GROUNDFISH ADVISORY SUBPANEL REPORT ON COST RECOVERY REPORT

The Groundfish Advisory Subpanel (GAP) received an update on the topic from Mr. Ryan Wulff, Dr. Michelle McClure, Ms. Kelly Ames, and Mr. Chris Biegel, and offers the following comments and suggestions.

The GAP understands that National Marine Fisheries Service (NMFS) requires additional time to address industry feedback and provide more detailed information than in past reports. The GAP appreciates NMFS candor and being willing to discuss industry concerns with the cost recovery process and reports to date. This is a good start. The GAP hopes this continuing conversation can lead to addressing concerns laid out in past GAP cost recovery statements such as in our statements from April 2017 and November 2017.

The GAP sees two of the foundational issues being:

- 1) determination of what is recoverable and
- 2) determination of defining true incremental costs

The April 2017 GAP cost recovery report details how in 2010 and 2011 the Council defined the framework and methodology for NMFS to adopt. The GAP is hopeful that conversations between NMFS and industry can lead to the fulfillment of this original Council direction.

PFMC 04/08/18