



# Standardized Bycatch Reporting Methodology (SBRM) Omnibus FMP Amendment

*Review of the Public Draft and  
Comments*

NEFMC meeting  
January 30, 2014

# Presentation Overview

- History of the SBRM Amendment
- Review of the SBRM Amendment document structure and alternatives
- Overview of public comments

# Background for SBRM Amendment

- Magnuson-Stevens Act requirements
  - Definitions
  - National Standard 9
  - Section 303(a)(11)
- Court Rulings
  - *Oceana v Evans I* (Amendment 13 challenge)
  - *Oceana v Evans II* (Amendment 10 challenge)
  - *Oceana v Locke* (2007 SBRM challenge)

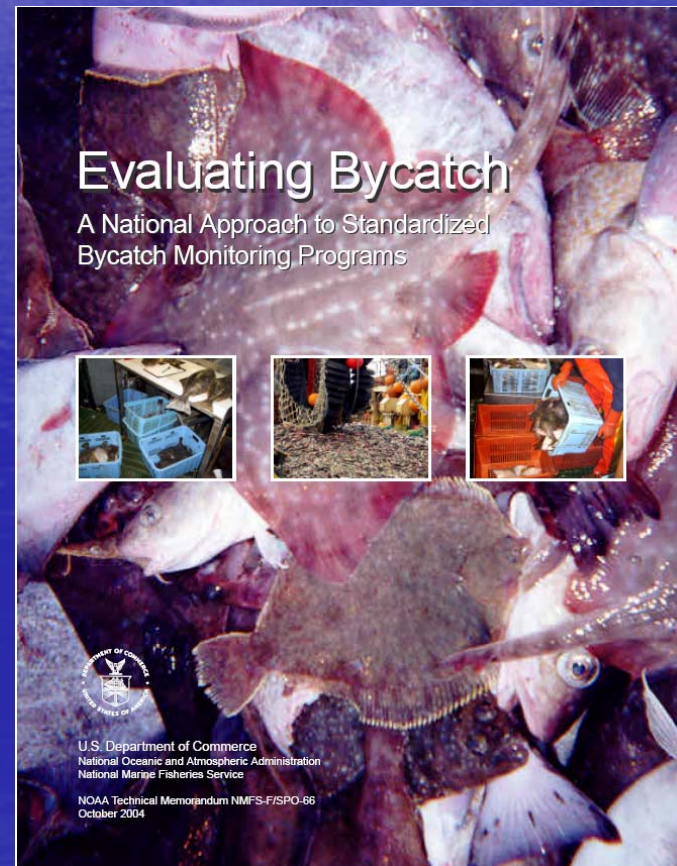
# Magnuson-Stevens Act

- Minimize bycatch to extent practicable (NS 9), *and*
- “Establish a[n] [SBRM] to assess the amount and type of bycatch occurring in the fishery” (§ 303(a))
- “Bycatch” is defined as discards (economic and regulatory), but does not include recreational catch-and-release programs
- Term “bycatch” does not apply to marine mammals or seabirds

# What is an SBRM?

An SBRM is the “combination of data collection and analyses that [are] used to estimate bycatch in a fishery.”

- Evaluating Bycatch, NMFS 2004



# Court Rulings

- In challenges to groundfish and scallop actions, D.C. Circuit Court found the A13 and A10 documents:
  - Failed to fully evaluate reporting methodologies to assess bycatch;
  - Did not mandate an SBRM; and
  - Failed to respond to potentially important scientific evidence
- Strictly speaking, rulings apply solely to the Sea Scallop and Northeast Multispecies FMPs

# Court Rulings (cont'd)

- In challenge to the 2007 SBRM Amendment, the District Court initially found in favor of the gov't
- Appeals Court overturned the District Court
- While the whole amendment was vacated, the Court found fault with only one aspect
- Councils formed a new FMAT specifically to address the deficiencies in the prioritization trigger and process identified by the Appeals Court

# Purpose of SBRM Amendment

- Explain methods and processes to monitor and assess bycatch for Northeast Region fisheries
- Determine if current methods and processes need to be modified and/or supplemented
- Establish standards of precision for bycatch estimation for Northeast Region fisheries
- Consider accuracy of estimate as well as precision
- Document the SBRM established for all Northeast Region FMP fisheries



# Structure of SBRM Amendment

- Chapter 1 – Introduction and Background
  - Statement of the problem
  - Purpose and need
  - Issues to be addressed
- Chapter 2 – Description of the Fisheries
  - Background on each subject FMP
  - Recent landings and value (*updated*)
- Chapter 3 – Description of Fishing Modes
  - Characterization of each gear/area-based mode
  - Landings, ports, areas fished, no. of vessels (*updated*)
- Chapter 4 – Bycatch Reporting Mechanisms
  - Overview of each mechanism used and/or considered

# Structure (cont'd)

- Chapter 5 – Sampling Design and Estimation of Precision and Accuracy
  - Discussion of sampling design
  - Estimation of precision
  - Analysis of accuracy
- Chapter 6 – Alternatives Under Consideration
  - Preferred alternatives (*once selected*)
  - Other alternatives considered
  - Alternatives considered but rejected
- Chapter 7 – Environmental Consequences
  - Affected environment
  - Biological, physical, socio-economic effects
  - Cumulative effects
- Chapter 8 – Applicable Laws and Directives
- Glossary, References, and Appendices

# Overview of Alternatives

SBRM Element	Alternatives Under Consideration			
1. Bycatch Reporting and Monitoring Mechanisms	Status quo		Implement electronic video monitoring	
2. Analytical Techniques and Allocation of Observers	Pre-2007 SBRM Amendment	Integrated allocation approach	Integrated allocation approach w/ importance filter	Minimum percent observer coverage
3. SBRM Performance Standard	No performance standard		Establish a CV standard	
4. SBRM Review/ Reporting Process	Status quo		Specify a SBRM review process	Require periodic discard reports
5. Framework Adjustment Provisions	Status quo	Framework adjustment	Frameworks and annual adjustments	Frameworks and annual adjustments, exclusive of fishing mode
6. Prioritization Process				
6.1 Funding trigger	Status quo		Identify specific SBRM funding sources	
6.2 Reallocation	Council consultation		Proportional adjustment	Penultimate Cell Approach
6.3 Less than Minimum Pilot Coverage	Ad hoc prioritization		Remove fleets with high MPC	Remove fleets with high MPC to days absent ratio
7. Industry-Funded Observer Programs	Status quo		Observer provider approval	Framework provisions

*Shaded cells indicate the alternatives adopted by the Council in June 2006*

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# SBRM Element 2

## Analytical Techniques and Allocation of Observers

- Pre-2007 SBRM Amendment process
- Integrated allocation approach
- Integrated allocation approach w/ importance filter
  - Option A: 2007 SBRM public hearing draft
  - Option B: Filters as adopted in 2007 SBRM (*2007 SBRM implemented option*)
  - Option C: Same as option B, but without unlikely (gray-cell) filter (*Status quo*)
- Minimum percent observer coverage

# SBRM Element 5

## Framework Adjustment Provisions

- Status quo
  - Changes to CV-based performance standard, how discard data is collected, SBRM reporting, industry funded observers, and fishing modes require amendment
- Framework adjustment
- Frameworks and annual adjustments (*2007 SBRM implemented option*)
- Frameworks and annual adjustments, no Council action needed for changes to fishing modes (*Additional option*)

# SBRM Element 6

## Prioritization Process

- Funding Trigger (6.1) - How we determine the available funds
- Resulting Sea Day Adjustments (6.2) - What we do if the trigger condition is met
- Funding Below Minimum Pilot Coverage (6.3) - What if not all fleets can get useful coverage



# SBRM Element 6.1

## Prioritization Process–Part 1: Trigger

### 6.1.1 Status quo

- Uses combination of available sources of funding within established funding restrictions, limitations, and expectations.
- Found deficient by the Court

### 6.1.2 Identify specific SBRM funding sources

- Funds allocated to the Northeast Region under 4 specific Congressional appropriation lines would be used for SBRM coverage.
- Does not specify a fixed dollar amount.

# SBRM Element 6.1

## 6.1.2 Identify dedicated SBRM funding sources, cont.

Funding Line	Average Proportion to NE Region (2010-2012)
Northeast Fisheries Observer Program	98 percent
Atlantic Coast Observers	43 percent
National Observer Program	43 percent
Reducing Bycatch - Observers	13 percent

- Atlantic Coast Observers funding line is divided between Northeast Region, Southeast Region, and HQ.
- National Observer Program and Reducing Bycatch funds are divided between all 6 Regions and HQ.
- Funding allocated to the NE Region through these lines would be used to support SBRM consistent with historic practice.
- Observer funding from other sources may also be available outside of SBRM (MMPA, ESA, catch shares, etc.).

# SBRM Element 6.2

## Prioritization Process–Part 2: Sea Day Adjustment

6.2.1 Status quo

6.2.2 Proportional adjustment approach

6.2.3 Penultimate cell approach

## 6.2.1 Status quo

Within the Agency-funded fleets

- 1) Identify fleets that correspond to funding restrictions, limitations, and expectations
- 2) Adjustments of days to cover unfunded fleets
- 3) A blend of ad-hoc methods including sea day allocations proportional to last year's effort used to meet funding source, Agency, and Council needs.
- 4) Consultation with Councils on proposed observer sea-day allocations.

However, similar to the previous process, which was found deficient by the Court.

## 6.2.2 Proportional Approach

Within the Agency-funded fleets

1. For each fleet, derive COMBINED MPC Adjusted days by subtracting the minimum pilot days from the COMBINED days
2. Derive proportion shortfall  
(funded days – min pilot days) / (COMBINED MPC Adjusted days)
3. For each fleet, derive rescaled days  
(COMBINED MPC Adjusted days x proportion shortfall)
4. Derive prioritized days  
(rescaled days + min pilot days)

# Illustrative Example using 2012

Description	Days	% of days	Terminology Used
NEGF (aka NEFOP for SBRM)	2,448	28%	SBRM-applicable
At-Sea Monitoring (ASM)	5,255	60%	non-SBRM-applicable
Atlantic Coast Observers	484	6%	SBRM-applicable
MMPA	274	3%	non-SBRM-applicable
Reducing Bycatch	49	1%	SBRM-applicable
National Observer Program	276	3%	SBRM-applicable
<b>TOTAL</b>	<b>8,786</b>	<b>100%</b>	

Agency-funded days

3,257

37%

Applicable for SBRM process

Agency-funded days

5,529

63%

Not applicable for SBRM process

Industry-funded days

3,606

Not applicable for SBRM process

# Filtered Sea Days

Row	Gear Type	Region	Mesh Group	RCRAB	SBM	MONK	GFL	GFS	SKATE	DOG	FSB	TURS	Pilot days	Min Pilot Days	2012 Sea Days Needed COMBINED
5	Otter Trawl	MA	sm	3,231	364	0	497	545	397	325	513	1,719	160	30	3,231
6	Otter Trawl	MA	lg	5,551	0	164	141	0	107	333	173	2,952	266	27	5,551
7	Otter Trawl	NE	sm	0	411	0	461	451	531	1,151	489	-	168	29	1,151
8	Otter Trawl	NE	lg	3,879	0	568	76	280	261	229	788	-	415	35	3,879
17	Otter Trawl, Haddock	NE	lg	0	0	0	0	0	257	567	0	-	100	100	567
22	Sink, Anchor, Drift Gillnet	MA	sm	0	0	0	0	0	0	0	0	172	40	13	172
23	Sink, Anchor, Drift Gillnet	MA	lg	0	0	0	0	0	0	0	0	172	43	13	172
24	Sink, Anchor, Drift Gillnet	MA	xlg	0	0	70	0	0	83	0	0	1,096	61	15	1,096
26	Sink, Anchor, Drift Gillnet	NE	lg	0	0	0	0	0	0	97	0	-	134	14	97
36	Scallop Dredge	MA	all	0	0	312	0	0	164	0	0	598	238	109	598
39	Mid-water Paired & Single	NE	all	0	0	0	0	0	0	571	0	-	43	43	571
48	Pots and Traps, Lobster	NE	all	429	429	429	429	429	429	429	429	-	429	17	429
⋮	⋮			⋮	⋮	⋮	⋮	⋮	⋮	⋮	⋮	⋮		⋮	⋮

2012: 55 fleets

- 46 Agency-funded fleets
- 9 Industry-funded fleets

Red font indicates "driving" species group for the fleet  
 Purple shade indicates Industry-funded fleets

Agency-funded fleets	18,301
Industry-funded fleets	2,289
<b>Total</b>	<b>20,590</b>

\* Turtle sea days for gear type groups have been distributed across fleets according to the percentage of days needed for each fish fleet.

## 6.2.2 Proportional Example (full example given in Appendix)

Agency-funded fleets				Total	MPC Adjusted	Proportion					
				3,257	2,032	0.12					
Row	Gear Type	Region	Mesh Group	2012 Sea Days for Min Pilot Coverage (MPC)	2012 Sea Days Needed COMBINED	2012 Sea Days Needed COMBINED MPC Adjusted	2012 Sea Days Needed COMBINED MPC Adjusted Rescaled	2012 Sea Days SBRM PRIORITIZED (Proportional)	2012 Sea Days non-SBRM (Catch share, MMPA, Discovery)	2012 Industry-funded Sea Days	Sea Days Allocated for April 2012 - March 2013 (Total)
5	Otter Trawl	MA	sm	30	3,231	3,201	381	411			411
6	Otter Trawl	MA	lg	27	5,551	5,524	657	684	1,271		1,955
7	Otter Trawl	NE	sm	29	1,151	1,122	134	163			163
8	Otter Trawl	NE	lg	35	3,879	3,844	457	492	1,981		2,473
17	Otter Trawl, Haddock Separator	NE	lg	100	567	467	56	156	203		359
22	Sink, Anchor, Drift Gillnet	MA	sm	13	172	159	19	32			32
23	Sink, Anchor, Drift Gillnet	MA	lg	13	172	159	19	32			32
24	Sink, Anchor, Drift Gillnet	MA	xl	15	1,096	1,081	129	144	287		431
26	Sink, Anchor, Drift Gillnet	NE	lg	14	97	83	10	24	640		664
36	Scallop Dredge	MA	all	109	598					1,713	1,713
39	Mid-water Paired & Single Trawl	NE	all	43	571	528	63	106			106
48	Pots and Traps, Lobster	NE	all	17	429	412	49	66			66
⋮	⋮			⋮	⋮	⋮	⋮	⋮	⋮	⋮	⋮
MMPA coverage									274		274
<b>Agency-funded fleets</b>				<b>1,225</b>	<b>18,301</b>	<b>17,076</b>	<b>2,032</b>	<b>3,257</b>	<b>5,529</b>		<b>8,786</b>
<b>Industry-funded fleets</b>				<b>783</b>	<b>2,289</b>					<b>3,606</b>	<b>3,606</b>
<b>Total</b>				<b>2,008</b>	<b>20,590</b>						<b>12,392</b>

Purple shade indicates Industry-funded fleets



## 6.2.3 Penultimate Approach

Within the Agency-funded fleets

- 1) Within each fleet, list days in descending order
- 2) Derive differences between days within fleet
- 3) Rank the differences across fleets but respecting the sequence of differences within fleets
- 4) Reduce sea days needed following the ranked order until the cumulative reduction meets the shortfall

5	Otter Trawl	MA	sm	3,231	1,719	545	513	497	397	364	325	30
				RCRAB	TURS	GFS	FSB	GFL	SKATE	SBM	DOG	MPC

6	Otter Trawl	MA	lg	5,551	2,952	333	173	164	141	107	27
				RCRAB	TURS	DOG	FSB	MONK	GFL	SKATE	MPC

7	Otter Trawl	NE	sm	1,151	531	489	461	451	411	29
				DOG	SKATE	FSB	GFL	GFS	SBM	MPC

8	Otter Trawl	NE	lg	3,879	788	568	280	261	229	76	35
				RCRAB	FSB	MONK	GFS	SKATE	DOG	GFL	MPC

17	Otter Trawl, Haddock Separator	NE	lg	567	257	100
				DOG	SKATE	MPC

22	Sink, Anchor, Drift Gillnet	MA	sm	172	13
				TURS	MPC

23	Sink, Anchor, Drift Gillnet	MA	lg	172	13
				TURS	MPC

24	Sink, Anchor, Drift Gillnet	MA	xlg	1,096	83	70	15
				TURS	SKATE	MONK	MPC

26	Sink, Anchor, Drift Gillnet	NE	lg	97	14
				DOG	MPC

39	Mid-water Paired & Single Trawl	NE	all	571	43
				DOG	MPC

48	Pots and Traps, Lobster	NE	all	429	17
				Pilot	MPC

1) Order days within fleets  
(descending)

## 6.2.3 Penultimate Example

5	Otter Trawl	MA	sm	3,231	1,719	545	513	497	397	364	325	30
				RCRAB	TURS	GFS	FSB	GFL	SKATE	SBM	DOG	MPC

6	Otter Trawl	MA	lg	5,551	2,952	333	173	164	141	107	27
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- 1) Order days within fleets (descending)
- 2) Derive differences within fleets

## 6.2.3 Penultimate Example

5	Otter Trawl	MA	sm	3,231	1,719	545	513	497	397	364	325	30	
				RCRAB		TURS	GFS	FSB	GFL	SKATE	SBM	DOG	MPC
				4		5							
				1,512	1,174	32	16	100	33	39	295		
6	Otter Trawl	MA	lg	5,551	2,952	333	173	164	141	107	27		
				RCRAB		TURS	DOG	FSB	MONK	GFL	SKATE	MPC	
				2		3		13					
				2,599	2,619	160	9	23	34	80			
7	Otter Trawl	NE	sm	1,151	531	489	461	451	411	29			
				DOG		SKATE	FSB	GFL	GFS	SBM	MPC		
				7									
				620	42	28	10	40	382				
8	Otter Trawl	NE	lg	3,879	788	568	280	261	229	76	35		
				RCRAB		FSB	MONK	GFS	SKATE	DOG	GFL	MPC	
				1		11		12					
				3,091	220	288	19	32	153	41			
17	Otter Trawl, Haddock Separator	NE	lg	567	257	100							
				DOG		SKATE	MPC						
				10		16							
				310	157								
22	Sink, Anchor, Drift Gillnet	MA	sm	172	13								
				TURS		MPC							
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				TURS		SKATE	MONK	MPC					
				6		13		55					
				1,013									
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				DOG		MPC							
				8									
				528									
48	Pots and Traps, Lobster	NE	all	429	17								
				Pilot		MPC							
				9									
				412									

- 1) Order days within fleets (descending)
- 2) Derive differences within fleets
- 3) Rank the differences across fleets (but sequentially within fleets)

## 6.2.3 Penultimate Example

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				5											
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				2		2,599	2,619	160	9	23	34	80			
				3											
				13											
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				DOG	SKATE	FSB	GFL	GFS	SBM	MPC					
				7		620	42	28	10	40	382				
8	Otter Trawl	NE	lg	3,879	788	568	280	261	229	76	35	280			
				RCRAB	FSB	MONK	GFS	SKATE	DOG	GFL	MPC				
				1		3,091	220	288	19	32	153	41			
				11											
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				DOG	SKATE	MPC									
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				14		159									
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				TURS	SKATE	MONK	MPC								
				6		1,013	13	55							
26	Sink, Anchor, Drift Gillnet	NE	lg	97	14	14									
				DOG	MPC										
				17		83									
39	Mid-water Paired & Single Trawl	NE	all	571	43	43									
				DOG	MPC										
				8		528									
48	Pots and Traps, Lobster	NE	all	429	17	17									
				Pilot	MPC										
				9		412									

- 1) Order days within fleets (descending)
- 2) Derive differences within fleets
- 3) Rank the differences across fleets (but sequentially within fleets)
- 4) Reduce sea days following the ranked order until the cumulative reduction equals the shortfall

### 6.2.3 Penultimate Example

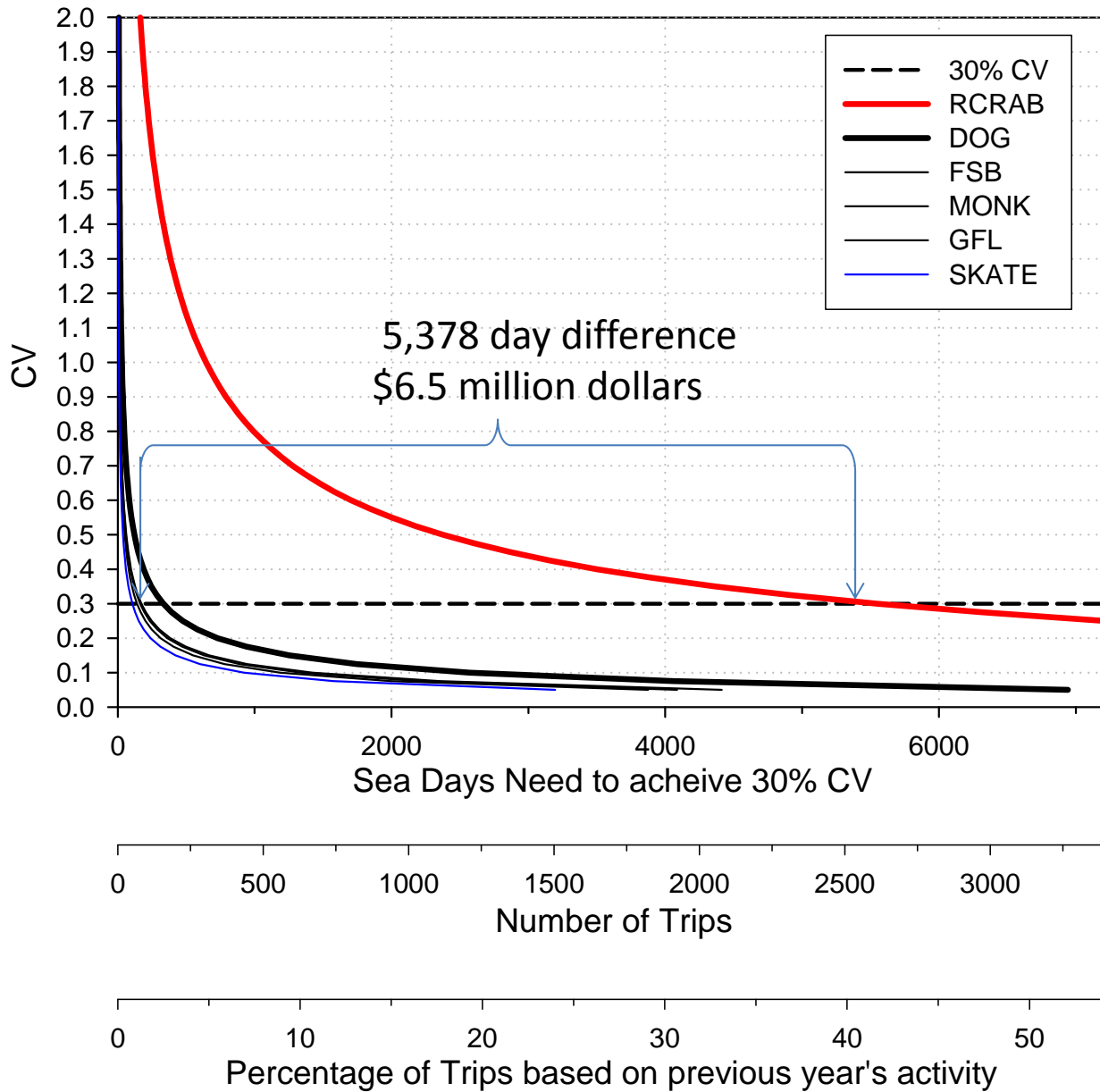
### 6.2.3 Penultimate Example (full example given in Appendix)

Row	Gear Type	Region	Mesh Group	2012 Sea Days Needed COMBINED	2012 Sea Days SBRM PRIORITIZED (Penultimate)	2012 Sea Days non-SBRM (Catch share, MMPA, Discovery)	2012 Industry-funded Sea Days	Sea Days Allocated for April 2012 - March 2013 (Total)
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7	Otter Trawl	NE	sm	1,151	531			531
8	Otter Trawl	NE	lg	3,879	280	1,981		2,261
17	Otter Trawl, Haddock Separator	NE	lg	567	100	203		303
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23	Sink, Anchor, Drift Gillnet	MA	lg	172	13			13
24	Sink, Anchor, Drift Gillnet	MA	xlg	1,096	83	287		370
26	Sink, Anchor, Drift Gillnet	NE	lg	97	74	640		714
36	Scallop Dredge	MA	all	598			1,713	1,713
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⋮	⋮			⋮	⋮	⋮	⋮	⋮
	MMPA coverage					274		274

<b>Agency-funded fleets</b>	<b>18,301</b>	<b>3,257</b>	<b>5,529</b>		<b>8,786</b>
<b>Industry-funded fleets</b>	<b>2,289</b>			<b>3,606</b>	<b>3,606</b>
<b>Total</b>	<b>20,590</b>				<b>12,392</b>

Purple shade indicates Industry-funded fleets

# MA OTTER TRAWL LARGE-MESH (ROW 6)



Days Needed for fleet  
5,551

Days Prioritized to fleet  
173

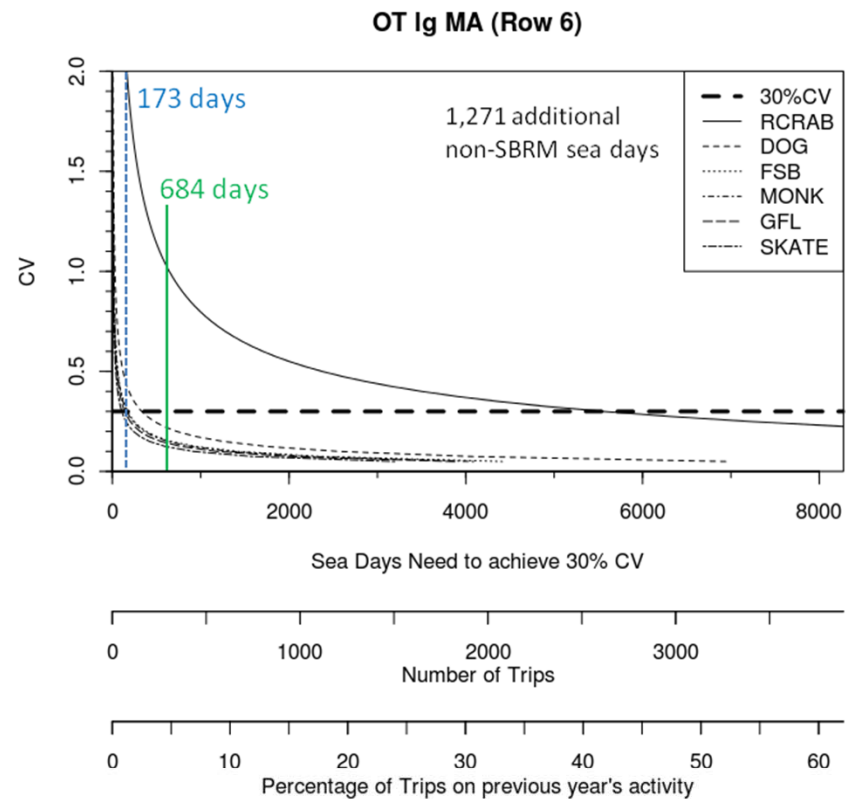
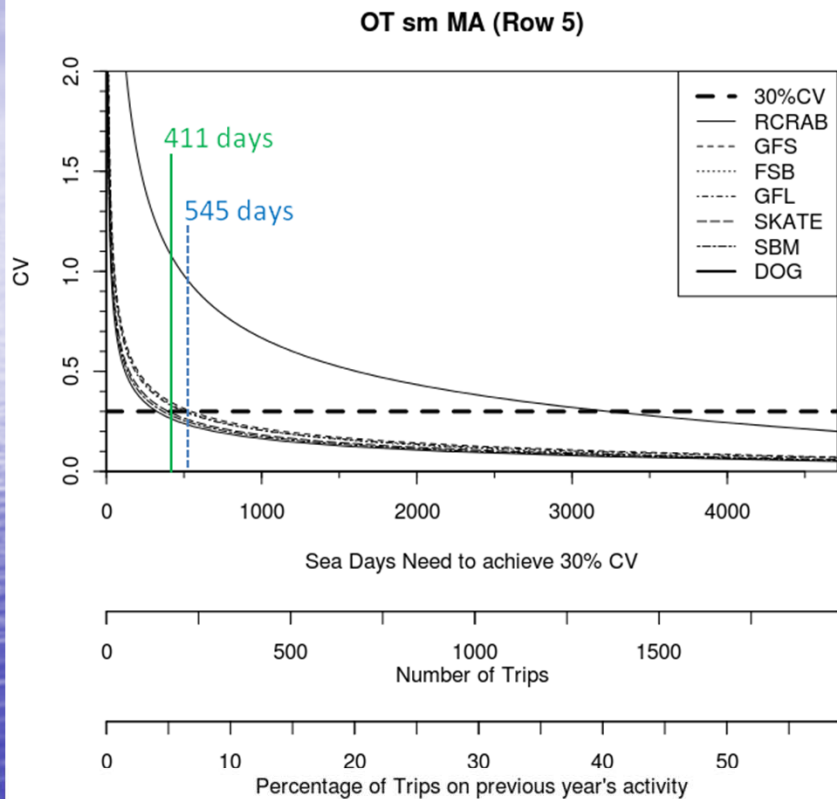
Impact:

Red crab: 195% CV

Dogfish: 42% CV

Other FISH species groups:  
≤ 30% CV

For TURS, see MA Trawl



green solid line indicates days prioritized via proportional approach;  
 blue dashed line indicates days prioritized via penultimate approach



# SBRM Element 6.3

## Prioritization Process–Part 3: Funding Below Minimum Pilot Coverage

- MPC is 3 trips per quarter, using average trip length
- Assures a usable discard estimate for all fleets
- If funding below MPC, some fleets would lose coverage

6.3.1 Assign coverage ad-hoc

6.3.2 Eliminate fleets w/ highest MPC days

6.3.3 Eliminate fleets w/ highest ratio of MPC to days absent

## 6.3.1 Assign Coverage Ad-hoc

Regional Administrator and Science Research Director prepare proposal for Councils, which includes:

- Details of the funding shortfall
- Recommendations of which fleets receive coverage
- Legal mandates, management priorities, or data needs considered.

Councils would consider the proposal at a public meeting, and may recommend revisions or additional considerations.

## 6.3.2 Eliminate Highest MPC Example (full example given in Appendix)

*Example with 1,000 SBRM-applicable funded sea days*

Row	Gear Type	Region	Mesh Group	2012 Sea Days for Min Pilot Coverage (MPC)	MPC Rank (Desc)	2012 Sea Days SBRM PRIORITIZED (SBRM < MPC Option 1)	2012 Sea Days non-SBRM (Catch share, MMPA, Discovery)	2012 Industry-funded Sea Days	Sea Days Allocated for April 2012 - March 2013 (Total)
1	Longline	MA	all	67	4	67			67
8	Otter Trawl	NE	lg	35	10	35	1,981		2,016
15	Otter Trawl, Ruhle	NE	lg	59	6	59	37		96
17	Otter Trawl, Haddock	NE	lg	100	2	0	203		203
18	Shrimp Trawl	MA	all	120	1	0			0
25	Sink, Anchor, Drift Gillnet	NE	sm	41	8	41			41
36	Scallop Dredge	MA	all	109				1,713	1,713
39	Mid-water Paired & Single	NE	all	43	7	43			43
45	Pots and Traps, Hagfish	NE	all	74	3	0			0
50	Pots and Traps, Crab	NE	all	67	4	67			67
53	Dredge, Other	MA	all	41	8	41			41
⋮	⋮			⋮	⋮	⋮	⋮	⋮	⋮
	MMPA coverage						274		274
	Remaining Days					69			
	<b>Agency-funded fleets</b>			<b>1,225</b>		<b>1,000</b>	<b>5,529</b>		<b>6,529</b>
	<b>Industry-funded fleets</b>			<b>783</b>				<b>3,606</b>	<b>3,606</b>
	<b>Total</b>			<b>2,008</b>					<b>10,135</b>

## 6.3.3 Eliminate Highest MPC to Days Absent Ratio Example (full example given in Appendix)

*Example with 1,000 SBRM-applicable funded sea days*

Row	Gear Type	Region	Mesh Group	2012 Sea Days for Min Pilot Coverage (MPC)	TOTAL VTR DAYS	Ratio (MPC/VTR)	Ratio Rank (Desc)	2012 Sea Days SBRM PRIORITIZED (SBRM < MPC Option 2)	2012 Sea Days non-SBRM (Catch share, MMPA, Discovery)	2012 Industry-funded Sea Days	Sea Days Allocated for April 2012 - March 2013 (Total)
13 +	Otter Trawl, Ruhle	MA	lg	9	7	1.28571	2	0			0
14 +	Otter Trawl, Ruhle	NE	sm	27	25	1.08000	3	0			0
15	Otter Trawl, Ruhle	NE	lg	59	389	0.15167	8	0	37		37
16 +	Otter Trawl, Haddock	MA	lg	8	12	0.66667	5	0			0
25	Sink, Anchor, Drift Gillnet	NE	sm	41	28	1.46429	1	0			0
36	Scallop Dredge	MA	all	109	11,906					1,713	1,713
38	Mid-water Paired & Single	MA	all	17	40	0.42500	6	0			0
44	Pots and Traps, Hagfish	MA	all	3	3	1.00000	4	0			0
45	Pots and Traps, Hagfish	NE	all	74	369	0.20054	7	0			0
49	Pots and Traps, Crab	MA	all	12	83	0.14458	9	12			12
53	Dredge, Other	MA	all	41	347	0.11816	10	41			41
⋮	⋮			⋮	⋮	⋮	⋮	⋮	⋮	⋮	⋮
	MMPA coverage								274		274
	Remaining Days							13			
	<b>Agency-funded fleets</b>			<b>1,225</b>	<b>149,684</b>			<b>1,000</b>	<b>5,529</b>		<b>6,529</b>
	<b>Industry-funded fleets</b>			<b>783</b>	<b>30,284</b>					<b>3,606</b>	<b>3,606</b>
	<b>Total</b>			<b>2,008</b>	<b>179,968</b>						<b>10,135</b>

# Review Public Comments

- Comment period was initially open from September 27, 2013 through October 27, 2013
- A *Federal Register* notice was published on November 19, 2013, reopening the comment period through December 19, 2013
- 3 comments were received
  - Dr. Tom Hoff
  - David Goethel
  - Oceana

# Ad Hoc Committee Alternatives

SBRM Element	Alternatives Under Consideration			
1. Bycatch Reporting and Monitoring Mechanisms	Status quo		Implement electronic video monitoring	
2. Analytical Techniques and Allocation of Observers	Pre-2007 SBRM Amendment	Integrated allocation approach	Integrated allocation approach w/ importance filter (Option C)	Minimum percent observer coverage
3. SBRM Performance Standard	No performance standard		Establish a CV standard	
4. SBRM Review/ Reporting Process	Status quo		Specify a SBRM review process (Option D – 3 yrs)	Require periodic discard reports (Option B – Annual)
5. Framework Adjustment Provisions	Status quo	Framework adjustment	Frameworks and annual adjustments	Frameworks and annual adjustments, exclusive of fishing mode
6. Prioritization Process				
6.1 Funding trigger	Status quo		Identify specific SBRM funding sources	
6.2 Reallocation	Council consultation		Proportional adjustment	Penultimate Cell Approach
6.3 Less than Minimum Pilot Coverage	Ad hoc prioritization		Remove fleets with high MPC	Remove fleets with high MPC to days absent ratio
7. Industry-Funded Observer Programs	Status quo		Observer provider approval	Framework provisions

*Shaded cells indicate the alternatives selected by the Ad Hoc SBRM Committee on 1/16/2014*

Questions?