

Annex PD: Objections Procedure – Normative

PD1 Background

PD1.1 Documents

- PD1.1.1 The parties to the objection shall:
- a. Use the version of the objections procedure that corresponds with the version of the process requirements against which the fishery is being assessed. (See section on implementation timeframes)
 - b. Use the same version of the objection procedure throughout the entire objection process.

PD2 Objections Procedure

PD2.1 Object and purpose

- PD2.1.1 The purpose of the Objections Procedure is to provide an orderly, structured, transparent and independent process by which objections to the Final Report and determination of a Conformity Assessment Body (CAB) can be resolved.

PD2.1.1.1 It is not the purpose of the Objections Procedure to review the subject fishery against the MSC fisheries standard, but to determine whether the CAB made an error of procedure, scoring or condition setting that is material to the determination or the fairness of the assessment.

- PD2.1.2 Subject to [PD2.3.1.3](#) the procedure is open only to parties involved in or consulted during the assessment process.
- PD2.1.3 An independent adjudicator will examine the claims made by an objector in a notice of objection and will make a written finding as to whether the CAB made an error that is material to the determination or the fairness of the assessment. If any error is identified, and if there is adjudged to be a real possibility that the CAB may have come to a different conclusion, the independent adjudicator will remand the determination back to the CAB for reconsideration.
- PD2.1.4 In the event that a notice of objection is filed, a certificate shall not be issued or ecolabel licensing agreements entered into relating to any fishery product until the objections procedure has run its course in accordance with the procedures set out in this Annex, and the Public Certification Report has been issued in accordance with FCR 7.19.1.

PD2.2 The independent adjudicator

- PD2.2.1 The MSC Board of Trustees shall appoint an independent adjudicator to consider all objections to a Final Report or determination.

PD2.2.1.1 The independent adjudicator shall be appointed for a period of 3 years and

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may be reappointed.

- PD2.2.1.2 The decision of the MSC Board of Trustees in appointing or reappointing the independent adjudicator shall be final.
- PD2.2.1.3 The independent adjudicator shall perform all the functions allocated to him or her in accordance with the procedures set out in the MSC Fisheries Certification Requirements (FCR).
- PD2.2.1.4 A different independent adjudicator may be appointed at any time to act in cases where original independent adjudicator is unavailable to act for any reason, including a conflict of interest or unavailability.
- PD2.2.1.5 In the event that, in relation to any particular objection, there is a conflict of interest involving the independent adjudicator, unless the parties agree otherwise he or she shall excuse him or herself from further participation in that particular objection. In the event of any difference of opinion between the independent adjudicator and any party to the objection as to whether a conflict of interest exists, the decision of the MSC Board of Trustees on the matter shall be final.
- PD2.2.2 The independent adjudicator may be removed by the MSC Board of Trustees for good cause, including incompetence, bias or impropriety.
- PD2.2.3 The independent adjudicator shall be independent of the MSC, but the MSC may provide him or her with appropriate administrative and logistic support, including sending and receiving notices and correspondence.

PD2.3 Notice of objection

- PD2.3.1 A notice of objection to a Final Report or determination may be submitted by:
 - PD2.3.1.1 The fishery client(s).
 - PD2.3.1.2 Any party to the assessment process that made written submissions to the CAB during the fishery assessment process or attended stakeholder meetings.
 - PD2.3.1.3 Any other party that can establish that the failure of the CAB to follow procedures prevented or substantially impaired the objecting party's participation in the fishery assessment process.
- PD2.3.2 A notice of objection must be submitted no later than fifteen days after the date on which the Final Report and determination is posted on the MSC website.
- PD2.3.3 A notice of objection must be submitted in the format prescribed by the MSC (<http://www.msc.org/documents/scheme-documents>). It shall be addressed to the independent adjudicator and sent to objections@msc.org.
- 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).

- PD2.3.5 If it is asserted that the determination should be remanded for the reasons set out in [PD2.7.3](#) the notice of objection must specify, in sufficient detail, the:
- PD2.3.5.1 Nature of the additional information that it is asserted should reasonably have been made available to the CAB, and
 - PD2.3.5.2 Reasons why it is considered that the information, if considered, could have been material to the determination or the fairness of the assessment.
- PD2.3.6 Upon receipt of a notice of objection, the independent adjudicator shall proceed in the manner set out in PD2.4.

PD2.4 Procedure on receipt of a notice of objection

- PD2.4.1 If the independent adjudicator, in his or her discretion, determines that the notice of objection is not in the form required by these procedures or has no reasonable prospect of success, the independent adjudicator may either:
- PD2.4.1.1 Dismiss all or part of the objection, giving written reasons; or
 - PD2.4.1.2 Request further clarification from the objector on all or part of the objection.
- 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.
- PD2.4.3 In the event that the independent adjudicator decides to dismiss the objection, the objector may nonetheless submit an amended notice of objection within 5 days of being so notified by the independent adjudicator.
- PD2.4.3.1 An objector shall have only one opportunity to submit such an amended notice of objection.
- PD2.4.4 In the event that the independent adjudicator requests further clarification from the objector, the independent adjudicator shall notify the objector in writing of the clarification sought and the time limit for responding (which, in the absence of special circumstances to justify a longer time, should normally be not more than 5 days).
- PD2.4.4.1 If the objector fails to respond within the time specified, it shall be assumed that the objector does not wish to proceed further and the independent adjudicator shall thereupon issue a notice in writing dismissing the objection.
- PD2.4.5 If the independent adjudicator, in his or her discretion, determines that the amended notice of objection submitted under [PD2.4.2](#) or [PD2.4.3](#) does not disclose any of the grounds set out in [PD2.3.4](#), is not in the form required by these procedures, has no reasonable prospect of success or is spurious or vexatious, the independent adjudicator shall dismiss the objection, giving written reasons therefore.

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- PD2.4.6 If a notice of objection is received in the correct format and by a person entitled to make an objection under [PD2.3.1](#) but dismissed on other grounds by the independent adjudicator, the MSC shall ensure the notice of objection and independent adjudicator notice of dismissal are posted on the MSC website.
- PD2.4.7 Where a notice of objection is accepted, the independent adjudicator shall promptly notify the CAB, the fishery client(s) and the objectors.
- PD2.4.7.1 The MSC shall ensure the notice of objection is posted on the MSC website.
- PD2.4.7.2 The date upon which the notice of objection is posted shall be the “date of publication”
- PD2.4.8 The fishery client(s) or any stakeholder that participated in the fishery assessment process (other than the objector(s)) may, within 15 days of the date of publication, submit written representations on the matters raised in the accepted notice of objection.
- PD2.4.8.1 All such written representations shall be submitted through the independent adjudicator and shall be posted on the MSC website.

PD2.5 Reconsideration by the CAB

- PD2.5.1 Where a notice of objection has been accepted, the CAB shall be required to reconsider its Final Report and determination in light of the matters raised in the notice of objection.
- PD2.5.1.1 The CAB shall, within 20 days of the date of publication, provide a written response to the notice of objection.
- PD2.5.1.2 The response shall provide appropriate information indicating the extent to which the matters set forth in the notice of objection were considered in the fishery assessment and the impact thereof on the determination.
- PD2.5.1.3 In formulating its response, the CAB shall also take into account any written representations received in accordance with [PD2.4.8](#).
- PD2.5.1.4 The CAB shall also indicate and give reasons for any proposed changes to its Final Report and determination in the light of the reconsideration.
- PD2.5.2 The response of the CAB shall be made available to all parties, including the objector(s), the fishery client(s) and the MSC and shall be posted on the MSC website.
- PD2.5.3 Upon receipt of the response by the CAB, the independent adjudicator shall consult with the objector(s), the fishery client(s) and the CAB in order to determine whether the response of the CAB, including any proposed changes to the Final Report and determination, adequately addresses the issues raised in the notice of objection.
- PD2.5.3.1 The independent adjudicator shall strive to conclude such consultations within a period of 10 days but may if necessary, at his or her discretion after consultation with the parties, extend such period if it appears that there is a real and imminent prospect of reaching a solution that is acceptable to all relevant parties.
- PD2.5.4 In the event that the issues raised in the notice of objection can be resolved through consultations, the CAB, in consultation with the independent adjudicator,

shall make such changes and revisions to the Final Report and determination as may be agreed and shall proceed to prepare a Public Certification Report in accordance with FCR 7.19.1 No further appeal or objection shall be permitted.

- PD2.5.5 In the event that some or all of the issues raised in the notice of objection cannot be resolved through consultations, the independent adjudicator shall notify all parties that the adjudication phase will commence immediately in accordance with PD2.6.

PD2.6 Adjudication

- PD2.6.1 Subject to [PD2.9 \(Costs\)](#), the independent adjudicator shall, within 30 days of the date upon which the parties were notified of the intention to proceed to adjudication, convene an oral hearing of the objection, unless the parties to the objection agree otherwise.

PD2.6.1.1 A written hearing shall be undertaken if the parties agree that an oral hearing is not wanted.

- PD2.6.2 The oral hearing is intended to provide an opportunity for the CAB, the objector(s) and the fishery client(s) (if not the objecting party) to present their respective cases in person, including by video or teleconference.

- PD2.6.3 The independent adjudicator shall conduct the hearing in accordance with the provisions of this section but may also promulgate additional rules of procedure, including time limits on oral presentations and rules as to representation.

PD2.6.3.1 The independent adjudicator shall normally aim to complete the hearing during one session but may, where necessary, adjourn to continue the hearing using electronic communications or other means.

- PD2.6.4 The fishery client(s), the objector(s), and the CAB may submit additional or supplementary written representations on the matters raised in the notice of objection or in the written representations submitted by other parties under [PD2.4.8](#).

PD2.6.4.1 All such written representations shall be submitted through the independent adjudicator and must be received no later than 5 days before the date set for an oral hearing or as set out by the independent adjudicator in the case of a written hearing.

PD2.6.4.2 A list of the persons whom the parties would wish to attend the hearing shall be submitted to the independent adjudicator for circulation to all hearing parties and must be received no later than 5 days before the date set for hearing.

- PD2.6.5 The independent adjudicator shall evaluate objections solely on the basis of:

PD2.6.5.1 The record, which shall include and be limited to:

- a. The Final Report of the CAB and the record on which the Final Report was based, including written submissions and reports provided to the CAB during the assessment process, the written record of oral, written or documentary evidence submitted in the assessment process, as well as any other evidence referenced or cited in the final report;
- b. The notice of objection;
- c. Any written representations submitted pursuant to [PD2.4.8](#) and

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PD2.6.4;

- d. Any representations made by any party at an oral hearing pursuant to these procedures; and
- e. Other clarifications required by the independent adjudicator.

PD2.6.5.2 Any additional information, not forming part of the record, that was in existence prior to the posting of the Public Comment Draft Report and is relevant to issues raised in the notice of objection that:

- 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.

PD2.6.5.3 The MSC fisheries standards ([Annexes SA](#), [SB](#), [SC](#) and [SD](#)); and

PD2.6.5.4 The MSC Fisheries Certification Requirements current at the time of the assessment in question, together with Guidance to the MSC Fisheries Certification Requirements and amendments thereof made by the MSC Technical Advisory Board and the Board of Trustees, any related interpretations to these documents whether or not of mandatory effect with regard to CAB conformity made by the MSC and MSC's accreditation body.

PD2.6.6 The independent adjudicator may not consider issues not raised in the notice of objection, even if the independent adjudicator is of the view that a particular issue should have been raised.

PD2.6.6.1 In no case shall the independent adjudicator substitute his or her own views or findings of fact for those of the CAB.

PD2.6.7 The independent adjudicator may solicit external advice on technical matters from, and for this purpose may sit with and receive technical advice from, qualified experts.

PD2.6.7.1 Such technical experts shall not take part in decision making.

PD2.6.7.2 Any written reports or advice tendered by the technical experts shall be attached to the independent adjudicator's written decision.

PD2.6.8 The experts selected by the independent adjudicator to provide advice in relation to any particular objection shall not be involved in any activity that constitutes a conflict of interest. Such conflicts include, but are not limited to, the following criteria:

PD2.6.8.1 Experts shall not be members of the MSC Board of Trustees, Technical Advisory Board, Stakeholder Council or MSC;

PD2.6.8.2 Experts shall not have commercial involvement with the CAB, the subject fishery or the objector(s);

PD2.6.8.3 Experts shall not be involved in management or lobbying for or against the fishery or be involved with an organisation that has indicated its opposition to the certification of the fishery under objection;

PD2.6.8.4 Experts shall not have been involved in any part of the current assessment process for the fishery under objection.

PD2.6.9 In order to facilitate the Objections Procedure, the MSC may maintain a public

register of suitably qualified persons willing and available to act as independent experts. Experts may, however, be selected who are not on the register.

- PD2.6.10 At any stage of the objections process, any party to an objection may, by notification in writing, call the attention of the independent adjudicator to an alleged error of fact, procedural error or unfairness on his or her part with respect to the objections process and the independent adjudicator shall respond as soon practicable.

PD2.7 Powers of the independent adjudicator

- PD2.7.1 The independent adjudicator shall issue a decision in writing either:

- PD2.7.1.1 Confirming the determination by the CAB; or
- PD2.7.1.2 Remanding the determination to the CAB.

- PD2.7.2 The independent adjudicator shall remand the determination to the CAB if he or she determines either:

- PD2.7.2.1 There was a serious procedural or other irregularity in the fishery assessment process that was material to the fairness of the assessment; or
- PD2.7.2.2 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; or
- PD2.7.2.3 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 because either:
 - a. The CAB made a mistake as to a material fact.
 - b. The CAB failed to consider material information put forward in the assessment process by the fishery or a stakeholder.
 - c. The CAB failed to consider material information put forward by the peer reviewer(s).
 - d. The scoring decision was arbitrary or unreasonable in the sense that no reasonable CAB could have reached such a decision on the evidence available to it.

- PD2.7.3 It is necessary to remand the determination in order to enable the CAB to consider additional information described in [PD2.6.5.2](#) and described in the notice of objection.

- PD2.7.3.1 In such a case, the remand shall be limited to a request to the CAB to consider the impact of the additional information on its original determination and to provide a response in accordance with [PD2.8.2](#).

PD2.8 Remand

- PD2.8.1 In the event that a determination is remanded, the independent adjudicator shall state, in writing, the grounds upon which the objection has been remanded, the specific matters that the CAB must consider in the remand and the relationship of these matters to the MSC fisheries standard or procedural rules.
- PD2.8.1.1 Copies of the remand shall be sent to the MSC, the fishery client(s) and the objecting party.
- PD2.8.2 Within 10 days after receipt of the remand instructions, unless the independent adjudicator has granted the CAB a specific amount of additional time, the CAB shall respond in writing to the matters specified in the remand, with copies sent to the MSC, the fishery client(s) and the objecting party. The response of the CAB shall either:
- PD2.8.2.1 Include a statement of “no change” in relation to the scoring of performance indicators.
- PD2.8.2.1 Indicate any proposed changes to the justification for a score or indicate a change in the score in relation to any of the performance indicators.
- PD2.8.2.3 Give reasons for its decision under either PD2.8.2.1 or PD2.8.2.2.
- PD2.8.3 Any party to the objection may make written submissions on the matters specified in the remand or on the response thereto by the CAB under PD2.8.2. Such submissions must be received by the independent adjudicator no later than 5 days following the response by the CAB.
- PD2.8.4 The independent adjudicator shall, within 10 days of the response by the CAB, either:
- PD2.8.4.1 Accept the response as adequately addressing the findings raised in the remand and confirm the original or amended Final Report and Determination by the CAB.
- PD2.8.4.2 After reviewing the response of the CAB, determine that the objection shall be upheld on one or more of the grounds specified in [PD2.7.2](#).
- PD2.8.5 If the CAB does not respond to the remand within the time limits specified in PD2.8.2 the independent adjudicator shall proceed to PD2.8.4 as if the CAB had made a “no change” response to the remand.
- PD2.8.6 The independent adjudicator shall include in the final decision a summary of conclusions from previous decisions, in order to provide a complete record of issues, including for example issues that are rejected, dismissed or closed prior to the final decision.
- PD2.8.7 A decision by the independent adjudicator under PD2.8.4 is final. No additional objections may be lodged under these procedures in respect of such decision. The certification decision of the CAB shall be made with reference to the decision of the independent adjudicator.
- PD2.8.8 In the event that the independent adjudicator confirms the amended determination, the CAB shall make such amendments to the Final Report and Determination as may be necessary in the light of the findings of the independent adjudicator and shall proceed to issue a Public Certification Report in accordance with FCR 7.19.1, which shall be assessed for adequacy by the independent adjudicator as per [PD2.8.9](#).

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- PD2.8.9 The independent adjudicator shall, prior to the issue of the Public Certification Report, determine whether the amendments to the Final Report and Determination made by the CAB adequately address the findings of the independent adjudicator.
- a. If the independent adjudicator determines that the amendments adequately address the findings of the independent adjudicator, the MSC shall publish the Public Certification Report in accordance with [FCR 7.19.1](#).
 - b. If the independent adjudicator determines that the amendments do not adequately address the findings of the independent adjudicator, the Public Certification Report shall not be published, and the independent adjudicator shall send the Public Certification Report back to the CAB for further amendments to be made and then to be considered by the independent adjudicator as per [PD2.8.9](#).
- PD2.8.10 Nothing in these procedures shall prevent any party to a fishery assessment from submitting a complaint relating to the CAB to MSC's Accreditation Body in accordance with the procedures of that provider.
- PD2.8.10.1 No such appeal to the MSC's Accreditation Body shall affect the outcome under this Objection Procedure.

PD2.9 Costs

- PD2.9.1 The costs of the adjudication process, up to a maximum level established from time to time by the MSC Board of Trustees, shall be borne by the objector or, if there is more than one objector, the objectors in equal shares.
- PD2.9.2 In exceptional circumstances, the independent adjudicator may decide to waive the costs in respect of an objector in whole or in part in accordance with [PD2.9.6](#).
- PD2.9.3 The MSC shall provide information relating to the costs agreement and waiver application to the objector(s) at the earliest opportunity after the acceptance of the notice of objection and in any case no later than 5 days from when the notice of objection is accepted as per [PD2.4.7](#).
- PD2.9.4 Notwithstanding the provisions of [PD2.6](#), an objection shall not proceed to adjudication unless, within 10 days after the date on which the independent adjudicator notifies the parties that the adjudication phase will commence, the objector(s) has either:
- PD2.9.4.1 Signed a costs agreement with the MSC; or
 - PD2.9.4.2 Obtained a waiver from the independent adjudicator in accordance with [PD2.9.6](#).
- PD2.9.5 An application for a waiver shall be made in writing to the independent adjudicator by a duly authorised representative of the objector within 15 days from when the notice of objection is accepted per [PD2.4.7](#).
- PD2.9.5.1 Such an application should provide the justification as to why a waiver is sought and must be accompanied by appropriate evidence to demonstrate exceptional circumstances, including, where available, the objector's most recent audited financial report.
- PD2.9.6 The independent adjudicator shall decide within 5 days, to refuse the application or to waive the whole or part of the costs that would otherwise be attributed to

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the objector. 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 take into account:

- PD2.9.6.1 Any evidence relating to the financial ability of the objector to meet the costs of the adjudication process.
- PD2.9.6.2 The impact on the objector's other activities of paying the costs of the adjudication process.
- PD2.9.6.3 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.
- PD2.9.7 Where the application is refused or where a partial waiver is granted, the objector must sign a costs agreement with the MSC in order for the objection to proceed further.
- PD2.9.8 In the event that, 10 days after the date on which the independent adjudicator notified the parties that the adjudication phase will commence, any objector has not either signed a costs agreement with the MSC or obtained a waiver from the independent adjudicator in accordance with [PD2.9.6](#), the objection in respect of that objector shall be considered to have been dismissed.
 - PD2.9.8.1 If there is more than one objector, the independent adjudicator shall nonetheless go on to consider the notice of objection submitted by those objectors that have either signed a costs agreement with the MSC or obtained a waiver from the independent adjudicator in accordance with [PD2.9.6](#).
 - PD2.9.8.2 If the independent adjudicator fails to decide the waiver issue within the time specified by [PD2.9.6](#), and such failure is attributable solely to the independent adjudicator, the time deadline specified in the first sentence of this subsection shall be extended for such limited period as the MSC considers appropriate under the circumstances.
- PD2.9.9 Nothing in this section shall prevent reconsideration by the CAB and consultations pursuant to [PD2.5](#).

PD2.10 General provisions relating to the objections process

- PD2.10.1 Where these procedures require that any notice or document is to be submitted to the independent adjudicator or to the MSC within, or before, a specified time limit, the following provisions shall be applied in order to determine whether the notice or document was served in time:
 - PD2.10.1.1 Any references to time shall be, unless it is otherwise specifically stated, British Standard Time or, during daylight savings, British Daylight Time.
 - PD2.10.1.2 "Days" means "working days".
 - PD2.10.1.3 A document served after 5 p.m. or at any time on a Saturday, Sunday or a United Kingdom Bank Holiday will be treated as being served on the next working day.
 - PD2.10.1.4 Where the time limits prescribed in these procedures do not account for statutory holidays in countries where involved stakeholders reside, the

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independent adjudicator may allow an extension of time limits so as to give effect to the intent of these procedures; that all parties have the nominated number of days within which to respond.

- PD2.10.1.5 In exceptional circumstances, the independent adjudicator may consider and grant an extension to any of the time limits set out in these procedures.
- PD2.10.2 Service shall be effective if made by hand, or by facsimile or by the provision of the information in an electronic document containing a digital signature.
- PD2.10.3 Service by hand shall be effective when made. Delivery by facsimile shall be effective when the "transmit confirmation report" confirming the transmission to the recipient's published facsimile number is received by the transmitter. An electronic document is presumed to be received by the addressee when it enters an information system designated or used by the addressee for the purpose of receiving documents of the type sent and it is capable of being retrieved and processed by the addressee.
- PD2.10.4 The working language of the MSC is English. Documents shall be submitted in English, or with an accompanying full English translation at the cost of the submitting party.
- PD2.10.5 For the avoidance of any doubt, every notice or document issued, or posted on the MSC website, by the independent adjudicator or the MSC, shall bear the date upon which it was so issued or posted and shall also specify the date upon which any subsequent notice, response, submission or document is required to be submitted in accordance with these procedures. Notwithstanding any other provision of these procedures, and regardless of whether a particular document is posted on the MSC website or not, any documentation submitted by any party to an objection, except for documentation relating to costs under [PD2.9](#), shall be available to any other party.

PD2.11 Final documentation of an objection on the MSC website

- PD2.11.1 In accordance with [FCR 7.19.1](#), the Public Certification Report shall include all decisions made by the independent adjudicator and shall indicate all the changes to the Final Report and Determination that have been made as a result of the objection.
- PD2.11.2 All objections-related documents, except the Public Certification Report, will be removed from the MSC website 6 months after the completion of the assessment.

End of Annex PD
