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Brussels, 29.11.2024

REGARDING MARINTRUST'S CERTIFICATION OF ESTABLISHMENTS IN OCCUPIED WESTERN SAHARA

Western Sahara Resource Watch (WSRW) is privileged to present you with our compliments. We are writing to inquire about MarinTrust's certification of companies that operate in occupied Western Sahara.

The background for our request is that we are publishing a report on the certification schemes involved in the problematic trade of fisheries products from Western Sahara on the websites www.vest-sahara.no and www.wsrw.org in approximately a month from now, and we are going to include references to your company in the report.

We have some questions that we look forward to seeing responded to, outlined further below, **prior to 15 December 2024**.

Specifically, we are reaching out in relation to the following cases:

- The 2023 certification of **Tiscop Trading**,¹ in accordance with the requirements of ISO/IEC 17065 for fishmeal and fish oil products, and with the requirements of MarinTrust's Marine Ingredients Responsibly Supplied Chain of Custody Standard Issue 2.
- The 2022 certification of **Copelit S.A.R.L.**² as complying with the MarinTrust Standard for Responsible Supply of Marine Ingredients Version 2.0.
- The 2022 certification of **KB Fish**³ (PE16/819942701) as complying with MarinTrust Global Standard for Responsible Supply V2.0.
- The 2024 certification of **Laayoune Protein**⁴ as complying with the MarinTrust Standard for Responsible Supply of Marine Ingredients Version 2.0.
- The 2022 certification of **Protein and Oil Industry**⁵ as complying with MarinTrust Global Standard for Responsible Supply V2.0. (PE19/819943202). T
- The 2022 certification of **Atlantic Tank Terminal**⁶ as complying with Marine Ingredients Responsibly Supplied Chain of Custody Standard Issue 1.1.
- The 2020 certification of Seafoodia's supplier **DIPROMER**⁷ for complying with the Marine Ingredients Responsibly Supplied Chain of Custody Standard Issue 1.1.

¹ https://www.marin-trust.com/sites/marintrust/files/2023-07/MTCOC175%20TISCOP%20TRADING%20s.a.r.l.%20Certificate%202023-2026_.pdf

² <https://www.marin-trust.com/sites/marintrust/files/2022-05/205%20COPELIT%20s.a.r.l.%20Certificate.pdf>

³ https://www.marin-trust.com/sites/marintrust/files/2022-11/PELIM_819942701_GenericCertificate_Final.pdf

⁴ <https://www.marin-trust.com/sites/marintrust/files/2021-10/173%20Laayoune%20Proteine%20Certificate.pdf>

⁵ https://www.marin-trust.com/sites/marintrust/files/2022-10/PELIM_819943202_GenericCertificate_Final.pdf

⁶ https://www.marin-trust.com/sites/marintrust/files/2022-02/MTCOC164%20ATLANTIC%20TANK%20TERMINAL%20Certificate%202022-2025_.pdf

⁷ https://www.marin-trust.com/sites/marintrust/files/2022-06/MTCOC133%20Seafoodia%20Certificate%202020-2023_.pdf

- The German fishmeal importer **Köster Marine Proteins**⁸ for complying with the MarinTrust - Marine Ingredients Responsibly Supplied Chain of Custody Standard Issue 1.1". KMP is a regular importer of fishmeal from occupied Western Sahara.

We fail to understand how MarinTrust came to the conclusion that companies in the occupied territory could obtain certificates. Secondly, we are surprised to see that the geographical location of all of seven Moroccan establishments is «Laayoune, Morocco» or «Dakhla, Morocco». The cities of El Aaiún (also spelled 'Laayoune') and Dakhla are not located in Morocco.

The geographical error, failing to relate to the UN maps and rulings of international courts on the matter of Western Sahara, as we see it, constitutes an act of gross negligence.

Allow us to first contextualise our query. The United Nations consider Western Sahara to be a non-self-governing territory without an administering power in place. The International Court of Justice has confirmed that Morocco has no sovereignty over the territory, and that the people of Western Sahara have a right to self-determination – the right to determine the future status of the territory.⁹ In 1988, the UN was able to broker a ceasefire arrangement between Morocco and the Western Sahara liberation movement, Polisario, in which both parties agreed to hold a referendum on self-determination.¹⁰ To that goal, a UN mission (MINURSO) has been deployed to the territory, but it has not been able to organise a referendum as Morocco continues to block any effort that offers a choice beyond integration. In November 2020, the ceasefire collapsed after the Moroccan army seized a section of the UN buffer zone to break up a Saharawi protest.¹¹

While well over a hundred of UN Resolutions, and rulings by the International Court of Justice, the European Court of Justice¹² and the African Court on Human and People's Rights¹³, all underline that Morocco has no sovereignty or administering mandate over Western Sahara, Morocco continues to militarily control about three-quarters of the territory. Incentivized by its exploitation of the territory's resources, Morocco has little interest to genuinely take part in the UN-mediated peace process. Meanwhile, the lingering conflict continues to have a high human and humanitarian cost: over 170,000 Saharawis are stuck in refugee camps in neighbouring Algeria, surviving in harsh desert conditions and dwindling humanitarian aid. Saharawis who live under the yoke of Morocco's occupation are victims of serious human rights violations that have been reported by the UN Human Rights Committee, UN Working Group on Arbitrary Detention, the UN Special Rapporteur on Human Rights Defenders, in addition to credible international organisations such as Human Rights Watch, Amnesty International, and others. In 2023, the UN High Commissioner for Human Rights lamented the fact that his Office has not been allowed to visit Western Sahara for the last eight years.¹⁴ Year after year, Western Sahara is ranked among the worst countries and territories in terms of political rights and civil liberties, on par with countries and territories like North Korea, Syria, Afghanistan and Crimea.¹⁵

The status of the territory comes with repercussions for business activities. As established in 2002 by the UN Legal Counsel at the request of the Security Council, any economic activity in the territory would be in violation of international law if not undertaken in accordance with the wishes and the interests of the people of the territory.¹⁶ We also refer to the conclusions of the UN Treaty Body on Economic, Social and Cultural Rights¹⁷ and

⁸ <https://www.marin-trust.com/sites/marintrust/files/2022-02/MTCCOC140%20K%C3%B6ster%20Marine%20Proteins%20GmbH%20Certificate%202021-2024.pdf>

⁹ International Court of Justice, Western Sahara, <https://www.icj-cij.org/case/61>

¹⁰ The "settlement proposals" are included in the Report of the UN Secretary General on Western Sahara of June 1990, available here:

https://minurso.unmissions.org/sites/default/files/unsr_report_18_june_1990.pdf

¹¹ WSRW, 19.11.2020, Saharawi gov calls for halt of all activity in Western Sahara over war, <https://wsrw.org/en/news/saharawi-gov-calls-for-halt-of-all-activity-in-western-sahara-over-war>

¹² The Rulings for cases T-512/12, T-180/14, C-266/16, T-275/18 and combined cases T-344/19, T-356/19 and T-279/19 can be accessed at the site of the EU Court of Justice, <http://curia.europa.eu>.

¹³ African Court on Human and People's Rights, 22.09.2022, Ruling on Application N° 028/2018 <https://www.african-court.org/cpmt/storage/app/uploads/public/632e0f3ad/632e0f3ad580e748464681.pdf>

¹⁴ OHCHR, 07.03.2023, Global update: High Commissioner outlines concerns in over 40 countries, <https://www.ohchr.org/en/statements-and-speeches/2023/03/global-update-high-commissioner-outlines-concerns-over-40-countries>

¹⁵ <https://freedomhouse.org/countries/freedom-world/scores?sort=asc&order=Total%20Score%20and%20Status>

¹⁶ UN Security Council, 12.02.2002, Letter dated 29 January 2002 from the Under-Secretary-General for Legal Affairs, the Legal Counsel, addressed to the President of the Security Council, S/2002/161, <https://undocs.org/S/2002/161>

¹⁷ UN Economic and Social Council, 22.10.2015, Concluding Observations on the fourth periodic report of Morocco, E/C.12/MAR/CO/4*, §6, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2fMAR%2fCO%2f4&Lang=en

of the UN Human Rights Committee¹⁸, which have both emphasized the need of obtaining the Saharawi people's "consent to the realization of developmental projects and [resource] extraction operations". In this context, it is important to stress that the rights of the people of Western Sahara should not be viewed through the concept of FPIC, as they are not an indigenous people with a certain rights to a part of a territory in a state that they recognise as such - the people of Western Sahara are the holders of the sovereign rights to Western Sahara as a whole. Their homeland is in part under foreign occupation, but the right to self-determination - the right to decide the status of the territory as a whole, and of the resources harboured therein - lies with the Saharawi people. The UN treats the unresolved conflict in Western Sahara through the right to self-determination as the cornerstone principle, and does not regard this as an indigenous peoples issue.

Recent years have witnessed an emerging body of law pertaining to Morocco's claim to the territory. Since 2015, in ten (!) consecutive rulings, the Court of Justice of the European Union has concluded on the following points as settled:

- The territory of Western Sahara constitutes a territory distinct from that of the Kingdom of Morocco.¹⁹
- Morocco has no sovereignty²⁰ or administering mandate²¹ over Western Sahara.
- Consequently, the waters adjacent to Western Sahara cannot be regarded as part of the Moroccan fishing zone, territorial waters, exclusive economic zone, or any other notion used to describe Morocco's role vis-à-vis the waters off Western Sahara.²²
- The people of Western Sahara are to be regarded as a third party to the EU's agreements with Morocco, and that as such, no agreement can affect their territory without their consent, as a corollary of the right to self-determination.²³
- The Court is clear that the right to consent resides with the people of Western Sahara, and not with the population of the territory.²⁴ The Court stipulates that "a majority of the population of Western Sahara is not part of the people holding the right to self-determination, namely the people of Western Sahara. That people, which for the most part has been displaced, is the sole holder of the right to self-determination with regard to the territory of Western Sahara."²⁵ The Court adds that "there is a difference in that regard between the concept of the 'population' of a non-self-governing territory and of the 'people' of that territory. The latter refers to a political unit which holds the right to self-determination, whereas the concept of 'population' refers to the inhabitants of a territory."²⁶
- The Court has firmly established the position of Front Polisario, the UN-recognised representation of the people of Western Sahara to be able to bring cases before EU Courts on behalf of the Saharawi people, and that it has access to the Court to defend their right to self-determination.²⁷
- In Case C-399/22, which specifically dealt with the labelling of products from Western Sahara, the Court again emphasised the separate and distinct status of the territory in relation to Morocco, and concluded that at the stages of import and sale to the consumer, the labelling of the goods from Western Sahara must indicate Western Sahara alone as the country of origin of those goods.²⁸

Against that backdrop, we have several questions about the decision to certify companies operating in the territory.

Regarding MarinTrust and international law:

1. Does MarinTrust agree with the ICJ, CJEU, UN and the African Court on Peoples' and Human Rights that Western Sahara is not part of Morocco?

¹⁸ UN Human Rights Committee, 01.12.2016, Concluding Observations on the sixth periodic report of Morocco, §10, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR/C/MAR/CO/6&Lang=En

¹⁹ Judgment of 21 December 2016, EU:C:2016:973, §92, and reiterated in the Judgment of 27 February 2018, EU:C:2018:118, §62, Judgment of 4 October 2024, EU:C:2024:833, §163, Judgment of 4 October 2024, EU:C:2024:839, §85 and Judgment of 4 October, EU:C:2024:835, §134.

²⁰ Judgment of 10 December 2015, EU:T:2015:953, §241. Considered a settled matter in subsequent rulings.

²¹ "Account must also be taken of the fact that the Kingdom of Morocco does not have any mandate granted by the UN or by another international body for the administration of that territory, and it is common ground that it does not transmit to the UN information relating to that territory, such as those provided for by Article 73(e) of the UN Charter." Judgment of 10 December 2015, EU:T:2015:953, §233. Considered a settled matter in subsequent rulings.

²² Judgment of 27 February 2018, EU:C:2018:118, §67-85. Considered settled in subsequent rulings.

²³ Judgment of 21 December 2016, EU:C:2016:973, §104. Reiterated and refined in subsequent rulings.

²⁴ Judgment of 4 October 2024, EU:C:2024:833, §180-181. Judgment of 4 October 2024, EU:C:2024:835, §152-153.

²⁵ Judgment of 4 October 2024, EU:C:2024:833, §157. Judgment of 4 October 2024, EU:C:2024:835, §128.

²⁶ Judgment of 4 October 2024, EU:C:2024:833, §158. Judgment of 4 October 2024, EU:C:2024:835, §129.

²⁷ Judgment of 4 October 2024, EU:C:2024:833, §96-138, Judgment of 4 October 2024, EU:C:2024:835, §70-109.

²⁸ Judgment of 4 October 2024, EU:C:2024:839, §89.

2. Does MarinTrust agree with the CJEU that the waters offshore Western Sahara do not belong to Morocco's EEZ?²⁹
3. We take note of MarinTrust certificate relating to Laayoune Proteine³⁰, which has its operations in Western Sahara. The certificate explains that the waters from where Laayoune Proteine is sourcing its raw material constitutes the "Moroccan EEZ". The MarinTrust certificate relating to Cibel II³¹ in Agadir, refers to European Pilchard originating from similar "A", "B" and "C" zones within the "Moroccan EEZ". As known, Zone A is offshore Morocco proper, Zone B is offshore both Morocco and Western Sahara, stretching south to the 27° N latitude, whereas Zone C is only offshore Western Sahara. We see no other logical explanations to these references than it is in MarinTrust's opinion that the Moroccan EEZ extends into Western Sahara. On what legal basis has MarinTrust come to such a conclusion?
4. The MarinTrust Standard Version 3 mentions in its introduction that it "draws upon the following normative documents: • United Nations Convention on the Law of the Sea. 1982"³² If Morocco is neither the sovereignty power nor the administering power over the non-self-governing territory of Western Sahara, and in light of the 2018 CJEU ruling on fisheries in the territory (paragraph 67-69), how can Morocco's issuing of fishing licences for the waters off Western Sahara be seen as in line with the MarinTrust Standard, namely that the Standard draws upon the UNCLOS?
5. MarinTrust has, during the years 2019-2024 finalised a series of reports assessing sustainability of the stocks in "Morocco":
 - "By-product Fishery Assessment Sardine in the Eastern-Central Atlantic, Zones A&B"³³, September 2022
 - "By-product Fishery Assessment MAR003 – Sardine in FAO 34, Morocco Zones A + B"³⁴, August 2024
 - "By-product Fishery Assessment MAR005 – Atlantic chub mackerel in FAO 34"³⁵, October 2024
 - "By-product Fishery Assessment MAR003 – European pilchard (*Sardina pilchardus*), FAO 34 Central zone, Zones A and B"³⁶, September 2023.
 - "By-product Fishery Assessment Round sardinella (*Sardinella aurita*) in FAO 34, Atlantic eastern central"³⁷, February 2024.
 - Report on Chub Mackerel (*Scomber japonicus/colias*), FAO 34 Morocco, October 2019³⁸. These reports make no distinction between the waters of Morocco and Western Sahara, and state that the "Country of origin of the product" is Morocco. Around half of the establishments mentioned in the document are in Western Sahara. Why is the data from Western Sahara presented as being of Morocco?
6. Does MarinTrust agree with the ICJ³⁹ that the right to self-determination of a people of a non-self-governing territory constitutes a fundamental human right?
7. Does MarinTrust have any policy in place in relation to companies operating in occupied territories?

²⁹ Judgment of the Court (Grand Chamber) of 27 February 2018, ECLI:EU:C:2018:118, §67-69, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62016CJ0266>

³⁰ <https://www.marin-trust.com/sites/marintrust/files/2022-08/PROTEIN%20AND%20OIL%20INDUSTRY.pdf>

³¹ https://www.marin-trust.com/sites/marintrust/files/2024-06/PELIM_819942652_GenericCertificate_Final.pdf

³² <https://www.marin-trust.com/sites/marintrust/files/2023-11/STG-001%20-%20MarinTrust%20Global%20Standard%20for%20Responsible%20Supply%20of%20Marine%20Ingredients%20V3.0.pdf>

³³ https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/MAR003%20European%20sardine%20Eastern%20central%20Atlantic%20Zones%20A%20BB%20byproduct%20re-approval%20Sep%202022_Final.pdf

³⁴ https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/MAR003_Sardine_Morocco%20FAO%2034%20Zones%20A%20%20B%20B_Surveillance%202_August%202024_Final.pdf

³⁵ https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/MAR005%20Atlantic%20chub%20mackerel%20FAO%2034%20byproduct%20surveillance%20October%202024_Final.pdf

³⁶ <https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/MAR003-%20European%20pilchard-%20Byproduct%20fishery%20assessment%20Final.pdf>

³⁷ https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/MAR001_Morocco_Round%20sardinella_FAO%2034_Surveillance%202_February_2024.pdf

³⁸ https://www.marin-trust.com/sites/marintrust/files/approved-raw-materials/Chub%20Mackerel%20%28Scomber%20japonicus%29_FAO%2034_Morocco_Re-approval_2019_Final.pdf

³⁹ <https://www.icj-cij.org/sites/default/files/case-related/169/169-20190225-ADV-01-00-EN.pdf>

Regarding the certification:

8. We notice that all the above mentioned MarinTrust certified facilities in Western Sahara are referred to as being in “Morocco”. Has Global Trust, Intertek/SAI or SGS ever informed MarinTrust that the physical address of the above-mentioned establishments is incorrect, through placing the cities of El Aaiún and Dakhla within the country of “Morocco”?
9. Which countries’ laws regulate the contracts between Global Trust, Intertek/SAI and SGS, on the one hand, and the certified companies on the other?
10. Did Global Trust, Intertek/SAI and SGS physically travel into the occupied territory as part of the MarinTrust certification?

Regarding the standard:

11. In the Global Standard for Responsible Supply of Marine Ingredients version 3.0⁴⁰, under the point “Eligibility criteria” it is established that: “To be eligible to apply for certification, facilities shall: [...] • be legally licenced in the country of operation • meet the legal obligations that are in place for the jurisdiction(s) where marine ingredients are produced and supplied”
 - a. Does MarinTrust agree that the country of operation of the establishments in El Aaiún and Dakhla is in fact not Morocco?
 - b. If that is the case, how can it be seen as in line with the Standard that the place where marine ingredients are produced and supplied is located outside of the internationally recognised borders of the country that issued the licence to operate?
12. In terms of social accountability, the Responsible Supply of Marine Ingredients version 2 requires applicants to “have a documented policy that demonstrates compliance with their national legislation to ensure that their marine ingredient products are manufactured in compliance to all relevant employment, welfare and safety requirements as stated in this sector”. Which national legislation does MarinTrust consider to be applicable in Western Sahara?
13. In terms of reporting and recording of material, the Standard requires that recording of raw material includes proof of authorisation to engage in the specific fishing activity. Does MarinTrust accept authorisations accorded by the government of Morocco to be legally valid in occupied Western Sahara?
14. The Standard for Responsible Supply of Marine Ingredients, version 2, contains provisions on “responsible sourcing of legal, regulated and reported fishery material and avoidance of material sourced from IUU fishing activity”. The Standard defines illegal fishing as “operating in a country’s waters without permission”. The people of Western Sahara, through their government in exile, have not permitted any of the current fishing activities in their land’s waters. All fishing in the waters offshore Western Sahara takes place on the basis of licences accorded by the Moroccan government, which has no sovereignty, jurisdiction of administering mandate over Western Sahara or its waters. The provisions on responsible traceability further emphasize the importance that MarinTrust attaches to legally sourced material, in containing requirements that compliant marine ingredients are to be traced back to an approved fishery material, and that avoidance of IUU fishing should be demonstrated.
 - a. If not IUU, how does MarinTrust qualify the *legal nature* of the Moroccan fisheries operations in Western Sahara?
 - b. On what legal basis, according to MarinTrust, does the supplier of raw materials in Western Sahara sell fish caught in Western Sahara to the certified establishments?
15. The MarinTrust certificate of the facilities of Nouvelle Ougala⁴¹ in Tan Tan, South Morocco, establish that the raw materials are supposed to originate from the «Moroccan EEZ».

⁴⁰ <https://www.marin-trust.com/sites/marintrust/files/2023-11/STG-001%20-%20MarinTrust%20Global%20Standard%20for%20Responsible%20Supply%20of%20Marine%20Ingredients%20V3.0.pdf>

⁴¹ <https://www.marin-trust.com/sites/marintrust/files/2022-02/IMPRESION%20DE%20CERTIFICADO%20-%20NOUVELLE%20OUGALA.pdf>

- a. What is done, if anything, to ascertain that the raw materials that are transported to the factory Nouvelle Ougala, either by sea or by land, originate from the Moroccan EEZ, and not from south of parallel 27°40'N?
 - b. Have measures been taken vis-a-vis the certified companies in South Morocco to ascertain that they agree with the interpretation of the CJEU and of the United Nations that the Moroccan EEZ does not extend into the waters offshore Western Sahara?
16. The provisions on responsible manufacturing practices require packaging and labelling to display the country of production. Does MarinTrust accept that the above listed certified companies, all located outside of Morocco, include Morocco as the country of production on packaging and labelling?
17. The Global Standard for Responsible Supply of Marine Ingredients Version 3.0, paragraph 2.11.2.1, establishes that facilities that are sourcing whole fish, need to ascertain that the "facility shall complete and document the results of the MarinTrust Social Responsibility Risk Assessment for all vessels". From what we understand, this is done based on data from the "Social risk assessment guidance for facilities", and, particularly, the Country Risk Ratings of Annex 2.⁴²
 - a. As long as the territory of Western Sahara - which according to the CJEU, ICJ, African Court of Human and Peoples Rights - is not enlisted with a Country Risk rating, how is this measured?
 - b. If applying the risk data for Morocco on Western Sahara, why is that done that way?
18. The Standard contains requirements on community engagement. It expects the applicant to have a written evaluation of the potential impacts of direct operations on the local community.
 - a. How does MarinTrust evaluate a written application by an applicant in occupied Western Sahara, that concludes a positive impact on "the local community" (which are in Western Sahara are in majority Moroccan settlers) against the wider impacts of certifying a business operation that runs on the back of illegal fishery in a territory under occupation, against the will of the people of the territory?
 - b. Would MarinTrust consider the impact of a business on the local community to be of higher importance than the impact on the rights of the people of the territory in which the business operates?
 - c. In terms of community engagement, "regular engagement with local community representatives and organizations" is expected. What relevance does this have in Western Sahara, where the denial of the right to freedom of assembly for Saharawis is well documented (there are no registered Saharawi organisations, as this is considered treason), and where the local community representatives are likely to be Moroccan, and not Saharawi (as Saharawis are a minority in their own land, and openly identifying yourself as Saharawi puts you under police surveillance)?

Regarding credibility of the standard:

19. Does MarinTrust consider it relevant to correctly reflect the country in which the certified establishments are located on its website?
20. Does MarinTrust consider it relevant that its certificates correctly reflect the country in which the certified establishments are located?
21. Does MarinTrust qualify incorrect country-of-origin as a matter of Food Fraud?
22. Consumers have the right to know the origin of the products that they purchase. The companies operating in Western Sahara are not honestly reporting the country of origin of their products. What reputational risks does MarinTrust consider it might have for the Standard that its logo is to be found on products displaying a false country of origin, in violation of the CJEU ruling of 4 October 2024?
23. If an establishment that wishes to be certified disagrees with MarinTrust in terms of which country the establishment it is located in, is MarinTrust still willing to accept the certification of such

⁴² <https://www.marin-trust.com/sites/marintrust/files/2024-08/STG%20-%20006%20MarinTrust%20V3%20factory%20standard%20-%20social%20risk%20assessment%20-%20whole%20fish%20vessels%201.1.pdf>

establishments? If yes, how can a company be trusted in terms of fulfillment of basic criteria under the standard if it fails to agree in which country it is located?

We'd be grateful for your response. Any answer from your company will be included in the report. We'd appreciate answers prior to 15 December.

A copy of this letter is sent to Western Sahara Campaign UK.

Looking forward to hearing from you,

Sincerely,

Erik Hagen,

Western Sahara Resource Watch

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