiently justified. If these scorings would be corrected the average score of PI would decrease below 80 and the certification outcome would be altered. We focused our objection on 1.1.1 stock status and 1.2.1 harvest strategy because a) peer reviewer and MSC technical oversight also raised concerns about these scorings and these concerns were not sufficiently addressed by the CAB and b) in both PIs material score reductions are expected to decrease scoring < 80 and much needed conditions would have to be raised.

## 7 Objection Pursuant to PD2.7.3

- 7.1 Using the template below, please list all additional information not forming part of the record[2] that is relevant to the circumstances at the date of the determination that you feel has not been considered, as per PD2.7.3 of the objections procedure. Be sure to provide the reasons why you or your organisation believes that the particular information in question (as per PD2.6.5.2):
- a) was known or should reasonably have been known to any party to the assessment process, and
  - b) should reasonably have been made available to the CAB, and
  - c) if considered, could have been material to the determination or the fairness of the assessment.

<i>Information</i>	
<i>Reason why information was known or should reasonably have been known.</i>	
<i>Reason why information should reasonably have been made available.</i>	
<i>Reason why information could have been material to the determination or the fairness of the assessment.</i>	

[1] As defined in paragraph PD2.6.5.1 (a) of the objections procedure.

[2] As defined in paragraph PD2.6.5.1 (a) of the objections procedure.

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