

# Universal Data Collection

January 24, 2023<sup>1</sup>

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## 1 Introduction

In October 2022, the North Pacific Fishery Management Council (Council) directed staff to provide an expanded discussion paper evaluating the implementation of a Universal Data Collection program to collect Alaska Department of Fish and Game (ADFG) or Commercial Fisheries Exchange Commission (CFEC) crew license data; crew compensation; and the number of crew positions on vessels operating in federal fisheries. This discussion paper is also to evaluate the scale of data to be collected by fishery and area and outline a simple annual collection mechanism(s) and associated cost/burden. The associated analytical value and ability of NMFS to collect quota lease costs as part of the annual quota applications administered by the NMFS Restricted Access Management Division, for those programs that currently do not report lease costs, should also be evaluated.

## 2 Background

The Council and NMFS have implemented four data collection programs in the federally managed groundfish and crab fisheries of Alaska, Economic Data Reports or EDRs. The EDRs gather various levels of ownership, revenue, cost, vessel operations, and employment information from vessel owners, vessel operators, processors, permit holders, and leaseholders who participate in three out of the seven catch-share programs in the North Pacific fisheries. The catch share programs that are subject to some form of EDR requirements are the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, BSAI Amendment 80, and the American Fisheries Act (AFA) pollock fisheries. In addition, the Council and National Marine Fisheries Service (NMFS) implemented EDR requirements for the Gulf of Alaska (GOA) trawl catcher vessels and processors in fisheries not yet managed under a catch share program.

The purpose of the EDR requirements is to gather information to improve the Council’s ability to analyze the economic effects of the catch share or rationalization programs, understand the economic performance

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<sup>1</sup> Prepared by: Michael Fey (PSMFC)

of participants in these programs, and help estimate the impacts of future issues, problems, or proposed revisions to the programs covered by the EDRs. The EDR programs were first initiated in 2006 under the Crab Rationalization program. In 2015 the Council initiated the latest program, the GOA groundfish trawl catcher vessel and shoreside processor data collection.

In February 2022 the Council recommended changes to the EDR program including the removal of third-party audits, changes in the confidentiality requirement, and the removal of the GOA trawl catcher vessel EDR requirement. Upon the removal of the GOA trawl EDR requirement, a discussion paper was requested to bring forward data components that are not currently collected across all sectors but could improve FMP and regulatory impact analyses if collected and/or should continue to be collected from catch share programs and could inform potential revisions to current EDR requirements.

In October of 2022, the Council reviewed the discussion paper that identified four data components that could benefit analytical documents; crew licenses, crew compensation, fuel/lube costs, and lease costs. The discussion paper also included ways in which the reporting burden could potentially be reduced. Upon reviewing the discussion paper, the Council identified three data components to be brought forward in an expanded discussion paper which would also include a more complete analysis of the scope and cost of the proposed data collection. The three components included were crew licenses, crew positions, and crew compensation. The Council also requested a review of NMFS's ability to collect quota lease costs.

### **3 Data Collection Implementation**

An annual survey of vessels that participate in a federally managed fishery or a fishery jointly managed by NMFS and the state of Alaska may be an appropriate mechanism to collect the three data components identified; crew licenses, crew positions, and crew compensation. This proposed data collection or Universal Data Collection (UDC) as outlined would focus on collecting crew information that would be widely used by analysts and presented in most Council documents. The collection would support crew residency and crew compensation per pound or ton tables. Community impacts rely solely on the city of the vessel owner's residence when crew information is not available. Crew residence would add a key component in understanding the impacts on communities and the relationship between vessels and communities. The Council could also pursue existing reporting requirements or alternative approaches to collect the data components identified. Crew licenses and positions could be collected in eLandings or logbooks and FFP (Federal Fisheries Permit) applications could potentially collect crew compensation. These alternative approaches do have shortcomings. The data would not be under the same management structure and data stewardship that Pacific States Marine Fisheries Commission (PSMFC) has established for EDRs. These alternate methods do not have clear paths to implementation; logbooks are not currently available electronically and are not required universally, eLandings would need broad updates to include multiple crew licenses entered on each fish ticket that may require scan cards or auto-population. FFP applications are every three years. For these reasons, the implementation of the UDC is being considered here as an annual survey similar to the current EDR programs. However, improvements or changes to current systems may change the shortcomings of alternative approaches.

PSMFC operates as the independent third-party Data Collection Agent (DCA) for the EDR program. In collaboration with AFSC, PSMFC has developed a robust infrastructure for administering EDRs, including an online portal for submission, data validation, and data distribution. PSMFC would likely be able to integrate a new data collection in an annual format with the current EDR efforts.

Using a similar methodology to EDRs, PSMFC/AFSC would identify vessels on an annual basis and then submit the list of vessel owners to PSMFC. PSMFC then would contact the vessel owner and manage the data collected. AFSC uses multiple identifiers to deliver vessel owner information. CFEC vessel registration is likely the best source of information and may be most appropriate for the broad data

collection proposed. Vessel owners would be contacted via certified mail with a link to an online form. The notification also offers the vessel owner the ability to request a paper copy. Paper submissions require data entry before being available in the database. Once entry is complete PSMFC internally audits the data and cleans it as necessary. Historically EDR submissions are due June 1<sup>st</sup> of the following year. The resulting data would typically be available to analysts in October of the following year.

The Council would need to determine to whom the data collection would apply. For instance, the Council could consider participation in a federally or jointly managed fishery as a requirement to complete the appropriate forms under the Universal Data Collection. Active vessels could be identified as having a landing within a calendar year. This landing data would be best sourced from eLandings for catcher vessels and Catch Accounting for catcher processors. If a vessel were to have a commercial landing in either source in an identified fishery the vessel owner according to CFEC would be contacted. Permits could also be used; however, vessels can be inactive while holding a fishing permit. The federal fisheries would include halibut/sablefish IFQ, Limited or Open Access fisheries, and rationalized programs (A80, AFA, Central Gulf of Alaska (CGOA) Rockfish Program). Jointly managed fisheries would include scallops, rationalized crab, charter halibut, and CDQ and could be identified by having a landing within those programs. The halibut charter fleet is the only fleet that does not report via eLandings.

Table 1 identifies the number of vessels active in each fleet with the corresponding type of fishery the fleet participates in. As of 2021, 1,109 vessels had landings in the federally or jointly managed fisheries of Alaska, 1,050 vessels participated in the federally managed fishery.

The Council may wish to consider excluding some of the fleets or certain vessels from the initial implementation of such a program. It is assumed that the data collection would not include charter halibut vessels although these vessels fall under joint management. Charter vessels utilize log books and do not submit landing reports. These vessels are also not required to obtain a FFP (Federal Fishing Permit). Although charter halibut vessels do employ skippers and deck crew, these crew members are not required to obtain a commercial crew license, and therefore surveyed information would need to be uniquely designed if a data collection was extended to this fleet.

It is noteworthy that the halibut CDQ fleet and jig fleet have decreased significantly. In 2013 the halibut CDQ fleet was comprised of 244 vessels of which 204 vessels were less than 30 feet in length. The jig fleet had 285 vessels participate in 2016 of which 56 participated in federal waters. In considering the burden of the data collection it may be necessary to consider what types of changes in fishery participation might occur including changes to previous norms.

If the Council were to remove an individual fleet from the collection it is noteworthy that vessels may participate in multiple fleets. For example, of the 28 vessels that participated in the halibut CDQ fleet 14 also participate in other federal fleets, typically the halibut IFQ fleet. A broader exclusion of CDQ vessels would result in 15 vessels being excluded from the collection as analysts were able to identify 1 vessel that operated in 2021 that was active solely in the pot fleet and landed solely CDQ. If all jointly managed fisheries were excluded it would remove 15 CDQ vessels, 2 scallop vessels, 1,204 charter vessels, and 56 crab rationalization vessels.

**Table 1 Vessels Active by Fleet (2021)**

Fleet	Number of Vessels	Duplicative EDR Submission	Management
Amendment 80	21	Y	Federal
AFA Catcher Processor	15	N	Federal
AFA CV Mothership	14	N	Federal
AFA CV Shoreside	75	N	Federal
Halibut IFQ	744	N	Federal
Halibut CDQ	28	N	Joint
Halibut Charter	1204	N	Joint
Sablefish IFQ	304	N	Federal
Freezer Longliner	20	N	Federal
Pot	98	N	Federal
Central Gulf Trawl	53	N	Federal
Western Gulf Trawl	35	N	Federal
Longline CV	39	N	Federal
Jig	64	N	Federal
Crab Rationalization	66	Y	Joint
Scallop	2	N	Joint

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive\_FT

\*Vessels and fleets may operate in CDQ and non-CDQ except for the Halibut CDQ fleet

Vessels that currently submit EDRs are included in table 1. The Council may choose to opt-out vessels required to submit EDRs that contain similar or duplicative data elements. This would include Amendment 80 vessels and vessels that participate in the crab rationalization program. As of 2021, there were 87 vessels in this category, 21 Amendment 80 vessels, and 66 crab rationalization vessels.

There are several options the Council may take regarding vessels submitting duplicative EDR data. One option would be to opt the vessels out of the new data collection program. Although this appears to be the easiest solution it does come with drawbacks. EDR data may be collected in a slightly different format which would create inconsistencies across the data collection programs. One example would be the proposed data collection form (Appendix 1) identifies if hired captains are utilized and the compensation associated with hired captains. Currently, EDRs do not separate hired captains from crew. It may therefore be appropriate to update the EDR forms to contain the data points of the new data collection if vessels are opted out. The Council could also consider updating the Amendment 91 forms to include the additional data points. This would increase the number of vessels opting out from 87 to 185. This would require changes to the structure of the current EDR forms and data tables behind the forms. Another option would be to remove the pieces of the EDR that would be duplicative and request vessel owners to complete the current EDR and the new data collection. Having two forms would likely be a poor option due to the confusion and increased burden that it may present. The final option would be to replace the EDR forms with the new collection. The Amendment 80 forms and to a lesser extent, the CR Program forms include a suite of operational cost questions (e.g., fuel costs). The Amendment 80 forms also include questions regarding vessel characteristics.

The Council may also choose to provide exemptions for vessels of a certain length or vessels that operate solely in state waters. This would reduce the reporting requirement for vessels that might have limited

participation. If vessels less than 45’ in length were able to opt out, 458 vessels would be removed from the data collection. Table 2 below shows the average revenue per vessel in 2021 by length. Vessels less than 40’ in length had significantly less revenue than vessels 40’ and over. If vessels less than 40’ in length were able to opt-out it would remove 343 vessels from the data collection.

**Table 2** **Vessels with Landings in Federally or Jointly Managed Fisheries (2021)**

Vessel Length	Number of Vessels	Average 2021 Revenue*
<25	49	\$19,914
25-29	43	\$36,135
30-34	147	\$118,721
35-39	104	\$105,027
40-45	115	\$366,926
>45	651	\$1,707,289
Total	1109	\$1,029,849

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive\_FT

\*Does not include catcher processors

Of the 1,109 vessels that participated in federal or jointly managed fisheries in 2021, 334 did not participate in federal waters. The vessels that operated solely in state waters were mostly halibut IFQ/CDQ vessels (319) with the remaining being jig (12) or pot (4) vessels. The majority of the vessels that only operated in state waters were less than 45’ in length, 273 vessels of the 334. All vessels operating in state waters only were less than 60 feet in length.

Beyond state waters, the Council may also consider vessels participating in the BSAI (Bering Sea and Aleutian Islands) and GOA (Gulf of Alaska) separately. Of the 775 vessels that participated in the federal fishery in federal waters, 311 were active in the BSAI and 560 were active in the GOA.

## 4 Administrative and Reporting Cost

The cost information analyzed is based on the Universal Data Collection and does not include costs associated with the collection of leasing information. The estimated costs are based on the annual survey methodology and do not include alternative approaches.

This discussion of potential agency expenditures and industry reporting costs in this section relies on the previous estimates for current programs from the February 2022, EDR Amendment analysis. Any new data collection would require approval through the Office of Management and Budget under the Paperwork Reduction Act. This process includes reporting burden estimates for the public and provides an opportunity for the public to comment on these estimates of burden.

### 4.1 Agency Expenditures

Table 3 below from the previous analysis outlines the historic administrative costs associated with EDR data collection and the cost recovery paid by participants of rationalized programs to fund these administrative costs. Of note, the GOA Trawl program will no longer be active in 2023 and the costs associated with the crab EDR program have significantly declined with the removal of third-party audits.

**Table 3 Cost Recovery and PSMFC Administrative Costs of the EDR Programs**

Program/Year	Crab <sup>1</sup>	A80	AFA <sup>2</sup>	Cost Recovery Total	GOA Trawl <sup>3</sup>	Total EDR cost
2005	\$150,000			\$150,000		\$150,000
2006	\$150,000			\$150,000		\$150,000
2007	\$259,938			\$259,938		\$259,938
2008	\$338,276			\$338,276		\$338,276
2009	\$314,303			\$314,303		\$314,303
2010	\$352,508			\$352,508		\$352,508
2011	\$323,588			\$323,588		\$323,588
2012	\$373,316			\$373,316		\$373,316
2013	\$318,278			\$318,278		\$318,278
2014	\$342,703			\$342,703		\$342,703
2015	\$269,583			\$269,583	\$53,771	\$323,354
2016	\$345,509	\$88,254	\$62,114	\$495,877	\$73,221	\$569,098
2017	\$180,168	\$91,482	\$66,929	\$338,579	\$91,879	\$430,458
2018	\$202,012	\$92,462	\$40,631	\$335,105	\$61,765	\$396,870
2019	\$180,224	\$87,644	\$56,989	\$324,857	\$57,486	\$382,343
2020	\$91,620	\$72,976	\$48,194	\$212,791	\$107,459	\$320,250
2021	\$72,927	\$85,123	\$52,735	\$210,786	\$73,240	\$284,026

Source: EDR Amendment Final Action (February 2022)

<sup>1</sup> The year listed in this table reflects the first year of the crab fishing season.

<sup>2</sup> Only includes costs associated with the inshore sector

<sup>3</sup> Only includes PSMFC administrative costs

The costs of the EDR efforts are primarily borne by AFSC. Catch-share programs have cost recovery requirements that may be used to support EDR programs. The EDRs are funded through NMFS' Data Collection Grant which is then passed on to PSMFC. AFSC manages the grant and oversees PSMFCs scope of work for each of the EDR projects. PSMFC submits expenditure reports to NMFS, NMFS recovers the expended funds through cost recovery when available and directs the funds from the grant. If PSMFC is named as the DCA and administers the Universal Data Collection, either folding it into the EDR program or keeping it separate, it would be funded through the Data Collection Grant. Alternatively, AKR could be the lead on the data collection either contracting it out to PSMFC or administering it internally. An annual contract could potentially be problematic due to changes in NMFS' annual financing.

There would be upfront expenditures to build out a new Universal Data Collection and also long-term costs to maintain the collection. The upfront costs would include the database design, application build, and form creation. PSMFC estimates that the upfront expenditures would be \$23,000. There could also be expenditures associated with a re-design of duplicative EDRs to match the data components outlined if EDRs were maintained. This would likely be a minimal expense and not require additional funding.

The recurring administrative expenditures for the new data collection are estimated at \$113,069. This estimate includes salary, benefits, and wages for staff to support the data collection. The mailing of forms is estimated to cost \$10,000 annually. The estimate is based on 1,109 vessels and could be less if options were chosen that reduce the number of vessels surveyed. The Universal Data Collection would be the most expensive data collection in total yet the average cost per survey would be the lowest. The Crab

EDR costs \$1,105 per survey while the administrative costs per survey of the proposed Universal Data Collection would be \$102.

#### **4.2 Industry Cost of Preparing and Submitting**

To estimate the cost to the industry two pieces of information must be attained, the cost per hour to complete the form and the hours needed to complete it. To estimate the costs to the industry the previous EDR analysis in February 2022 was leveraged. The low estimate for hours to complete the form in the analysis was \$37 per hour. This estimate is an average hourly estimate used for forms and components in most of NMFS' information collections and is based on the assumption that information is being submitted by operators of small vessels or administrative or management staff in processing plants or fishing companies. The estimate of \$37 per hour has not been systematically validated through surveys and has not been updated in several years. The upper estimate for the hourly expense identified for EDRs was \$165 per hour for the crab EDR and \$75 per hour for the A91 EDR based on comments received on past EDR renewals. NMFS presents its burden hour and hourly cost estimates for public comment and generally updates and revises them if it receives information that supports doing so. The new data collection would likely need less expertise than both the A91 EDR and crab EDR yet due to increasing costs it is reasonable to assume a cost of \$75 per hour to complete the form.

Similarly, the previous EDR document reviewed the time burden associated with completing the applicable forms. The Amendment 80 EDR is estimated to take 22 hours and the crab EDR is estimated to take 20 hours. While the Gulf of Alaska Trawl EDR form was estimated to take 15 hours. The Universal Data Collection outlined would likely be significantly less burdensome than EDR forms. The proposed form contains significantly fewer components and focuses on crew information. Due to the nature of the proposed data collection, the burden hours may be more difficult to estimate than previous data collections. For example, in 2021 catcher processors are estimated to have an average crew size of 43 while the halibut IFQ sector is estimated to have an average of 4 crew members. The form may take several hours for a catcher processor while taking significantly less time for a small vessel that has a minimal crew and little or no compensation associated with crew.

Using an estimate of 6 hours per catcher processor (66) and 3 hours for all other vessels (1,043) at the \$75 per hour rate the burden of reporting for vessels is estimated at \$265,000. This would cost \$239 per survey/vessel. This estimate would be subject to changes if vessels were excluded from the collection, such as; vessels that submit EDRs, vessels that fall below a length threshold, vessels that only participate in state waters, or vessels that only operate in a jointly managed fishery.

### **5 Lease Cost Collection**

Lease costs or costs associated with temporary transfers of quota are currently not collected across all catch-share programs. Leasing cost information would help stakeholders and managers understand the constraints that participants may incur. Program reviews would report the amount of fish leased and the value of leasing if that information was made available. Some analytical documents would also present this information; however, it would not be a standard data component. The two types of tables that could be presented are the price per pound of leased fish and the total value/amount of leased fish within the program.

Values associated with leasing are currently collected via vessel owner submission of EDR forms for the Amendment 80 and Crab Rationalization programs. The Halibut and Sablefish IFQ program reports values on transfer forms, however, data quality has been an issue in the past. Leasing cost information is not available for the AFA, CDQ, or CGOA Rockfish programs. The newly created Pacific Cod Trawl

Cooperative or PCTC program would likely fall under the same requirements as the CGOA Rockfish program and would not have lease cost information collected.

To collect lease cost data current structures could be utilized. Participants in rationalized programs may submit; quota transfer forms, annual permit applications, and cooperative reports. These reporting requirements depend on the particular program and are not consistent between programs. The Council may also consider a new data collection program that is focused on the value associated with quota transfers.

### 5.1 Transfer Application and Reporting Forms

Of the options to collect lease costs theoretically the best way to collect the data would be at the transfer level. The collection at this level of detail allows for the identification of complexities that affect the value of transfers. There are trades or transfers that occur with no value, arm’s length transfers that occur between unaffiliated entities, and transfers that occur between entities with various levels of affiliation or non-arm’s length transactions. Transactions that occur at arms-length are typically the most accurate estimate of the barrier to entry for new entrants that do not have affiliations and would be the reported price when available.

RAM (NMFS Restricted Access Management Division) currently administers transfers that can be submitted electronically via eFish or in paper form. Since a form or an online transaction is already being completed at the transfer level this could be a solution with minimal burden. Unfortunately, there are several shortcomings to note; not all transfers require a form to be submitted, value information is not collected on all forms, and prices/values are not audited.

Table 4 below represents the various quota transfer reporting requirements for catch-share programs. Many cooperative-based programs are not required to submit a form when transferring quota within a cooperative. The only intra-coop transfer forms required are for the Crab Rationalization program. In these cases, the lack of intra-cooperative reporting would cause any data collected to be an underestimate of the total value and amount of leasing. Requesting forms to be completed for transfers within cooperatives would require a substantial amount of additional work that is currently not deemed a necessary management measure for cooperatively managed programs. Additional transfer forms would be an additional burden on the industry.

**Table 4 Transfer Form Requirements**

Program	Cooperative Management	Transfer Application	Intra Coop QS Transfer Application	Transfer Value on Application	Transfers on Coop Reports
AFA	Y	N*	N	NA	Y
Amendment 80	Y	Y	N	N	N
CDQ	N	Y	NA	N	NA
Crab Rationalization	Y	Y	Y	Y	N
Halibut/Sablefish IFQ	N	Y	NA	Y	NA
CGOA Rockfish	Y	Y	N	N	Y

\*Contract fishing requires a paper form submitted to RAM

### 5.2 Cooperative Reports

Currently, the AFA program and Rockfish program require cooperatives to submit the amount of transfers that occur on cooperative reports. The Rockfish cooperatives report inter-cooperative transfers while AFA cooperatives report both intra-cooperative transfers and contract fishing which is similar to inter-



cooperative transfers. Transfers aggregated at the cooperative level appear to be accounted for in amounts, the value of transfers is not currently reported and would be an additional burden. Reporting value information could be a substantial burden depending on how transfers are currently recorded by cooperatives. The cooperative reports associated with the Crab Rationalization Program have voluntarily reported average lease rates for the Bristol Bay red king crab fishery and the Bering Sea snow crab fishery in previous years. However, this lease rate reporting is not standardized or broken down into QS types, it is focused on a specific question regarding measures taken to address high lease rates. The Amendment 80 program does not currently report on transfers of quota in cooperative reports. The Halibut/Sablefish IFQ and CDQ program are not cooperatively managed.

Reporting of transfer values by cooperative would lose some of the detail of the price per pound of quota transfers however it would be suitable for the total value of transfers that occur for the programs that are cooperatively managed. The Council could request that CDQ groups report on the value of quota transfers and rely on transfer forms for values associated with halibut/sablefish IFQ.

### **5.3 Permit Applications**

Some participants in rationalized programs submit annual applications to be issued IFQ or CQ (cooperative quota). The halibut/sablefish IFQ program and the CDQ program do not submit annual applications for quota. The applications submitted are typically done at the cooperative level except for the Crab Rationalization program. The value and amount of transfers could be added to these annual forms. This option would have aspects of transfer forms and cooperative reports. Due to the nature of the forms for cooperatives, the lease cost information would likely be submitted in aggregate by the cooperative. The form would then be handled as a paper form by RAM and be subject to similar reporting issues as transfer forms. Applications are due between June 15<sup>th</sup> and November 1<sup>st</sup> depending on the program and would result in a lag between when the transfers occur and the time in which analysts would be able to access the data similar to the time lag that occurs with EDRs.

**Table 5 Annual Application Requirements**

Program	Annual Application	Cooperative Application	Quota Holder Application
AFA	Y	Y	N
Amendment 80	Y	Y	N
CDQ	N	NA	NA
Crab Rationalization	Y	N	Y
Halibut/Sablefish IFQ	N	NA	NA
CGOA Rockfish	Y	Y	N

#### 5.4 Quota/Permit Holder Leasing Data Collection

Due to the shortcomings associated with adding lease cost information to existing reporting requirements, it may be necessary to consider a new data collection that quota or permit holders in rationalized programs would be required to complete. There are several benefits to a new collection; universally applied to rationalized programs, audited values, and identification of arm’s length transactions. Currently, Amendment 80, Crab Rationalization, and Halibut/Sablefish IFQ programs submit lease cost information. Depending on the future of those data collections, a new quota/permit holder data collection would also apply to the AFA, CDQ, CGOA Rockfish, and PCTC programs.

## 6 Possible Solutions

The Universal Data Collection may be brought forward to collect crew positions, crew compensation, and crew licenses as outlined in the Universal Data Collection Form (appendix 1). Vessels that have a commercial landing in the federally or jointly managed fishery of Alaska as identified in eLandings or Catch Accounting could be included in the collection except for vessels that participate in the duplicative EDR programs, the A80 and Crab Rationalization programs. Options could be considered to allow vessels that are less than 30’ in length to opt out or vessels that are only active in state waters.

An option to collect lease cost information may be to request that cooperative reports include the value and quantity of inter-cooperative and intra-cooperative quota transfers. This option would also exclude participants in duplicative EDR programs; A80 and Crab Rationalization programs. It would also be necessary to request improvements to the lease cost information reported on quota transfers for the Halibut/Sablefish IFQ program as this program does not have cooperatives or submit EDRs. Likewise, the CDQ program does not have a cooperative structure or submit EDRs therefore NMFS would need to add pricing information to the CDQ transfer forms as is included in halibut/sablefish transfers.

These solutions would enable analysts to present crew data and lease cost data which would improve the community impacts section of analytical documents and provide insight into costs associated with rationalized programs.

## **7 Preparers and Persons Consulted**

### **Preparers**

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### **Contributors**

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## **8 Literature cited**

NPFMC, 2022. Economic Data Report (EDR) Amendments – Final Action, February 2022, <https://meetings.npfmc.org/CommentReview/DownloadFile?p=9a43752a-3f79-40c3-8aa5-c42c11202770.pdf&fileName=C1%20EDR%20Analysis.pdf>

## **9 Appendix: Universal Data Collection Sample Form**

# Universal Data Collection

CALENDAR YEAR 2023

This form can be downloaded from  
<http://www.alaskafisheries.noaa.gov>



## PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 22 hours per response, including time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden to Assistant Regional Administrator, Sustainable Fisheries Division, NOAA National Marine Fisheries Service, P.O. Box 21668, Juneau, AK 99802-1668.

## ADDITIONAL INFORMATION

Before completing this form, please note the following: 1) Notwithstanding any other provision of law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number; 2) This information is mandatory and is required to manage commercial fishing efforts for groundfish under section 402(a) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*) as amended in 2006; 3) Responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act. They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

## PRIVACY ACT STATEMENT

**Authority:** The collection of this information is authorized under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C 1801 *et seq.*

**Purpose:** In order to manage U.S. fisheries, the NOAA National Marine Fisheries Service uses economic data reports (EDRs) under the Gulf of Alaska Trawl EDR Program to collect baseline information to inform the North Pacific Fishery Management Council (NPFMC) when making conservation and management decisions. The primary purpose for requesting costs and revenues from each participant is to develop baseline information on harvesters, processors, and communities. NOAA and the NPFMC will use this information in aggregate form.

**Routine Uses:** The Department will use this information to identify fishery participants and assess management impacts on harvesters, processors, and the surrounding communities. Disclosure of this information is permitted under the Privacy Act of 1974 (5 U.S.C. Section 552a), to be shared within NMFS offices, in order to coordinate monitoring and management of sustainability of fisheries and protected resources, as well as with the applicable State or Regional Marine Fisheries Commissions and International Organizations. Disclosure of this information is also subject to all of the published routine uses as identified in the [Privacy Act System of Records Notice COMMERCE/NOAA-16](#), Economic Data Reports for Alaska Federally Regulated Fisheries off the Coast of Alaska.

**Disclosure:** Furnishing this information is required to retain federal fishing permits or federal processing permits; failure to provide complete and accurate information will result in NMFS revoking these permits.

### Introduction

This report collects data on vessels active in the federal or jointly managed fishery of Bering Sea and Aleutian Islands Management Area (BSAI) and Gulf of Alaska (GOA).

A completed Universal Data Collection (UDC) report must be submitted for each calendar year on or before June 1 of the following year.

All required reports must be submitted to the NMFS Data Collection Agent, Pacific States Marine Fisheries Commission electronically or by mail at the address provided below.

### Instructions for completing this UDC Form

- Provide all information requested in each section.
- Record only whole numbers. Round up dollar figures to the next whole dollar.
- Record a zero (0) or not applicable (N/A) where appropriate, and do not skip any questions or leave any data entry cells blank.
- All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

If YOUR label address is incorrect or missing, please correct the error on the label or print your permanent name and address here.

Vessel Name
Company Name
Street address or P.O. Box Number
City, State, and Zip Code

**The due date for UDC Submissions is June 1, 2024**

**UDC submitters are encouraged to complete the form online at <https://survey.psmfc.org>.**

If you have not received instructions for accessing the online UDC form by mail, please contact Pacific States Marine Fisheries Commission at 1-877-741-8913 or by email at [UDC@psmfc.org](mailto:UDC@psmfc.org)

If not submitting the UDC form online, mail or FAX the completed UDC form by June 1, 2024 to:

Pacific States Marine Fisheries Commission NMFS Universal Data Collection 205 SE Spokane, Suite 100 Portland, OR 97202 FAX No. 503-595-3450
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**CERTIFICATION PAGE**

This is a **required form**. Provide all information requested below.

<b>Vessel Owner Information</b>	
Name of company, partnership, or other business entity	
Name of Vessel owned (if none, enter N.A.)	
Business telephone number (999-999-9999)	
Business E-mail address, if available (email@domain.com)	

<b>Person Completing this form</b>	
Name	Title
Business telephone number (999-999-9999)	
Business E-mail address, if available (email@domain.com)	

**Signature**

Signature	Date signed
Printed Name of Vessel Owner (or Designated Representative)	

**Table 1 - Vessel Identification**

This questionnaire is designed to collect information on individual vessels even if the vessel is part of a larger company. The intent is to evaluate each vessel as a stand-alone entity. All of the following questions pertain to calendar year 2023. Indicate "N/A" for any item that is not applicable.

Vessel Name	
1. USCG Documentation No.	
2. ADF&G Vessel No. (K12345 or 12345)	

**Table 2 – Crew Compensation**

In the table below, report the total calendar year 2023 compensation including bonuses and payroll taxes, but excluding benefits and insurance. Round all answers to the nearest 100 dollars. For each item, if not applicable, enter “N/A” for the dollar amount.

Expense Category	Total Cost
1. Fishing (deck crew) labor compensation	\$
2. Processing labor compensation	\$
3. Labor compensation for all other employees (engineers, cooks, etc.) aboard the vessel	\$
4. Hired captain compensation	\$

**Table 3 – Crew Positions**

In the table below, report information about average and total number of individuals employed onboard the vessel. For individuals that worked in more than one category, report information associated with their primary category of work. If not applicable, enter “N/A”.

1. What was the average number of positions on the vessel and the total number of individuals employed during the 2023 calendar year, counting separately by fishing (deck) crew, processing employees, and all other positions. The sum of the number of positions should be the total size of the vessel's crew as reported in eLandings (on average).		
Labor category	Average number of positions aboard	Number of employees in 2023
a. Fishing (deck crew)		
b. Processing		
c. Hired captains		
d. All other employees onboard the vessel (including officers, engineers, cooks, etc)		

**Table 4 - Harvest Crew Licenses/CFEC Permits**

In the table below, report either the ADF&G Commercial Crew license number or CFEC Gear Operator permit number for each individual who worked as a licensed fishing crew member on the Catcher Vessel/Processor during the previous calendar year. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a fishing crew member during groundfish fisheries. Include deck crew, captains, officers, processors, engineers, and other fishing crew members.

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 crew member. If not applicable, enter “N/A” in the first row.

License/Permit Number	Check All Applicable		
	IFQ/CDQ	Open Access	AFA/ A80/ CGOA Rockfish
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Commercial fishing license and permit information is public record. A vessel has the right to record the crew member's license number or permit ID and no release is necessary to report the information here.



