

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-3(a) - Initial Review of Crab EDR

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	EYRA BETH WILFY	Westward Seafoods
2	Edward Paulsen	Alaska Bering Sea Crabbers
3	Steve Minor	North Pacific Crab Association
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Joint Comments

**North Pacific Crab Association
and
Alaska Bering Sea Crabbers**

September 27, 2011

Mr. Eric Olson, Chairman
Mr. Chris Oliver, Executive Director
North Pacific Fishery Management Council
Anchorage, Alaska

Agenda Item C-3(a) Crab EDRs

Gentlemen,

It is apparent that the current EDR process is broken: significant amounts of data that are collected lack analytical precision, there is redundancy between the EDR and other data collection processes, and the costs to the stakeholders are significant. This has been apparent for some time, and the Council has appropriately responded; for the last three years a significant amount of our work has been dedicated to a collaborative effort to improve crab program EDRs to better inform the Council about the performance of the program.

At our current pace, a new EDR process will most likely be in place by the 2013 "crab year". By that time the crab program itself will be seven years old. At this point, the EDR process should be focused on the Council's future analytical needs, rather than repetitive efforts to "fix" the old data. We are writing today to ask that the Council continue it's work to meet this goal and not get side-tracked by calls for yet more delays and committees.

Recently we have participated in several meetings and listened to AFSC Staff argue that essentially all of the current data should still be collected because they can "...look for signals in the (bad) data that will allow them to impute accurate values." This does not seem to meet reasonable statistical standards for precision, nor serve the Council's analytical needs.

Earlier this week the Advisory Panel recommended several additions to the current suite of Alternatives to expand their analytical range. We support those changes. It is our understanding that the Council can, at Final Action, mix and match various Options from among the Alternatives to create it's the final package. If our understanding is correct, than we feel that there is now a sufficiently broad range of Options on the table and the analytical package should move forward.

Finally, concerning the AFSC's recent CIE Review of the Crab EDRs; we also have these concerns and comments:

- The PNCIAC and the NPCA were never formally notified of the CIE review, even after requesting notification several weeks prior to the event. We were able to send several representatives to the two-day meeting, but we are concerned about the lack of public notice that was provided.
- New metadata was presented at the CIE review, which had not been previously reviewed by the PNCIAC or any of its Members. Industry has always been provided an opportunity to review metadata in the past so as to ensure metadata definitions are accurate. The fact that industry was not provided an opportunity to review this new metadata is disturbing.
- On a more positive note, some CIE reviewers stated clearly that the Council and the Industry are the "Information Consumers" for the EDR process, and as such it is up to the "Consumers" to determine both their analytical needs and the desired level of data precision.

The MSA supports the Council's current approach to addressing Crab EDR issues. Section 109-479(a)(1) specifies that a data collection process can only be initiated by either a direct Council request or the Secretary. This flies in the face of several AFSC statements about Council conflict of interest, as well as their belief that they also have the authority to determine what should be collected.

In addition, section 109-479(c)(2) specifically states that the collection of information must be limited to "...that necessary to achieve a demonstrated conservation and management purpose." In other words, we should be required to submit only what the Council needs.

Sincerely,



Steven K. Minor
Executive Director, NPCA



Edward Poulsen
Executive Director, ABSC