

ENFORCEMENT CONSULTANTS REPORT ON
PREPARE COMMENTS ON PROPOSED CHANGES TO THE
NATIONAL STANDARD GUIDELINES 1, 3, AND 7

The Enforcement Consultants (EC) have reviewed Agenda Item F.2, Comments on Proposed Changes to National Standard Guidelines (NS) 1, 3, and 7 and have the following comments, specifically pertaining to NS-7.

As discussed in Agenda Item F.2, Attachment 1, the Magnuson-Stevens Fishery Conservation and Management Act states, *Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.* The EC requests NMFS consider adding language to the guidelines to note the value of actively engaging with enforcement agencies to solicit feedback when considering an action's impacts under NS7. As the Council recognizes, enforcement agencies, such as state enforcement and the U.S. Coast Guard, expend significant at-sea and shoreside resources to enforce regulations resulting from various management measures adopted by the Pacific Council and enacted by NMFS. The EC believes adding this concept to the guidelines acknowledges that enforcement agencies are well positioned to provide valuable information relative to operating costs associated with enforcement, as well as the costs of industry compliance with these regulations, and to offer considerations regarding potential management strategies to minimize those costs.

Recommendation: The EC recommends the Council consider inclusion of the above in any comments prepared in advance of the June 23-25 Council Coordination Committee meeting.

NOAA representatives to the EC abstained from commenting on this EC report.

PFMC
04/12/15