

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver *CO*  
Executive Director

DATE: September 20, 2012

SUBJECT: Crab economic data reporting – review forms and draft regulations

ESTIMATED TIME

12 HOURS

(all C-6 items)

**ACTION REQUIRED**

(f) Review forms and draft regulations

**BACKGROUND**

As a part of the crab rationalization program, the Council developed a reporting system under which harvesters and processors participating in the crab fisheries are required to annually report economic data concerning their operations. These data are to be used by analysts and the Council to determine whether the program is achieving its intended effects. Based on several reviews of the data collection program, as well as input from stakeholders, the Council elected to revise the program to correct inaccuracies, remove redundancies, and reduce the costs of complying with the reporting requirements. At its February 2012 meeting, the Council selected its preferred alternative for the action (Item C-6(f)(1)).

At that time, the Council also recommended that the NOAA Fisheries Service adopt general regulations to implement the collection, with all forms (and any form revisions) subject to revision in the Council process. In the intervening time, NOAA Fisheries Service, with input from Council staff and industry, has prepared the required Paper Work Reduction Act submission, the draft regulations, and data forms (Item C-6(f)(2)) for review by the Council.

Data type	Data element	Alt. 1. (status quo)	Alt. 2	Alt. 3	Modified Alt. 3
Production	Production - dates covered by fishery	by crab fishery			
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days		
	Raw crab processed by fishery	by crab fishery			
	Product and processed pounds by fishery	by crab fishery			
	Production - crab size and grade	by crab fishery			
	Production - box size	by crab fishery			
	Production - finished pounds	by crab fishery			
	Production - custom processing Identifier	by crab fishery			
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery		
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery FOB Alaska only	by crab fishery FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include raw pounds and pounds of product)	by crab fishery (include raw pounds and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery			
	Man-hours	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
	Total processing labor payments	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
	Crab processing employees by residence	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
Custom processing services purchased	Reporting requirement			All companies contracting custom processing must report	All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery			
	Custom processing services purchased - box size	by crab fishery			
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Ait 1. (status quo)	Ait. 2	Ait. 3	Modified Ait. 3
Crab purchases	Raw crab purchases by fishery - lfg type	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery			
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Crab processing costs	Fisheries taxes and fees - crab only	by crab fisheries			
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries			
	Food and provisions - crab only	aggregated across crab fisheries			
	Other direct crab labor costs	aggregated across crab fisheries			
	Insurance deductibles - crab only	aggregated across crab fisheries			
	Repackaging costs	aggregated across crab fisheries			
	Broker fees and promotions by fishery	by crab fishery			
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments)	by crab fishery - arm's length (monetary payments)
	Observer costs	by crab fishery			
	Freight cost for plant supplies	aggregated across crab fisheries			
	Freight costs for products	aggregated across crab fisheries			
	Product storage	aggregated across crab fisheries			
	Water, sewer, and waste disposal	aggregated across crab fisheries			
	Other crab-specific costs	aggregated across crab fisheries			
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries			
	Vessel and equipment investments	aggregated across all fisheries			
	Repair and maintenance	aggregated across all fisheries			
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other vessel specific costs	aggregated across all fisheries			
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Processing labor costs - annual total all fisheries	aggregated across all fisheries	aggregated across all fisheries		

**North Pacific Fishery Management Council, October 2012  
Crab Economic Data Reporting Forms C-6 (f)**

- *Supporting statement*
- *Draft Regulations*
- *Catcher Processor form, Catcher Vessel form, Processor Form*

**SUPPORTING STATEMENT  
ALASKA CRAB ECONOMIC DATA REPORTS  
OMB CONTROL NO. 0648-0518**

This action is a revision of an existing collection-of-information due to associated rule: RIN 0648-BC25. In addition, the name of the collection is changed.

**INTRODUCTION**

In January 2004, the U.S. Congress amended Section 313(j) of Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) as amended in 2006 to mandate the Secretary of Commerce (Secretary) to implement the Crab Rationalization Program for the Bering Sea and Aleutian Islands Management Area (BSAI) crab fisheries. The Program allocates BSAI crab resources among harvesters, processors, and coastal communities. The North Pacific Fishery Management Council (Council) prepared, and NMFS approved, the Fishery Management Plan for BSAI King and Tanner Crabs (Crab FMP). The Crab FMP establishes criteria for the management of certain aspects of the BSAI crab fisheries by the State of Alaska Department of Fish and Game (ADF&G) and is implemented by regulations at 50 CFR part 680.

The National Marine Fisheries Service, Alaska Region (NMFS) implemented the Crab Rationalization Program (CR Program) to both maintain rigorous safeguards on use of fishing privileges for a public resource and to provide safeguards for program constituents. The CR Program components include quota share (QS) allocation, processor quota share (PQS) allocation, individual fishing quota (IFQ), individual processing quota (IPQ) issuance, quota transfers, use caps, crab harvesting cooperatives, protections for Gulf of Alaska groundfish fisheries, arbitration system, monitoring, economic data collection, and cost recovery fee collection. The economic data collection program details may be found at: <http://www.alaskafisheries.noaa.gov/regs/680/default.htm>.

Congress required that an independent third-party data collection agent (DCA) administer the collection and dissemination of the crab EDR data. NMFS selected the Pacific States Marine Fisheries Commission (PSMFC) to be the DCA.

Section 313(j)(1) requires the Secretary to collaborate with the Federal Trade Commission (FTC) and Department of Justice (DOJ) to develop economic data for analysis by these agencies. Data from the EDR will directly contribute to this ongoing evaluation of potential anti-trust and anti-competitive practices in the crab industry.

**A. JUSTIFICATION**

The CR Program is a limited-access system that allocates crab managed under the FMP among harvesters, processors, and coastal communities. The CR Program currently includes a comprehensive economic data collection program requiring participants to complete annual EDRs. These EDRs are intended to aid the Council and NMFS in assessing the success of the CR Program and developing amendments to the FMP to mitigate any unintended consequences of the CR Program.

The EDR Program is administered by NMFS through contracts with PSMFC. The information collected in the EDRs is intended to provide comprehensive data to analysts to examine changes in resource utilization, excess harvesting and processing capacity, economic returns, variable costs and revenues, economic efficiency, and the stability of harvesters, processors and coastal communities. Data submission is mandatory.

**1. Explain the circumstances that make the collection of information necessary.**

Amendment 42 to the Crab FMP would revise the annual crab EDRs currently required from each of the three categories of participants in the CR Program fisheries: catcher vessels, catcher/processors, and shoreside processors/stationary floating crab processors. The crab EDRs request data on cost, revenue, ownership, and employment and are used to study the economic impacts of the CR Program on affected harvesters, processors, and communities. This action to revise the existing collection-of-information is necessary to eliminate redundant reporting requirements, standardize reporting across respondents, and reduce costs associated with the data collection.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

EDRs are submitted for calendar year fishery participation. The Crab EDRs were specifically designed to assist the Council and analysts in understanding

- ◆ Costs and benefits of the harvesters' and processors' crab operations,
- ◆ Economic performance of crab fishermen,
- ◆ How this performance has changed after crab rationalization, and
- ◆ What aspects of these changes are specifically attributed to crab rationalization.

During its five year review of the CR Program on 2010, the Council identified several issues with the current EDRs which are discussed below: inaccurate and inconsistent data, duplicative data, and higher than anticipated costs of data reporting and program administration.

Inaccurate reporting limits the utility of the data and reduces the analytical benefits that can be derived from the data. In many cases, the level of inaccuracy of the data supplied to NMFS cannot be estimated as the true value of the element is not known. Therefore, those data are deemed unusable. In addition, several elements of the data were found to be duplicative of other data collection programs. In some cases, redundancies are partial, with collected data providing some additional information, but in other cases, the data collected in the EDRs are completely redundant. Finally, the cost to industry, both directly through data submission and indirectly through cost recovery funding of program administration, outweighs the benefits of the resultant data. Administrative costs associated with the current EDRs arise from the production and distribution of data collection forms, processing of completed forms, data entry, data verification, and data management. Since the EDR Program's inception, these costs have decreased. As NMFS works with the Council and PSMFC to streamline the data collection and reduce reporting errors, these costs are expected to decrease further.

This action would amend the EDR process with the intention that the data collected are accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost. The Council plans to limit the EDRs to the collection of data that have been demonstrated, through the development of the EDR metadata and other reviews of the data, to be sufficiently accurate while reducing the reporting time and monetary costs to industry (see Tables 1 to 3).

Table 1 lists the data elements that will be collected in the proposed catcher vessel EDR.

Deliveries and revenues	Landings by share type (pounds) by crab fishery
	Landings by share type (revenue) by crab fishery
	Leased quota by share type (pounds) by crab fishery – arm’s length monetary payments only
	Leased quota by share type (cost) by crab fishery – arm’s length monetary payments only
Crew	Payments to crew by crab fishery
	Payments to captain by crab fishery
	Crew license number/CFEC permit number aggregated across all crab fisheries
Crab Costs	Bait used - species/pounds by fishery, purchases by crab fishery
	Bait used – species/cost by fishery, purchases by crab fishery
	Fuel used – gallons by crab fishery (gallons only)
	Food and provisions by crab fishery
Vessel Costs	Fuel – gallons and cost aggregated for all fisheries
All Activities	Tendering
	Labor cost – all activities aggregated across all activities

Table 2 lists all the data elements that will be collected in the proposed catcher/processor EDR.

Deliveries and revenues – for operations as a catcher vessel	Landings by share type (pounds) by crab fishery
	Landings by share type (revenues) by crab fishery
Revenues	Sales to affiliates/non-affiliates by species (product/process) by crab fishery
	Sales to affiliates/non-affiliates by species (box size and finished pounds) by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species (revenues) by crab fishery – FOB Alaska
	Custom processing by species/product/process by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues by crab fishery
IFQ	Leased quota by share type (pounds) by crab fishery – arm’s length monetary payments only
	Leased quota by share type (cost) by crab fishery – arm’s length monetary payments only
Crew	Payments to captain by crab fishery
	Payments to harvest crew by crab fishery (aggregated across harvesting and processing crew)
	Crew license number/CFEC permit number aggregated across all crab fisheries
Custom Processing Services Purchased	Custom processing services purchased (raw pounds) by crab fishery
	Custom processing services purchased (product and process) by crab fishery
	Custom processing services purchased (finished pounds) by crab fishery
	Custom processing services purchased (processing fee) by crab fishery

Crab purchases	Raw crab purchases by fishery (IFQ type) by crab fishery
	Raw crab purchases by fishery (pounds) by crab fishery
	Raw crab purchases by fishery (gross payments) by crab fishery
Crab Costs	Bait used (species/pounds by fishery) purchases by crab fishery
	Bait used (species/cost by fishery) purchases by crab fishery
	Fuel used – gallons by crab fishery (gallons only)
	Food and provisions (cost) purchases by crab fishery
	Other crew expenses purchases by crab fishery
	Lease (IPQ) costs by crab fishery – arm’s length monetary payments
Vessel Costs	Foremen, managers, other employees and salaries aggregated across all fisheries
	Fuel – gallons and cost aggregated for all fisheries

Table 3 lists the data elements that will be collected in the proposed combined Shoreside Processor/Stationary Floating Processor Crab EDR.

Revenues	Sales to affiliates/non-affiliates by species (product/process) by crab fishery
	Sales to affiliates/non-affiliates by species (box size and finished pounds) by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species (revenues) by crab fishery – freight on board (FOB) Alaska only
	Custom processing by species/product/process by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues by crab fishery
Labor	Man-hours by crab fishery
	Total processing labor payments by crab fishery
	Crab processing employees by residence by crab fishery
Custom Processing Services Purchased	Reporting requirement – all companies contracting custom processing must report
	Raw pounds by crab fishery
	Product and processes by crab fishery
	Finished pounds by crab fishery
Crab Purchases	Processing fee by crab fishery
	Raw crab purchases by fishery (IFQ type) by crab fishery
	Raw crab purchases by fishery (pounds) by crab fishery
Crab Processing Costs	Raw crab purchases by fishery (gross payments) by crab fishery
	Lease (IPQ) costs by crab fishery – arm’s length (monetary payments)
General Plant Costs	Foreman, managers, other employees and salaries aggregated across all fisheries

The EDR program is focused on collecting production, cost, earnings, and employment information from harvesting and processing sectors of crab fisheries to evaluate effects of the CR Program over time. Although active participants routinely comply with the EDR requirement, reporting methods vary. Seventy-four percent of all processors electronically submitted EDR reports as PDF files, while only 3

percent of vessel EDRs were submitted in that manner. Most (65%) vessel EDR submitters used Web data entry forms. During 2010, only 19 percent of the submissions needed corrections, compared with 75 percent of submissions in 2005.

The EDR program is based on calendar-year data. The first phase of implementation collected pre-Program historical (baseline) information for 1998, 2001, and 2004. The first year of data collection from the rationalized fishery was submitted for calendar year 2005, due in June 2006.

Included as part of the EDR form is a certification section on which the data submitter provides a signed certification statement indicating the data is complete and accurate. Individuals who receive notice from PSMFC that they are required to submit an EDR for the year, but did not participate in the fishery that year, can claim exemption from completing the full EDR by submitting a signed certification stating that they did not operate a vessel or plant in the rationalized crab fishery during the specified calendar year.

NMFS makes automatic computer comparisons to compare the crab EDR responses with participants requesting crab permits; this is necessary to determine eligible participants to renew crab permits. NMFS may issue annual permits for the CR Program only if a person has applied timely, paid any fees owed (including Capacity Reduction [Buyback] and Cost Recovery fees), fulfilled EDR requirements, if any, and if there are no other impediments to issuing the permits.

Persons participating in the CR fisheries are required to annually complete and submit a paper or electronic crab EDR to PSMFC by following the instructions on the form. Submission of the completed certification and EDR form must occur between July 17th and July 31st. All forms must be submitted on or before the reporting deadline of July 31 by using the address on the form. Annual crab EDR forms are available on the NMFS Alaska Region website at <http://alaskafisheries.noaa.gov> or by contacting NMFS at 1-877-741-8913.

#### **a. Annual catcher vessel crab EDR**

This action would revise the Annual Catcher Vessel Crab EDR by decreasing the data collection substantially from the current EDR. The proposed EDR would eliminate the reporting of fishing data, transiting days, and shipyard days, as these can all be garnered from other data sets. It would omit any collection of information concerning overall vessel activities except tendering and labor costs. Any owner or leaseholder of a catcher vessel that landed BSAI crab from a CR fishery must submit a complete Annual Catcher Vessel Crab EDR. Any owner of a catcher vessel in a CR fishery that did not land BSAI crab or any owner of a catcher vessel in a CR fishery that leased the vessel to another party and did not land BSAI crab must submit complete certification pages.

#### **Catcher vessel crab EDR Certification Page**

##### **Catcher Vessel Information**

Vessel Name and ADF&G Vessel Registration Number  
Crab License Limitation Permit Number(s)  
USCG Documentation Number  
Current Estimated Market Value of Vessel and Equipment  
Replacement Value of Vessel and Equipment  
Name of Crab Harvesting Cooperative (if applicable)

##### **Owner Information**

Name of company, partnership, or sole proprietorship  
Business Telephone Number and Business FAX Number  
Business E-mail address, if available

##### **Leaseholder Information (if applicable)**

Name of company, partnership, or sole proprietorship  
Business Telephone Number and Business FAX Number  
Business E-mail address, if available



**Person Completing this Report (check one)**

- Owner (If name and address are the same as the Owner Information block, do not repeat)
- Leaseholder (If name and address are the same as the Leaseholder Information block, do not repeat)
- Designated Representative
  - Name and Title
  - Business Telephone Number and Business FAX Number
  - Business E-mail address (if available)

**EDR filing Status**

- Check appropriate statement to describe EDR filing status
- Buyer/Leaseholder Information (if applicable)
  - Buyer/Leaseholder Name
  - Telephone No (include area code)
  - Business Address
  - Date of Sale or Lease (day/month/year)

**Certification Signature and date signed**

**Catcher Vessel Crab EDR**

**CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

- Total pounds sold to crab buyers during the previous calendar year. Exclude deadloss crab that is discarded unsold at the landing
- Gross revenue received for ex-vessel sales to crab buyers for all CR crab landed by the vessel during calendar year

**CR Crab Fishing Quota Costs, by CR Fishery and Quota Type Market-Value and Negotiated-Price Transfers Only**

- Total pounds and monetary cost for transfers of annual crab IFQ and CDQ pounds during calendar year, by CR fishery and harvest quota permit type. Include only transfers of quota
- For all market-value and/or negotiated-price quota transfers, report the following:
  - Total pounds of transferred crab fishing quota used to land crab caught by the vessel during the previous calendar year
  - Total gross cost paid as monetary compensation, after taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date

**CR Crab Crew Labor Costs, by CR Fishery**

- Total amount paid to vessel crew members for fishing labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master. Include all post-season adjustments paid as of the date of submitting this EDR
- Total payment made to the captain(s) for vessel master services in CR fisheries during the previous calendar year. Include all post-season adjustments paid as of the date of submitting this EDR
- Indicate whether provide paid health insurance or retirement benefits to captain or crew members in addition to labor payments

**Vessel Operating Expenses, by CR Fishery**

- Total cost of food and provisions purchased for use in each CR fishery during the previous calendar year
- Total cost of bait purchased for use in each CR fishery during the calendar year
- Total gallons of fuel consumed by the vessel while operating in each CR fishery

**Vessel Operating Expenses, Annual**

- Fuel Cost, Annual
  - Total quantity of fuel purchased for the vessel during the previous calendar year
  - Total payment for fuel purchased for the vessel during the previous calendar year, including all sales taxes and surcharges
- Total direct payment to vessel crew and captain for labor in all vessel operations during the calendar year, including shipyard labor and tendering. Include labor payments for CR crab operations in the total.
- Indicate if the vessel performed tendering in any fishery during the previous calendar year (including, but not limited to crab)

**BSAI Crab Crew Licenses and CFEC Permits**

- Record the Alaska Commercial Crew license number or a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number for each individual who worked as a captain or crewmember during the previous calendar year
- For Commercial Crew Licenses, report the full 7-digit license number.
- For Gear Operator Permits, include the fishery code and permit number (e.g. M71B25321N).

Indicate whether ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number  
Record one license or permit number per crewmember. Do not record any crewmember more than once.

The number of catcher vessels participating in the CR Program was 81 in 2011, 89 in 2010, 95 in 2009, 98 in 2008, 108 in 2007, 217 in 2006, and 378 in 2005. In 2010, 89 full EDRs were submitted and 18 certifications were submitted. The estimated number of 80 catcher vessels is used in this analysis, because the trend for participating vessels appears to be decreasing.

<b>Catcher vessel crab EDR, Respondent</b>	
<b>Number of respondents</b>	<b>80</b>
<b>Total annual responses</b>	<b>80</b>
Frequency of response = 1	
<b>Total burden hours</b>	<b>800 hr</b>
Time per response = 10 hr	
<b>Total personnel cost (\$25/hr)</b>	<b>\$0</b>
<b>Total miscellaneous costs</b>	<b>\$1,124</b>
Photocopy ( $\$0.10 \times 15\text{pp} \times 80 = 120$ )	
Online costs ( $80 \times \$0.05 = 4$ )	
Postage paid by PSMFC	
Accountant completion of EDR ( $\$100 \times 10 = \$1000$ )	

<b>Catcher vessel crab EDR, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel costs</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>

#### **b. Annual catcher/processor crab EDR**

Catcher/processors participate in both harvesting and processing. Therefore, the Catcher/processor Crab EDR includes elements for the collection of harvesting and processing information.

The proposed Annual Catcher/processor EDR would eliminate the reporting of fishing data, as well as production information. These data are available to analysts through other sources and collection of these elements in the EDR would be duplicative. A new section would be added for deliveries and revenues by quota share type when the catcher/processor is operating as a catcher vessel. Most catcher/processors are unlikely to operate as a catcher vessel, but in instances when a catcher/processor operates as a catcher vessel, these data could be important to understanding total catcher vessel revenues in the fishery.

Any owner or leaseholder of a catcher/processor that landed or processed crab from a CR fishery must submit a completed Annual Catcher/processor Crab EDR. Any owner of a catcher/processor in a CR fishery that did not land or process BSAI crab or any owner of a catcher/processor in a CR fishery that leased all of its IPQ to another party and did not land or process BSAI crab must submit complete certification pages.

#### **Annual catcher/processor crab EDR Certification page** **Catcher/processor Information**

Catcher/processor Name and ADF&G Processor Code  
Registered Crab Receiver Permit Number  
Crab License Limitation Permit Number(s)  
USCG Documentation Number  
Current Estimated Market Value of Vessel and Equipment  
Replacement Value of Vessel and Equipment  
Name of Crab Harvesting Cooperative (if applicable)

**Vessel Owner Information**

Name of company, partnership, or sole proprietorship  
Business Telephone Number and Business FAX Number  
Business E-mail address, if available

**Leaseholder Information (if applicable)**

Name of company, partnership, or sole proprietorship  
Business Telephone Number and Business FAX Number  
Business E-mail address, if available

**Person Completing this Report (check one)**

Owner (If name and address are the same as Owner Information block, do not repeat)  
Leaseholder (If name and address are as Leaseholder Information block, do not repeat)  
Designated Representative  
Name and Title  
Business Telephone Number and Business FAX Number  
Business E-mail address (if available)

**EDR filing Status**

Check appropriate statement to describe EDR filing status  
Buyer/Leaseholder Information (if applicable)  
Buyer/Leaseholder Name  
Telephone No (include area code)  
Business Address  
Date of Sale or Lease (day/month/year)

**Signature and date signed**

**Annual catcher/processor crab EDR**

**CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

Pounds Sold: record the total pounds of BSAI crab landed by this vessel and sold to crab buyers during the previous calendar year.  
Gross Revenue: record the gross revenue from crab delivered to processors during the calendar year

**Annual CR Crab Product Sales**

Report calendar year crab sales from CR fisheries to affiliated entities and to unaffiliated entities for each combination of crab species, product, process, and box size sold  
Species Code: Record the species codes for CR crab product sold in previous calendar year  
Product Code: Record the product codes for each product.  
Process Code: Record the process codes. If more than one process was used to create a specific crab product form (such as cooked and frozen crab sections), enter more than one process code in the process code box for that product  
Box Size Code: Record the box size category code for each product sold  
Finished Pounds: Record the total finished pounds of each product sold  
Gross First Wholesale Revenue: Record the amount you received for each product sold

**CR Crab Custom Processing Services Provided, by CR Fishery**

CR Fishery Code for each CR fishery in which you provided custom processing services  
Product Code for each product  
Process Code  
Total Raw Pounds of CR crab provided by Registered Crab Receiver (RCR)  
Finished Pounds or total pounds of output for each custom processed product  
Custom Processing Revenue received for custom processing the specified products

**Raw CR Crab Purchases from Delivering Vessels**

Raw Pounds Purchased  
Gross Payment or total amount paid to ex-vessel sellers for raw crab purchased

**CR Crab Custom Processing Services Purchased**

CR Fishery Code for each CR fishery in which you purchased custom processing services  
Product Code for each product.  
Process Code  
Total Raw Pounds of CR crab provided to processors providing custom processing services  
Finished Pounds or total pounds of output for each custom processed product  
Processing Fee or payment made to custom processors for each crab product

**CR Crab Quota Costs, by CR Fishery and Quota Type Market-Value Transfers Only**

Total pounds and cost for market-value transfers of crab fishing and processing quota pounds during calendar year, unless one or more of the following conditions was true:

- The respondent did not pay the full market lease value of quota pounds
- The respondent provided monetary compensation to the quota holder
- The respondent paid non-monetary or in-kind compensation to the quota holder in addition to monetary payment
- The respondent received non-monetary or in-kind goods or services of value in addition to the quota pounds transferred
- The respondent did not use the quota pounds for crab landed or processed by this vessel or purchased from delivering vessels

Total pounds of transferred crab fishing quota used to land crab caught by the vessel or purchase crab from delivering vessels during the previous calendar year

Total gross cost paid as monetary compensation, before taxes or fees are deducted

**Crab Fishing and Processing Labor Cost, by CR Fishery**

Total amount paid to vessel crew members for fishing and processing labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master

Total payment made to the captain(s) for service as vessel master in CR fisheries during the calendar year

**Vessel Operating Expenses, by CR Fishery**

Total cost of food and provisions purchased for use in each CR fishery during the previous calendar year

Total cost of bait purchased for use in each CR fishery during the calendar year

Total gallons of fuel consumed by the vessel while operating in each of the CR fisheries

**Vessel Operating Expenses, Annual**

Total quantity of fuel purchased for the vessel during the previous calendar year, in gallons.

Total payment for fuel purchased for the vessel during the previous calendar year, including all sales taxes and surcharges

General Labor Cost, Annual: For all personnel employed during the year in positions other than crab fishing and processing crew

Number of persons employed during the previous calendar year

Total calendar year salaries and wages for employees as described above

**BSAI Crab Crew Licenses and CFEC Permits**

Alaska Commercial Crew license number or a CFEC gear operator permit number for each individual who worked as a captain or crewmember during the previous calendar year. Record one license or permit number per crewmember

For Commercial Crew Licenses, report the full 7-digit license number.

For Gear Operator Permits, include the fishery code and permit number (e.g. M71B25321N).

The number of catcher/processors participating in the CR Program was 3 in 2011, 5 in 2010, 5 in 2009, 6 in 2008, 7 in 2007, 10 in 2006, and 19 in 2005. All three EDRs received in 2011 were full EDRs. The estimated number of 3 catcher/processors is used in this analysis.

<b>Catcher/processor crab EDR, Respondent</b>	
<b>Number of respondents</b>	<b>3</b>
<b>Total annual responses</b>	<b>3</b>
Frequency of response = 1	
<b>Total burden hours</b>	<b>30 hr</b>
Time per response = 10 hr	
<b>Total personnel cost</b>	<b>\$0</b>
<b>Total miscellaneous costs (3001.08)</b>	<b>\$3,001</b>
Photocopy \$0.05 x 12pp x 3 = 1.80	
Postage paid by PSMFC	
Accountant fee to complete EDR (\$100 x 30 = \$3000)	

<b>Catcher/processor EDR, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel cost</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>

**c. Annual Processor Crab EDR**

The proposed action would combine the proposed Annual Shoreside Processor with the Annual Stationary Floating Processor Crab EDR to create the proposed Processor EDR since both forms are similar. The proposed action also would eliminate several elements from the current data collections, much of which currently suffer from data quality limitations. Most of these elements are from the production data, which are similar to data found within the State of Alaska Commercial Operators Annual Report (see OMB Control No. 0648-0428) and processing and plant costs. The production data that isn't available through other sources could be estimated based on landings data from fish tickets. Therefore, the exclusion of these data from this data collection would not affect the analysis and may decrease the time burden required to fill in the form.

Any owner or leaseholder of a stationary floating crab processor (SFCP) or shoreside crab processor that processed BSAI crab from a CR fishery must submit a completed Processor EDR. Any owner of a SFCP or shoreside crab processor that did not process BSAI crab from a CR fishery or any owner of a SFCP or shoreside crab processor that leased all of its IPQ to another party and did not process any BSAI crab from a CR fishery at the facility must submit complete certification pages.

**Processor EDR Certification page**

Processor Information

- Name and ADF&G Processor Code
- RCR Permit Number
- USCG Documentation Number
- Current Estimated Market Value of processor and Equipment
- Replacement Value of SFCP and Equipment

Owner Information

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business Fax Number
- Business E-mail address, if available

Leaseholder Information (if applicable)

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business Fax Number
- Business E-mail address, if available

Person Completing this Report

- Indicate if owner, leaseholder, or designated representative
- Designated Representative
  - Name and Title
  - Business Telephone Number and Business Fax Number
  - Business E-mail address (if available)

EDR Filing Status

- Select the appropriate statement to describe EDR filing status
- Buyer/leaseholder Information
  - Name
  - Business Telephone Number and Business Fax Number
  - Business E-mail address (if available)

Signature and date signed

**Processor EDR**

**CR Crab Product Sales**

**CR Crab Sales to Affiliated Entities**

Species Code  
Product Code  
Process Code  
Box Size Code  
Finished Pounds

Gross First Wholesale Revenues

**CR Crab Sales to Unaffiliated Entities**

Species Code  
Product Code  
Process Code  
Box Size Code  
Finished Pounds

Gross First Wholesale Revenues

**CR Crab Custom Processing Services Provided by CR Fishery**

CR fishery code

Product Code

Process Code

Raw pounds

Finished pounds

Custom Processing Revenue

**Raw CR Crab Purchases from Delivering Vessels, by CR Fishery and Quota Type**

Raw pounds purchased

Gross Payment

**CR Crab Custom Processing Services Purchased, by CR Fishery**

CR Fishery Code for each CR fishery in which you purchased custom processing services

Product Code for each product.

Process Code

Total Raw Pounds of CR crab provided to processors providing custom processing services

Finished Pounds or total pounds of output for each custom processed product

Processing Fee or payment made to custom processors for each crab product.

**CR Crab Processing Quota Costs by CR Fishery Market-Value and Negotiated-Price Transfers Only**

Total pounds transferred crab fishing quota used to land crab caught by the vessel during calendar year

Total gross cost paid as monetary compensation, before taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date

**Crab Processing Labor Cost, by CR Fishery**

Total Man-Hours or the sum of all hours worked by crab processing workers for each CR fishery

Total Labor Payment or total gross wages paid to crab processing workers in each CR fishery

Computed Average Hourly Wage

**General Non-processing Labor Expenses, Annual**

For all non-processing personnel employed during the year

Number of Employees or the number persons employed in non-processing positions at the processing facility during the previous calendar year

Salaries and wages or total calendar year gross wages for non-processing employees

**CR Crab Processing Employee Residence**

Official locations of residence

Number of individuals employed, by location.

For residence locations in Alaska, list individual Alaska cities

For US locations outside of Alaska, list individual US states

For non-US locations, list individual counties

For each location of residence

Total number of individuals employed processing CR crab

Total number of individuals employed in seafood processing in all fisheries, including CR crab

The number of SFCPs participating in the CR Program was 3 in 2011, 1 in 2010, 4 in 2009,

4 in 2008, 6 in 2007, 6 in 2006, and 7 in 2005. The estimated number of 3 SFCPs is used in this analysis. The number of shoreside processors participating in the CR Program was 15 in 2011, 15 in 2010, 16 in 2009, 15 in 2008, 16 in 2007, 18 in 2006, and 30 in 2005. The estimated number of 15 shoreside processors is used in this analysis, for a total of 18 processor respondents.

<b>Processor crab EDR, Respondent</b>	
<b>Number of respondents</b>	<b>18</b>
SFCP = 3	
Shoreside = 15	
<b>Total annual responses</b>	<b>18</b>
Frequency of response = 1	
<b>Total burden hours</b>	<b>180 hr</b>
Time per response = 10 hr	
<b>Total personnel cost</b>	<b>\$0</b>
<b>Total miscellaneous costs (1810.8)</b>	<b>\$1811</b>
Photocopy (\$0.05 x 12pp x 18 = 10.80)	
Postage paid by PSMFC	
Accountant fee to complete EDR (\$100 x 18 = 1800)	

<b>Processor crab EDR, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel costs</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>

**d. Verification of data.**

A data verification audit process was initiated in 2006 to ascertain the accuracy of data recording in the EDR forms. The validation audit was performed by the accounting firm Aldrich Kilbride & Tatone of Portland, Oregon. In May of 2007, PSMFC released the report of their findings and audit methods employed to conduct the study. The general findings of the audit review were that the information submitted in the EDR forms for 1998, 2001, 2004, and 2005 was supported by documentation and records. Where errors were identified, there was generally not a directional bias in the submission of the data; that is, auditors found no strategic misreporting of the information requested.

Despite the specific definitions included in the EDRs, there was variability in how information was reported for a number of variables, based on the ability to break down information in the manner requested and sophistication of accounting systems. In addition, there was significant variability in the quality of supporting documentation submitted in the EDRs, particularly for the 1998 reporting year and to a lesser degree for 2001. Information provided by the audit review and ongoing interaction with data submitters were used to improve directions and definitions in the EDR forms used with reports submitted for 2006.

The PSMFC auditor may review and request copies of additional data provided by the owner or leaseholder, including but not limited to previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data.

The owner or leaseholder must provide copies of additional data to facilitate verification by PSMFC. Auditors will verify records by comparing specific elements of the report with participant accounting records. To make this activity as efficient and non-intrusive as possible, NMFS suggests that participants:

- ◆ Keep a copy of the completed EDR or certification pages submitted to PSMFC. Copy and attach extra sheets as needed.

- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Ensure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:
  - Audited financial statements
  - Reviewed financial statements
  - Compiled financial statements
  - Tax returns.
- ◆ Record only whole numbers. Round up dollar figures to the next highest dollar.

The verification questions are likely to be small in number, and occur through a telephone call or other short communication. The owner or leaseholder must respond to data verification inquiries from PSMFC within 20 days of the date of issuance of the inquiry. The 20-day response period is necessary in case there are EDR verification questions that are sequential based on previous questions. It would be difficult to reasonably complete verification, if a longer period were allowed.

<b>Verification of Data, Respondent</b>	
<b>Number of respondents</b>	<b>101</b>
Catcher vessels = 80	
Catcher/processors = 3	
Processors = 18	
<b>Total annual responses</b>	<b>101</b>
Frequency of response = 1	
<b>Total burden hours</b>	<b>808 hr</b>
Time per response = 8 hr	
<b>Total personnel cost (\$25/hr)</b>	<b>\$20,200</b>
<b>Total miscellaneous costs</b>	<b>\$606</b>
Photocopy (\$0.05 x 20pp x 101 = 101)	
Telephone calls (\$5 x 101 = 505)	

<b>Verification of Data, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel costs</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>

It is anticipated that the information collected by the proposed action will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about Crab Rationalization. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The EDRs may be downloaded from the NMFS web site at [www.alaskafisheries.noaa.gov](http://www.alaskafisheries.noaa.gov), printed, and submitted by mail or FAX to PSMFC. The catcher vessel EDR is provided online for participants.



In 2010 an online web application version of the catcher vessel EDR continued to be used as an additional alternative to paper and fillable-PDF form versions used in previous years. The online version reduced the time required for data processing by PSMFC by allowing data providers to enter data directly into an online database. The online form included additional directions and built-in error checking, which reduced the number of follow-up calls from PSMFC for error-correction purposes.

New in 2010, an Excel version of the processor EDRs was created that allows easy copy and pasting of values from the submitters' workbooks directly into the EDR format for submission.

NMFS plans to coordinate efforts with PSMFC in the next year or so to create a data entry system that will allow additional applicants to enter EDR data online. The data will go directly into a database. It is anticipated that this type of system will be more efficient, timely, and accurate, though some respondents may choose to continue to use the fillable PDF version.

**4. Describe efforts to identify duplication.**

Previously, the Council conducted a five year review of the CR Program, which include the data collection program. Several elements of the EDR data being collected were found to be duplicative of other data collection programs. In some cases, redundancies were partial and in other cases, the data collected in the EDRs are completely redundant. Based on the EDR review and testimony from EDR Program respondents, the Council considered a number of alternatives for revising EDRs to improve data quality, simplify the reporting requirement, and reduce reporting burden and duplication with other reporting requirements. In February 2012, the Council recommended the proposed action to revise the crab EDR Program and survey instruments.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

Elimination of inaccurate and duplicate data is mitigating the costs for the small business – cost reduction is one of the purposes of the proposed action.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

The intent of this collection is to study the impacts of the CR Program; to ensure that the program achieves equity between the harvesting and processing sectors; and to monitor the economic stability for harvesters, processors, and coastal communities. Without the specified reporting scheme described in this Supporting Statement, the program would be jeopardized.

NOAA Fisheries Office for Law Enforcement uses the individual and confidential EDR data to ensure industry compliance with the data reporting requirements of the CR Program. Compliance monitoring is an integral component of collecting reliable and accurate data. It would not be possible to ensure reporting compliance from the firms that are required to provide the data in a timely fashion without these enforcement tools.

If NMFS did not collect this information, all components of Pub. L. No. 108-199 would be threatened. Public Law No. 108-199 requires that each component of the CR Program enacted by Congress must be implemented or the whole program must be withdrawn. NMFS would be unable to provide data to the Council and the State of Alaska to evaluate the CR Program for each of the required review periods if the collection were not conducted.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

Not applicable

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A proposed rule (RIN 0648-BC25) will be published coincidentally with this statement to solicit public comment.

In 2010, the Council initiated an analysis to modify the EDR based on the results of its data quality review process and public comment received during the Council's five-year review of the CR Program. As part of this analysis, the Council considered input from a Center for Independent Experts review of the data collection program that was completed in October 2011 (see Section 2.4.3 of the analysis for additional detail). In February 2012, the Council recommended Amendment 42 to the FMP to modify the EDR. This proposed rule would implement the Council's recommended changes to the EDR under Amendment 42.

Following the Council's recommendation of Amendment 42, additional industry outreach and Council review of the proposed EDR revisions was carried out to ensure that the revisions were compatible with industry recordkeeping procedures and consistent with the intent of the Council recommendations. In October 2011, the Council reviewed the three proposed EDR forms developed for this action, and the draft Paperwork Reduction Act submission. The Council expressed its support that NMFS go forward with this proposed rule with minor, clarifying revisions to the EDR forms.

In preparation for revision of the Crab EDRs

- ◆ NMFS and the AFSC held a public workshop in Seattle, WA (77 FR 40341, July 9, 2012) on Friday, July 20, 2012, from 9 a.m. to 5 p.m. The objective of the workshop was to review preliminary draft EDR forms for catcher vessels, catcher/processors, shoreside crab processors, and SFCPs participating in the CR Program fisheries, as well as Registered Crab Receivers that participate in the fisheries as non-processing crab buyers.

The workshop, planned as a focus group to work out in detail any issues with the EDRs, was intended to gather input from participants on the preliminary draft EDR forms. NMFS will use feedback received during the workshop to develop the proposed rule to implement the Council's preferred alternative. Other topics addressed at the workshop include general planning for administration of the EDR process by PSMFC, future potential for online reporting, and the development of the draft proposed rule implementing the Council's preferred alternative to revise the EDR requirements.

- ◆ Workshop Revisions to EDRs. NMFS and Council staff gathered comments from the workshop participants on the proposed the EDRs. New EDR drafts incorporating the public comments were distributed to select participants for additional comments.
- ◆ EDR Pre-test. NMFS provided a pre-test to two or three selected respondents from a group of volunteers to go over each question on the EDRs.

- ◆ **Council Briefing of Final EDRs.** After revisions to the EDRs resulting from the pre-tests, NMFS will present the final CR Program EDRs to the Council for their final review. Any comments from the Council will be incorporated into the EDRs before publication of the proposed rule.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payment or gift will be provided under this program.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

The EDR data are confidential and are not disseminated to the public. PSMFC disseminates the EDR data to NMFS, ADF&G, and the Council staff after removing all personal identifiers such as Social Security Numbers, vessel identification numbers, names, addresses, and telephone numbers. PSMFC supplants the data with a randomized identification number that can be matched between datasets.

The information collected is confidential under section 303(d) of the Magnuson-Stevens Act (16 U.S.C. 1801 et seq.) and under NOAA Administrative Order (AO) 216-100, which sets forth procedures to protect confidentiality of fishery statistics. It was last revised in 1994.

NOAA also follows regulatory procedures for data confidentiality found at 50 CFR Sec. 600.405 et seq. The Magnuson-Stevens Act generally prohibits collection of economic data, particularly from processing entities. In the legislation for the CR Program, an exception was created to the prohibition. NMFS was directed to implement a mandatory economic data program and feed the data to prescribed entities, with or without identifiers, depending on the entity.

NMFS will retain control over the information that is supplied, and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information.

**System of Records: Routine Uses**

The routine uses were described in the COMMERCE/NOAA System-16; Crab Economic Data Report for Bering Sea/Aleutian Islands Management Area (BSAI) off the coast of Alaska, published in 40 FR 28953-28955

1. In the event that a system of records maintained by the Department to carry out its functions indicates or is relevant to a violation or potential violation of law or contract, whether civil, criminal or regulatory in nature and whether arising by general statute or particular program statute or contract, or rule, regulation or order issued pursuant thereto, or the necessity to protect an interest of the Department, the relevant records in the system of records, including individual identifiers, may be referred to the appropriate agency, whether Federal, State, local or foreign, charged with the responsibility of investigation or prosecuting such violation or charged with enforcing or implementing the statute or contract, or rule, regulation or order issued pursuant thereto, or protecting the interest of the Department. That agency may disclose such records in the course of conducting its investigation.
2. A record from this system of records may be disclosed in the course of presenting evidence to a court, magistrate or administrative tribunal, including disclosures during the course of litigation, such as through discovery or to opposing counsel in the course of settlement negotiations.

3. A record in this system of records may be disclosed to a Member of Congress submitting a request involving an individual when the individual has requested assistance from the Member with respect to the subject matter of the record.
4. A record in this system of records may be disclosed without individual identifiers to a contractor of the Department having need for the information in the performance of the contract, but not operating a system of records within the meaning of 5 U.S.C. 552a(m).
5. A record in this system of records may be disclosed with individual identifiers to Department of Justice and the Federal Trade Commission when such records are requested by those agencies for anti-trust analyses or enforcement proceedings.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This information collection does not involve information of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

Estimated total respondents: 101, down from 132. Estimated total responses: 202, up from 176. Estimated total burden: 1,818 hr, down from 4,534 hr. Estimated total personnel costs: \$20,200, up from \$0.

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

Estimated total miscellaneous costs: \$6,542, down from \$454,367.

**14. Provide estimates of annualized cost to the Federal government.**

Estimated total burden: 0, down from 4 hr. Estimated total personnel costs: \$0, down from \$200. Estimated total miscellaneous costs: \$500,000.

The online forms will result in cost savings for NMFS because it will not need to update the online forms annually, beyond changing the year and perhaps clarifying instructions for some data elements. As more people submit their EDRs online it will save them time posting data and will save time for PSMFC when data entering and reviewing the EDR.

It takes a few years to get a majority of submitters using the online form vs. the paper fillable pdf forms.

A significant cost of administering the EDR is the cost of the contract with the independent third party. In Pub. L. No. 108-199, section 801, Congress required that the economic data collection be administered by an independent third party under contract to NMFS. The PSMFC is the independent agent selected by NMFS to disseminate EDR forms, to be the collection point for the EDR, and to verify the accuracy of the data collected from the BSAI crab fishing industry. The estimated cost of this contract is \$500,000 annually.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.**

This action is a revision with program changes and adjustments to the CR Program and CR Program EDRs. The cost to complete each of the EDRs is changed with this action. Total estimated changes are shown below:

**Catcher Vessel EDR**

Respondents and responses: 80, changed from 90  
Burden hours: 800 hr, changed from 3,114 hr  
Miscellaneous costs: \$1,124, changed from \$ 311,464

**Catcher/processor Crab EDR**

Respondents and responses: 3, changed from 5  
Burden hours: 30 hr, changed from 185 hr  
Miscellaneous costs: \$3,001, changed from \$ 18,508

**Shoreside processor crab EDR (REMOVED)**

Respondents and responses: 0, changed 29  
Burden hours: 0 hr, changed from 781 hr  
Miscellaneous costs: \$0, changed from \$ 78,113

**Stationary floating crab processor EDR (REMOVED)**

Respondents and responses: 0, changed from 8  
Burden hours: 0 hr, changed from 102 hr  
Miscellaneous costs: \$0, changed from \$10,202

**Processor Crab EDR (NEW -- combined shoreside processor/SFCP EDRs)**

Respondents and responses: 18, changed from 0  
Burden hours: 0, changed from 180 hr  
Miscellaneous costs: \$1,811, changed from \$ 0

**Verification of Data**

Respondents and responses: 101, changed from 44  
Burden hours: 808, changed from 325 hr  
Personnel costs: \$ 20,200, changed from \$0  
Miscellaneous costs: \$606, changed from \$ 36,080

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The Council will use the data for ongoing monitoring of and developing amendments to the CR Program. In addition, the EDR data are used in analyses for the Alaska Stock Assessment and Fishery Evaluation (SAFE) Report. The SAFE is a document or set of documents that provides the Council with a summary of information concerning the most recent biological condition of stocks and the marine ecosystems in the Fishery Management Unit and the social and economic condition of the recreational and commercial fishing interests, fishing communities, and the fish processing industries. The SAFE report may be used to update or expand previous environmental and regulatory impact documents, and ecosystem and habitat descriptions.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not applicable

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

Not applicable

## B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The Council developed the following purpose and need statement defining its rationale for considering this action:

*As a part of its Bering Sea and Aleutian Island crab rationalization (CR) program, the Council developed a comprehensive economic data collection (EDR) program to provide information to analysts to assess the effects of the CR program and identify problems that may require future amendments to the EDR program.*

*Council review of the EDR program, development of the EDR metadata through PNCLAC and testimony from the industry has resulted in the identification of substantial portions of the EDR data that are inaccurate. In addition, several elements are wholly or partially redundant with other existing data collection requirements, and some components may not further the Council's objectives. The cost to industry, both directly through data submission, and indirectly through cost recovery funding of program administration, outweigh the benefits of the resultant data and greatly exceed estimates provided in the initial analysis of the EDR program and in the accompanying regulatory analyses.*

*To address these problems, the Council intends to amend the EDR process so that the data collected is accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost.*

*The Council expressly wants to limit the EDR to the collection of data that have been demonstrated, through the development of the EDR metadata, and other reviews of the data, to be sufficiently accurate. Data collection should be structured and specific elements identified, to minimize costs while maintaining accuracy and providing the greatest information value to the management decision making process.*

*As analysts develop, refine, and verify methods for accurately collecting additional informative data elements, the Council will consider expansion of the data collection program to include those elements. This process can also inform the future Council action regarding other existing and future EDR programs.*

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.**

As a result of a 2010 Pacific States Marine Fisheries Commission review (Test Plan) of EDR data, the numbers required EDRs for previous years were updated to reflect submissions with more accuracy. Some processors had provided voluntary data that changed counts of submitted full EDRs. Such submissions were reclassified as a certification page submission.

- ◆ Number of EDRs required: 91
- ◆ Number of EDRs submitted: 91

Ninety distinct persons had EDR requirements for calendar year 2010 and all submitted full EDRs; eighteen submitted certifications.

This data collection process will take the form of a census. Therefore, all vessel and plant owners are required to fill out the EDRs. The response rate is expected to be 100 percent. NOAA Fisheries Office for Enforcement (OLE) can levy fines against any individual who does not comply with the law.

**2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

EDRs will be collected from all vessels and plant owners participating in crab fisheries during each year. Owners of these vessels and plants will be identified through fish tickets, COAR, and crab quota shareholder data. We will not be sampling from these populations, but rather compiling a census for the historical years and a census for all future years.

With the response (produced from completed and verified data forms), AFSC analysts will construct statistical models for estimating key variable values for each strata. These data will also be used to develop cost functions from this data and to estimate changes in variable costs of operations, average gross earnings, and changes to net revenues arising from changes in the costs of elements collected. Data may be developed to estimate changes in purchases and economic impacts before and after CR Program implementation. Several methods are available to estimate these outputs. The analysts will select the best methods based on an assessment of the data in this collection and from other sources.

**3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.**

Each of the owners and leaseholders in the BSAI crab harvesting and processing sectors are required to submit an annual EDR. Therefore, the response to mandatory data requirements should be very high. Those individuals who do not submit their EDR by the submission date will receive a follow-up phone call from PSMFC. If a solution cannot be reached at that point, their information will be referred to the OLE. Therefore, we are anticipating response rates of 95-100 percent.

Enforcement of the data collection program with regard to non-compliance has been different from enforcement programs used to ensure that accurate landings are reported. The economic data will not be used for in-season management; persons submitting the data are given an opportunity to correct omissions and errors before any enforcement action is taken.

Giving the person submitting data a chance to correct problems is considered important because of the complexities associated with generating these data. Only if the agency and the person submitting the data cannot reach a solution would the enforcement agency be contacted. The intent of this program is to ensure that accurate data are collected without being overly burdensome on industry for unintended errors.

**4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.**

Since the CR EDR Program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. The accountants that perform the data quality audits, as well as PSMFC (who administers the data collection) also document ways in which the EDRs could be clarified and we have used this information to clarify

instructions and variable definitions.

**5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Mark Fina  
Senior Economist  
North Pacific Fishery Management Council  
PH: (907) 271-2802  
FAX: (907) 271-2817  
Internet Address: [mark.fina@noaa.gov](mailto:mark.fina@noaa.gov)

Brian Garber-Yonts, Ph.D.  
Research Economist  
NOAA Fisheries, Alaska Fisheries Science Center  
PH: (206) 526-6301  
FAX: (206) 526-6723  
Internet Address: [Brian.Garber-Yonts@noaa.gov](mailto:Brian.Garber-Yonts@noaa.gov)

Karen Palmigiano  
Fisheries Management Specialist  
NOAA/NMFS Alaska Region  
PH: (907) 586-7240  
FAX: (907) 586-7465  
Internet Address: [Karen.Palmigiano@noaa.gov](mailto:Karen.Palmigiano@noaa.gov)

Geana Tyler  
Pacific States Marine Fisheries Commission  
PH: (503) 595-3100  
FAX: (503) 595-  
[gtyler@psmfc.org](mailto:gtyler@psmfc.org)



Draft Regulations have not been cleared by NOAA General Counsel, Alaska Section.

---

For the reasons set out in the preamble, 50 CFR part 680 is proposed to be amended as follows:

**PART 680—SHELLFISH FISHERIES OF THE EXCLUSIVE ECONOMIC ZONE OFF ALASKA**

**Subpart A—General**

1. The authority citation for 50 CFR part 680 continues to read as follows:

Authority: 16 U.S.C. 1862; Pub. L. 109-241; Pub. L. 109-479.

2. § 680.6 is proposed to read as follows:

**§ 680.6 Crab economic data report (EDR)**

(a) *Requirements.* (1) Any owner or leaseholder of a vessel or processing plant that harvested or processed CR crab during a calendar year must submit a complete Economic Data Report (EDR) by following the instructions on the applicable EDR form.

(2) A completed EDR or EDR certification pages must be submitted to the DCA for each calendar year on or before 1700 hours A.l.t., July 31 of the following year.

(3) Annual EDR forms for catcher vessels, catcher/processors, shoreside crab processors, and stationary floating crab processors are available on the NMFS Alaska Region website at <http://alaskafisheries.noaa.gov> or the Pacific States Marine Fisheries Commission (PSMFC) Alaska Crab Rationalization Program website at [www.psmfc.org/alaska\\_crab/](http://www.psmfc.org/alaska_crab/), or by contacting NMFS at 1-800-304-4846.

(b) EDR certification pages. The owner or leaseholder must submit the EDR certification pages either:

Draft Regulations have not been cleared by NOAA General Counsel, Alaska Section.

(1) *As part of the entire EDR.* The owner or leaseholder must submit the completed EDR certification pages as part of the entire EDR and must attest to the accuracy and completion of the EDR by signing and dating the certification pages; or

(2) *As a separate document.* The owner or leaseholder must submit the completed EDR certification pages only, and must attest that they meet the conditions exempting them from submitting the EDR, by signing and dating the certification pages.

(c) Annual catcher vessel crab EDR —Any owner or leaseholder of a catcher vessel that landed CR crab in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed catcher vessel EDR for annual data for the previous calendar year.

(d) Annual catcher/processor crab EDR—Any owner or leaseholder of a catcher/processor that harvested or processed CR crab in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed catcher/processor EDR for annual data for the previous calendar year.

(e) Annual stationary floating crab processor (SFCP) and shoreside crab processor EDR —Any owner or leaseholder of an SFCP or shoreside crab processor that processed CR crab, including custom processing of CR crab performed for other crab buyers, in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed processor EDR for annual data for the previous calendar year.

(f) Verification of data. (1) The DCA shall conduct verification of information with the owner or leaseholder.

(2) The owner or leaseholder must respond to inquiries by the DCA within 20 days of the date of issuance of the inquiry.

Draft Regulations have not been cleared by NOAA General Counsel, Alaska Section.

(3) The owner or leaseholder must provide copies of additional data to facilitate verification by the DCA. The DCA auditor may review and request copies of additional data provided by the owner or leaseholder, including but not limited to previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data.

(g) DCA authorization. The DCA is authorized to request voluntary submission of economic data specified in this section from persons who are not required to submit an EDR under this section.

3. Remove Tables 2, 3c, 4, 5, and 6 to part 680.

DRAFT

**Draft Specifications for Revised Crab Catcher/Processor EDR Data Elements Per  
NPFMC Preferred Alternative  
For Discussion Only**

**Instructions for completing this EDR Form**

- Provide all information requested in each section.
- Record only whole numbers, and round all decimal values up.
- Record a zero (0) or not applicable (N/A) where appropriate, and do not skip any questions or leave any data entry cells blank.
- Submit the completed certification and EDR form as required on or before the reporting deadline of **July 31**. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

**Table A: Bering Sea and Aleutian Islands Crab Rationalization (CR) Program Fisheries**

CR Fishery Code	CR Fishery	Geographic Area
BBR	Bristol Bay red king crab ( <i>Paralithodes camtschaticus</i> )	in waters of the EEZ with a northern boundary of 58° 30' N. lat., a southern boundary of 54° 36' N. lat., and a western boundary of 168° W. long. and including all waters of Bristol Bay.
BSS	Bering Sea Snow crab ( <i>Chionoecetes opilio</i> )	in waters of the EEZ with a northern and western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) with a southern boundary of 54° 30' N. lat. to 171° W. long., and then south to 54° 36' N. lat.
EAG	Eastern Aleutian Islands golden king crab ( <i>Lithodes aequispinus</i> )	in waters of the EEZ with an eastern boundary the longitude of Scotch Cap Light (164° 44' W. long.) to 53° 30' N. lat., then West to 165° W. long. a western boundary of 174° W. long., and a northern boundary of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab ( <i>Lithodes aequispinus</i> )	in waters of the EEZ with an eastern boundary the longitude 174° W. long., a western boundary the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and a northern boundary of a line from the latitude of 55°30' N. lat., then west to the U.S.-Russian Convention line of 1867.
EBT	Eastern Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	in waters of the EEZ a western boundary the longitude of 166° W. long a northern boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) a southern boundary of 54° 36' N. lat.

<b>WBT</b>	Western Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	In waters of the EEZ with: <b>an eastern boundary</b> the longitude of 166° W. long., <b>a northern and western boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) <b>a southern boundary</b> of 54°30' N. lat. To 171° W. long., and then south to 54°36' N. lat.
<b>PIK</b>	Pribilof red king and blue king crab ( <i>Paralithodes camtschaticus</i> and <i>P. platypus</i> )	In waters of the EEZ with: <b>a northern boundary</b> of 58° 30' N. lat., <b>an eastern boundary</b> of 168° W. long., <b>a southern boundary</b> line from 54° 36' N. lat., 168° W. long., to 54° 36' N. lat., 171° W. long., to 55° 30' N. lat., 171° W. long., to 55° 30' N. lat., 173° 30' E. lat., and then westward to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
<b>SMB</b>	St. Matthew blue king crab ( <i>Paralithodes platypus</i> )	in waters of the EEZ with <b>a northern boundary</b> of 62° N. lat., <b>a southern boundary</b> of 58°30' N. lat., and <b>a western boundary</b> of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
<b>WAI</b>	Western Aleutian Islands red king crab ( <i>Paralithodes camtschaticus</i> )	In waters of the EEZ with: <b>an eastern boundary</b> the longitude 179° W. long., <b>a western boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and <b>a northern boundary</b> of a line from the latitude of 55°30' N. lat., then west to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

**Table B: Quota Type**

<b>Quota Type Code</b>	<b>CR Quota Types</b>
CVO-A	Catcher Vessel Owner Class A IFQ, all Regions
CVO-B	Catcher Vessel Owner Class B IFQ
CPO	Catcher Processor Owner IFQ
CVC	Catcher Vessel Crew IFQ
CPC	Catcher Processor Crew IFQ
CDQ	Community Development Quota
ACA-WAG	Adak Community Allocation Western Aleutian Island Golden king crab IFQ

**Table C. Crab Species Codes**

Species Code	Common Name	Scientific Name
921	Red king crab	<i>Paralithodes camtschaticus</i>
922	Blue king crab	<i>Paralithodes platypus</i>
923	Golden (brown) king crab	<i>Lithodes aequispinus</i>
931	Tanner crab	<i>Chionoecetes bairdi</i>
932	Snow crab	<i>Chionoecetes opilio</i>

**Table D. Crab Product Codes Used for EDRs**

Code	Description
01	Whole crab
80	Crab sections
81	Crab meats
82	Crab claws
83	Crab tails
84	Crab legs
97	Other crab product (specify)

**Table E. Crab Process Codes.**

(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.

(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Process Code	Description
00	Other (specify):
01	Raw
02	Plate frozen/Blast frozen
03	Brined/frozen
07	Live

**Table F. Box Size Codes**

Code	Description
Small	Boxes 15 pounds or smaller

**1. CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

In Table 1 below, record the total pounds sold and gross revenue received for ex-vessel sales to crab buyers for all CR crab landed by the vessel during calendar year 2012. Report pounds and revenue for each CR fishery and harvest quota permit type separately, using the CR Fishery codes from Table A and Quota Type codes from Table B.

**Pounds Sold:** Record the total pounds of BSAI crab landed by this vessel and sold to crab buyers during the previous calendar year. Exclude deadloss crab that is discarded unsold at the landing.

**Gross Revenue:** Record the gross revenue from crab delivered to processors during the calendar year. Report the gross revenue value of all landings before deductions for taxes, bait, quota permits, or other withholding by crab buyer. Include all post-season adjustments received by the date of submitting this EDR, but do not report any payments not yet received as of this date.

**Table 1: CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

Quota Type	CR Fishery	Pounds Sold	Gross Revenue
CVO-A	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CVO-B	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$

Quota Type	CR Fishery	Pounds Sold	Gross Revenue
CPO	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CVC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CDQ	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
	ACA-WAG	WAG	lbs



## 2. CR Crab Product Sales

In Tables 2a and 2b below, report calendar year crab product sales from CR fisheries. Report sales to **affiliated** entities (Table 2a) and to **unaffiliated** entities (Table 2b) for each combination of crab species, product, process, and box size sold. Do not include sales of crab product produced from fisheries other than CR crab fisheries.

For further details on the definition of "Affiliation" refer to the federal regulations at 50 CFR part 680.2.

**Species Code:** Record the species codes from Table C for CR crab product sold in 2012.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections), enter more than one process code in the process code box for that product.

**Box Size Code:** Record the box size category code from Table F for each product sold.

For each unique product combination of CR crab species, product code, process code(s), and box size code identified using the codes listed in Tables C-F that was sold during 2012, report the following:

**Finished Pounds:** Record the total finished pounds of each product sold.

**Gross First Wholesale Revenue:** Record the amount you received for each product sold. Do not include any additional payment you received to cover any shipping, handling, or storage costs associated with the sale beyond the FOB port. Adjust all revenues to FOB Alaska-equivalent value. Do not deduct any broker fees, taxes paid, royalties for IPQ, or other fees or charges

**Table 2a: CR Crab Sales to Affiliated Entities**

Species Code	Product Code	Process Code	Box Size Code	Finished Pounds	Revenue
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$

**Table 2b: CR Crab Sales to Unaffiliated Entities**

Species Code	Product Code	Process Code	Box Size Code	Finished Pounds	Revenue
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$

**3. CR Crab Custom Processing Services Provided, by CR Fishery**

In Table 3 below, record processed output and revenue received for custom processing of CR crab performed for other crab buyers during the previous calendar year, by product code and process code for each CR Fishery Code in which custom processing was provided.

**CR Fishery Code:** Record the code from Table A for each CR fishery in which you provided custom processing services. If you produced multiple custom products within a CR fishery, record information for each on separate lines.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections) enter more than one process code in the process code box for that product.

For each CR fishery and unique combination of product code and process code(s) identified using the codes listed in Tables D and E produced as custom processing, report the following:

**Raw Pounds:** Record the total raw pounds of CR crab provided by RCRs receiving custom processing services from this processing facility.

**Finished Pounds:** Record the total pounds of output for each custom processed product.

**Custom Processing Revenue:** Record the revenue received for custom processing the specified products.

**Table 3: Custom Processing Services Provided**

CR Fishery Code	Product Code	Process Code(s)	Raw Pounds	Finished Pounds	Custom Processing Revenue
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$

**4. Raw CR Crab Purchases from Delivering Vessels, by CR Fishery and Quota Type**

In Table 4 below, record the following information on raw crab purchases from delivering vessels during the previous calendar year, by CR Fishery Code and fishing quota type. Use the CR Fishery codes from Table A and Quota Type codes from Table B.

**Raw Pounds Purchased**

Record the total pounds of raw crab purchased.

**Gross Payment**

Record total gross value of raw crab purchases, including all post-season adjustments paid to sellers as of the date of submitting this EDR.

**Table 3: Raw Crab Purchases, by CR Fishery and Quota Type**

CR Fishery Code	Quota Type	Raw Pounds Purchased	Gross Payment
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$

**5. CR Crab Custom Processing Services Purchased, by CR Fishery**

In Table 5 below, record the following information on custom crab processing provided for you by processors during the previous calendar year, by product code and process code for each CR Fishery Code in which custom processing was purchased.

**CR Fishery Code:** Record the code from Table A for each CR fishery in which you purchased custom processing services. If you received multiple custom products within a CR fishery, record information for each on separate lines.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections) enter more than one process code in the process code box for that product.

For each CR fishery and unique combination of product code and process code(s) identified using the codes listed in Tables D and E produced as custom processing, report the following:

**Raw Pounds:** Record the total raw pounds of CR crab provided to processors providing custom processing services

**Finished Pounds:** Record the total pounds of output for each custom processed product.

**Processing Fee:** Record the payment made to custom processors for each crab product.

**Table 4: Custom Processing Services Purchased**

CR Fishery Code	Product Code	Process Code	Raw Pounds	Finished Pounds	Processing Fee
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$

**6. CR Crab Fishing and Processing Quota Costs, by CR Fishery  
Market-Value and Negotiated-Price Transfers Only**

In Table 6 below, record the total pounds and monetary cost for transfers of annual CR crab fishing (IFQ, CDQ) and/or processing (IPQ) quota pounds received for your use during the previous calendar year, by CR fishery. Use the CR Fishery codes from Table A and Quota Type codes from Table B.

Include only transfers of quota for which you paid the only monetary compensation, based on the market value or a price negotiated between you and the quota holder(s). Do **not** include quota transfers for which:

- payment was based on a nominal (or non-negotiated) price, **or**
- non-monetary or in-kind compensation was included in the transaction, in addition to transferred quota pounds and monetary payment, **or**
- you did not use the quota pounds for crab harvested and/or processed by this vessel or purchased from delivering vessels by the end of the season, or re-transferred the quota pounds for use by another vessel.

For all market-value and/or negotiated-price quota transfers, report the following:

**Pounds Transferred:** Record the total pounds of transferred crab fishing (IFQ, CDQ) and/or processing (IPQ) quota used to harvest CR crab on the vessel or purchase CR crab from delivering vessels during the previous calendar year.

**Total Cost:** Record the total gross cost paid as monetary compensation, before taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date.

**Table 6: CR Annual Crab Fishing and Processing Quota Costs, by CR Fishery and Quota Type - Market-Value and Negotiated Price Transfers Only**

Quota Type	CR Fishery	Pounds Transferred	Total Cost
CVO-A	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$

Quota Type	CR Fishery	Pounds Transferred	Total Cost
CPOCVO-B	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPO	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CVC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$

Quota Type	CR Fishery	Pounds Transferred	Total Cost
CPC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CDQ	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
ACA-WAG	WAG	lbs	\$
CPC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$



**7: CR Crab Crew Labor Costs, by CR Fishery**

In Table 7 below, record the total direct payment to vessel fishing crew, processing employees, and captain for labor performed in CR fisheries during calendar year 2012, by CR fishery. Use the CR Fishery codes from Table A.

Report the total payment amount actually paid to processing employees, fishing crew, and captain in gross earnings and settlements, not earnings before vessel-related expenses (such as fuel, bait, or food and provisions) were deducted. Exclude any payments for labor provided before or after crab fishing seasons, or for crab fishing quota that the crew or captain leased to the vessel. Exclude non-wage expenses such as payroll taxes, unemployment insurance, workmen's compensation, and exclude costs of non-wage benefits provided such as paid travel, health insurance, or retirement.

**Labor Payment – Fishing and Processing Crew:** Record the total amount paid to vessel fishing crew and processing employees for labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master. Include all post-season adjustments paid as of the date of submitting this EDR.

**Labor Payment - Captain:** Record the total payment made to the captain(s) for vessel master services in CR fisheries during the previous calendar year. Include all post-season adjustments paid as of the date of submitting this EDR.

**Table 7: CR Crab Crew Labor Payments, by CR Fishery**

CR Fishery	Labor Payment	
	Fishing and Processing Crew	Captain
BBR	\$	\$
BSS	\$	\$
EAG	\$	\$
WAG	\$	\$
EBT	\$	\$
WBT	\$	\$
SMB	\$	\$
PIK	\$	\$
WAI	\$	\$

**Health Insurance and Retirement Benefits:** Did you provide paid health insurance or retirement benefits to captain or crew members in addition to labor payments reported above?

**Crew:**  Yes  No

**Captain:**  Yes  No

**8: Vessel Operating Expenses, by CR Fishery**

In Table 8 below, record the following operating expenses for this vessel, by CR fishery. Include any taxes paid in the cost value reported. Use the CR Fishery codes from Table A.

If one or more of the items listed below are not purchased and/or tracked in your accounting system on a fishery basis, estimate the amount for each fishery for EDR reporting purposes by pro-rating the total amount purchased or consumed based on the average daily use or cost of the item during fishery operations and number of days operating in each fishery.

**Food and Provisions – Total Cost:** Record the total cost of food and provisions purchased for use in each CR fishery during the previous calendar year.

**Crab Bait Purchased - Total Cost:** Record the total cost of bait purchased for use in each CR fishery during the calendar year. Do not include cost of bait used in CR fisheries during 20XX that was purchased for fisheries occurring prior to the 2012 calendar year.

**Fuel Consumed – Gallons Only:** Record the total gallons of fuel consumed by the vessel while operating in each of the CR fisheries. Include the amount of fuel used during directed fishing, searching, traveling between delivery port and fishing grounds, and offloading catch. Do not include amount of fuel used transiting to and from your home port before and/or after crab fishery operations.

**Table 8: Vessel Operating Expenses, by CR Fishery**

CR Fishery	Food & Provisions Total Cost	Bait Purchased Total Cost	Fuel consumed (gallons)
BBR	\$	\$	gal
BSS	\$	\$	gal
EAG	\$	\$	gal
WAG	\$	\$	gal
EBT	\$	\$	gal
WBT	\$	\$	gal
SMB	\$	\$	gal
PIK	\$	\$	gal
WAI	\$	\$	gal

**9: Vessel Operating Expenses, Annual**

In Table 9 below, record the total calendar year expenditure on the following operating costs for this vessel. Include any taxes paid on the listed items in the total.

**Fuel Cost, Annual**

**Gallons:** Record the total quantity of fuel purchased for the vessel during the previous calendar year, in gallons.

**Cost:** Record the total payment for fuel purchased for the vessel for all crab, non-crab, and non-fishing operations during the previous calendar year, including all sales taxes and surcharges. Do not include the cost of lubrication or other fluids.

**Vessel Labor Cost:** Record the total direct payment to vessel processing employees, fishing crew, and captain for labor performed in all vessel operations during the calendar year, including shipyard labor and tendering. Include labor payments for CR crab operations reported in Table 7 in the total.

**Table 9: Vessel Operating Expenses, Annual**

Fuel		Vessel Labor Cost
Gallons	Cost	
gal	\$	\$

**10. BSAI Crab Crew Licenses and CFEC Permits**

In Table 10 below, for each individual who worked as a captain or crewmember during the previous calendar year, record either the Alaska Commercial Crew license number or a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a captain or crewmember during CR fisheries.

For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, including permits not endorsed for crab, include the fishery code and permit number (e.g., M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox.

**Table 10: Crew Licenses/Permits**

Crewmember	License/Permit Number	Check One		Crewmember	License/Permit Number	Check One	
		ADF&G Crew License	CFEC Gear Operator Permit			ADF&G Crew License	CFEC Gear Operator Permit
1		<input type="checkbox"/>	<input type="checkbox"/>	15		<input type="checkbox"/>	<input type="checkbox"/>
2		<input type="checkbox"/>	<input type="checkbox"/>	16		<input type="checkbox"/>	<input type="checkbox"/>
3		<input type="checkbox"/>	<input type="checkbox"/>	17		<input type="checkbox"/>	<input type="checkbox"/>
4		<input type="checkbox"/>	<input type="checkbox"/>	18		<input type="checkbox"/>	<input type="checkbox"/>
5		<input type="checkbox"/>	<input type="checkbox"/>	19		<input type="checkbox"/>	<input type="checkbox"/>
6		<input type="checkbox"/>	<input type="checkbox"/>	20		<input type="checkbox"/>	<input type="checkbox"/>
7		<input type="checkbox"/>	<input type="checkbox"/>	21		<input type="checkbox"/>	<input type="checkbox"/>
8		<input type="checkbox"/>	<input type="checkbox"/>	22		<input type="checkbox"/>	<input type="checkbox"/>
9		<input type="checkbox"/>	<input type="checkbox"/>	23		<input type="checkbox"/>	<input type="checkbox"/>
10		<input type="checkbox"/>	<input type="checkbox"/>	24		<input type="checkbox"/>	<input type="checkbox"/>
11		<input type="checkbox"/>	<input type="checkbox"/>	25		<input type="checkbox"/>	<input type="checkbox"/>
12		<input type="checkbox"/>	<input type="checkbox"/>	26		<input type="checkbox"/>	<input type="checkbox"/>
13		<input type="checkbox"/>	<input type="checkbox"/>	27		<input type="checkbox"/>	<input type="checkbox"/>
14		<input type="checkbox"/>	<input type="checkbox"/>	28		<input type="checkbox"/>	<input type="checkbox"/>

Note: Commercial fishing license and permit information is public record. A vessel master has the right to record the crew member's license number or permit ID and no release is necessary to report the information here. EDR submitters can contact ADF&G or CFEC to request license or permit numbers by crewmember name at the contacts below:

ADF&G – Commercial Crew License  
Licensing Questions (907) 465-2376 ☐  
Licensing FAX (907) 465-2440 ☐  
Licensing Email [licensehelp@fishgame.state.ak.us](mailto:licensehelp@fishgame.state.ak.us)

CFEC - Gear Operator Permit  
Phone: (907) 790-6921  
Email: [dfg\\_cfec\\_questions@alaska.gov](mailto:dfg_cfec_questions@alaska.gov)  
Website: <http://www.cfec.state.ak.us/publook/publook.jsp>

**NOTES**

**Draft Specifications for Revised Crab Catcher Vessel EDR Data Elements Per  
NPFMC Preferred Alternative  
For Discussion Only**

**Instructions for completing this EDR Form**

- Provide all information requested in each section.
- Record only whole numbers, and round all decimal values up.
- Record a zero (0) or not applicable (N/A) where appropriate, and do not skip any questions or leave any data entry cells blank.
- Submit the completed certification and EDR form as required on or before the reporting deadline of **July 31<sup>st</sup>**. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

**Table A: Bering Sea and Aleutian Islands Crab Rationalization (CR) Program Fisheries**

CR Fishery Code	CR Fishery	Geographic Area
BBR	Bristol Bay red king crab ( <i>Paralithodes camtschaticus</i> )	in waters of the EEZ with <b>a northern boundary</b> of 58° 30' N. lat., <b>a southern boundary</b> of 54° 36' N. lat., and <b>a western boundary</b> of 168° W. long. and including all waters of Bristol Bay.
BSS	Bering Sea Snow crab ( <i>Chionoecetes opilio</i> )	in waters of the EEZ with <b>a northern and western boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) with a <b>southern boundary</b> of 54° 30' N. lat. to 171° W. long., and then south to 54° 36' N. lat.
EAG	Eastern Aleutian Islands golden king crab <i>Lithodes aequispinus</i> )	in waters of the EEZ with <b>an eastern boundary</b> the longitude of Scotch Cap Light (164° 44' W. long.) to 53° 30' N. lat., then West to 165° W. long. <b>a western boundary</b> of 174° W. long., and <b>a northern boundary</b> of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab ( <i>Lithodes aequispinus</i> )	in waters of the EEZ with <b>an eastern boundary</b> the longitude 174° W. long., <b>a western boundary</b> the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and <b>a northern boundary</b> of a line from the latitude of 55°30' N. lat., then west to the U.S.-Russian Convention line of 1867.
EBT	Eastern Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	in waters of the EEZ <b>a western boundary</b> the longitude of 166° W. long <b>a northern boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991)

		a southern boundary of 54° 36' N. lat.
WBT	Western Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	In waters of the EEZ with: an eastern boundary the longitude of 166° W. long., a northern and western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) a southern boundary of 54°30'N. lat. To 171° W. long., and then south to 54°36' N. lat.
PIK	Pribilof red king and blue king crab ( <i>Paralithodes camtschaticus</i> and <i>P. platypus</i> )	In waters of the EEZ with: a northern boundary of 58° 30' N. lat., an eastern boundary of 168° W. long., a southern boundary line from 54° 36' N. lat., 168° W. long., to 54° 36' N. lat., 171° W. long., to 55° 30' N. lat., 171° W. long., to 55° 30' N. lat., 173° 30' E. lat., and then westward to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
SMB	St. Matthew blue king crab ( <i>Paralithodes platypus</i> )	in waters of the EEZ with: a northern boundary of 62° N. lat., a southern boundary of 58°30' N. lat., and a western boundary of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
WAI	Western Aleutian Islands red king crab ( <i>Paralithodes camtschaticus</i> )	In waters of the EEZ with: an eastern boundary the longitude 179° W. long., a western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and a northern boundary of a line from the latitude of 55°30' N. lat., then west to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

Table B: Quota Type

Quota Type Code	CR Annual Quota Types
CVO-A	Catcher Vessel Owner Class A IFQ, all Regions
CVO-B	Catcher Vessel Owner Class B IFQ
CPO	Catcher Processor Owner IFQ
CVC	Catcher Vessel Crew IFQ
CPC	Catcher Processor Crew IFQ
CDQ	Community Development Quota
ACA-WAG	Adak Community Allocation Western Aleutian Island Golden king crab IFQ

**1. CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

In Table 1 below, record the total pounds sold and gross revenue received for ex-vessel sales to crab buyers for all CR crab landed by the vessel during calendar year 2012. Report pounds and revenue for each CR fishery and harvest quota permit type separately, using the CR Fishery codes from Table A and Quota Type codes from Table B.

**Pounds Sold:** Record the total pounds of BSAI crab landed by this vessel and sold to crab buyers during the previous calendar year. Exclude deadloss crab that is discarded unsold at the landing.

**Gross Revenue:** Record the gross revenue from crab delivered to processors during the calendar year. Report the gross revenue value of all landings before deductions for taxes, bait, quota permits, or other withholding by crab buyer. Include all post-season adjustments received by the date of submitting this EDR, but do not report any payments not yet received as of this date.

**Table 1: CR Crab Ex-vessel Sales, by CR Fishery and Quota Type**

Quota Type	CR Fishery	Pounds Sold	Gross Revenue
CVO-A	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CVO-B	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$



Quota Type	CR Fishery	Pounds Sold	Gross Revenue
CPO	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CVC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CDQ	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
WAI	lbs	\$	
ACA-WAG	WAG	lbs	\$

**2. CR Crab Fishing Quota Costs, by CR Fishery and Quota Type  
Market-Value and Negotiated-Price Transfers Only**

In Table 2 below, record the total pounds and monetary cost for negotiated transfers of annual crab fishing quota (IFQ and CDQ) pounds received for harvest on your vessel during calendar year 2012, by CR fishery and harvest quota permit type. Use the CR Fishery codes from Table A and Quota Type codes from Table B.

Include only transfers of quota for which you paid only monetary compensation, based on the market value or a price negotiated between you and the quota holder(s). Do not include quota transfers for which:

- payment was based on a nominal (or non-negotiated) price, or
- non-monetary or in-kind compensation was included in the transaction, in addition to transferred quota pounds and monetary payment, or
- you did not catch the transferred quota pounds on this vessel by the end of the season, or re-transferred the quota pounds for use by another vessel.

For all market-value and/or negotiated-price quota transfers, report the following:

**Pounds Transferred:** Record the total pounds of transferred crab fishing quota used to land crab caught by the vessel during the previous calendar year.

**Total Cost:** Record the total gross cost paid as monetary compensation, after taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date.

DRAFT

**Table 2: CR Crab Fishing Quota Costs, by CR Fishery and Quota Type:  
 Market-Value and Negotiated Price Transfers Only**

Quota Type	CR Fishery	Pounds Transferred	Total Cost
CVO-A	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPOCVO-B	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPO	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$

Quota Type	CR Fishery	Pounds Transferred	Total Cost
CVC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CPC	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	WAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
CDQ	BBR	lbs	\$
	BSS	lbs	\$
	EAG	lbs	\$
	EBT	lbs	\$
	WBT	lbs	\$
	SMB	lbs	\$
	PIK	lbs	\$
	WAI	lbs	\$
ACA-WAG	WAG	lbs	\$

**3. CR Crab Crew Labor Costs, by CR Fishery**

In Table 3 below, record the total direct payment to vessel crew and captain for labor performed in CR fisheries during calendar year 2012, by CR fishery. Use the CR Fishery codes from Table A.

Report the payment amount actually paid to vessel crew and captain in settlements, not earnings before fishing-related expenses (such as fuel, bait, or food and provisions) were deducted. Exclude any payments for labor provided before or after crab fishing seasons, or for crab fishing quota that the crew or captain leased to the vessel. Exclude non-wage expenses such as payroll taxes, unemployment insurance, workmen's compensation, and exclude costs of non-wage benefits provided such as paid travel, health insurance, or retirement.

**Labor Payment – Fishing Crew:** Record the total amount paid to vessel crew members for fishing labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master. Include all post-season adjustments paid as of the date of submitting this EDR.

**Labor Payment - Captain:** Record the total payment made to the captain(s) for vessel master services in CR fisheries during the previous calendar year. Include all post-season adjustments paid as of the date of submitting this EDR.

**Table 3: CR Crab Crew Labor Payments, by CR Fishery**

CR Fishery	Labor Payment	
	Fishing Crew	Captain
BBR	\$	\$
BSS	\$	\$
EAG	\$	\$
WAG	\$	\$
EBT	\$	\$
WBT	\$	\$
SMB	\$	\$
PIK	\$	\$
WAI	\$	\$

**Health Insurance and Retirement Benefits:** Did you provide paid health insurance or retirement benefits to captain or crew members in addition to labor payments reported above?

Crew:  Yes  No

Captain:  Yes  No

**4: Vessel Operating Expenses, by CR Fishery**

In Table 4 below, record the following operating expenses for this vessel, by CR fishery. Include any taxes paid in the cost value reported. Use the CR Fishery codes from Table A.

If one or more of the items listed below are not purchased and/or tracked in your accounting system on a fishery basis, estimate the amount for each fishery for EDR reporting purposes by pro-rating the total amount purchased or consumed based on the average daily use or cost of the item during fishery operations and number of days operating in each fishery.

**Food and Provisions – Total Cost:** Record the total cost of food and provisions purchased for use in each CR fishery during the previous calendar year.

**Crab Bait Purchased - Total Cost:** Record the total cost of bait purchased for use in each CR fishery during the calendar year. Do not include cost of bait used in CR fisheries during 20XX that was purchased for fisheries occurring prior to the 2012 calendar year.

**Fuel Consumed – Gallons Only:** Record the total gallons of fuel consumed by the vessel while operating in each of the CR fisheries. Include the amount of fuel used during directed fishing, searching, traveling between delivery port and fishing grounds, and offloading catch. Do not include amount of fuel used transiting to and from your home port before and/or after crab fishery operations.

**Table 4: Vessel Operating Expenses, by CR Fishery**

CR Fishery	Food & Provisions Total Cost	Bait Purchased Total Cost	Fuel consumed (gallons)
BBR	\$	\$	gal
BSS	\$	\$	gal
EAG	\$	\$	gal
WAG	\$	\$	gal
EBT	\$	\$	gal
WBT	\$	\$	gal
SMB	\$	\$	gal
PIK	\$	\$	gal
WAI	\$	\$	gal

**5: Vessel Operating Expenses, Annual**

In Table 5 below, record the total calendar year expenditure on the following operating costs for this vessel. Include any taxes paid on the listed items in the total.

**Fuel Cost, Annual**

**Gallons:** Record the total quantity of fuel purchased for the vessel during the previous calendar year, in gallons.

**Cost:** Record the total payment for fuel purchased for the vessel for all crab, non-crab, and non-fishing operations during the previous calendar year, including all sales taxes and surcharges. Do not include the cost of lubrication or other fluids.

**Vessel Labor Cost:** Record the total direct payment to vessel crew and captain for labor performed in all vessel operations during the calendar year, including shipyard labor and tendering. Include labor payments for CR crab operations reported in Table 3 in the total.

**Table 5: Vessel Operating Expenses, Annual**

Fuel		Vessel Labor Cost
Gallons	Cost	
gal	\$	\$

**Tendering:** Did the vessel perform tendering in any fishery during the previous calendar year?

- Yes
- No

**6. BSAI Crab Crew Licenses and CFEC Permits**

In Table 6 below, for each individual who worked as a captain or crewmember during the previous calendar year, record either the Alaska Commercial Crew license number or a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a captain or crewmember during CR fisheries.

For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g., M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license or permit number per crewmember.

**Table 6: Harvest Crew Licenses/Permits**

Crewmember	License/Permit Number	Check One		Crewmember	License/Permit Number	Check One	
		ADF&G Crew License	CFEC Gear Operator Permit			ADF&G Crew License	CFEC Gear Operator Permit
1		<input type="checkbox"/>	<input type="checkbox"/>	15		<input type="checkbox"/>	<input type="checkbox"/>
2		<input type="checkbox"/>	<input type="checkbox"/>	16		<input type="checkbox"/>	<input type="checkbox"/>
3		<input type="checkbox"/>	<input type="checkbox"/>	17		<input type="checkbox"/>	<input type="checkbox"/>
4		<input type="checkbox"/>	<input type="checkbox"/>	18		<input type="checkbox"/>	<input type="checkbox"/>
5		<input type="checkbox"/>	<input type="checkbox"/>	19		<input type="checkbox"/>	<input type="checkbox"/>
6		<input type="checkbox"/>	<input type="checkbox"/>	20		<input type="checkbox"/>	<input type="checkbox"/>
7		<input type="checkbox"/>	<input type="checkbox"/>	21		<input type="checkbox"/>	<input type="checkbox"/>
8		<input type="checkbox"/>	<input type="checkbox"/>	22		<input type="checkbox"/>	<input type="checkbox"/>
9		<input type="checkbox"/>	<input type="checkbox"/>	23		<input type="checkbox"/>	<input type="checkbox"/>
10		<input type="checkbox"/>	<input type="checkbox"/>	24		<input type="checkbox"/>	<input type="checkbox"/>
11		<input type="checkbox"/>	<input type="checkbox"/>	25		<input type="checkbox"/>	<input type="checkbox"/>
12		<input type="checkbox"/>	<input type="checkbox"/>	26		<input type="checkbox"/>	<input type="checkbox"/>
13		<input type="checkbox"/>	<input type="checkbox"/>	27		<input type="checkbox"/>	<input type="checkbox"/>
14		<input type="checkbox"/>	<input type="checkbox"/>	28		<input type="checkbox"/>	<input type="checkbox"/>

Note: Commercial fishing license and permit information is public record. A vessel master has the right to record the crew member's license number or permit ID and no release is necessary to report the information here. EDR submitters can contact ADF&G or CFEC to request license or permit numbers by crewmember name at the contacts below:

ADF&G – Commercial Crew License Licensing Questions (907) 465-2376 ☐ Licensing FAX (907) 465-2440 ☐ Licensing Email <a href="mailto:licensehelp@fishgame.state.ak.us">licensehelp@fishgame.state.ak.us</a>	CFEC - Gear Operator Permit Phone: (907) 790-6921 Email: <a href="mailto:dfg_cfec.questions@alaska.gov">dfg_cfec.questions@alaska.gov</a> Website: <a href="http://www.cfec.state.ak.us/publook/publook.jsp">http://www.cfec.state.ak.us/publook/publook.jsp</a>
---	---



**NOTES**

DRAFT

**Draft Specifications for Revised Crab Processor EDR Data Elements Per NPFMC Preferred Alternative For Discussion Only**

**Instructions for completing this EDR Form**

- Provide all information requested in each section.
- Record only whole numbers, and round all decimal values up.
- Record a zero (0) or not applicable (N/A) where appropriate, and do not skip any questions or leave any data entry cells blank.
- Submit the completed certification and EDR form as required on or before the reporting deadline of **July 31**. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

**Table A: Bering Sea and Aleutian Islands Crab Rationalization (CR) Program Fisheries**

CR Fishery Code	CR Fishery	Geographic Area
BBR	Bristol Bay red king crab ( <i>Paralithodes camtschaticus</i> )	in waters of the EEZ with a northern boundary of 58° 30' N. lat., a southern boundary of 54° 36' N. lat., and a western boundary of 168° W. long. and including all waters of Bristol Bay.
BSS	Bering Sea Snow crab ( <i>Chionoecetes opilio</i> )	in waters of the EEZ with a northern and western boundary of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) with a southern boundary of 54° 30' N. lat. to 171° W. long. and then south to 54° 36' N. lat.
EAG	Eastern Aleutian Islands golden king crab ( <i>Lithodes aequispinus</i> )	in waters of the EEZ with an eastern boundary the longitude of Scotch Cap Light (164° 44' W. long.) to 53° 30' N. lat., then West to 165° W. long., a western boundary of 174° W. long., and a northern boundary of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab ( <i>Lithodes aequispinus</i> )	in waters of the EEZ with an eastern boundary the longitude 174° W. long., a western boundary the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and a northern boundary of a line from the latitude of 55°30' N. lat., then west to the U.S.-Russian Convention line of 1867.

<b>EBT</b>	Eastern Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	in waters of the EEZ <b>a western boundary</b> the longitude of 166° W. long <b>a northern boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) <b>a southern boundary</b> of 54° 36' N. lat.
<b>WBT</b>	Western Bering Sea Tanner crab ( <i>Chionoecetes bairdi</i> )	In waters of the EEZ with: <b>a eastern boundary</b> the longitude of 166° W. long., <b>a northern and western boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) <b>a southern boundary</b> of 54°30'N. lat. To 171° W. long., and then south to 54°36' N. lat.
<b>PIK</b>	Pribilof red king and blue king crab ( <i>Paralithodes camtschaticus</i> and <i>P. platypus</i> )	In waters of the EEZ with: <b>a northern boundary</b> of 58° 30' N. lat., <b>a eastern boundary</b> of 168° W. long., <b>a southern boundary</b> line from 54° 36' N. lat., 168° W. long., to 54° 36' N. lat., 171° W. long., to 55° 30' N. lat., 171° W. long., to 55° 30' N. lat., 173° 30' E. lat., and then westward to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
<b>SMB</b>	St. Matthew blue king crab ( <i>Paralithodes platypus</i> )	in waters of the EEZ with <b>a northern boundary</b> of 62° N. lat., <b>a southern boundary</b> of 58°30' N. lat., and <b>a western boundary</b> of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).
<b>WAI</b>	Western Aleutian Islands red king crab ( <i>Paralithodes camtschaticus</i> )	In waters of the EEZ with: <b>a eastern boundary</b> the longitude 179° W. long., <b>a western boundary</b> of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and <b>a northern boundary</b> of a line from the latitude of 55°30' N. lat., then west to the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

**Table B: Quota Type**

Quota Type Code	CR Quota Types
CVO-A	Catcher Vessel Owner Class A IFQ, all Regions
CVO-B	Catcher Vessel Owner Class B IFQ
CPO	Catcher Processor Owner IFQ

CVC	Catcher Vessel Crew IFQ
CPC	Catcher Processor Crew IFQ
CDQ	Community Development Quota
ACA-WAG	Adak Community Allocation Western Aleutian Island Golden king crab IFQ

**Table C. Crab Species Codes**

Species Code	Common Name	Scientific Name
921	Red king crab	<i>Paralithodes camtschaticus</i>
922	Blue king crab	<i>Paralithodes platypus</i>
923	Golden (brown) king crab	<i>Lithodes aequispinus</i>
931	Tanner crab	<i>Chionoecetes bairdi</i>
932	Snow crab	<i>Chionoecetes opilio</i>

**Table D. Crab Product Codes Used for EDRs**

Code	Description
01	Whole crab
80	Crab sections
81	Crab meats
82	Crab claws
83	Crab tails
84	Crab legs
97	Other crab product (specify)

**Table E. Crab Process Codes.**

(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.

(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Process Code	Description
00	Other (specify):
01	Raw
02	Plate frozen/Blast frozen
03	Brined/frozen
07	Live

<b>Table F. Box Size Codes</b>	
<b>Code</b>	<b>Description</b>
Small	Boxes 15 pounds or smaller

## **1. CR Crab Product Sales**

In Tables 1a and 1b below, report calendar year crab product sales from CR fisheries. Report sales to **affiliated** entities (Table 1a) and to **unaffiliated** entities (Table 1b) for each combination of crab species, product, process, and box size sold. Do not include sales of crab product produced from fisheries other than CR crab fisheries.

For further details on the definition of "Affiliation" refer to the federal regulations at 50 CFR part 680.2.

**Species Code:** Record the species codes from Table C for CR crab product sold in 2012.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections), enter more than one process code in the process code box for that product.

**Box Size Code:** Record the box size category code from Table F for each product sold.

For each unique product combination of CR crab species, product code, process code(s), and box size code identified using the codes listed in Tables C-F that was sold during 2012, report the following:

**Finished Pounds:** Record the total finished pounds of each product sold.

**Gross First Wholesale Revenue:** Record the amount you received for each product sold. Do not include any additional payment you received to cover any shipping, handling, or storage costs associated with the sale beyond the FOB port. Adjust all revenues to FOB Alaska-equivalent value. Do not deduct any broker fees, taxes paid, royalties for IPQ, or other fees or charges.

**Table 1a: CR Crab Sales to Affiliated Entities**

Species Code	Product Code	Process Code	Box Size Code	Finished Pounds	Revenue
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$

**Table 1b: CR Crab Sales to Unaffiliated Entities**

Species Code	Product Code	Process Code	Box Size Code	Finished Pounds	Revenue
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$
				lbs	\$

**2. CR Crab Custom Processing Services Provided, by CR Fishery**

In Table 2 below, record processed output and revenue received for custom processing of CR crab performed for other crab buyers during the previous calendar year, by product code and process code for each CR Fishery Code in which custom processing was provided.

**CR Fishery Code:** Record the code from Table A for each CR fishery in which you provided custom processing services. If you produced multiple custom products within a CR fishery, record information for each on separate lines.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections) enter more than one process code in the process code box for that product.

For each CR fishery and unique combination of product code and process code(s) identified using the codes listed in Tables D and E produced as custom processing, report the following:

**Raw Pounds:** Record the total raw pounds of CR crab provided by RCRs receiving custom processing services from this processing facility.

**Finished Pounds:** Record the total pounds of output for each custom processed product.

**Custom Processing Revenue:** Record the revenue received for custom processing the specified products.

**Table 2: Custom Processing Services Provided**

CR Fishery Code	Product Code	Process Code(s)	Raw Pounds	Finished Pounds	Custom Processing Revenue
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$

**3. Raw CR Crab Purchases from Delivering Vessels, by CR Fishery and Quota Type**

In Table 3 below, record the following information on raw crab purchases from delivering vessels during the previous calendar year, by CR Fishery Code and fishing quota type. Use the CR Fishery codes from Table A and Quota Type codes from Table B.

**Raw Pounds Purchased**

Record the total pounds of raw crab purchased.

**Gross Payment**

Record total gross value of raw crab purchases, including all post-season adjustments paid to sellers as of the date of submitting this EDR.

**Table 3: Raw Crab Purchases, by CR Fishery and Quota Type**

CR Fishery Code	Quota Type	Raw Pounds Purchased	Gross Payment
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$
		lbs	\$



**4. CR Crab Custom Processing Services Purchased, by CR Fishery**

In Table 4 below, record the following information on custom crab processing provided for you by processors during the previous calendar year, by product code and process code for each CR Fishery Code in which custom processing was purchased.

**CR Fishery Code:** Record the code from Table A for each CR fishery in which you purchased custom processing services. If you received multiple custom products within a CR fishery, record information for each on separate lines.

**Product Code:** Record the product codes from Table D for each product.

**Process Code:** Record the process codes from Table E. If more than one process was used to create a specific crab product form (such as cooked *and* frozen crab sections) enter more than one process code in the process code box for that product.

For each CR fishery and unique combination of product code and process code(s) identified using the codes listed in Tables D and E produced as custom processing, report the following:

**Raw Pounds:** Record the total raw pounds of CR crab provided to processors providing custom processing services

**Finished Pounds:** Record the total pounds of output for each custom processed product.

**Processing Fee:** Record the payment made to custom processors for each crab product.

**Table 4: Custom Processing Services Purchased**

CR Fishery Code	Product Code	Process Code	Raw Pounds	Finished Pounds	Processing Fee
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$
			lbs	lbs	\$

**5. CR Crab Processing Quota Costs, by CR Fishery  
Market-Value and Negotiated-Price Transfers Only**

In Table 5 below, record the total pounds and monetary cost for transfers of crab individual processing quota (IPQ) pounds received for your use in purchasing landed CR crab during the previous calendar year, by CR fishery. Use the CR Fishery codes from Table A.

Include only transfers of quota for which you paid the only monetary compensation, based on the market value or a price negotiated between you and the quota holder(s). Do **not** include quota transfers for which:

- payment was based on a nominal (or non-negotiated) price, **or**
- non-monetary or in-kind compensation was included in the transaction, in addition to transferred quota pounds and monetary payment, **or**
- you did not use the quota pounds for crab processed by this vessel or purchased from delivering vessels by the end of the season, or re-transferred the quota pounds for use by another vessel.

For all market-value and/or negotiated-price quota transfers, report the following:

**Pounds Transferred:** Record the total pounds of transferred crab individual processing quota (IPQ) pounds acquired for your use in purchasing landed CR crab during the previous calendar year.

**Total Cost:** Record the total gross cost paid as monetary compensation, before taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date.

**Table 5: CR Crab Processing Quota (IPQ) Costs**

CR Fishery Code	IPQ Costs	
	Pounds Transferred	Total Cost
BBR	lbs	\$
BSS	lbs	\$
EAG	lbs	\$
WAG	lbs	\$
EBT	lbs	\$
WBT	lbs	\$
SMB	lbs	\$
PIK	lbs	\$
WAI	lbs	\$

**6: Crab Processing Labor Cost, by CR Fishery**

In Table 6 below, record the following information about labor costs associated with crab processing, by CR fishery: Use the CR Fishery codes from Table A.

**Total Man-Hours:** Record the sum of all hours worked by crab processing workers for each CR fishery.

**Total Labor Payment:** Record the total gross wages paid to crab processing workers in each CR fishery. Include wages and bonuses only for the processing workers included above. Do not count any payments to salaried employees (these will be recorded in Section 7).

**Computed Average Hourly Wage:** Please inspect the Average Hourly Wage (automatically computed by this form) to ensure that the values reported for Total Man-Hours and Total Labor Payment result in an average wage rate that is representative of wages paid by your company to processing employees in CR crab fisheries.

**Table 6: Crab Processing Labor Cost**

CR Fishery Code	Crab Processing Labor		
	Total Man-Hours	Total Labor Payment	Computed Average Hourly Wage
BBR	hrs	\$	\$/hr
BSS	hrs	\$	\$/hr
EAG	hrs	\$	\$/hr
WAG	hrs	\$	\$/hr
EBT	hrs	\$	\$/hr
WBT	hrs	\$	\$/hr
SMB	hrs	\$	\$/hr
PIK	hrs	\$	\$/hr
WAI	hrs	\$	\$/hr

**7: General Non-processing Labor Expenses, Annual**

In Table 7 below, record the total previous calendar year expenditure on wages and salaries for foremen, managers, administrative, personnel, and other non-processing labor.

For all non-processing personnel employed during the year, report the following:

**Number of Employees:** Report the number persons employed in non-processing positions at the processing facility during the previous calendar year. Include foremen, managers, administrative, and other personnel not primarily employed as processing line laborers.

**Salaries and wages:** Total calendar year gross wages for non-processing employees as described above. Do not include non-wage benefits, payroll taxes, training costs, or other costs of employment.

**Table 7: General Non-processing Labor Expenses, Annual**

Number Of Non-Processing Employees	Total Wages And Salaries
	\$

**8. CR Crab Processing Employee Residence**

In Table 8 below, record the official locations of residence as identified in employment records (i.e., W-4 forms) for CR crab processing personnel employed at this facility during the previous calendar year, and the number of individuals employed, by location. For residence locations in Alaska, list individual Alaska cities. For US locations outside of Alaska, list individual US states, and for non-US locations, list individual counties. For each location of residence, report the total number of individuals employed processing CR crab, and the total number of individuals employed in seafood processing in all fisheries, including CR crab. **Do not count any employee in the total for more than one location of residence.**

**Table 8: CR Crab Processing Employee Residence**

US Residents		If Country Other Than United States, Enter Primary Country Of Residence	Number Of Processing Employees CR Crab Only
If Alaska, Enter Primary City Of Residence	If Other Than Alaska, Enter Primary State Of Residence		

**NOTES**

North Pacific Fishery Management Council  
210<sup>th</sup> Plenary Session – Anchorage Hilton Hotel  
October 1-9, 2012

**C-6 BSAI Crab Management: Captains & Crewmembers on the topics of:**

- (b.) Initial Review of BSAI Crab active participation requirements.**
- (c.) Discussion paper on BSAI Crab Cooperative Provisions for Crew.**
- (f.) Crab Economic Data Reporting – Review forms and draft regulations.**

**For the Official Record: Ensuring Fair & Equitable Rights or Compensation**

Tuesday, September 25, 2012

Secretary Rebecca Blank, Chairman Eric Olson, and Council members:

The Captains and Crewmembers' representatives have long voiced concerns about the unjust level of economic protections provided in January 2004 when Congress amended Section 313(j) of the MSA and in 2006 mandated the Secretary to implement the Crab Rationalization Program – a privatization of once-public fisheries designed to serve special interests while restraining trade.

Brought into law by the trickery of Regulation-Negotiation and breaking the Federal Register (Dec. 14, 2000) provisions to ensure the Council submitted its proposals — on whether or not Crab Ratz should occur — to the appropriate jurisdictional and authorizing bodies of the Congress. It became a winners versus losers action.

The three pie system, a legislative end-run statute, failed to include any provision for all of the captains and crewmembers — the primary 'active participants' — to receive their historical share of the economic take from crabbing. This separate statutory authority' offers no excuse for the Secretary not ensuring that other applicable federal laws got applied. Its rights shifting also offers no excuse for the Leasing of shares (taken off-the-top before Trip Settlements) and other reasons dramatically lowering net crew take home compensation. I.E. rights to shares and rights to compensation may be differentiated, in part, even though diminishing the one clearly leads to diminishing the other. To protect one right, you must first protect the other.

The Commercial Fishing Industry Vessel Safety Act of 1988, 46 U.S.C. §106, and Lay Share laws, 46 U.S.C. §10601 and §11107 still apply. As do Contract Law provisions, where agreements must be fairly negotiated between willing parties, free from duress, and in writing – prior to performance, etc. The Admiralty has a long and storied role in protecting fishermen. Why won't it do the job today in Alaska's fisheries?

You have heard repetitive pleas from crewmembers about how Cooperatives and individual vessel owners have worked together to radically change the compensation system. And to crimp the annual economic earnings of crewmembers by demanding they do low wage-earning shipyard work (displacing higher paid shipyard craftsmen) and partake in summer salmon tendering operations in order to keep their crab jobs. They are not free agents able to maximize their annual incomes on their own basis. Using the terms indentured and 'sharecroppers' is not without accuracy and reason.

The Economic Data Reporting system is seriously flawed because it does not gather the Leasing information required for analysis, and to measure compliance with these other laws. The United States Coast Guard does not have in its boarding requirements a check to see that the vessel carries a copy of all applicable crew contracts for the fishing voyage currently underway. Furthermore, the Council has not provided any means or regulations to ensure Law Share (and contract) laws are followed, let alone collected the data required to ensure "fair and equitable" standards under the MSA, and that staff analysis (e.g. the 5-year review) is possible in this regard.

Please improve EDRs and the analysis to ensure there is no further violation of "the social contract" inherent in Catch Share management. Use 'active participation' measures to help correct the problems encountered to-date and to avoid harms in the future (e.g. upcoming GOA privatization). These things are only a start, as we believe that the Catch Share mentality and model is inferior to the form of a more "restricted common property" approach.

That begins with right thinking – that captains and deckhands are the active participants and (as Abraham Lincoln noted), "*Labor is superior to capital, and deserves the much higher consideration.*"

You'll be tempted to go about 'trying your way out of problems' the Council has largely created for itself. Remember, "*Trying is much harder than just doing it!*" Please just do it right for the sake of the Public stewards of these national resources.

Respectfully,

Stephen Taufen, Groundswell Fisheries Movement

Stephen R. Taufen  
P.O. Box 714  
Kodiak, AK 99615



Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Fishing Data	Dates covered (days in the fishery)	by crab fishery			
	Days fishing	by crab fishery	-	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery			
	Days processing	by crab fishery			
Deliveries and revenues - for operations as a catcher vessel	Landings by share type - pounds	-	by crab fishery	by crab fishery	by crab fishery
	Landings by share type - revenues	-	by crab fishery	by crab fishery	by crab fishery
Production	Raw crab processed by fishery	by crab fishery			
	Product and processed pounds by fishery	by crab fishery			
	Production - crab size and grade	by crab fishery			
	Production - box size	by crab fishery			
	Production - finished pounds	by crab fishery			
	Production - custom processing identifier	by crab fishery			
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery		
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska	by crab fishery - FOB Alaska
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
IFQ	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-	-
	Vessel owner's IFQ used on other vessels by share type				
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost				
	Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing	-	-

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Crew	Number of harvest crew by fishery	by crab fishery	-	-	-
	Payments to captain	by crab fishery	by crab fishery -check box for skipper/owners	by crab fishery	by crab fishery
	Payments to harvest crew	by crab fishery	by crab fishery	by crab fishery	by crab fishery (aggregated across harvesting and processing crew)
	Harvest labor payment details - charges and deductions	in all crab fisheries			
	Number of crew paid based on processing work	by crab fishery			
	Average processing positions by fishery	by crab fishery			
	Total processing labor payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	All unique captain and crew contracts and settlement sheets		by crab fisheries	by crab fisheries	-
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-	aggregated across all crab fisheries
	Crab processing employees by residence	aggregated across all crab fisheries	aggregated across all crab fisheries	-	-
Custom processing services purchased	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery			
	Custom processing services purchased - box size	by crab fishery			
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery			
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Crab costs	Insurance premium - crab only	aggregated across all crab fisheries	-	-	-
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-	-
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only	-	-
	Pot purchases - cost				
	Pot purchases - location	aggregated for all crab fisheries	-	-	-
	Line and other gear purchases - costs	aggregated for all crab fisheries	-	-	-
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-	-
	Bait used - species/pounds by fishery	by crab fishery	-	-	purchases by crab fishery
	Bait used - species/cost by fishery				
	Bait used - purchase location by fishery	by crab fishery	-	-	-
	Fuel used - gallons by fishery	by crab fishery	-	by crab fishery (gallons only)	by crab fishery (gallons only)
	Fuel used - cost by fishery			-	-
	Fuel used - purchase location by fishery	by crab fishery	-	-	-
	Food and provisions - costs	aggregated across all crab fisheries	-	-	purchases by crab fishery
	Other crew expenses	aggregated for all crab fisheries	-	-	
	Processing and packing materials, equipment, and supplies - crab	aggregated across crab fisheries	-	-	-
	Repackaging costs	aggregated across crab fisheries			
	Broker fees and promotions by fishery	by crab fishery			
	Lease (IPQ) costs		by crab fishery	by crab fishery - arm's length (monetary payments)	by crab fishery - arm's length (monetary payments)
	Landing and sales taxes and fees - crab only	by crab fisheries			
	Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries			
	Observer costs - by fishery	by crab fishery	-	-	-
	Freight costs for products	aggregated across crab fisheries			
Product storage	aggregated across crab fisheries				
Cooperative fees	aggregated across all crab fisheries	-	-	-	
Other expenses	aggregated across all crab fisheries	-	-	-	

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.	Modified Alt 3.
Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	-	-
	Vessel and equipment investment - location	aggregated across all fisheries	-	-	-
	Repair and maintenance - costs	aggregated across all fisheries	-	-	-
	Repair and maintenance - location	aggregated across all fisheries	-	-	-
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Insurance premium	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel - gallons and cost			aggregated all fisheries	aggregated all fisheries
	Fuel, lubrication, fluids - annual - cost	aggregated across all fisheries	Aggregated All Fisheries	-	-
	Fuel, lubrication, fluids - annual - location	aggregated across all fisheries	-	-	-
	Other vessel specific costs	aggregated across all fisheries	-	-	-
All activities	Processing days - all activities	aggregated all fisheries	aggregated all fisheries		
	Days at sea - all activities	aggregated across all activities	aggregated all fisheries		
	FOB revenues - all activities	aggregated across all activities	aggregated all fisheries		
	Finished pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries		
	Round/raw pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries		
	Labor cost - all activities	aggregated across all activities	aggregated all fisheries		

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3	Modified Alt. 3
Production	Production - dates covered by fishery	by crab fishery			
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days		
	Raw crab processed by fishery	by crab fishery			
	Product and processed pounds by fishery	by crab fishery			
	Production - crab size and grade	by crab fishery			
	Production - box size	by crab fishery			
	Production - finished pounds	by crab fishery			
	Production - custom processing identifier	by crab fishery			
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery		
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska only	by crab fishery - FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery			
	Man-hours	by crab fishery	by crab fishery	aggregated across all fisheries	by crab fishery
	Total processing labor payments	by crab fishery	by crab fishery	aggregated across all fisheries	by crab fishery
	Crab processing employees by residence	by crab fishery	by crab fishery	aggregated across all fisheries	by crab fishery
Custom processing services purchased	Reporting requirement			All companies contracting custom processing must report	All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery			
	Custom processing services purchased - box size	by crab fishery			
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery			
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Fisheries taxes and fees - crab only	by crab fisheries			
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries			
	Food and provisions - crab only	aggregated across crab fisheries			

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3	Modified Alt. 3
Crab processing costs	Other direct crab labor costs	aggregated across crab fisheries			
	Insurance deductibles - crab only	aggregated across crab fisheries			
	Repackaging costs	aggregated across crab fisheries			
	Broker fees and promotions by fishery	by crab fishery			
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments )	by crab fishery - arm's length (monetary payments )
	Observer costs	by crab fishery			
	Freight cost for plant supplies	aggregated across crab fisheries			
	Freight costs for products	aggregated across crab fisheries			
	Product storage	aggregated across crab fisheries			
	Water, sewer, and waste disposal	aggregated across crab fisheries			
	Other crab-specific costs	aggregated across crab fisheries			
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries			
	Plant and equipment investments	aggregated across all fisheries			
	Repair and maintenance	aggregated across all fisheries			
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other plant specific costs	aggregated across all fisheries			
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Processing labor costs - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3	Modified Alt. 3
Production	Production - dates covered by fishery	by crab fishery			
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days		
	Raw crab processed by fishery	by crab fishery			
	Product and processed pounds by fishery	by crab fishery			
	Production - crab size and grade	by crab fishery			
	Production - box size	by crab fishery			
	Production - finished pounds	by crab fishery			
	Production - custom processing identifier	by crab fishery			
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery		
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery FOB Alaska only	by crab fishery FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include raw pounds and pounds of product)	by crab fishery (include raw pounds and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery			
	Man-hours	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
	Total processing labor payments	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
	Crab processing employees by residence	by crab fishery	aggregated across all fisheries	aggregated across all fisheries	by crab fishery
Custom processing services purchased	Reporting requirement			All companies contracting custom processing must report	All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery			
	Custom processing services purchased - box size	by crab fishery			
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3	Modified Alt. 3
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery			
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery	by crab fishery
Crab processing costs	Fisheries taxes and fees - crab only	by crab fisheries			
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries			
	Food and provisions - crab only	aggregated across crab fisheries			
	Other direct crab labor costs	aggregated across crab fisheries			
	Insurance deductibles - crab only	aggregated across crab fisheries			
	Repackaging costs	aggregated across crab fisheries			
	Broker fees and promotions by fishery	by crab fishery			
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments)	by crab fishery - arm's length (monetary payments)
	Observer costs	by crab fishery			
	Freight cost for plant supplies	aggregated across crab fisheries			
	Freight costs for products	aggregated across crab fisheries			
	Product storage	aggregated across crab fisheries			
	Water, sewer, and waste disposal	aggregated across crab fisheries			
Other crab-specific costs	aggregated across crab fisheries				
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries			
	Vessel and equipment investments	aggregated across all fisheries			
	Repair and maintenance	aggregated across all fisheries			
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other vessel specific costs	aggregated across all fisheries			
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries		
	Processing labor costs - annual total all fisheries	aggregated across all fisheries	aggregated across all fisheries		



# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-6(f) Crab EDR

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Steve Minor	NACA
2	MARLE GLEASON; SIRI DAMARRELL	ABSC
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

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.



**ALASKA**  
Bering Sea Crabbers

206.783.0188 | 5470 Shilshole Ave. NW, Suite 505 | Seattle, WA 98107  
alaskaberingscraabbers.com

September 27, 2012

Eric A. Olson, Chairman  
Chris Oliver, Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

**October 2012 NPFMC Agenda Items C-6 (f) "Crab Economic Data Reporting - Review forms and draft regulations"**

Dear Chairman Olson,

Alaska Bering Sea Crabbers (ABSC) is a 501c(5) non-profit, seafood industry trade association representing roughly 70% of the harvest quota shareholders ("QS holders") in the BSAI Rationalized Crab (CR) fisheries. We appreciate the opportunity to provide the Council with comments on agenda item C-6 (f).

During its February 2012 meeting, the Council approved substantial revisions to the Crab Economic Data Reporting (EDR) forms. ABSC supported the revisions approved by the Council at that time. ABSC members and their bookkeepers have met with NMFS staff several times since to ensure the revisions approved by the Council were fully integrated into the revised EDR forms. There has been a healthy dialogue between ABSC and NMFS throughout this revision process. We are pleased to inform the Council that ABSC is fully supportive of the revised forms as provided to you under this agenda item. We feel the revised forms will dramatically increase the accuracy of the data collected. Additionally, they will substantially reduce the burden on industry associated with completing the forms. Once again, we applaud the agency for its willingness to complete these revisions in a timely manner and we feel it appropriate for the Council to move forward with the revised forms at this time.

There is only one minor deviation from the Council's February motion. At the request of ABSC, the revised forms now contain a "check box," if health insurance or retirement benefits are provided to captains and crew. We feel this additional information will provide a better understanding of the non-monetary benefits that accrue to captains and crew. In conclusion, ABSC requests the Council to move forward with the revised Crab EDR forms at this time. We appreciate the opportunity to provide the Council with our comments.

Sincerely,

  
Mark Gleason, Executive Director