

Industry-funded Monitoring Omnibus Amendment

Omnibus Alternatives

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Purpose and Need (p3)

- Allow Councils to implement IFM programs with available Federal funding
- Allow Councils and NMFS to prioritize available Federal funding among IFM programs

General Approach

- Through future framework action individual FMPs would specify coverage *targets*
 - NOT mandatory coverage levels
- Tool to approve Council's desired levels of monitoring above statutory requirements, without NMFS commitment in years when Federal funding is unavailable or less than total funding needed

Comparison of Monitoring Types

	NEFOP Observer	At-Sea Monitor	Electronic Monitoring	Portside Sampling
Minimum Education Requirements	Bachelor's Degree*	High School Diploma or Equivalency	N/A	High School Diploma or Equivalency
Data Collected on Retained Catch	Fishing effort and species composition	Fishing effort and species composition	Verify retention of catch	Species Composition
Data Collected on Discarded Catch	Fishing effort and species composition	Fishing effort and species composition	Frequency of discard events	None
Biological Sampling	Age and length data	Length data	None	Age and length data
Supplemental Research Projects	Collects additional data as requested	Collects additional data as requested	None	Collects additional data as requested

* Subject to national policy on minimum education requirements, but exceptions may be made for individuals with appropriate work experience.

Key results if adopted

This amendment would...

- Establish a standardized structure for new industry-funded programs

This amendment would not...

- Impact industry-funded programs already in place, including groundfish and scallop programs

OMNIBUS ALTERNATIVES

Omnibus Alternatives (p5)

- Alternative 1: No Standardized Industry-Funded Monitoring Programs (No action)
- Alternative 2: Standardized Industry-funded Monitoring Programs
 - Standardize cost responsibilities
 - Framework adjustment process for industry-funded monitoring programs
 - Standardized industry-funded monitoring service provider requirements
 - Prioritization process
 - Option for Monitoring Set-Aside

Omnibus Alternative 2: Standardized Cost Responsibilities (p13)

NMFS (Administrative) Costs	Industry (Sampling) Costs
Facilities and labor for training and debriefing	Program management and provider overhead
NMFS-issued gear	Salary and per diem for training and debriefing
Certification	Equipment
Vessel selection	Deployments and sampling
Data processing	All other costs
Compliance and safety liaison	

Estimates of Monitoring Costs (p16)

	NMFS Cost per Seaday	Industry Cost per Seaday
NEFOP-Level Observer	\$479	\$818
At-Sea Monitor	\$530	\$710
Electronic Monitoring	Year 1: \$36,000 startup + \$97 per seaday Year 2: \$97	Year 1: \$15,000 startup + \$326 or \$187 per seaday Year 2: \$326 or \$187
Portside	\$479-\$530	\$5.12 or \$3.84 per mt

Omnibus Alternative 2: Standardized Costs Responsibilities INDIRECT IMPACTS

Negligible Biological and Economic Impacts

- Process focused, do not impact fishing activity

Omnibus Alternative 2: Framework Adjustment Process (p17)

- Details of any industry-funded monitoring program (at-sea, dockside, or electronic monitoring) would be specified/modified in a framework to the relevant FMP.
- Details may include, but are not limited to:
 1. Level and type of coverage target
 2. Rationale for level and type of coverage
 3. Minimum level of coverage necessary
 4. Consideration of coverage waivers
 5. Process for vessel notification and selection
 6. Process for payment of industry cost responsibilities
 7. Standards for monitoring service providers
 8. Any other measures necessary

Omnibus Alternative 2: Framework Adjustment Process INDIRECT IMPACTS

Negligible Biological and Economic Impacts

- Process focused, do not impact fishing activity

Omnibus Alternative 2: Monitoring Service Providers (p18)

- Industry contracts with a service provider for monitors or camera systems and review
- Sets up general service provider requirements for at-sea, dockside, and electronic monitoring service providers for all New England and Mid-Atlantic FMPs
- If Councils wish to deviate, could do so on an FMP-by-FMP basis

Omnibus Alternative 2: Monitoring Service Providers INDIRECT IMPACTS

- Biological – low positive
 - Greater consistency in information collection
 - better management of biological resources
- Economic – low positive
 - Potential for industry to negotiate costs
 - May allow for efficiencies in program administration, which could reduce costs
 - Greater consistency in information collection
 - better management of biological resources

Omnibus Alternative 2: Prioritization Process (p22)

Reminder of Approach:

- Individual FMPs specify coverage *targets*
- A prioritization process used to determine actual coverage rates for each FMP based on available Federal funding
- Process addresses both New England and Mid-Atlantic FMPs

Omnibus Alternative 2: Prioritization Process

- Alternative 2.1 – NMFS-led
- Alternative 2.2 – Council-led
- Alternative 2.3 – Proportional
- Alternative 2.4 – Lowest Coverage Ratio-based
- Alternative 2.5 – Highest Coverage Ratio-based

	Alternative	Summary
Discretionary	2.1 NMFS-led	NMFS staff would use a weighting approach, in consultation with the Councils, to determine how NMFS funding is allocated among IFM programs.
	2.2 Council-led	Both Councils would work together using a weighting approach to determine how NMFS funding is allocated among IFM programs.
Formulaic	2.3 Proportional	Each IFM program would be reduced by the same percentage as the funding shortfall (i.e. if NMFS funding is short by 20%, each IFM program would receive only 80% of the Federal funding needed for that program).
	2.4 Lowest Coverage Ratio-based	The amount of funding would be allocated to each FMP by prioritizing coverage in fisheries that have the lowest coverage needs relative to fleet activity. This alternative would favor coverage for the FMPs that don't need much additional coverage to meet targets and the most active FMPs with IFM programs.
	2.5 Highest Coverage Ratio-based	The amount of funding would be allocated to each FMP by prioritizing coverage in fisheries that have the highest coverage needs relative to fleet activity. This alternative would favor coverage for the FMPs that need more coverage to meet targets and the least active FMPs with IFM programs.

Omnibus Alternative 2: Prioritization Process

- Deliberative (Alternatives 2.1 and 2.2)

Pros	Cons
Allows NMFS/Councils to distribute funding based on priorities	Could require rulemaking
Takes objectives and context into account	Timeline > 1yr

Weighting Approach (p27)

Step 1

- Compare industry-funded monitoring criteria to each other to create a criteria weighting

Step 2

- Evaluate how each industry-funded monitoring program meets each criterion

Omnibus Alternative 2: Prioritization Process

- Formulaic (Alternatives 2.3, 2.4 and 2.5)

Pros	Cons
Shorter timeline	Not possible to allocate funding based on program design
Adaptive to budget changes and timing	Blunt instrument

Omnibus Alternatives 2.1-2.5: INDIRECT IMPACTS

Biological and Economic Impacts – low positive

- Process considers all IFM programs when deciding how to allocate funding
- 2.1 and 2.2 - Greatest potential positive compared to no action because industry-funded monitoring program design is considered as part of prioritization
- 2.3 – Ensures that all programs get some funding
- 2.3 – 2.5 - Do not consider industry-funded monitoring program objectives in prioritization process

Omnibus Alternative 2.6: Monitoring Set-Aside (p39)

- Include general language to allow individual FMPs to establish a monitoring set-aside via framework adjustment
- Example:
 - Reserve X% of ACL
 - If a vessel is selected to carry an observer, then vessel granted a certain amount of extra pounds to land above possession limit
 - Revenue from sale of extra fish helps offset cost of observer
- If added, the IFM Omnibus would **NOT** implement monitoring set-asides for individual FMPs

Omnibus Alternative 2.6:

INDIRECT IMPACTS

- No impact on biological resources, the physical environment, or fishery-related businesses
- Any impacts associated with implementing a monitoring set-aside program in a future framework adjustment would need to be fully analyzed in supporting documents

Timeline

Dates	Meeting/Deadline	Action
January 2016	NEFMC Meeting	NEFMC selects preliminary preferred omnibus alternatives
February 2016	MAFMC Meeting	MAFMC selects preliminary preferred omnibus alternatives
April 2016	MAFMC and NEFMC Meetings	NEFMC and MAFMC select preliminary preferred herring/mackerel alternatives
May 2016		30-day comment period on draft EA and public hearings
June 2016	MAFMC and NEFMC Meetings	NEFMC and MAFMC take final action
August – November 2016		EA finalized, proposed rule and final rulemaking
December 2016		Final rule effective