


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver 
Executive Director

DATE: November 30, 2010

SUBJECT: GRS Program Changes

ESTIMATED TIME 4 HOURS

ACTION REQUIRED

Initial review of an analysis to remove the retention standard from the GRS program.

BACKGROUND

At its June 2010 meeting, the Council reviewed a NMFS report on the status of monitoring, enforcing, and prosecuting the GRS program. In that report, NMFS identified two issues with the current GRS program. First, implementation of the GRS calculation requires groundfish retention above what was considered by the Council. Second, NMFS enforcement has significant concerns with the cost of enforcing a GRS violation, which may hinder their ability to enforce the current GRS program.

After reviewing the NMFS status report and listening to public comment, the Council, in June 2010, recommended an emergency action to temporarily suspend the GRS regulations. Additionally, the Council initiated an FMP amendment to explore revising the current GRS program by considering two approaches.

The first approach would revise the current GRS schedule to correlate groundfish retention considered in the Amendment 79 analysis to groundfish retention calculated with the current GRS enforcement methodology. A "recalibrated" GRS based on the estimates provided in the Amendment 79 would establish a standard that meets the Council's expectations (i.e., imposes a retention requirement similar to those considered in the original analysis of Amendment 79). However, a recalibration would not address the monitoring and enforcement issues cited in the NMFS GRS report, and therefore is not an alternative considered in the analysis.

The second approach would allow the Amendment 80 sector to engage in internal monitoring and administration of a groundfish retention program to meet Council retention goals described in Amendment 79. To accomplish this approach, the analysis includes an alternative to remove the retention standard requirement from the GRS program. In addition, the alternative would require the Amendment 80 sector to report to the Council on an annual basis the sector's groundfish retention performance.

Since the June meeting, NMFS and Council staff have completed the analysis for the emergency action to temporarily exempt the Amendment 80 sector from the GRS. That action is expected to be implemented prior to the 2011 fishing season. In addition, staff has prepared the initial review draft analysis to permanently remove the retention requirement from the GRS program. The initial review draft was mailed to the Council in early November. The executive summary for that analysis is attached as **Item C-6(1)**.