SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON COUNCIL COMMENTS ON PROPOSED REVISIONS TO NATIONAL STANDARD 2 GUIDELINES – SCIENTIFIC INFORMATION

The National Marine Fisheries Service is seeking comment on proposed changes to the guidelines on National Standard 2 – Scientific Information of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The Scientific and Statistical Committee (SSC) has emphasized the importance of good science, peer review and evaluation of uncertainty in assessment and management, and generally supports the proposed guidelines and the definitions they provide. Updates to our Terms of Reference (TOR) already reflect the proposed guidelines; for example, we identify and eliminate potential conflicts of interest in the review process. However, we have some concern that ambiguous language in the provision could unintentionally constrain rigorous procedures for review and evaluation of scientific information. Specifically, the recommended restrictions on SSC re-evaluation of peer-review reports seem counter to our current framework for assessment review:

“the SSC should not repeat the peer review process by conducting a subsequent detailed technical review” (pg. 65726, third column)

Our existing process is hierarchical; our TOR specifies SSC leadership and participation in Stock Assessment Review (STAR) Panels, and when necessary, STAR Panel work is re-evaluated in a “mop-up” panel meeting with external peer review. The SSC wants to maintain flexibility to deal with situations which may require additional analysis, for example, following review of the STAR reports by the full SSC. This procedure is complementary, not duplicative, of the STAR Panel process, and assures broad identification of the “best available science.” We recommend deletion or clarification of the referenced language in the proposed rule that may restrict additional SSC evaluation.

PFMC
03/06/10