

NORTHWEST INDIAN FISHERIES COMMISSION STATEMENT ON THE MODEL EVALUATION WORKGROUP AND SALMON METHODOLOGY REVIEW

The Northwest Indian Fisheries Commission (NWIFC) reiterates the points from our previous statement on the Model Evaluation Workgroup (MEW) (June 2022 Agenda Item C.7.a, Supplemental Tribal Report 1), and offers the following additional thoughts on how best to serve the needs of the Council relative to reviews of the Fishery Regulation Assessment Model (FRAM) and related salmon modeling to ensure that they reflect the best scientific information available. Our comments are about the function and current structure of the MEW and are not a reflection on the workgroup members or staff involved.

The MEW was originally established with the intent of producing documentation for the Chinook and coho FRAMs. To date the progress on the Chinook and coho FRAM documentation has been a co-manager work product. Additionally, the MEW's scope has expanded beyond the original task of providing documentation for the FRAM, and in some years the MEW is tasked with participating in the annual Salmon Methodology review with the Salmon Technical Team (STT) and Scientific and Statistical Committee (SSC) Salmon Subcommittee.

The NWIFC is concerned that the MEW as structured does not serve as an independent review body for changes to the FRAM, and is redundant in the development and review processes already in place for the FRAM. Three of the four current members of the MEW are members of the STT, and this high degree of overlap leads to the appearance of conflicts of interest with STT and MEW members reviewing work that they produced or helped produce.

Prior to adoption for use in management, any proposed new FRAM methodologies or changes to existing FRAM methodologies should be presented to the Council's SSC and STT for scientific review and consideration of technical aspects of implementation, respectively, as is done for other Fishery Management Plans (FMPs). This would increase transparency vis-a-vis authorship of work products and independence of reviewers and better meet the need for a thorough and defensible independent scientific and technical review in keeping with the requirements of the Magnuson Stevens Act. This also would be more in keeping with the fact that the "ownership" of the FRAM resides with the state and tribal co-managers and not PFMC.

The standard for review needs to be the same across all FMPs and Council Operating Procedures (COP). Specific standards for the peer review process and the selection of reviewers are listed in the regulations implementing National Standard 2 under the Magnuson Stevens Act (50 CFR 600.315). In particular, reviewers should not have contributed or participated in the development of the work product or scientific information under review and reviewer responsibilities should rotate across the available pool of qualified reviewers, when possible. COP 15 should be updated to reflect these standards and to ensure that the salmon methodology review is consistent with the Council's other FMPs. Additionally, salmon methodology reviews should occur as needed, as is the case for groundfish and coastal pelagic species.

As has been expressed previously, the NWIFC has strong reservations about the conflicts of interest present within the MEW, with many members of the MEW and STT reviewing their own work. Given the ethical challenges this poses, and the ongoing considerations around the Council's workload and budget, the NWIFC recommends that the MEW should be disbanded and reviews of changes to FRAM methodologies should be conducted with clear terms of reference, transparency, and independence. Doing so would make the salmon methodology review process more consistent with other FMPs and National Standard 2 regulations. Additionally, there have been ongoing concerns about the capacity of the STT – disbanding the MEW could free up additional resources to increase the STT membership.

If the MEW is to continue, then its membership structure, responsibilities and tasks, and operating procedures all require careful consideration, review, and revision. The MEW should develop work products based on a defined need that is not redundant to co-manager efforts or the STT and SSC review process. Additionally, the MEW membership should be more diverse and independent, with only one designated representative each for the STT and SSC.