



D6 Economic Data Report Workshops and Social Science Planning Team Report

April 2021

Action Memo

- Council Staff: Sarah Marrinan
- Other Presenters: Katie Latanich (consultant) and Dr. Steve Kasperski (AFSC, SSPT Chair)
- Action Required:
1. Review the EDR stakeholder workshop reports
 2. Review SSPT report and recommends on EDRs
 3. Consider any revisions to EDR motions

BACKGROUND

The Council is in the process of considering revisions to its Economic Data Reporting (EDR) Programs. It currently has two outstanding motions on EDRs (attached). These motions include considering levels of revision that span smaller changes (e.g., removing third party audit requirements, as included in “issue 1”), broad-scale changes (e.g., implementing more standardized EDRs with appropriate variations to address different operation and gear types- as included in “issue 2”) and considerations for removing GOA trawl EDR or all EDR Programs (as included in “issue 1”). Along with its April 2019 motion, the Council requested its Social Science Planning Team (SSPT) assist with the review and revisions to the EDRs, while incorporating opportunities for public input. A timeline of recent EDR considerations with the links to all relevant motions, meeting materials, and reports is also attached below.

The SSPT discussed EDRs at its Nov 2019 teleconference, along with reviewing an EDR conceptual framework document. The SSPT identified a need to connect variables to performance metrics to analytical questions, in order to identify if pertinent Council questions could be addressed with the available information. The team highlighted the need to incorporate industry perspective on the needs and uses of social and economic data and recommended an EDR workshop for 2020.

The Council supported a concept of a workshop, but due to the COVID-19 pandemic the workshop was not able to occur in person. Instead, a series of virtual meetings were scheduled to provide an opportunity for back-and-forth “dialogue” between SSPT members and stakeholders through iterative meetings. The intention was to hone questions from broad concepts of economic data value and burden to specific changes that could be included in an alternative set for Council consideration.

The first opportunity for stakeholder engagement was the virtual EDR stakeholder workshop held August 26, 2020 and was facilitated by consultant Katie Latanich along with Council, NMFS SF and AFSC staff. This discussion was focused broadly and across all fisheries with EDRs to allow for a more high-level discussion about cost/ burden and utility among economic data collections. The meeting had over 60 participants, including those who complete EDRs and other stakeholders. The meeting report documented a host of the current concerns and perspectives on EDR.

The SSPT held a follow-up meeting on September 21, 2020 to discuss reactions to this meeting, SSPT perspectives on use of economic data in the Council process, and a framework for organizing stakeholder

questions moving forward. The SSPT felt future stakeholder discussions were best organized by specific EDR to allow for more focused questions.

In line with this recommendation, in November 2020, the Council hosted a series of stakeholder workshops one for each specific EDR program. They were hosted online and lasted approximately two hours each. The four webinars each followed a consistent format focusing on 1) reviewing the specific EDR's purpose and need statement, 2) providing input on opportunities to improve consistency across EDRs, and 3) and more in-depth opportunity to discuss EDR forms and variables. Participation in each meeting varied from approximately 10 to 20 participants and had a small group of participants active in discussion (about 2-5). The November workshop report captures ideas from EDR-specific discussions, cross-cutting themes that emerged in multiple conversations, and stakeholder questions that can help frame the SSPT and Council's consideration of alternatives.

The SSPT then reconvened through an online meeting on March 4, 2021 to consider stakeholder feedback on EDRs and EDR recommendations to forward to the Council. The SSPT received the November workshop report. The group discussed each EDR separately providing recommendations spanning from smaller/ specific changes to opportunities for clarification of a purpose and need. The SSPT also included a recommendation to develop a consolidated purpose and need general to catch share economic data collection. The meeting concluded with a presentation of the activity of other related Council bodies (the Local Knowledge Traditional Knowledge and Subsistence Taskforce and the Community Engagement Committee) and consideration of the SSPT's next tasks.

At this April 2021 Council meeting, the SSC, AP, and Council will receive a report from Katie Latanich summarizing key themes of stakeholder discussion from the Aug 2020, and primarily the Nov 2020 stakeholder workshops. Workshop reports from these meetings are posted on the eAgenda. The SSPT chair Steve Kasperski will present a summary of SSPT discussion and recommendations related to EDRs from the March 2021 meeting. The eAgenda includes the SSPT report from March 2021 as well as two graphical representations comparing the scope of the Council's SSPT, Community Engagement Committee, and Local Knowledge Traditional Knowledge and Subsistence Taskforce.

No action is necessary after receiving these reports. However, based on the discussions and recommendations provided through the workshops and SSPT meetings, notice has been given that the Council may choose to modify its two outstanding motions relative to EDR revisions. If options/ alternatives are added into the February 2020 motion they will be analyzed with the issue 1 amendment package (note that the Council has not yet identified a preliminary preferred alternative). For instance, the SSPT made recommendations for smaller program changes that may fit into the Council's Feb 2020 motion.

In addition, analysts suggest the Council consider breaking "Alternative 3: Remove EDR requirements" out as options to consider removing each program separately. This change would make it more explicit that the Council has the ability to remove one or more programs without removing all programs. Additionally, it would make the analytical task clearer and be in line with the way regulations may change (i.e., there are regulations for each program individually). This change may also be responsive to the SSPT's recommendations for the Council to reevaluate the purpose and need statement for several programs. After further analysis, the Council would have the opportunity to speak to each program's purpose and need if it wished.

The Council also may wish to consider the relationship of the Feb 2020 motion relative to issue 2 from its April 2019 motion. This may include integrating concepts from issue 2 into the analysis for the EDR amendment package (e.g., the four bullets could be considered under the analytical baseline), whether the issue 2 motion is no longer tasked, or whether it remains in the batter's box on a separate track. Note that the SSPT recommended a concept similar to an issue raised in the issue 2 motion- considering a more standardized purpose and need for EDRs. If this Council wishes to pursue this concept, given the magnitude of change that would be required from the current EDR Programs, this may be more appropriate for a separate track.

Attachment 1: Recent timeline of EDR considerations and relevant links:

The April 2019 discussion paper documents a longer timeseries of EDR development and considerations.

Dates	Meeting	Attachments
April 2018	<p><u>Council meeting</u> In response to discussion around regulatory reform EO as well as public testimony on burdensome reporting requirements, the Council tasks staff with a discussion paper on EDR requirements and data use.</p>	<ul style="list-style-type: none"> • Regulatory reform discussion paper • Council motion
April 2019	<p><u>Council meeting</u> The Council received a discussion paper on the EDR programs. In response, it passed a motion with two parts (issue #1 – specific changes; and issue #2 holistic changes which sought SSPT input and stakeholder engagement).</p>	<ul style="list-style-type: none"> • Discussion paper on EDRs • Council motion
May 2019	<p><u>SSPT meeting</u> The SSPT received a presentation on the EDR discussion paper. The group had extensive discussion highlighting issues with data coverage and consistency and suggested a day-long technical workshop.</p>	<ul style="list-style-type: none"> • eAgenda • SSPT meeting report
June 2019	<p><u>Council meeting</u> The Council received the SSPT report and took no action.</p>	
Nov 2019	<p><u>SSPT meeting</u> The SSPT considered the EDR framework analysis and classification of data quality using the tiered framework. The group also discussed how work to map the data through performance metrics and into questions useful for decision-making could benefit a future workshop.</p>	<ul style="list-style-type: none"> • eAgenda • AFSC EDR Framework paper • SSPT meeting report
Feb 2020	<p><u>Council meeting</u> The Council received the Initial review draft analysis for EDR changes. The Council made changes to the purpose and need statement, added an alternative for removing EDR requirements, and released that analysis for public review. As a separate agenda item, the Council received a report from the SSPT on the Nov 2019 meeting.</p>	<ul style="list-style-type: none"> • Initial Review Analysis • Council motion on EDR amendment package
May 2020	<p><u>SSPT meeting</u> <i>No May meeting this year</i></p>	
Aug 2020	<p><u>EDR workshop</u> The Council hosted the first meeting in a stakeholder workshop series. This meeting included stakeholders associated with all four EDR and covered big-picture topics.</p>	<ul style="list-style-type: none"> • eAgenda • Workshop summary
Sept 2020	<p><u>SSPT meeting</u></p>	<ul style="list-style-type: none"> • eAgenda • SSPT meeting report

	The SSPT held a teleconference to consider and respond to the first stakeholder meeting. The group determined it would be beneficial to continue the workshops by EDR program to allow for more specific feedback.	
Oct 2020	<u>Council meeting</u> Council staff provided the Council a brief update on the status of the EDR workshops.	<ul style="list-style-type: none"> • EDR status update for staff tasking
Nov 2020	<u>EDR workshops</u> The Council hosted separate workshop days for A80, crab, A91, and GOA trawl EDRs. These meetings raised specific questions around the purpose and need statements and specific information collected for each EDR.	<ul style="list-style-type: none"> • eAgenda • Purpose and need statements • Working draft alts • Workshop summary
March 2021	<u>SSPT meeting</u> The SSPT is meeting to review the workshop summary and provide recommendations on EDRs.	<ul style="list-style-type: none"> • eAgenda • SSPT meeting report and recommendations
April 2021	<u>Council meeting</u> <i>The Council will receive a presentation of the EDR stakeholder workshops and the SSPT reports and consider next steps for EDR Program modifications</i>	

North Pacific Fishery Management Council
D-5 Economic Data Reporting
Motion
April 7, 2019

Issue 1 – FMP and Regulatory Amendment Analysis

The Council requests staff initiate an analysis of alternatives to revise EDR requirements and adopts the following purpose and need statement and alternatives for this analysis. Additions to the alternatives recommended by the AP are underlined.

Purpose and Need

The current economic data reports (EDRs) provide valuable information for program evaluation and analysis of proposed conservation and management measures. However, after over ten years of operating the EDR programs, some revisions are needed to improve the usability, efficiency, and consistency of the data collection programs and to minimize cost to industry and the Federal government. 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 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 3 years and another year of data will be submitted in June 2019. 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.

Alternatives

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 for third party data verification audits under the existing programs and reduce burdens associated with this process.

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

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

While the analysis is in preparation, the Council also requests that NMFS reduce the burden associated with data verification audits as much as possible under existing regulations until the Council can consider alternatives to revise the FMPs and regulations.

Issue 2 – Review Current EDR Programs

Additions to the AP motion are underlined and deletions are shown in ~~strikeout~~.

The Council recommends that staff undertake a process to propose revisions to the current Economic Data Reporting (EDR) data collection programs, including the GOA trawl EDR. Recommended revisions should consider:

- 1) The Council's previously stated needs for economic and social science information and the utility of data for analysis of impacts of Council actions and for research that provides a better understanding of the impacts of future actions;
- 2) Data that are also collected in other data collection programs (such as the Commercial Operators Annual Reports) which may be duplicative and unnecessary to collect as a part of the ~~Economic Data Reports~~ EDRs;
- 3) Alternatives for creating more consistency across EDRs to increase the utility of economic and social information in analyses of Council actions and management program reviews and to support research that provides a better understanding of the impacts of future actions; and
- 4) Tradeoffs between aggregation of elements used to reduce reporting burden by streamlining collection and the effects of the loss of detail from that aggregation on the accuracy of resulting analyses.

Staff should consult the Social Science Planning Team, (SSPT) submitters, and data users of the various EDR programs in developing these recommendations. The recommendations should be developed to reduce burden and improve the practical utility of data collected through the elimination of duplicative data elements and elements of little analytical utility and the modification of specific data elements to achieve greater consistency across EDR programs. The recommendations should also consider the benefits and costs of implementing more standardized EDRs with appropriate variations to address different operation and gear types.

~~(5) Consider removing the requirement for EDR's in the GOA Trawl fishery until such a time as there is a Rationalized Fishery in the GOA.~~

Staff should address the SSC's April 2019 comments on the EDR discussion paper to the extent practicable.

In addition, the Council requests the SSPT review the EDR discussion paper and provide recommendations to the Council at its June 2019 meeting about which aspects of review of the current EDRs are within the scope and capability of the SSPT to undertake. The Council requests the SSPT develop a plan for conducting this review. This plan should include opportunities for public input during the review, the work products that would be needed from staff to conduct the review, and a projected timeline for the review.

**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.