

M E M O R A N D U M

TO: Council, AP and SSC Members  
FROM: Jim H. Branson  
Executive Director  
DATE: May 12, 1987  
SUBJECT: Council Observer Program

ACTION REQUIRED

Information only.

BACKGROUND

(a) Status Report on Pilot Observer Program

Since receiving approval to expend \$200,000 in programmatic funds for a pilot domestic observer program, Council staff has been working with staff members of the Northwest & Alaska Fisheries Center, NMFS-Alaska Region, and Alaska Sea Grant to establish the program's framework. Attachment A is a summary of a planning meeting held in Seattle on May 1 to discuss this matter.

(b) Review of Domestic Observer Policy

At the May 1 planning meeting, the question was raised whether Sections 1 and 5 of the Council's Domestic Observer Policy (Attachment B) should be strictly applied to the pilot program or whether observer placement could be handled, in this instance only, by NMFS and the Council. The Council may wish to ask the Domestic Observer Committee to address this question at its evening meeting May 21. The Council may also wish to ask the Committee to review NMFS' draft Domestic Observer Policy (Attachment C) on Thursday evening. Comments on the policy statement must be received by the NMFS Central Office by June 15, 1987.

## DOMESTIC OBSERVER PROGRAM

Planning Meeting Summary

May 1, 1987

Representatives from the Northwest & Alaska Fisheries Center, NMFS-Alaska Region, Alaska Sea Grant, and the Council met in Seattle on May 1, 1987 to discuss the structure of the pilot domestic observer program, the functions of the observers, the distribution of the observer effort, and the roles of the various agencies. In attendance were Bill Aron, Bill Robinson, Bob McVey, Ron Dearborn, Janet Wall, Loh Lee Low, Rich Marasco, Fred Gaffney, Jim Branson, Clarence Pautzke, Ron Miller, and Denby Lloyd.

In discussions, four main characteristics of the pilot observer program were emphasized:

- (1) It is a pilot program, an interim solution to a longer term need for domestic observers in the groundfish fleet. The \$200,000 in programmatic funds will not provide much more than about 34 to 36 man-months of at-sea time and even that may be optimistic once all the real costs shake out.
- (2) It is a research program. The observers will collect badly needed data on catch rates of target and bycatch species that will be used in future management of the fisheries. It is not the purpose of the observers to monitor the fisheries on a daily basis with an eye toward making inseason adjustments or closures.
- (3) Taking an observer aboard will be voluntary on the part of the vessel owner or skipper. NMFS and the Council will determine suitable coverage by fleet segment, time and area, but will depend heavily on the industry associations to nominate vessels willing to take observers.
- (4) All observer data will be held confidential. Information generated from the pilot program will be merged into the large observer data base at the Northwest & Alaska Fisheries Center and have the full protection of federal disclosure laws.

Though the details still need to be finalized, the following roles were discussed for each agency:

Northwest & Alaska Fisheries Center. The Center will provide a list of six to nine or more top flight, trained, experienced observers for deployment in the domestic fleet, and will provide gear and other materials as now done for the foreign observer program. The Center will help in post-trip debriefing as necessary, and also could act as a major point of contact for embarking observers on factory trawlers departing Seattle if that is preferable over embarking in Alaska. Center scientists also will help in determining where and when observers should be placed to obtain optimal coverage.

University of Alaska Sea Grant. Alaska Sea Grant will be the major contractor for the Council's programmatic funds and be fully responsible for the day-to-day management of the observer program, including arranging for observers to embark on the nominated vessels, for lodging between trips, and payment of the observers who all will be employees of the University of Alaska Sea Grant Program. Sea Grant will also provide for debriefing of observers as necessary.

NMFS-Alaska Region. The Regional Office, in consultation with the Council and the Northwest & Alaska Fisheries Center, will provide direction on fleet coverage by observers. The Region could also help in debriefing personnel disembarking in Southeast Alaska.

North Pacific Fishery Management Council. The Council and its staff will be in close touch with NMFS and Sea Grant, not only to advise on the disposition of the observers throughout the fleet but also to help with debriefing for those domestic observers coming through Anchorage.

The observer program is expected to get under way on July 1 this year, and meeting participants felt that it would be productive to meet with industry and association representatives on May 21, Thursday night of Council week, to go over the program and enlist their help in nominating vessels. Because this is a voluntary program, industry associations will be very valuable points of contact with the fleet.

The results of the Thursday night meeting, along with more details of the program operation will be available for Council discussion and approval on Friday. The Council is requested to write a letter to industry fully explaining the domestic observer program.

Domestic Observer Policy

1. The North Pacific Fishery Management Council should have the lead in determining observer placement;
2. Observer placement should not be punitive and should be on all gear types;
3. Observers should be used to verify bycatches, handling mortalities and to gather data for use in determining equilibrium yield levels;
4. The observer program should not be an enforcement program.
5. When the Council decides domestic observers are needed in a fishery, an ad hoc committee will be established consisting of participants in the relevant fishery and SSC members. The ad hoc committee will set specific observer duties and the level of observer coverage. The percentage of vessels required to carry observers will vary by fishery but may be at a level less than 100% for all fisheries.



APR 24 1987

F/M11:SC

MAY - 6 1987

MEMORANDUM FOR: Regional Fishery Management Councils  
Center Directors  
Regional Directors

FROM:

*for* William E. Evans *W. Evans*  
Assistant Administrator for Fisheries

SUBJECT: Domestic Observer Policy

Dr. Anthony J. Calio, Under Secretary, NOAA, has approved in principle a draft National Marine Fisheries Service (NMFS) domestic observer policy. The scope of this draft policy paper is confined to the mandatory placement of observers on U.S. fishing vessels under the provisions of the Magnuson Fishery Conservation and Management Act (MFCMA).

Attached is a copy of the draft NMFS domestic observer policy paper for your review and comment. I would appreciate having all comments for consideration no later than June 15, 1987. Comments and questions should be addressed to:

Richard B. Roe  
Office of Fisheries Management (F/M1)  
National Marine Fisheries Service, NOAA  
Washington, D.C. 20235  
Phone: (202) 673-5263

All comments received will be considered as we prepare the final policy paper.

Attachment

*Mr. Jim Branson*



NATIONAL MARINE FISHERIES SERVICE  
POLICY FOR REQUIRING OBSERVERS TO BE  
CARRIED ON U.S. FISHING VESSELS (DRAFT)

March 6, 1987

INTRODUCTION

The Americanization of the U.S. Exclusive Economic Zone (EEZ), and the development of sophisticated fishery management plans (FMPs) under the Magnuson Fishery Conservation and Management Act (MFCMA), have accelerated the need for more accurate and timely fisheries monitoring and research data. As a result, some Regional Fishery Management Councils (with support from some members of Congress) are requesting the use of observers on domestic fishing vessels to collect this essential data.

PURPOSE

This paper establishes the policy and addresses the issues related to the placement of National Marine Fisheries Service (NMFS) employees or agents on U.S. fishing vessels.

SCOPE

The policy focuses on the use of mandatory observer programs to collect essential fishery monitoring data to meet the objectives of FMPs implemented under the MFCMA. The policy does not govern the use of any voluntary observer program, including voluntary scientific observer programs, that are carried out for research purposes.

DEFINITIONS

For the purposes of this policy:

Monitoring Observer: means a NMFS employee or authorized agent placed onboard a U.S. fishing vessel to collect monitoring data for management purposes.

Monitoring Data: means catch and effort monitoring data and compliance monitoring data.

Catch and Effort Monitoring Data: means group/fishery data used to assess the performance of the fishery (e.g., to establish when fishery quotas have been reached).

Compliance Monitoring Data: means individual/specific data used to assess the performance of industry participants (e.g., to verify that specific fishing gear is being used).

Scientific Observer: means a NMFS employee or authorized agent placed on board a U.S. fishing vessel to collect scientific data for research purposes.

Scientific Data: means biological and fishery-dependent catch data used to assess fish stocks, their habitat and the effects of fishing.

Authorized Agent: means a person employed by an organization under contract to NMFS to carry out observations on board U.S. fishing vessels.

Secretary: means the Secretary of Commerce.

#### BACKGROUND

Prior to the implementation of the Marine Mammal Protection Act (MMPA) in 1972, the U.S. fishery agencies responsible for scientific research and joint international management of living marine resources beyond the territorial sea had a long history of using scientific investigators on board U.S. vessels to collect fishery monitoring and/or scientific data. These programs were carried out on a voluntary basis and provided a high level of valid fishery-dependent data.

After 1972, fishing which required authorization under the MMPA became subject to certain obligations. One of these obligations was the regulatory requirement that, in certain circumstances, a Government employee or authorized agent be carried on board particular vessels. The purpose of this action was to collect data to monitor the level of marine mammal take and to monitor the performance of individual fishermen. This was the first use of mandatory observers by NMFS.

The passage of the MFCMA in 1976 proclaimed the right of the U.S. Government to manage the marine living resources of the fishery conservation zone (FCZ) and that fishing in these waters was subject to the fulfillment of specific legislative requirements. In the case of foreign fishing, one of these requirements was the mandatory stationing of observers on all vessels. The objective of this program was to gather accurate monitoring and scientific data for both management and research purposes.

Since 1972, NMFS has continued to use scientific investigators or scientific observers, on a voluntary basis in a number of domestic fisheries, as part of the information-gathering matrix required to perform the organization's management and research functions.

Under the MFCMA, Regional Fishery Management Councils (Councils) have systematically "Americanized" the U.S. EEZ and developed more sophisticated FMPs. This process has resulted in the loss of foreign fishing monitoring and scientific data and the need for more timely and accurate U.S. fishing vessel data. Consequently, some Councils have requested that NMFS use mandatory domestic observer programs to collect essential data to meet the objectives of some FMPs.

NMFS, Councils, and the fishing industry generally accept the voluntary use of scientific observers on board U.S. fishing vessels on a non-industry-funded basis. However, the mandatory placement of industry-funded monitoring observers on board U.S. fishing vessels is viewed by many as costly, intrusive, and imposing a management burden on the development of an efficient domestic fishery. Others believe that in non-selective multi-species fisheries managed by way of by-catch limits, or where fisheries products are exported directly from the EEZ, the mandatory use of monitoring observers is an appropriate data-gathering technique.

#### POLICY

- o NMFS considers that, in some circumstances, the use of mandatory observer programs involving U.S. fishing vessels is a legitimate and cost-effective technique of collecting essential fisheries monitoring data.
- o Mandatory observer programs will only be implemented when the Secretary, through the MFCMA fishery management planning process, is satisfied that:
  1. The program, being an integral part of the FMP, is reasonable and the results essential for the conservation and management of the fishery; and
  2. The program will not place a significant inequitable or undue financial or social burden on industry, measured against the overall benefits accruing from the FMP.
- o Mandatory domestic observer programs that have monitoring data collection objectives or a combination of monitoring and scientific data collection objectives will only be implemented on a fully non-Federal funded basis.

#### GUIDELINES

1. A Council/NMFS management team seeking Secretarial approval for an FMP containing provisions for a mandatory observer program must be able to demonstrate that the program is reasonable and that the program results are essential to achieve the FMP's conservation and allocation objectives. It must be clearly established, by examining all the options, that there is no other less costly or intrusive method of collecting the data and that these data are essential to the success of the plan.
2. The program design is to be included in the justification for the FMP and regulation approval. To be reasonable, the following operational elements must be included:



- a. A system of informing all vessel operators and/or vessel owners involved of the objectives and their legal obligations with respect to the observer program. The specific role, responsibilities, and powers of an observer must also be clearly communicated to industry members involved in the program;
  - b. A system of giving the vessel operator and/or vessel owner adequate notice of an observer being stationed on board at a particular place and time;
  - c. A system that allows the vessel operator and/or vessel owner an opportunity to comment on the decision to place an observer on a particular vessel at a particular place and time;
  - d. A system of training and written instruction that ensures that all observers understand their roles, responsibilities, and powers, and that they are fully competent to perform clearly defined activities on board the vessel.
3. To establish that the system of non-Federal funding is fair and equitable, the Councils/NMFS must demonstrate that:
- a. All those benefiting from the results of the program contribute to the costs;
  - b. It will not favor one size or type of vessel over another, and
  - c. It will not result in a lowering of overall industry efficiency.
4. Any form of non-Federal funding of a mandatory domestic observer program managed by NMFS dictates that there be direct accountability to the funding source. To this extent, NMFS will present an annual domestic observer program report. The annual report shall contain:
- a. Program objectives;
  - b. Program activities;
  - c. Program costs; and
  - d. Program results.
5. The analysis required to meet MFCMA national standards, Executive Order 12291, and the Regulatory Flexibility Act must be completed. It must be clearly shown that if a mandatory observer program is likely to have a significant adverse effect on existing cultural, economic, and social relationships in the fishing community, the conservation and economic benefits of the FMP outweigh the costs.

6. Any mandatory observer program must be operated in the most cost-efficient manner considering the total management responsibilities of both the Councils and NMFS. When developing program objectives, a substantiated rationale, through a cost-benefit analysis outlining the potential gains and losses, as to why the program should or should not have particular objectives must be completed. A cost-benefit analysis relating to the management and staffing options will also be required.

### ISSUES

#### Program Objectives: collecting scientific vs. monitoring data

The information-gathering technique of placing an observer on a U.S. fishing vessel can be operated in different ways to achieve different objectives. Two fundamental, but not mutually exclusive, reasons have been expounded for the implementation of domestic observer programs: the collection of scientific data, and the collection of monitoring data. This policy does not address the criteria under which voluntary scientific observer programs will be implemented. However, it is important to understand the characteristics of each in order to recognize the unique legal context of a mandatory program.

**Scientific:** NMFS views the use of scientific observers to collect scientific data as one of many information-gathering techniques that may be cost-effective in some situations. To obtain scientifically valid fishery-dependent catch information from this data collection technique, a fisherman's behavior must not be influenced from the norm. To achieve this, such programs should, where possible, be research-focused, distanced from programs with monitoring objectives, and carried out on a voluntary Government-sponsored basis. NMFS will determine the level of observer coverage, taking into account such variables as species characteristics, fleet profile, type of fishing gear and methods used, fishing patterns, etc., and the precision of information required for the research being carried out.

**Monitoring:** The use of observers to collect accurate real-time monitoring data for management purposes has been used successfully on both foreign and U.S. fishing vessels and is being increasingly requested by the Councils to achieve their FMP objectives. While the level of observer coverage will be determined by factors specific to each fishery and the standard of information required for management decisions, a relatively high level of coverage may be required for effective monitoring at critical times during a fishing season. This, along with the possibility that information collected by monitoring programs may be used in individual enforcement cases or to close a fishery when a quota has been reached, generally necessitates mandatory implementation. Experience in domestic fisheries where NMFS has

tried to implement monitoring programs with voluntary observers supports this assumption.

When establishing the objectives for a mandatory monitoring observer program, the question arises as to whether or not compliance monitoring, along with catch and effort monitoring, should be a program objective. Observers are not enforcement agents, however, individual/specific data collected by observers may be used for enforcement purposes in programs with compliance monitoring objectives.

#### Legal Authority

NMFS believes that the Secretary has the authority, under the broad rule-making provisions of Section 303 of the MFCMA, to place observers on U.S. fishing vessels. This authority is subject to the program being essential to achieving FMP objectives, the program being reasonable and equitable, and the economic and social benefits of the program outweighing the costs. Mandatory observer programs will only be approved by the Secretary when fully justified against these conditions through the FMP process.

#### Liability

To recover monetary compensation for personal injury from a private vessel owner, an observer, whether a Government employee or a contracted representative, would have to prove the vessel owner or operator breached a duty of reasonable care. Although the issue has not been litigated, NMFS believes that an observer would not qualify as a "Seaman" under the Jones Act or admiralty law concepts of maintenance and cure. As a result observers would not be entitled to additional compensation beyond that available under general maritime law.

If the observer is a Federal employee, he or she may file a claim against the Government under the Federal Employees Compensation Act. If the Government pays a FECA claim, it is assigned, to the extent of payment, the right to bring a negligence action against the vessel owner or operator. This does not preclude the observer from also taking a negligence action.

The Government cannot indemnify the vessel owner or take away, by way of contract or regulation, the right of an observer to take a negligence action. It would require specific statutory authority, which is improbable in this circumstance, to indemnify the vessel owner or operator from a negligence action.

Conclusion: The risks of transporting an observer aboard a domestic fishing vessel, therefore, rests ultimately with the vessel owner or operator. This risk can be insured against with a standard protection and indemnity policy. For all practical purposes, the issue of legal liability comes down to the question of who pays the Protection and Indemnity (P&I) insurance premium

to cover the vessel owner and/or operator from the extra liability incurred by carrying an observer. Costs involved in a mandatory program with catch and effort and/or compliance monitoring objectives can be treated as a legitimate business expense in a pervasively regulated industry, payable by those who derive direct economic benefit from the conservation and management of the public resource. This principle is not foreign to the commercial utilization of other publically managed resources including fish stocks conserved and managed by many State governments.

### Financing

Experience in the foreign fishing vessel observer programs and the domestic tuna purse seine observer program indicate the operational costs of implementing any domestic program will be very high. In FY 85, the foreign fishing vessel observer program cost foreign nations a total of \$8.5 million, an average of \$240 per observer day. In FY 85, a 60-day observer trip on a domestic tuna purse seiner cost an average of \$14,000 or \$217 per observer day.

There are two primary financing options available to implement a domestic observer program. They are not mutually exclusive.

1. Government-funded: based on the principle that the management of national natural resources should be paid for by the U.S. taxpayers; or
2. Industry-funded: based on the principle that the management of national natural resources should be paid for by those deriving economic benefits from the utilization of those resources.

It is the NMFS' policy that mandatory observer programs will only be implemented on a non-Federal funded basis. This policy is based on the conviction that a mandatory observer program, as an essential component of an FMP, be treated as a cost of doing business in a pervasively regulated industry and paid for by those who receive direct economic benefit from the management of that fishery. In the realities of today's economic environment, even with the reduction and/or termination of other programs and Congressional reprogramming approval, the NMFS budget could not be stretched to fund the operational costs of any significant mandatory domestic observer program. A Congressional line addition to the NMFS budget for a specific mandatory domestic observer program, such as that which operates in the tuna/porpoise program, is a remote funding option.

The funding options for a non-Federal funded mandatory observer program include:

1. Direct charging of vessel owners required to carry observers;
2. Funding by way of a non-Federal organization(s);
3. A fee or levy on those resource users benefitting from the FMP.

The direct charging of vessel owners is being used in some existing programs as it is the only viable financing alternative presently available. Using this method, all those benefitting economically from the management of the resource may not be sharing in the costs. It can also act in a punitive and discriminating way against vessel size and/or gear type and may lead to serious economic distortions in the harvesting sector.

The voluntary program funding by way of a non-Federal organization(s), such as industry groups and/or State governments, provides the best possible option. However, it may not always be available for consideration.

The option of funding mandatory programs with a fee or levy paid by those deriving direct benefit from the management of the fishery is viewed as being consistent with the principle on which this policy is based. However, the MFCMA does not provide authority to collect fees from domestic fishermen at this time.

Example: In the Alaskan groundfish fishery mandatory observers could be placed on trawlers to collect monitoring data related to the incidental by-catch limits on crab or halibut. The trawlers benefit by being able to fish at times or in areas where they may not have been able to fish without the observer program. The crab or halibut fishermen also directly benefit from the more effective management of the crab or halibut resource based on the information gained from the mandatory trawler observer program. The funding options consistent with this policy would be:

1. Funding by way of non-Federal organization(s) such as non-profit fishermen's organizations and/or state government;
2. Funding by way of a fee paid by those benefitting from the FMP (in this example, the trawlermen and the crab or halibut fishermen).

The financial impact on industry of non-Federal funded observer program may be considerable. The extra costs that may lower profitability and reduce competitiveness must be evaluated against the conservation and economic benefits that may be derived from the management plan. Rigorous testing and evaluation against Executive Order 12291, the Regulatory Flexibility Act, and MFCMA national standards is legally required to avoid undue burden on industry.

Conclusion: Until such time as the MFCMA is amended to allow for the charging of resource user fees mandatory domestic observer programs will only be approved under this policy if other forms of non-Federal funding is available.

### Organization

Mandatory observer programs with monitoring or a combination of monitoring and scientific data collection objectives may only be approved by the Secretary through the FMP process.

While program responsibility for all domestic observer programs will be with field managers, headquarters will maintain an appropriate standard-setting and oversight role.

### Confidentiality

Section 303(d) of the MFCMA and the subsequent regulations at CFR 50 CFR 603 provide for the confidentiality of fishery statistics submitted to the Secretary in accordance with the Act. All individual business and personal information collected as a result of any observer program on U.S. fishing vessels, whether that program is mandated by the MFCMA or not, will remain confidential to NMFS and the individual vessel owner. The Secretary will release such information only when required by a Court order or in aggregate or summary form such that it will protect the identity of vessels and vessel owners. NOAA circular 82-40, filed as NOAA Directive 88-30, outlines specific policies and procedures to protect the confidentiality of information collected by NMFS.

### Issues Conclusions:

NMFS concludes that:

- o The Secretary has the authority, under the MFCMA to implement mandatory observer programs on U.S. fishing vessels.
- o Mandatory observer programs should only be implemented in very limited circumstances on a fair and equitable, non-Federal funded basis.
- o Observer programs with monitoring or a combination of monitoring and scientific data collecting objectives should, in most circumstances, be implemented on a mandatory basis.
- o The risks involved in the transporting of any observer rests with the vessel owner and/or operator.
- o All information collected on mandatory observer programs will remain confidential to NMFS.

DRAFT

*Adopted*

PILOT DOMESTIC OBSERVER PROGRAM  
DOMESTIC OBSERVER COMMITTEE MEETING

DRAFT SUMMARY

May 21, 1987

The Council's Domestic Observer Committee met the evening of May 21, 1987 to review tentative plans for a pilot domestic observer program, the Council's policy on observers, and the draft NMFS NOAA policy on domestic observers. In attendance were Oscar Dyson (Chairman), John Winther, Rudy Petersen, Barry Fisher, Rich Marasco, Janet Wall, Clarence Pautzke, and Ron Miller.

The discussion began with a summary of the planning meeting which occurred on May 1 in Seattle with representatives of the Northwest and Alaska Fisheries Center, NMFS-Alaska Region, Alaska Sea Grant, and the Council.

The Committee discussed general principles for the pilot domestic observer program, operational responsibilities, funding, duties, a suggested plan for the placement of observers, and methods for choosing specific vessels for observer placement.

General Principles. The Committee agreed on the following general principles for the domestic observer program:

1. A neutral party must administer, manage, and operate the program.
2. The purpose of the program is to collect biological information.
3. The sampling of fleets must ensure representativeness of the data.

4. *Information collected by observers will be confidential & provided to the vessel captain.*

Operations and Agency Roles. The Committee then discussed general operations and agency roles for the observer program as follows:

1. The observer coverage scheme will be designed by the NWAFC in consultation with NMFS ~~Central~~ <sup>Regional</sup> Office and ADF&G.

2. The observer coverage scheme, once developed, will be submitted to the North Pacific Fishery Management Council ~~and industry~~ for review and comment.
3. Agencies responsible for operations of the program will coordinate closely with industry and their associations in selecting vessels for observer placement.
4. Training observers will be the responsibility of the NWAFC.
5. Field operations and personnel management will be the responsibility of the University of Alaska, drawing on observer experience available from other agencies.
6. The NWAFC will be the lead agency responsible for debriefing observers to ensure consistency of data. These responsibilities will be shared with ADF&G and the University of Alaska.
7. Observer data processing will be the responsibility of the NWAFC who will ensure timely availability of the information derived from the program while maintaining the full confidentiality of the data.

Pilot Program for 1987-88. Based on the above general principles and operational responsibilities, the pilot observer program for the next 12 to 18 months is proposed as follows:

1. Development of Observer Coverage Plan. The Council will arrange a meeting in June with industry to formulate a coverage scheme. A preliminary example of such a scheme is shown in Table 1 (attached).
2. Insurance Coverage. The University of Alaska will resolve any outstanding problems concerning insurance coverage for observers.
3. Selection of Observers. The NWAFC will supply a list of experienced observer candidates to the University of Alaska.



4. Selection of Vessels. Given the voluntary nature of this pilot program, parties responsible for operating the program will meet with industry representatives to identify and solicit suitable vessels to voluntarily take observers.
  
5. Target Date for Implementing Program. September 1, 1987.

It was a general sense of the Committee that this pilot domestic observer program needs to get off to the best start possible. It is important that the program be perceived by industry as impartial, equitable, and cooperative in nature. Feedback from the industry should be solicited on ways to improve the program toward providing better information. Above all there should be no question that the confidentiality of the information derived from the observer program will be maintained and that the emphasis will be on acquiring biological information.

#### Council Domestic Observer Policy

The Committee voted to review the Council's domestic observer policy during the summer to determine whether it is still relevant or if changes are needed.

#### NMFS Draft Domestic Observer Policy

The Committee recommends the Council request an extension of the June 15, 1987 deadline for the submission of comments on the NMFS Draft Domestic Observer Policy. The Committee will review this policy during the summer and make their recommendations to the Council in September.

Table 1.--Suggested deployment of observers to achieve as much information as possible on the various elements of the domestic fleet.

Fisheries	Number of observer months on each vessel type					
	CP Trawl	CP LL	SSD Trawl	SSD LL	Mother- ship	Sablefish Pot
a) Bering pollock (roe)	2	--	1	--	0	--
b) Gulf pollock (roe)	0	--	2	--	--	--
c) Bering pollock/cod	3	0	4	--	1	--
d) Bering flatfish	3	0	--	--	1	--
e) Gulf pollock/cod	2	0	3	3	--	--
f) Bering rockfish	2	--	--	--	0	--
g) Gulf rockfish	2	--	0	2	0	--
h) Bering sablefish	--	1	--	--	--	--
i) Gulf sablefish	--	1	--	3	--	0
Observer totals	14	2	10	8	2	0

(Total number of observer months = 36)

CP = Catcher/processor  
 LL = Longline vessel  
 SSD = Shoreside delivery