COST ALLOCATION DRAFT POLICY DIRECTIVE
QUESTIONS FROM ETWG MEETING

1) Base cost allocation on revenues in fishery

Some ETWG members suggested that cost allocation be based on the revenues in the fishery. Revenues in the fishery could be accommodated by the details of a particular transition plan.

I think that this concept should not included because it would encourage people to argue for a sliding scale based on revenue which would be slow and political and many low revenue fisheries could get EM with no cost allocation which would shift all costs to NMFS

2) Base cost allocation on the type of the observer program, e.g. science or monitoring.

The cost allocation document is directed at monitoring programs. Programs to gather scientific information will continue to be an agency obligation. Should this be noted in the draft policy directive?

I think that we have said that observers are gov't responsibility and ASM is subject to cost allocation. We could include as a footnote

3) How to address cost allocation where discrepancies between EM review results and logbooks are found?

ETWG members raised a number of questions about how to address discrepancies between EM review results and logbooks. Among the questions are:

a) Does this constitute a penalty without due process?

It was suggested that EM programs should be written to meet data quality standards or performance specifications rather than containing the allocation of the cost of extra review. This could be done through the regulations establishing an EM program.

4) Expand explanation of cost allocation categories listed on page 3

It was suggested that the cost allocation categories assigned to industry or agency on page 3 be expanded for better description.

Do we want to expand these definitions? This could be done by an appendix to not clutter the document but could also result in an extended discussion about the definitions.