

Perspectives on the NEFMC Risk Policy

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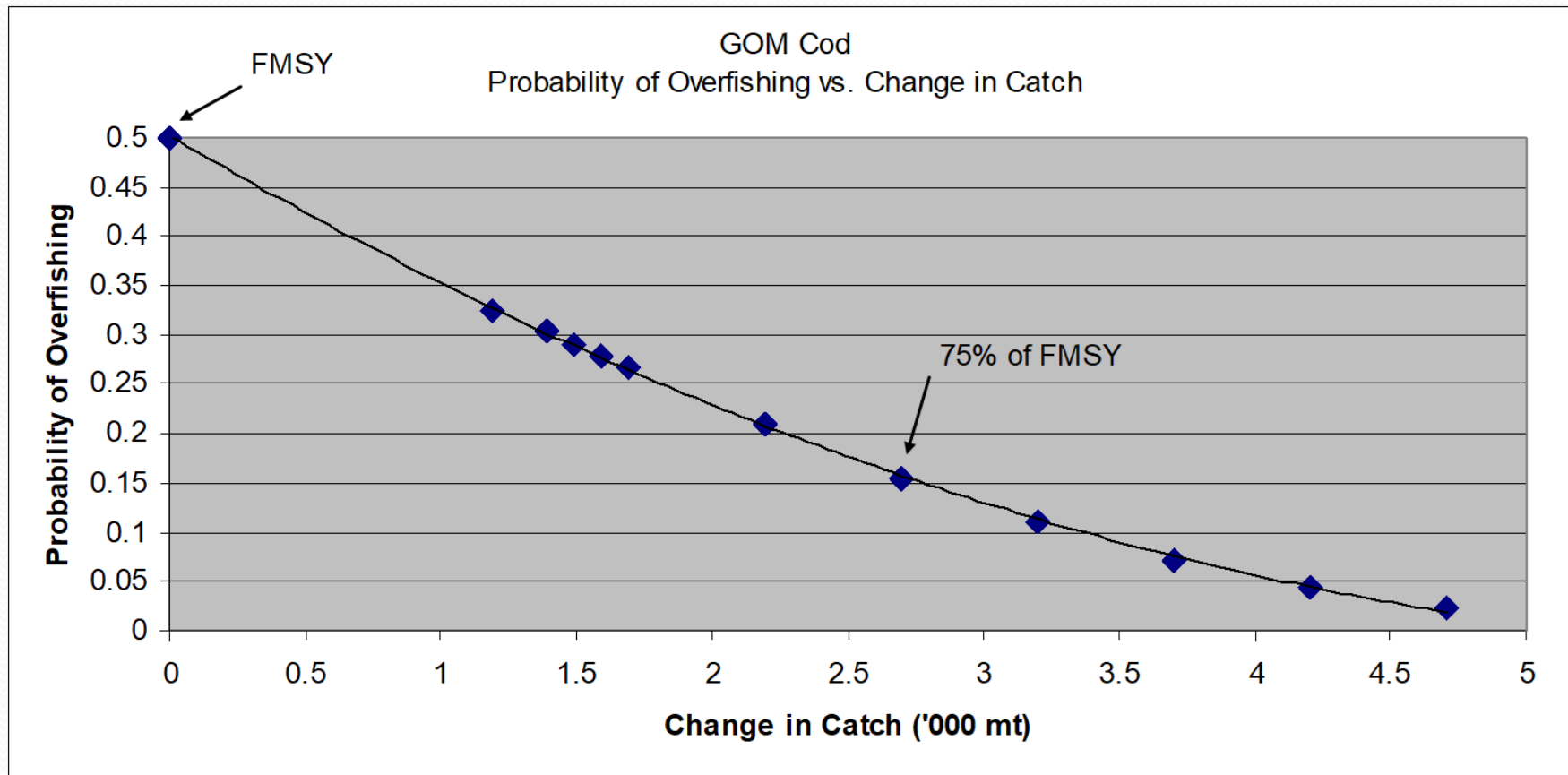
New England Fishery Management Council

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New England
Fishery Management Council


Post-Amendment 16



Risk Policy Statement

- Policy: Possible misinterpretation over weighing risk of overfishing
- Purpose:
 - Guidance unclear
 - Not sure what NMFS does with our preferences
 - Are decisions truly transparent, understandable, and predictable?

Risk Policy Strategy

- Has it prevented long-term negative impacts on the ecosystem?
- Cumulative effects considered  not seem to be considered
- What does stability mean?
- Many ABC control rules/HCRs adopted before the risk policy and not revisited

Road Map

- Optimistic on analytic abilities and support (net benefits, evaluating management strategies)
- Discussion of stability does not adequately consider legal requirements
- Implementation plan partially followed

Summary

- Guidance needs to be clear
- Legal and policy constraints need to be taken into account
- Staff and Council resources are limited; Council needs to be realistic about time it is willing to devote to implementation

Questions?