

**E1 Staff Tasking: Modifications to Lead Level 2 Endorsement Requirements**  
**Council Motion**  
**October 8, 2025**

The Council adopts the following purpose and need statement and list of alternatives for analysis.

Purpose and Need

The purpose of this action is to revise requirements for Lead Level 2 (LL2) observers in the North Pacific Observer Program while maintaining high standards for LL2 observer qualification. The majority of monitored trips/deliveries in the North Pacific occur in the full coverage category, and many of these trips require a LL2-endorsed observer. The full coverage program continues to face challenges in the ability to generate a pool of LL2-endorsed observers for deployment, given fewer vessels on which to meet the two-deployment minimum as well as meet the minimum number of hauls required for endorsement. The lack of qualified observers risks the ability of full coverage fisheries to operate under the current regulations. Modifying the current criteria for endorsement in regulations at 50 CFR 679.53 could increase the pool of LL2-qualified observers and mitigate potential impacts of LL2 shortages on vessel operators.

Alternatives

**Alternative 1** - No action (status quo).

*The action alternatives are not mutually exclusive.*

**Alternative 2** - Modify the LL2 endorsement criteria at § 679.53(a)(5)(v) to allow observer experience, including sampled hauls and observer cruises (deployments) in the At-Sea Hake Observer Program to count towards meeting requirements to obtain a LL2 endorsement in Alaska.

**Alternative 3** - Modify the LL2 endorsement criteria at § 679.53(a)(5)(v) to allow hauls sampled at shoreside plant offloads in Alaska to count towards the minimum sampled haul requirement to obtain a LL2 endorsement in Alaska (§ 679.53(a)(5)(v)(A) and (C)(3)).

**Alternative 4** - Modify the LL2 endorsement criteria at § 679.53(a)(5)(v)(A) and (C)(3)) to revise the minimum sampled hauls performed on a catcher/processor using trawl gear or a mothership from 100 to 60 sampled hauls.

**Alternative 5** - Provide the North Pacific Observer Program the authority to waive LL2 requirements for deployment of observers on full coverage vessels when no LL2 observers are reasonably available.