

Council motion C-4 Economic Data Reporting January 30, 2020

The Council releases the analysis for public review, with incorporation of SSC comments as practicable, and revises the purpose and need statement and set of alternatives as follows.

Purpose and Need

The current EDRs may provide valuable information for program evaluation and analysis of proposed conservation and management measures. However, after over ten years of operating the EDR programs, **the Council intends to review whether** some revisions are needed to improve the usability, efficiency, and consistency of the data collection programs **in its responsibility** and to minimize cost to industry and the Federal government. **This includes evaluation of whether the value of EDRs to management outweighs the cost to industry and NOAA, and/or whether annual submission of EDRs is necessary.** Several revisions could be made to EDRs, specifically on the use of third-party audits and “blind-data” protocols that could reduce the cost of the data collection program to the industry and government while still maintaining the integrity and confidentiality of the data collection program.

Several provisions were implemented to provide a higher standard of confidentiality for proprietary business information reported in EDRs, above those that apply to all other confidential fisheries information. In practice, these provisions have proven to reduce the usability of the data for analysis and increase the cost of the data collection programs without providing additional practical protections. In addition, confidentiality requirements that apply to all data collections may provide sufficient protections for the EDR data.

The GOA Trawl EDR program implemented in 2015 was designed to collect baseline information to assess the impacts of a future catch share program. Data has been collected under this program for 4 years and another year of data will be submitted in June 2020. The Council should re-evaluate the purpose and need for the GOA trawl EDR, and make adjustments as necessary in either the purpose and need for the program or in the data collection program itself.

Alternative 1: Status Quo

Alternative 2: Make revisions, where needed, in the EDR sections of the crab or groundfish FMPs and in the EDR regulations.

Component 1: ~~Remove any requirements~~ **Revise authorizations** for third party data verification audits under the existing programs and reduce burdens associated with this process. **Amend regulatory language in all EDR programs to authorize third party data verification audits in cases of noncompliance.**

Component 2: Revise requirements for aggregation of data across submitters and blind formatting in ~~the crab data collection program~~ **all EDR programs** to make those data aggregation and confidentiality protections comparable to the requirements under other data collection programs.

Component 3: ~~Revise or remove~~ Remove the GOA trawl EDR requirements.

Component 4. Revise EDR collection period to every (options: 2 years; 3 years; 5 years)

Alternative 3: Remove EDR requirements.