

Scallop PDT Input on List of RSA Program Review Findings and Recommendations

In April, the Council received a report of the RSA program that included findings and recommendations. The Council is planning to discuss next steps for the program review on June 11, 2019 (5 pm agenda item).

Ahead of the May 9, 2019 PDT conference call, PDT members were asked to identify issues/recommendations from the RSA program review that they thought the Council should consider working on in the future. PDT members were also asked to identify recommendations that they thought the Council should not pursue.

To complete this exercise, the PDT members received a copy of the program review that [was presented to the Council on April 17, 2019](#). The PDT also received the presentation that was given by Deirdre Boelke (Council Staff), and Dr. Michael Sissenwine (Program Review Chair, Council Member (MA)) at the Council meeting.

Suggestions made in this document are opinions of individual PDT members. The Scallop PDT did not develop consensus recommendations in response to this report on its May 9, 2019 conference call. This information is being provided to support upcoming discussions at the Scallop RSA Share Day on May 21, 2019, and at the Scallop Committee meeting on May 23, 2019.

General input from multiple PDT members:

- Agreement with FINDING 1.
 - “Finding 1. The New England Council’s Research Set Aside programs are performing well, and are generally regarded as highly successful, especially the Scallop RSA program.”
- Several PDT members supported the development of a mission statement for the RSA as a short term/very important next step. Commenters also felt that additional documentation that outlines the full RSA process would be value.
- Do not make the RSA program more complex; do not screw up a good thing.
 - EX: Exploring reserves and year-to-year transfers should be evaluated in the context of overall program performance.
 - Carefully evaluate how some of the recommendations might be operationalized and consider they may alter the current RSA program.
- Support was expressed for a periodic review of the RSA set-asides amount and compensation fishing (e.g. every five years).

Questions/Comments:

- A master’s thesis by Erin Adams at S Mast looked at the RSA program. Did the review panel consider this work at all? The thesis evaluated the program using 4 metrics.
- 2.4.b – For all RSA species – bullet 1 on “Choke Stocks”: “Choke stocks” in the scallop fishery (yellowtail and windowpane) are prohibited from landing. There are also no individual allocations of sub-ACLs to the scallop, monkfish or herring fisheries.

- In Recommendation #3 To clarify the role of RSA, the NEMC should adopt a mission statement for RSA. The review panel offers that, “Some activities that might be explicitly excluded from an RSA mission statement might be:” The PDT seeks further clarification about this statement, and following bullets.
 - Is the review panel suggesting that a mission statement should exclude any language that suggests the program *should* support research that is intended to compete with or discredit NMFS scientists? In other words, the program should support scientific inquiry to advance the field, improve management, etc.?

PDT input by section:

- 2.1: Inadequacies in priority setting processes (short term – consider process following June recommendations, and make changes for 2021/2022 process)
 - *NEFMC STAFF*: Utilize correspondence over a longer time horizon.
 - If AP and Committee want – consider using a **webinar** if more meetings are needed.
 - 2.1.b. Note that the Scallop PDT generally meets several times to discuss priorities, mostly through conference calls and correspondence. There is a NEFSC person assigned to the PDT, however they may not be aware of the status of all of ongoing projects.
- 2.1.d Budgeting RSA fishing opportunities by topic rather than ranking priorities.
 - PDT members noted that the “ranking” process done in the scallop RSA is intended to convey the importance of research needs. History has shown that projects of all priority levels receive funding. There may also be some risk in capping pounds by topic area without knowing the range of proposals that will be submitted.
- 2.2 Perceived weaknesses and lack of transparency in review processes (short term – consider process following June recommendations, and make changes for 2021/2022 process)
 - PDT members generally agreed: “NMFS should consider improving communication about the administrative processes used for review and selection of RSA grant awards, such as updating the RSA Frequently Asked Questions, and the FAQ link could be included in all program communications.”
 - PDT Comment: It would be useful to have more explanation about how technical reviews are considered in/during the management review. (Short term, very important, Center & Council staff)
 - On the May 9, 2019 call, NEFSC and Council staff acknowledged that some of the questions/comments can be answered quickly (now).
 - Document all steps of the RSA process, including the processes that NEFSC use to determine final awards after the technical and management reviews are complete. For example, if additional reviews of methods or projects are being conducted after reviews are in but before awards are made, the Council should be aware of this process. (Short term, Very important, Center staff lead)
- 2.4.a The unique challenges created by awarding RSA fishing opportunities instead of monetary awards.

- Suggestion: Establish standard procedures on how to specify value estimates for each program (i.e. common price). (Short term, important, Center, Council, GARFO)
- The Scallop FMP already allows for RSA adjustments. There could be value in outlining or developing guidelines around when adjustments can be made (Short-term, Important), or for re-evaluating price estimates for multi-year grants (Short-term).
 - The PDT members had concerns about the complexity of operationalizing some of the recommendations in 4a. These recommendations might be more appropriate for herring or monkfish. (EX: Consider allowing the transfer of RSA quota or DAS between years to address inaccurate price estimates.
 - Consider reserving a portion of RSA quota or DAS that could be added to project awards to offset low price and value estimates.
 - Are there examples when work was not done because of lower than expected prices?
 - Council should consider the resources needed to manage a 1) RSA reserve; 2) RSA quota transfers between years to address inaccurate price estimates
- 2.4.b “To increase the value of RSA fishing opportunities so that more research can be supported, NMFS in consultation with the NEFMC, should consider:”
 - “Allow transfer between years (or further extend the 3 month RSA carryover provision).” A PDT member expressed concerns about the tracking RSA transfer between years, and the amount of resources that would be spent tracking 1.25 million lbs of scallops vs. managing the directed fishery.
 - EX: Flex in CAI with no RSA fishing was to facilitate harvest in the commercial fishery. Allowing carryover year to year would further complicate specifications setting.
 - Is 15 months not enough time to harvest RSA compensation pounds?
 - “Feasibility and benefit of periodically Increasing RSA amount (especially when total scallop harvest levels are relatively high) to create an RSA reserve that could be awarded to grant recipients and harvested at a later date.” (Low or medium priority? Medium or long term?) Input: If the Council is interested in looking at the feasibility and benefit of periodically increasing the RSA pounds, the Council should also articulate goals/objectives or rationale for increasing the RSA because this would be done in a management action as an alternative. In other words, why is 1.25 million lbs not sufficient to fund the program. This would help when evaluating the VECS.
 - “Allow harvest of scallops in certain areas or under certain situations for RSA only when it is not feasible to harvest them for the general fishery. For example, the smaller scallops in deep waters in Nantucket Lightship may not be suitable for normal fishery access. If those scallops are not allocated to the fishery, maybe they would be appropriate for RSA.” Members of the PDT agreed that slow growing scallops should be utilized if possible, but does NOT RECOMMEND pursuing their harvest as a long-term recommendation for the RSA program.

- Short term and important: Review the RSA set-aside amount and compensation fishing performance periodically (e.g. every five years).
 - Longer term: If the Council considers an auction program, look into the MAFMC RSA auction program before acting on this recommendation.
 - 2.5.c and 2.5.d – Same recommendation as above WRT the development of an on-line system.
- 2.5 Fairness concerns in the ways that RSA opportunities are used. (Short term, important)
 - PDT member input: This recommendation is useful – it could be helpful to have some clarity on intent of the RSA program from the Council (use mission statement as suggested).
- 2.6 Timeliness of RSA awards (Short term, Important)
 - The PDT feels that for scallops, the process has been fairly standardized in recent years and awards are made in time to allow research to be completed.
 - Council staff can assist with preparing a detailed time table for RSA steps. We generally do this as part of the Council process, but the information is not widely circulated.
 - Council staff have reservations about moving the priority setting process earlier in the year because there is value in seeing what projects are funded for the coming year before having the Council vote on new priorities. In the past, groups (PDT/AP) have been reluctant to engage in discussions about new priorities without knowing where things stand with the current cycle. If the awards can be made in early March, there could be time for the AP/CTE/Council fully develop research recommendations.
- 2.8.a “For sea scallop RSA survey projects, a post award meeting could be scheduled to share and review survey plans. This could be held in April after awards are made and before the survey season begins. It may be possible to evaluate and adjust survey plans to create a more effective overall survey strategy and to integrate the NEFSC survey plan at this stage as well.” (Clarification is needed, if pursued, medium or long term item?)
 - WRT 2.8.a, the PDT feels that additional clarification is needed about who would participate in this meeting, and how it is different from other RSA review panel meetings. (NEFSC staff/possibly Council staff?)
 - Also consider the Council’s priorities vs. creating a different “overall survey strategy” that integrates the NEFSC survey plan.
- 2.8.b “An Advisory Committee could be established for each award with NMFS/Council staff, and maybe others, to provide input throughout the project on ways to increase utility of the project and to identify ways the results can be integrated more effectively. If this process is too cumbersome, at a minimum one NEFSC staff person could be assigned to each project to identify if there are ways to enhance utility of results.” (Disagree, Council staff may be best suited WRT integration in management)
 - Members of the Scallop PDT do not support this recommendation. The priority setting process and combined technical and management reviews should be enough to identify which projects will contribute to management. If project results are not useful to management, then additional oversight from NEFSC is probably not the mechanism to enhance usefulness, possibly NEFMC staff.
- 2.8.g Periodic subject based updates on the status of RSA research through workshops.

- Scallop PDT supports this recommendation (Short term, Important), and suggests exploring other ways to disseminate information with creating a large additional workload.
- 2.9.b Data warehousing for data from RSA funded research (Long term)
 - If this is pursued, reviewers should be made aware of this line-item cost – some reviewers who are not familiar with the program or specific technologies may view additional data storage costs as unnecessary.
 - STAFF (JMP): this idea could benefit from a feasibility and cost study. This could take a lot of resources to maintain.
- 2.10 Lack of collaboration among scientists participating in RSA grants and NMFS scientists.
 - PDT member input: This recommendation would need careful consideration so that it would not result in precluding applicants from proposing projects that do not specifically include a cooperative agreement between NOAA and outside institutions. (important, medium?)
- 3. Develop a RSA mission statement (Short term – high priority)
 - Additional clarification is needed about what a mission statement might, or might not, include. (Short term)
- 4. A series of options for improving the efficiency and effectiveness of resource surveys for scallops should be considered. (Long term)
 - A member of the PDT felt that there are some contradictory statements in the report about the role of RSA and how to improve scallop surveys.
 - **From the “Findings” section:**
 - Priorities: “Program balance is usually addressed by allocating budget resources according to both the priority of the topic and the budgetary need to successfully address the topic.”
 - Scallop Surveys: “Currently NMFS pieces together a set of survey projects that it perceives as the best option given the proposals that have been submitted. This typically includes adjustments to proposed survey work to ensure important areas are covered, or elimination of unnecessary redundancy. In practice, once RSA survey coverage is identified, NMFS uses its own sea scallop surveys to fill in holes in the collection of RSA supported surveys.”
 - **From the “Recommendations” section:**
 - Role of RSA: “Some activities that might be explicitly excluded from an RSA mission statement might be:
 - De-facto funding for traditional government missions of monitoring and assessing fisheries”
 - Improve Scallop Surveys: “CARSAP could conduct planning processes such as designing and agreeing on a long term strategy for scallop surveys, including NMFS surveys.”
 - (Long term) It would be useful to have input from NMFS on the short, medium, and long term plans for the scallop survey – federal funding, methodology, vessel,

etc. This seems like a needed step before consideration of implementing the recommendations related to RSAs role in the scallop surveys.

- 4.3 “Using an RSA supported cooperative agreement to prepare a statistically rigorous (i.e., model based) design for Sea Scallop Surveys. The design should address all of the design considerations given in Finding 4. (i.e., spatial coverage, sampling design, sampling technology, sampling frequency, sampling intensity, modeling).”
 - Input from PDT members: This may need a longer time horizon, and separate process to develop.
 - More details are needed about the proposed model-based approach. Modelling exercises employ a range of assumptions and choices that would need to be considered.
 - Who would decide on the appropriate model? The Council’s SSC or NEFSC?
- 4 & 5 Move to a long term cooperative agreement to design and implement sea scallop surveys and CARSAP. (long term for development)
 - PDT interest in the idea of a cooperative agreement/longer term approach.
 - Details of a governance structure would be important. The PDT noted no mention of GARFO in this concept, (recognizing that details would need to be worked out).

Currently, the NEFMC is setting survey priorities (areas of importance). Under CARSAP, it is suggested that the Council would play an advisory role.
- 6. The NEFMC should consider preparing an Omnibus FMP for Research Set Aside Programs that would be available for all fisheries under the jurisdiction of the Council. (Important – Longer term)
 - The Council may wish to consider this.