



# NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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## Action Memo

**File Number:**Cons 15-032

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**Agenda Date**4/6/2015

**Agenda Number:**C8

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**Dan Hull, Chairman**  
**Chris Oliver, Executive Director**

**SUBJECT:**  
Observer Coverage on Small CPs - Initial Review

**ESTIMATED TIME:**  
2 hours

**ACTION REQUIRED:**  
Initial Review of RIR/IRFA to place certain small catcher/processors in partial observer coverage

**BACKGROUND:**  
In December 2014, the Council reviewed a discussion paper for a regulatory amendment analysis to revise the allowances for placing small catcher/processors in the partial coverage category. The Council had previously identified this regulatory change as a high priority for potential regulatory amendments to the Observer Program. Currently, under the Program, there is a general requirement that all catcher/processors are placed in the full coverage category, with two limited exceptions based on a vessel's activity from 2003 through 2009, and one exception based on a minimal amount of processing. The analysis, prepared by NMFS staff, evaluates different ways that the Council might consider revising the thresholds for catcher/processors with relatively small levels of groundfish production, while still maintaining an appropriate balance between data quality and the cost of observer coverage, and ensuring the threshold is not unduly difficult to apply and enforce.