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PROPOSAL FOR CONSERVATION AND MANAGEMENT MEASURE TO IMPLEMENT A WCPFC
ELECTRONIC MONITORING PROGRAM

WCPFC-SC22-2026-ST-WP10

11 July 2026

Submitted by the United States

As the Commission continues efforts to modernize and strengthen fisheries monitoring across the Convention Area, the United States submits this draft Conservation and Management Measure (CMM) to establish a WCPFC Electronic Monitoring Program (WCPFC EMP) for CCMs' consideration and discussion at SC22. The main objective of this proposal is two-fold: 1) to establish a framework whereby CCMs can implement and utilize EM in WCPFC; and 2) increase monitoring coverage in WCPFC longline fisheries to enhance data collection, and strengthen monitoring, control, and surveillance capabilities.

In particular, it aims to reflect the outcomes of Project 93, which undertook a comprehensive review of the WCPFC data needs, existing monitoring programs, and the potential role of EM in addressing identified gaps. Project 93 concluded the Commission's monitoring needs are not uniform across fisheries and that monitoring priorities should be directed toward those fisheries and activities where independent data collection and verification are currently limited. While the review found that purse seine fisheries, which already benefit from near-complete observer coverage and robust operational data, have relatively few monitoring gaps that could be addressed through additional EM, longline fisheries were identified as having several significant gaps resulting from comparatively low observer coverage.

Project 93 concluded that EM has the potential to substantially improve monitoring within WCPFC longline fisheries by:

- improving verification of catches subject to Commission catch limits;
- improving monitoring of bycatch, discards, and interactions with key and non-target species;
- augmenting scientific data collection where observer coverage is limited;
- improving monitoring of authorized at-sea transshipments;
- improving verification of bycatch mitigation measures; and
- strengthening compliance with vessel reporting requirements through independent verification.

The WCPFC Scientific Committee (SC) has also noted, and many Members have recognized, that the 5% coverage levels currently required in longline fisheries are not sufficient to provide accurate data, and SC has specifically recommended that the Commission explore options to expand observer coverage on longline vessels through both human and electronic approaches (SC19 Summary Report, para. 41).

In order to address these recommendations, the United States submits the following proposal for consideration by SC22. This proposal builds upon the consultative draft proposal for a CMM to establish a WCPFC EMP submitted by the United States at WCPFC22 (December, 2025), and has been updated based on engagement through the Electronic Reporting and Electronic Monitoring Intersessional Working Group (ER&EM IWG), and consultations bilaterally with Members. The draft still mirrors, as much as relevantly possible, the Regional Observer Program (ROP) CMM 2018-05; however, it incorporates the following updates based on feedback and discussions:

1. A streamlined body of the main proposal to simplify the overarching EMP and its associated requirements;
2. Incorporation of elements recommended through the ER&EM IWG that relate to the establishment of a WCPFC EMP; and
3. Updated monitoring requirements in Annex 2.

We have also incorporated feedback received from Members in the main body of the text and included several comments for further discussion. The majority of the updates to this draft are in Annex 2 and focus on establishing monitoring requirements for longline vessels. It includes a provision that requires a

phased implementation of 20% EM coverage by 2029. However, a significant change from the previous draft is that CCMs would not be required to have 100% installation of EM systems on longline vessels. New language specifies that regardless of how a CCM meets the monitoring requirements (through the EMP or ROP), coverage shall be applied across the fleet as a whole and be distributed in a manner that provides representative information across the fishing fleet.

It is important to note that this draft, specifically in Annex 2, would only establish specific monitoring requirements for the longline fishery. The proposal would not impact existing purse seine ROP requirements currently in place.

Finally, we have also included a rough draft of an Article 30 disproportionate burden analysis as Annex 6 to this proposal; however, we will continue to seek feedback from Members to strengthen this analysis in advance of WCPFC23.

SC22 is invited to provide feedback on this proposal.



Western and
Central Pacific
Fisheries
Commission

COMMISSION

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TBD

Conservation and Management Measure for
the WCPFC Electronic Monitoring Program (WCPFC EMP)

Conservation and Management Measure 2026-xx

The Western and Central Pacific Fisheries Commission:

[placeholder for preamble text, including discussion of CMM 2013-06 consultations]

Adopts the following Conservation and Management Measure (CMM).

1. The Western and Central Pacific Fisheries Commission adopts the following Conservation and Management Measure (CMM):

A. Establishment of the WCPFC Electronic Monitoring Program (WCPFC EMP)

2.1. There is hereby established by the The Commission *hereby establishes* the WCPFC Electronic Monitoring Program (WCPFC EMP), which shall be coordinated by the Secretariat of the Commission.

3.2. The WCPFC EMP is implemented through by CCMs' National or Sub-Regional existing EM Programs (as defined). Such EM Programs are authorized for inclusion in the WCPFC EMP through the [Authorization/Accreditation] & Audit Process of WCPFC EMP, as set forth in Annex 1 an accreditation, which will be carried out by the Secretariat of the Commission.

4. Audit requirements and definitions related to the WCPFC EMP are included as Annex 1.

5.3. The Secretariat shall provide an annual report to the Commission with regard to the WCPFC EMP and on other relevant matters relevant to with a focus on the efficient operation of the program.

B. Objective

6.4. The objectives of the WCPFC EMP shall be to collect verified catch data, other scientific data, and additional information related to the fisheries operating in the Convention Area for the purpose of

Commented [1]: A comment from Chinese Taipei recommended that since some CCMs' programs are still under development or in the pilot phase, it would be important to ensure there is room for their future participation in the WCPFC EMP. We have suggested edits to this paragraph to reflect this and also tie in the reference to the audit questionnaire that is being developed in the ER&EM IWG. The language is in brackets so we can ensure consistency in the title of the document once the document is adopted in the IWG.

monitoring the implementation of CMMs adopted by the Commission and to support enforcement investigations referred under Articles 23(5) and 25(2) of the [Convention](#).

C. Scope

~~7.5.~~ The WCPFC EMP shall apply to the following categories of fishing vessels authorized to fish in the Convention Area in accordance with the Commission's CMM 2018-06 (Record of Fishing Vessels and Authorization to Fish) or its replacement CMM:

- a. Vessels fishing exclusively on the high seas in the Convention Area,
- b. Vessels fishing on the high seas in the Convention Area and in waters under the jurisdiction of one or more coastal State CCMs, and
- c. Vessels fishing within the Convention Area in waters under the national jurisdiction of two or more coastal State CCMs.

~~8.6.~~ Specific requirements for each fishery specified in paragraph 7 ~~certain high seas fisheries~~ are covered in **Annex 2** of this measure.

~~9.7.~~ CCMs shall be responsible for ensuring compliance with WCPFC EMP requirements by all vessels entitled to fly their flag and fishing within the Convention Area (regardless of any chartering arrangement). ~~;~~ [those CCMs are referred to hereinafter as the "Responsible CCM(s)."] ~~To this end, all vessels operating under this CMM, whether on the high seas or in waters under a coastal State's jurisdiction, shall participate in the WCPFC EMP through the National or Sub-Regional EM Programs governed or endorsed by their flag CCM.]~~

D. Guiding principles for operation of the WCPFC EMP

~~10.~~ The WCPFC EMP shall operate in accordance with the following principles:

~~11.8.~~ Vessels that operate principally in coastal waters but occasionally venture on to the adjacent high seas within the Convention Area or into the waters under the jurisdiction of a neighboring CCM may carry either accredited WCPFC EMP Systems or EM Systems from their own national programs, provided those systems have been specifically authorized by the WCPFC EMP.

- a. The WCPFC EMP shall be organized in a flexible manner that considers ~~takes into account~~ the nature of the fisheries within the Convention Area and any other relevant factors the Commission may consider appropriate.
- b. To ensure cost effectiveness and to avoid duplication of effort, the WCPFC EMP shall be coordinated, to the maximum extent possible, with sub-regional and national EM Programs; and for this purpose, the Commission may enter into contracts or appropriate arrangements as may be deemed necessary to advance the objectives of the WCPFC EMP.

Commented [2]: Reflecting suggested edits from Chinese Taipei. The comment noted that it is already clear that whether a vessel operates under a charter arrangement or an access agreement, the CCM whose flag the vessel is entitled to fly remains its flag CCM. It therefore seems unnecessary to create a new term, as requiring the flag CCM to assume responsibility would achieve the same effect. In addition, a comment specified that given there is responsibility for governing vessel-level EMS to the flag CCM, it should be specified that vessels should carry EMS governed by their flag CCM. Otherwise, the ability of flag CCMs to ensure their vessels' compliance would be significantly limited.

Commented [3]: Already defined in scope and standards.

c. The WCPFC EMP shall facilitate a specified level of EM Coverage, as approved by the Commission, to ensure that the Commission receives appropriate data and information related to the fisheries within the Convention Area, taking into account the characteristics of the fisheries and any other relevant factors the Commission may consider appropriate;

d. ~~CCMs shall ensure that all applicable vessels collecting EM Data for purposes of the WCPFC EMP comply with that vessel's own Vessel Monitoring Plan (VMP), as set out in Annex 5 (VMP Guidelines).~~

e.d. The WCPFC EMP shall ensure the security and confidentiality of ~~non-aggregated data~~ and other information in accordance with applicable WCPFC data confidentiality rules ~~which the Commission deems to be of a confidential nature~~; the release of EM Records, EM Data, and other information collected by the WCPFC EMP shall be in accordance with guidelines set out in the Commission's Rules and Procedures for Access to, and Dissemination of, Data Compiled by the Commission ~~and Rules and Procedures for Protection Access to and Dissemination of High Seas Non-Public Domain Data and Information Compiled by the Commission for the Purpose of MCS Activities and Access to and Dissemination of High Seas VMS Data for Scientific Purposes~~.

Commented [4]: Moved to another section.

Commented [5]: Aligns with ROP CMM language (Para 15h)

Commented [6]: Added language per feedback received from Chinese Taipei noting that the according to this document, the ROP reports are considered examples of non-public domain data. Given the similar nature of EM records/data to the ROP report, this language is added for consideration.

E. Minimum Standards and Requirements of the WCPFC EMP

9. The minimum technical requirements, standards, and specifications for all WCPFC EMP systems shall be implemented in accordance with Annex 3.

12. ~~WCPFC EMP accredited electronic monitoring (EM) equipment shall automatically and autonomously collect information to generate EM Data (as defined) and shall be tamper evident (i.e., any attempts to tamper with the equipment will be detectable to the EM Service Provider/ vessel owner, and reported to the respective Responsible CCM authority).~~

Commented [7]: Redundant with information contained in the "Obligations of CCMs" section.

13. ~~The minimum technical requirements, standards and specifications that shall be implemented under the WCPFC EMP and captured by the accredited EM System(s) are provided in Annex 3.~~

14-10. The minimum data fields that shall be collected through the WCPFC EMP are provided in Annex 4. WCPFC EM data shall be submitted to the Secretariat within 120 days of vessel offloading.

Commented [8]: Per suggestion in the IWG that this element should be included in the EM CMM.

15. ~~CCMs whose vessels participate in the WCPFC EMP shall develop an EM Vessel Monitoring Plan (VMP) for each vessel. The VMP shall describe the configuration, components, and installation of EM equipment on each vessel, and this configuration should be capable of collecting EM Records consistent with all relevant minimum standards in this CMM and its annexes. A printed copy of the VMP approved by the CCM should be maintained aboard each vessel at all times when EM equipment is deployed. The VMP requirements are detailed in Annex 5.~~

Commented [9]: Redundant with information contained in the "Obligations of CCMs" section.

16. Any modification to a vessel's VMP, including changes to the type of EM equipment used, shall be promptly notified to the Secretariat of the Commission by the Responsible CCM.

F. Obligations of CCMs

~~17-11.~~ Each CCM shall require that:

- a. EM Systems installed and used by its vessels to collect and report information on its activities in the Convention area operate whose activities are within the scope of this CMM are accredited or authorized by the Commission in accordance with the standards and specifications included in Annex 3. ~~Such accredited/authorized systems shall be designed and implemented in a manner that ensures they are independent, transparent and accountable in accordance with the requirements provided in Annex 1.~~
- b. All vessels carrying WCPFC EMP Systems meet the minimum data collection standards ~~as outlined in and requirements as included Annex 3 and Annex 4.~~
- c. A unique Vessel Monitoring Plan (VMP) is developed for all applicable vessels collecting EM Data for purposes of the WCPFC EMP, as set out in Annex 5 (VMP Guidelines). All vessels carrying WCPFC EMP Systems maintain onboard [paper] copies of the vessel's [approved] current VMP at all times during fishing operations, in accordance with Annex 5.

~~18-12.~~ Each CCM implementing EM through the WCPFC EMP shall report to the Commission in its Annual Report Part 2, the results of the implementation of its WCPFC EMP during the corresponding reporting year, including at least, by fishery and gear type:

- a. The percentage of vessels within a fleet that have fully operational WCPFC-accredited or authorized EM Systems,
- b. The percentage of fishing activity by those vessels that was is-recorded by the WCPFC EMP System or WCPFC EMP-authorized EM System,
- c. The percentage of fishing activity recorded by the WCPFC EMP System or WCPFC EMP-authorized EM System that was is-subsequently reviewed,
- d. The percentage of reviewed fishing activity that was is reported to the Commission, ~~and~~
- e. Details on how those percentages were calculated; and
- e-f. High-level description of the EMP, including its scope (e.g., covered vessels and objectives); operating model (e.g., regulatory or voluntary framework, role of technology partners, and footage review procedures); technology stack (e.g., wireless vs. hard drive uploads, cloud vs. local storage, and use of artificial intelligence ((AI)).

enforcement mechanisms and maintenance of independence of Data Review Center (DRC) such as Organizational separation and conflict-of-interest.

Commented [10]: Taken from draft audit questionnaire and based on discussions in the IWG.

19. CCMs shall take advantage of the EM Records and other information collected via the WCPFC EMP for the purpose of supporting enforcement investigation referrals under Articles 23 and 25 of the Convention. CCMs requesting such an investigation shall, to the greatest extent possible, include all information, evidence, and data potentially relevant to an alleged infringement in the initial request communication, and shall cooperate in the exchange of additional information in accordance with standards adopted by the Commission, as applicable.

Commented [11]: Moved to the Compliance and Enforcement section down below.

G. Role of the Commission and its Subsidiary Bodies

13. The Commission shall, through its subsidiary bodies within their respective mandates, monitor and supervise the implementation of the WCPFC EMP. The Commission shall ensure the administration and coordination of the WCPFC EMP is adequately resourced. The Commission may enter into contracts or appropriate arrangements as needed for the administration of the WCPFC EMP.

14. The WCPFC Technical and Compliance Committee (TCC) shall have a role:

a. Verifying that the required EM data are provided to the Commission within the agreed upon deadlines;

b. Reviewing rules and procedures established to address issues such as technological EM System failure, including to ensure that any relevant EM Data collection or other WCPFC obligations, such as minimum observer coverage requirements, can be met through other means;

a.c. Assessing whether the percentage of vessels with EM systems, percentage of fishing activity recorded, and percentage of fishing activity reviewed and submitted to the Commission are appropriate for effective monitoring;

b.d. Assessing, via the existing compliance monitoring review process, whether appropriate follow-up investigations are undertaken by Responsible [flag] CCMs following the Article 23(5)/ Article 25(2) referral process for potential infringements of WCPFC CMMs detected through the WCPFC EMP; and

c.e. Reviewing and recommending any necessary changes to the technical standards for onboard EM systems and DRCs (Annex 3) for use in the WCPFC EMP. to the Commission specifications and characteristics of accredited WCPFC EM Systems, maintaining a list of current WCPFC EM Systems, and for developing criteria for consideration when CCMs request authorization of un-accredited EM Systems for use in the WCPFC EMP, with due

consideration of the development status of CCMs, equivalent to those set out in this CCM.

Commented [12]: Suggesting modifications as the Commission is not accrediting systems, they are accrediting programs that meet specific standards/requirements agreed upon.

15. The WCPFC Scientific Committee shall have a role in:

- a. Evaluating the scientific data collected through the WCPFC EMP and, if appropriate, suggesting improvements and adjustments to ensure that WCPFC scientific data collection requirements are met;
- b. Reviewing the percentage of vessels with EM systems, percentage of fishing activity recorded, and percentage of fishing activity reviewed and submitted to the Commission rates of EM Coverage within the WCPFC EMP to ensure they are sufficient to achieve robust data collection for catch of target and non-target ~~and~~ associated and dependent species; and
- c. Recommending to the Commission any modifications or additions necessary to the priorities and objectives of the WCPFC EMP with regard to the collection and reporting of scientific data.

H. Role of the Secretariat

16. The role of the Secretariat with regard to the WCPFC EMP will be to:

- a. ~~[Authorize]~~[Accredit] sub-regional and national EM programs under the WCPFC EMP.
- b. Coordinate WCPFC EMP activities including, *inter alia*,
 - i. Maintaining the WCPFC EMP technical and data standards and any other applicable requirements so that existing sub-regional and national programs participating in the WCPFC EMP maintain standards as adopted by the Commission;
 - ii. Receiving communications and providing reports on the WCPFC EMP's operation to the Commission (and its subsidiary bodies), including target and achieved EM Coverage and data review levels, and representativeness of the spatial, temporal, and vessel class coverage;
 - iii. Coordinating WCPFC EMP activities with other Regional Fishery Management Organizations (RFMOs), as appropriate;
 - iv. Facilitating the use of accredited EM Systems in the WCPFC EMP and authorizing non-accredited EM Systems for the same;
 - v. Ensuring that the WCPFC EMP addresses data and monitoring requirements of the Commission's CMMs;

Commented [13]: Align with adopted language from the IWG (once finalized).

- vi. Ensuring that appropriate information and data for the monitoring of the implementation of CMMs is collected, compiled, stored, and disseminated by the WCPFC EMP in accordance with procedures adopted by the Commission;
- vii. Providing support by Secretariat staff, as necessary, to effectively administer the WCPFC EMP; and
- viii. Maintaining on the Commission website an up-to-date list of accredited WCPFC EMP ~~Systems~~ Programs and the subregional and national EM Program Coordinators and their contact information.

I. Compliance and Enforcement

17. Any non-compliance with the WCPFC EMP system requirements or the failure to provide complete and accurate EM Data shall be considered a serious violation of this CMM, and CCMs shall be subject to priority non-compliance status in the Commission's Compliance Monitoring Scheme.

~~17-18.~~ CCMs shall take advantage of the information on fishing activities collected via the WCPFC EMP shall be used to support. ~~EM Records and other information collected via the WCPFC EMP for the purpose of supporting~~ enforcement investigation by flag States for referrals under Articles 23 and 25 of the Convention. CCMs requesting such an investigation shall, to the greatest extent possible, include all information, evidence, and data potentially relevant to an alleged infringement in the initial request communication, and shall cooperate in the exchange of additional information in accordance with standards adopted by the Commission, as applicable.

J. Capacity Building and Technical Assistance

~~18-19.~~ The Commission recognizes the need for capacity building and technical assistance to support small island developing states (SIDS) in implementing this CMM. In accordance with CMM 2013-06, the Commission, shall facilitate:

- a. Training programs on WCPFC EMP System installation, operation, and data analysis,
- b. Sharing of technical expertise and best practices, and
- c. Assistance in developing national EM implementation plans.

K. CMM Review

~~19-20.~~ This CMM shall be reviewed by the Commission two years after adoption and at least every three years as needed thereafter to evaluate its effectiveness in fulfilling its objectives and purpose and consider the need for revisions, taking into account, *inter alia*, relevant information provided by CCMs on the introduction and development of their sub-regional and national EM programs as well as taking into consideration any new technological developments.

XII. Effective Date

~~20-21.~~ This CMM shall enter into force on January 1, 2027.

Annex 1

WCPFC Interim Standards: Terms and Definitions

As agreed at WCPFC21, December 2024

Implementation of Electronic Monitoring Requirements for Longline Vessels Operating on the High Seas

1. The monitoring requirements set out in this Annex apply to the following vessels:
 - a) Longline vessels fishing exclusively on the high seas in the Convention Area,
 - b) Longline vessels fishing on the high seas in the Convention Area and in waters under the jurisdiction of one or more coastal State CCMs, and
 - c) Longline vessels fishing within the Convention Area in waters under the national jurisdiction of two or more coastal State CCMs.
2. No later than January 1, 2028, CCMs shall ensure 10% EM Coverage¹ for all vessels subject to paragraph 1.
3. No later than January 1, 2029, CCMs shall ensure 20% EM Coverage for all vessels subject to paragraph 1.
4. For vessels described in paragraph 1, CCMs may elect to satisfy the EM coverage requirements in paragraphs 2 and 3 through the use of observers deployed under the WCPFC Regional Observer Program (ROP), consistent with CMM 2018-05.
5. A CCM that satisfies the coverage requirements in paragraphs 2 and 3 shall be considered to have met the 5% ROP coverage requirement specified in Annex C of CMM 2018-05 for those vessels.
6. Whether a CCM meets the coverage requirements outlined in paragraphs 2 and 3 through electronic monitoring or ROP observers, coverage shall be applied across the fleet as a whole and distributed in a manner that provides representative information across the fishing fleet.

The objective is to achieve 100% electronic monitoring capabilities for all high-seas longline vessels fishing within the WCPFC Convention Area to enhance data collection, improve compliance, and strengthen monitoring, control, and surveillance (MCS) capabilities.

Each CCM that has ensured that all high-seas longline vessels entitled to fly their flag and fishing within the WCPFC Convention Area are equipped with a fully operational Electronic Monitoring (EM) System that fulfills the requirements of this CMM upon implementation of the WCPFC EMP may use EM to fulfill monitoring obligations (e.g., observers) starting January 1, 2027.

CCMs which review and report data on 20% of all eligible trips by longline vessels flying their flag and operating on the high seas within Convention Area shall be considered compliant with the 5% ROP coverage requirements, as outlined in Annex C of CMM 2018-05.

¹ EM Coverage = The proportion of Fishing effort (sets or Fishing Trips) that is analyzed through EM, calculated by multiplying the EM Installation Coverage by the EM Analysis Rate.

Annex 3

Interim Technical EM Standards

As agreed at WCPFC21, December 2024

Annex 4

Minimum Standard Data Fields
As agreed at WCPFC21, December 2024

Annex 5

Vessel Monitoring Plan Template
As agreed at WCPFC21, December 2024

CMM 2013-06 Disproportionate Burden Analysis

a. Who is required to implement the proposal?

According to the monitoring requirements set forth in Annex 2, CCMs operating the following categories of vessels would be subject to the requirements in the proposal:

- a. Longline vessels fishing exclusively on the high seas in the Convention Area,
- a. Longline vessels fishing on the high seas in the Convention Area and in waters under the jurisdiction of one or more coastal State CCMs, and
- a. Longline vessels fishing within the Convention Area in waters under the national jurisdiction of two or more coastal State CCMs.

b. Which CCMs would this proposal impact and in what way(s) and what proportion?

This CMM would impact all CCMs that operate the categories of longline vessels as noted in a), above.

CCMs are required to ensure 10% electronic monitoring (EM) Coverage for all vessels described above no later than January 1, 2028, reaching 20% EM coverage by January 1, 2029. CCMs may elect to satisfy the EM coverage requirements through either the use of human observers deployed under the existing WCPFC Regional Observer Program (consistent with CMM 2018-05) or through EM via the WCPFC EM Program (EMP) (to be established in this proposal).

c. Are there linkages with other proposals or instruments in other regional fisheries management organizations or international organizations that reduce the burden of implementation?

None identified at this time.

d. Does the proposal affect development opportunities for SIDS?

No, the proposal does not negatively affect development opportunities for SIDS or Participating Territories (hereafter "SIDS"). Increasing monitoring requirements in WCPFC longline fisheries may increase development opportunities for SIDS who have ROP or EM programs.

e. Does the proposal affect SIDS domestic access to resources and development aspirations?

No. See response to d.

f. What resources, including financial and human capacity, are needed by SIDS to implement the proposal?

The goal of the proposal is to increase monitoring in the longline fishery, in general. Regardless of the method the CCM chooses to increase the monitoring and meet the proposed monitoring requirements (10% and 20%), there will be financial implications on all CCMs to employ more human observers or to install EM systems on vessels. Any CCM who has longline vessels that fall under the three categories in part a), would need to implement the increased observer coverage in their national legislation/licensing conditions or access agreements, and may need resources, financial and human capacity, to implement the provisions. It is our understanding that some SIDS have already developed and are piloting EM programs so in this case, no additional resources may be needed.

Annex 6

g. *What mitigation measures are included in the proposal?*

The proposal does not require specific mitigation measures, however, it does include increased monitoring requirements on WCPFC longline fisheries which meet the criteria outlined in a).

h. *What assistance mechanisms and associated timeframe, including training and financial support, are included in the proposal to avoid a disproportionate burden on SIDS?*

As all CCMs that have vessels that meet the criteria outlined in a) have to increase observer coverage, we do not anticipate any disproportionate burden on SIDS at this time.