

## **Action Memo**

## File Number:Cons 14-025

Agenda Date12/8/2014

## Agenda Number:C9

Dan Hull, Chairman Chris Oliver, Executive Director

SUBJECT: Observer coverage on small CPs - Discussion Paper

ESTIMATED TIME: 3 hours

ACTION REQUIRED: Review discussion paper; take action as necessary.

## BACKGROUND:

In February 2014, the Council evaluated potential regulatory amendments for the Observer Program, and identified "revising allowances for small catcher/processors to be placed in partial coverage" as a high priority. NMFS has prepared the attached discussion paper which describes the purpose and need for the amendment, and proposes a draft set of alternatives for evaluating the issue. The alternatives have been developed to meet three objectives:

- Continue to maintain a relatively limited exception to the general requirement that all catcher/processors are in the full coverage category, so that independent estimates of catch can be made for these operations;
- Establish an appropriate balance between data quality and the cost of observer coverage; and
- Establish a threshold that is not unduly difficult to apply and enforce.

NMFS is seeking Council feedback on the statement of purpose and need, and the draft alternatives.