



# NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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## Action Memo

**File Number:**Cons 17-005

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**Agenda Date**4/3/2017

**Agenda Number:**C10

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

**SUBJECT:**

Lead Level 2 Observers - Initial Review

**STAFF CONTACT:** Diana Evans

**ACTION REQUIRED:**

Review analysis and determine whether to release for public review.

**BACKGROUND:**

At this meeting, the Council will review a Regulatory Impact Review (RIR) evaluating the costs and benefits of alternatives to address the potential for a shortage of fixed-gear lead level 2 (LL2) observers for deployment on freezer longline vessels. The majority of freezer longline vessels operate under monitoring requirements that require them to have at-sea scales and carry a single LL2 observer onboard at all times when the Pacific cod fishery is open in the BSAI. Vessel owners and observer coverage providers have reported challenges with LL2 observer availability, the consequence of which can be that the vessel has to delay fishing (with attendant cost).

The RIR analyzes various alternatives to address potential shortage of LL2 observers by either (1) creating a regulatory exception to the monitoring requirement, (2) creating additional opportunities for observers to gain the necessary experience to become endorsed as a LL2, or (3) creating an alternative monitoring requirement that would allow a vessel to conduct fishing without a LL2 observer onboard. Additionally, the analysis includes an option to expand the application of these alternatives to all fixed gear vessels that have a LL2 requirement.