

New England Fishery Management Council

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To: NEFMC Risk Policy Work Group **From:** Scientific and Statistical Committee

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Subject: Input on Draft Risk Policy Statement

The SSC met on August 26, 2014 in Boston, Massachusetts, to receive a progress report on the work of the Risk Policy Work Group (RPWG) from Council member Mary Beth Tooley, Chair of the RPWG, and NEMFC staff lead Lori Steele, and to offer feedback on the Draft Risk Policy Statement. Comments from the SSC are as follows:

- The SSC is encouraged to see development of a formal risk policy moving forward, and commends the RPWG on its progress. The SSC members serving on the RPWG expressed particular thanks to Lori and Mary Beth for their leadership in shepherding the large and diverse group.
- Development and application of ABC control rules in New England have been somewhat
 ad hoc and tailored to each FMP and its supporting assessments, unlike other regions that
 have moved towards a common control rule framework for all FMPs. However, there are
 advantages to the control rule approach adopted in New England, given the uniqueness of
 each assessment and fishery. The risk policy can play an important role in ensuring that
 each control rule is addressing a common policy across the region.
- At present, the target P* for a given stock is not tied to stock status. The approach can have advantages, and is a topic that could be addressed in the risk policy.
- In developing an overarching risk policy which all of its FMPs will strive to achieve, New England is ahead of most other regions. Therefore, the final risk policy and its role in shaping ABC control rules could be worth highlighting at the upcoming National SSC Workshop.
- The SSC expressed some concern about use of the term "stability" in strategic approach #3, given that its strict mathematical definition implies a static state rarely experienced in natural systems. However, this concern was lessened by the more complete discussion of stability in section 2.1.2 of the RPWG report to the SSC and NEFMC, which highlights key concepts such as uncertainty, robustness and noise. An important objective is to avoid amplifying perturbations in the system.

- Some SSC members felt that the weighing of both gains and losses inherent in the concept of "net benefits" should be specified, whereas others felt it is sufficiently implicit in the definition.
- The risk policy could explicitly consider a broader range of socio-economic outcomes. At present, the term "fishery benefits" is intended to capture socio-economic benefits. However, socio-economic benefits can include those beyond benefits for fisheries.
- As the RPWG moves further toward guidance on operationalizing the risk policy within each FMP, further discussion of analytical tools will be needed. This should include complex tools such as management strategy evaluation (MSE) and utility functions in more data-rich settings, as well as qualitative approaches where data are more limited. The analytical approach will need to be commensurate with the available data, and the RPWG is wise in opting to not be overly prescriptive.