NEW ENGLAND FISHERY MANAGEMENT COUNCIL

Report from the

RISK POLICY WORKING GROUP

(Formerly ABC Control Rule Working Group)

November 2013

The ***Risk Policy Working Group*** (RP WG or WG) was originally formed by the New England Fishery Management Council as the *ABC Control Rule Working Grou*p, but the name change to *Risk Policy Working Group* more accurately reflects the working group's immediate tasking, i.e., to prepare a work plan addressing how the Council may proceed with developing a risk policy so that control rules for acceptable biological catch (ABC control rules, ABC CRs) can clearly and consistently incorporate the Council's risk tolerance (see below). The goal of the work plan is to enable the Council to consider/approve a process for developing the risk policy as a 2014 management priority. Towards this end, several options have been developed by the Risk Policy Working Group and are presented in this report for the Council to consider at its November 2013 meeting. The working group recommendations are also provided in this report.

Risk Policy Working Group Membership: Mary Beth Tooley, Chairman (NE Council); David Pierce, Vice Chairman (NE Council); Matt McKenzie, Mike Sissenwine (NE Council); Demet Haksever, Lori Steele (NE Council staff); Steve Cadrin, Dan Georgianna, Jason McNamee, Patricia Pinto da Silva (SSC members); Jon Deroba (NEFSC); and Sarah Heil, Moira Kelly (NMFS NERO).

Background

Council Guidance to the Risk Policy Working Group states that the work plan should:

1. Consider the findings and recommendations from the Council's Risk Policy Workshop held in March 2013
2. Outline a process addressing:
    - Procedural options and the role of the Council, its advisors and the Scientific and Statistical Committee (SSC) in developing an approach to addressing risk when setting ABC control rules (risk policy);
    - Questions and the information or resources and analyses that may be needed
    - General alternatives for what a risk policy for setting ABC control rules could look like
    - A general timeline for the adoption of an approach including any rulemaking appropriate for implementing the risk policy

The working group notes that due to time constraints, general alternatives for what a risk policy could look like are not provided in this report. However, the group discussed several possible approaches and developed recommendations regarding goals/objectives for the Council's risk policy. The WG also reviewed approaches that other Councils have utilized to develop a risk policy and considered how these approaches may apply to New England fisheries. Should the Council agree to move forward with the development of a risk policy in 2014 based on one of the procedural options provided in this document, the RP WG can build from its ongoing discussions about risk policy alternatives and possible approaches to modifying existing ABC CRs.

The Council's Risk Policy Workshop (March 2013) explored a wide range of complex issues surrounding risk/uncertainty and identified challenges to setting ABC control rules that are unique to New England fisheries. It provided a foundation for developing a risk policy, but many of the details and recommendations from the workshop are outside of the current scope of the Risk Policy Working Group. The working group therefore agreed to focus its discussion on the elements of the Risk Policy workshop that are most specific to the guidance given by the Council (see above) – workshop consensus items, recommendations, lessons learned from other regions, and how the Council can move forward with the information generated by the Risk Policy Workshop to develop and adopt a formal risk policy. Modifications to existing ABC control rules may be appropriate following the adoption of a risk policy, and the report from the Risk Policy Workshop addresses many issues related to characterizing scientific uncertainty and developing ABC control rules. The RP WG discussed these issues but focused primarily on procedural matters and the steps needed to be taken by the Council to first establish a risk policy.

Terminology

The Risk Policy Working Group recognizes the need to clearly distinguish between the terms *risk policy*, *ABC control rule*, and *harvest control rule* and offers the following:

1. **Risk Policy:** Formal guidance to the SSC for specifying acceptable biological catch (ABC) levels for all NE Council-managed fisheries; universal policy to apply broadly across all FMPs that clearly reflects the Council's risk tolerance for overfishing a stock.
    - The risk policy is developed and adopted by the Council, with input from SSC and other technical groups.

2. **ABC Control Rule (ABC CR):** Provisions established by the NE Council intended to limit the probability of overfishing of a particular stock; provides guidance to the SSC regarding how far below OFL to set ABC for a stock based on scientific uncertainty, stock status, and the Council's risk tolerance.
    - ABC CRs are utilized by the SSC, in combination with the Council's risk policy (if one exists), to determine annual levels of ABC.
    - ABC CRs are species/stock-specific and are usually established in the respective FMPs (however, one ABC CR framework could be developed/applied across all FMPs).
    - By law, the ABC CR cannot result in a probability of overfishing that is greater than 50%, but it may result in a probability that is less than 50% depending on the Council's risk policy.

3. **Harvest Control Rule (HCR):** Stock-specific provisions for determining annual fishing mortality rates and yield; HCRs are based on established overfishing definitions and status determination criteria (reference points to determine "overfished/overfishing" status) and a prescribed approach to specify a target fishing mortality rate based on stock conditions.
    - HCRs are species/stock-specific and are established in the respective FMPs.
    - Reference points for HCRs are usually reviewed/updated in a benchmark stock assessment.
    - For each stock managed by the Council, the HCR forms the basis of the specification of the overfishing limit (OFL).

The New England Fishery Management Council has not yet adopted a risk policy to apply across all of its managed FMPs. The working group acknowledges that developing a risk policy is not a legal requirement and that the Council is not under a legal mandate/deadline to move forward at this time. In general, the Council has met its Magnuson-Stevens Act (MSA) requirements to establish annual catch limits (ACLs) and accountability measures (AMs) in all FMPs and currently utilizes its SSC to recommend ABC levels that account for scientific uncertainty. However, the working group recognizes that without a risk policy, ambiguity in some of the Council's ABC control rules leaves the SSC with unclear guidance for recommending ABCs. Recently, the SSC raised this issue when developing ABC recommendations for the 2013-2015 Atlantic herring fishery specifications (September-November 2012). The SSC suggested that the Council consider how to approach long-term management of the herring fishery to ensure that the next time herring are assessed, an appropriate control rule could be created which meets the needs of the Council. Much of the SSC's discussion reflected a lack of clarity regarding the Council's risk tolerance as well as long-term management objectives for the fishery. Developing and adopting a formal risk policy is therefore appropriate and would promote responsible management by improving clarity and consistency in the ABC-setting process.

Adoption of Risk Policy by Other Fishery Management Councils

Outside of New England, each Council has adopted a risk policy to help inform its SSC of its risk tolerance in setting specifications. Most Councils developed risk policies to be complementary with their ABC Control Rules, and a number of Councils did so through an Omnibus Amendment in conjunction with the development of ACLs and AMs after the reauthorization of the Magnuson-Stevens Act, and the new provisions requiring ACLs and AMs for each fishery. The majority of Councils have implicitly specified their risk tolerance through their ABC CRs and the factors identified to account for scientific uncertainty. MAFMC is the only Council that explicitly adopted a risk policy in its Omnibus Amendment. A number of Councils adopted generic risk policies and ABC Control Rules to apply to each of its FMPs, other Councils adopted different approaches for each FMP due to the challenges associated with managing diverse stocks (e.g., salmon and groundfish in the Pacific).

Prior to the reauthorization of the Magnuson-Stevens Act, NPFMC already had many provisions in its FMPs that complied with ACL and AM requirements. However, as noted above, many other Councils adopted risk policies and ABC control rules in conjunction with actions that adopted ACLs and AMs for the first time. Risk policies and control rules are generally designed to be iterative, and many Councils have already, or are undergoing, management actions to refine

their risk policies and control rules after a few years of management under ACLs and AMs. NEFMC may have a unique situation to apply lessons learned from its existing ABC control rules when developing its risk policy and considering any changes to its control rules.

A detailed summary of the process used by MAFMC to adopt a risk policy and ABC control rule is provided below, and information about the approach used by each Council is provided in Table 1.

Mid-Atlantic Fishery Management Council (MAFMC)

The MAFMC adopted an Omnibus Amendment to establish a consistent risk policy and ABC control rule to be used across all of its FMPs. This Omnibus Amendment also established ACLs and AMs for each of the MAFMC's FMPs. The initial action plan prepared by MAFMC is helpful to illustrate the process utilized to develop the omnibus amendment and is provided as an attachment to this report (Attachment 1).

The MAFMC worked with its SSC to develop alternatives for ABC control rules that used a tiered approach in order to rank each stock based on the quality of information available to assess the stock, along with other information. The SSC formed a Scientific Uncertainty Sub-Committee to provide advice to MAFMC during the development of risk policy options and help develop the ABC control rules utilizing the risk policy. An ACL/AM Committee was also established and was composed by a sub-set of Council members. A Fishery Management Action Team (FMAT), which is equivalent to a PDT, was also formed, and was composed of MAFMC staff, NERO staff (Sustainable Fisheries, General Counsel, and NEPA), NEFSC staff (stock assessment and socio-economic).

From the FMATs initial meeting (December 2008) to the implementation of the Final Rule (January 2011), the entire process took approximately two years. However, it is important to note that the Omnibus Amendment also established ACLs and AMs for each of MAFMC's FMPs, which required additional time and resources beyond the development of the risk policy and ABC Control Rule. Also, before the final rule for the Omnibus Amendment was implemented, the SSC began using the preferred alternative for the risk policy as a guide when recommending ABCs.

Both the risk policy and ABC control rules are codified in the regulations. The MAFMC risk policy and ABC Control Rule also outlines a process by which both could be modified in the future, including a performance review process. Based on experience in the first year after implementation of the Omnibus Amendment, the MAFMC completed an omnibus framework action in 2011/2012 to clarify its ABC control rule. Just recently in fall 2013, the MAFMC initiated another omnibus action to modify its ABC Control Rule and refine the criteria used to categorize each stock into tiers.

Table 1 Summary of Approaches Utilized by Other Councils to Adopt a Risk Policy and ABC Control Rules

Council	Process Used	Risk Policy			ABC Control Rule		
		Adopted?*	Generic or FMP-specific?	Codified in the Regulations?	Developed in Conjunction with Risk Policy?	Generic or FMP-specific?	Codified in the Regulations?
CFMC	Omnibus Amendment	Yes	Generic	No	Yes	Generic	No
GMFMC	Omnibus Amendment	Yes	Generic	No	Yes	Generic	No
MAFMC*	Omnibus Amendment	Yes	Generic	Yes	Yes	Generic	Yes
NPFMC	FMP Amendments	Yes	FMP-specific	No	Yes	FMP-specific	No
PFMC	FMP Amendments	Yes	FMP-specific	No	Yes	FMP-specific	No
SAFMC	Omnibus Amendment	Yes	Generic	No	Yes	Generic	No
WPFMC	Omnibus Amendment	Yes	Generic	No	Yes	Generic	No

** MAFMC is the only Council that explicitly adopted a risk policy in its Omnibus Amendment. Other Councils have implicitly specified their risk tolerance through their ABC CRs and the factors identified to account for scientific uncertainty.*

Risk Policy Goals/Objectives

In general, the concept of risk is often associated with the probability of an event occurring. However, risk is a function of both the likelihood of an event and the severity of associated consequences should the event occur. In a fisheries management context, managing to the same probability of overfishing for two stocks can result in drastically different consequences and thus pose significantly different levels of risk. Decision-making that accounts for risk always involves consideration of trade-offs, which are usually in the form of biological, ecological, economic, social impacts related to the impacts of the decision. When recommending ABC levels, the SSC tries to balance these trade-offs to account for scientific uncertainty. However, without clear guidance from the Council regarding its preferences, the perceptions of risk, and therefore risk tolerance, can be subjective. Individuals may perceive risks differently depending on how they view different consequences and the value they place on certain outcomes.

In addition to establishing ABC control rules, Councils can also establish complementary risk policies, which articulate the bounds of how risk tolerant or risk averse a Council should be given certain criteria. Risk policies are intended to inform and work in conjunction with a Council's application of a control rule. Though informed by scientific advice from the SSC, the Council's risk tolerance is ultimately a policy decision, and should be clearly articulated in a risk policy. The working group considered information and recommendations from the Council's Risk Policy Workshop (March 2013) and developed recommendations regarding goals and objectives for the New England Fishery Management Council's Risk Policy, should the Council choose to move forward with developing a risk policy in 2014.

Proposed Risk Policy Goals (RP WG Recommendation)

1. Provide clear guidance to the SSC for specifying risk-based ABC levels for all fisheries managed by the Council
2. Provide structure for accounting for risk that can be understood, interpreted, and applied
3. Improve consistency and clarity in the process for setting ABCs across fisheries

Proposed Risk Policy Objectives (RP WG Recommendation)

A. Clearly identify the Council's risk tolerance – articulate bounds for risk tolerance/risk aversion

B. Respond to different levels of scientific information and stock condition

C. Improve scientific analysis and reduce subjectivity associated with the interpretation of risk

D. Start simple, and be adaptable – evaluate performance and build in flexibility to revise/update risk policy based on new information, new metrics, and/or new risks

E. Focus initially on biological metrics (life history, stock status, etc.), but include flexibility to incorporate social, economic, and ecosystem metrics

Other Important Considerations (for Future Discussion)

Several additional considerations related to developing a risk policy and evaluating ABC control rules were identified by members of the RP WG, but time constraints precluded more thorough discussion of these issues by the entire group. The following issues will likely be revisited during further discussions by the working group if/when the Council moves forward with developing a risk policy:

- *The risk policy could include some metrics to evaluate future performance. The working group did not have sufficient time to discuss this issue in detail, but this should be addressed if the Council develops a risk policy.*
- *It will be important to clarify how probability estimations are calculated and how reliable they may be when defining metrics to evaluate risk and uncertainty.*
- *If the Council's risk policy ultimately is integrated into a broader framework for setting ABC, supporting analyses needed to develop an ABC CR framework may be extensive.*
- *Some working group members suggested that ABC framework should ultimately try to maximize net present value of fisheries under the jurisdiction of the New England Fishery Management Council. This issue should be considered during future discussions.*
- *Members of the working group identified the importance of incorporating a Management Strategy Evaluation (MSE) into the risk policy/ABC-setting process. The definition and application of MSE is not entirely clear and should be further discussed.*

Options for Risk Policy Development

The lack of a legal deadline provides the Council with some flexibility with respect to how to approach developing and adopting a risk policy, reviewing existing ABC CRs, and modifying these CRs (if necessary) to directly link them to the risk policy. The tables provided on the following pages summarize several procedural options for the Council to consider for moving forward with adopting a risk policy and implementing modifications to ABC CRs if necessary.

Of the options outlined in the following tables, the majority of the RP WG supports Option 4, a step-wise approach to developing a risk policy, but one member supports Option 3, an omnibus amendment approach. Working group members from the Regional Office highlighted benefits associated with both Options 3 and 4. The majority of members who support Option 4 prefer the timeline and diagnostic period associated with this option, which provides an opportunity to "field test" the risk policy and includes species-specific evaluation of the risk policy by the SSC. The RP WG noted that under Option 4, the risk policy would be formal guidance to be developed carefully and evaluated thoroughly so that it could become a long-lasting and effective policy. The WG member who supports Option 3 is concerned that Option 4 may provide too much flexibility; this individual would prefer to have the risk policy codified through regulation, as proposed in Option 3. The member who supports Option 3 also emphasized the importance of a transparent public process (i.e., NEPA) to develop the risk policy that could ultimately affect how resources will be harvested in the future.

OPTION 1 – STATUS QUO (NO ACTION)

Description	Status Quo – Council does not develop a risk policy in 2014
General Timeline	N/A
Regulatory/ Legal Issues	• Lack of clarity/consistency may invite legal challenge re. ABC specifications for some stocks
Technical Needs/ Analytical Requirements	N/A
Resource Needs/ Staff Support	N/A
Role of Council and SSC in Process	No change to current process
Public Participation	No change to current process
Pros/Cons and Other Issues	+ Allows the Council to address more immediate management needs in 2014 while not violating the law - Lack of consistency without a framework to guide the SSC in making ABC recommendations - Leaves interpretation of uncertainty and risk subjective - May reduce effectiveness of current ABC CRs • Does not preclude the Council from addressing this issue in 2015 • Does not preclude the Council from developing species-specific risk policies and changes to ABC CRs at any time

OPTION 2 – RISK POLICY APPROACH

Description	• **Council develops and formally adopts risk policy as part of Council Operations Handbook;** • **SSC utilizes risk policy to develop ABC recommendations**
General Timeline	1. Develop risk policy: January – October 2014 2. Approve risk policy: November 2014 3. Risk policy utilized by the SSC: January 2015 –
Regulatory/ Legal Issues	N/A
Technical Needs/ Analytical Requirements	• Evaluation/assessment of potential risk policies • FMP-specific analyses would not be necessary to develop risk policy; however, evaluation of potential risk policies may require some species-specific consideration. • Future species-specific application of risk policy may require more technical analysis without clear linkage between risk policy and ABC CRs; additional technical work may be necessary during species specifications process.
Resource Needs/ Staff Support	• Working Group staff support (NEFMC and NERO), some technical support from NEFSC
Role of Council and SSC in Process	• SSC and Council members serve on Working Group • Council formally adopts policy through majority vote at Council meeting • SSC utilizes risk policy to develop recommendations re. annual ABC specifications (current process)
Public Participation	• All WG, SSC, and Council meetings are public meetings, with advanced notification and opportunity for comments • Meetings specifically to solicit public comment regarding the development of the Council's risk policy could be conducted without a formal NEPA process.
Pros/Cons and Other Issues	+ Most time-efficient process to develop and adopt a risk policy; clearly identifies time frame and does not link establishment of risk policy to other issues/management actions + Allows risk policy to be developed independent of pre-determined/species-specific outcomes + More flexibility for considering impacts of risk policy application and making corresponding adjustments (allows for a more iterative process) - Does not directly link risk policy to ABC CRs in any FMPs; may result in unclear or inconsistent application of risk policy - May provide too much flexibility, i.e., opportunity to depart from risk policy, if not codified through regulation - May lack clearly-defined process for FMP-specific application and/or future revisions to policy - Potential challenge/impacts re. application of risk policy to transboundary resources/shared stocks • Would likely require a strategy for public participation and transparency during development of risk policy • Does not preclude the Council from considering or initiating further action after the risk policy is adopted (ex., developing an action to formally adopt risk policy in a species' FMP and/or modify ABC control rules)

OPTION 3 – OMNIBUS AMENDMENT APPROACH

Description	• **Council develops risk policy and modifies ABC CRs across all FMPs through an omnibus amendment;** • **Risk policy is formally incorporated into each FMP, in combination with any modifications to existing ABC CRs**
General Timeline	1. Initiate Omnibus Amendment/NEPA Process: January 2014 2. Scoping/Development of Goals/Objectives: Jan-June 2014 3. Develop Risk Policy, evaluate existing ABC CRs, and develop alts to modify existing ABC CRs, develop background information and analyses for NEPA document: July 2014 – August 2015 4. Approve Alternatives/Draft NEPA document – September 2015 5. Public comments/public hearings: November/December 2015 – March 2016 6. Select Final Measures: April 2016 7. Submission/Implementation: by 2017
Regulatory/Legal Issues	• Risk policy would be implemented in each FMP and codified in regulations through implementation of the omnibus amendment • More opportunity for risk policy to be subject of legal challenge/judicial review
Technical Needs/ Analytical Requirements	• Analytical requirements likely to be greatest under this option – evaluation of existing ABC CRs and development of alternatives to modify CRs, in addition to evaluation of risk policy • Technical needs are less significant during first ½ of 2014 (scoping, goals/objectives) but technical analyses needed to support development of analyses for the NEPA document during late 2014 – 2015
Resource Needs/ Staff Support	• NEFMC and NERO staffing needs are most significant under this option • WG staff support (NEFMC and NERO) to develop omnibus amendment; additional staff support for EIS review and implementation • Significant technical support from NEFSC to develop EIS analyses • May be difficult to coordinate through multiple species' Plan Development Teams (PDTs); may require creation of PDT or other technical team to support analytical work and development of NEPA document • Staff needs to support technical work increases in late 2014 and through 2015
Role of Council and SSC in Process	• Process similar to other amendments, with RP WG serving as the oversight Committee • Input sought from species oversight Committees on an as-needed basis • SSC members serve on RP WG; Council can request further guidance/input from full SSC as necessary
Public Participation	• Most opportunity for public participation; NEPA amendment process, including scoping and public comment period

OPTION 3 – OMNIBUS AMENDMENT APPROACH (CONTINUED)

Description	• **Council develops risk policy and modifies ABC CRs across all FMPs through an omnibus amendment;** • **Risk policy is formally incorporated into each FMP, in combination with any modifications to existing ABC CRs**
Pros/Cons and Other Issues	+ Initiating amendment may allow for more technical/manpower resources to be prioritized to investigate issues related to ABC CRs in more detail + Provides direct and formal linkage between risk policy and ABC CR in every FMP + Provides opportunity to evaluate performance of current ABC CRs and consider adjustments in the context of the risk policy; may provide better opportunity to address species-specific/unique issues + Provides opportunity to establish clear, formal process for revising risk policy and ABC CRs + Council and SSC could begin using risk policy as a guide before the amendment is implemented - Longest timeline for formally adopting a risk policy - Development of alternatives and related analyses may be more complex • Unclear whether the Council would need to develop a range of alternatives for the risk policy (in addition to a range of alternatives for the ABC CRs), versus developing the risk policy after the scoping process, to then serve as guidance for developing a range of alternatives for the ABC CRs. When the Mid-Atlantic Council developed its omnibus amendment, it began by considering a range of risk policies but selected one policy as the Preferred Alternative during further development/analysis; the SSC began to use the preferred risk policy as a guide before the omnibus amendment was implemented. • Unclear whether one “umbrella” risk policy would be developed, versus species-specific risk policies

OPTION 4 – STEP-WISE APPROACH

(MAJORITY OF RISK POLICY WORKING GROUP SUPPORTS THIS OPTION)

Description	• **Council develops and adopts risk policy as part of Operations Handbook; Council establishes linkage to risk policy in individual FMPs through omnibus framework adjustment;** • **Council develops action(s) to modify species' ABC CRs based on performance of risk policy during diagnostic ("testing") period, during which the risk policy is applied to the ABC CR and performance is evaluated by the SSC**
General Timeline	1. Develop risk policy: Jan 2014 – October 2014 2. Approve risk policy and initiate omnibus framework adjustment to establish linkage between FMP specifications process and risk policy: November 2014 3. Finalize omnibus framework adjustment: Feb 2015 4. Diagnostic time period – Council/SSC apply risk policy at least once for each stock and evaluates performance in conjunction with ABC CR: 2015-2017 5. Council formally incorporates risk policy into each FMP, as well as any modifications to existing ABC CRs, through FMP amendment(s): 2015 –
Regulatory/ Legal Issues	• Omnibus framework adjustment would address ABC-setting process only; framework action would be procedural and would require the SSC to consider the risk policy during the species' specifications process (modification to the existing process)
Technical Needs/ Analytical Requirements	• Evaluation/assessment of potential risk policies during 2014 • May require ad-hoc technical analysis as species-specific applications of the risk policy are evaluated and corresponding changes to ABC CRs are developed.
Resource Needs/ Staff Support	• WG staff support (NEFMC and NERO), some technical support from NEFSC to develop risk policy • Evaluation of risk policy performance by SSC would require technical support from species' PDTs • Analyses of changes to ABC CRs would be supported by species' PDTs as actions are developed
Role of Council and SSC in Process	• SSC and Council members serve on Working Group • Council formally adopts risk policy through majority vote at Council meeting • SSC utilizes risk policy to develop recommendations re. annual ABC specifications through current process, including evaluation of risk policy performance and related recommendations • Council develops omnibus framework adjustment through current framework process; Council develops future action(s) to modify ABC CRs through amendment process
Public Participation	• All WG, SSC, and Council meetings are public meetings, with advanced notification and opportunity for comments • Meetings specifically to solicit public comment regarding the development of the Council's risk policy could be conducted without a formal NEPA process. • Framework adjustment meetings are public meetings with advanced notification and opportunity for comments; additional opportunity for comment through rulemaking process.

OPTION 4 – STEP-WISE APPROACH (CONTINUED)

(MAJORITY OF RISK POLICY WORKING GROUP SUPPORTS THIS OPTION)

Description	• **Council develops and adopts risk policy as part of Operations Handbook; Council establishes linkage to risk policy in individual FMPs through omnibus framework adjustment;** • **Council develops action(s) to modify species' ABC CRs based on performance of risk policy during diagnostic ("testing") period, during which the risk policy is applied to the ABC CR and performance is evaluated by the SSC**
Pros/Cons and Other Issues	+ Clearly identifies time frame for adoption of risk policy; clearly identifies milestones to evaluate progress + Provides linkage between risk policy and ABC/specifications-setting process in each FMP + Allows risk policy to be developed independent of pre-determined/species-specific outcomes + Provides opportunity to field-test risk policy and possibly adjust/tailor policy to species-specific needs (iterative process) + Provides opportunity to evaluate and respond to specific performance indicators determined during development of risk policy - Relationship between risk policy and ABC CRs may be unclear during interim/diagnostic time period • Omnibus framework adjustment would add a sentence to the regulations associated with each FMP specifications process; the additional regulatory text would require the SSC to consider the Council's risk policy when developing its recommendations for ABC. • Modifications to ABC CRs after the diagnostic period could be implemented either ad-hoc (through individual FMPs, as described above) or through an omnibus amendment (developed after diagnostic period for all stocks (2016-2017)); a universal ABC CR to apply region-wide could also be developed, if appropriate. • Unclear whether one "umbrella" risk policy would be developed, versus species-specific risk policies