North Pacific Fishery Management Council

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Economic Data Reporting (EDR) Stakeholder Workshop

Webinars #2-5, November 2020

Meeting Summary and Discussion Themes

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Introduction

EDR revision process and stakeholder engagement

The North Pacific Fishery Management Council held a series of virtual stakeholder discussions in November 2020 to continue exploring potential revisions to the Council's Economic Data Reporting (EDR) programs.[1] These meetings provided the opportunity for focused discussion specific to each of the Council's four existing EDR programs. Meetings were held using Adobe Connect and lasted approximately two hours.[2]

The November 2020 EDR stakeholder discussions were part of an iterative process to support dialogue between stakeholders and the Council's Social Science Planning Team (SSPT). The Council has tasked the SSPT[3] with advising Council staff to develop recommendations for reducing burden and improving the

[1] Meetings were held 9:00-11:00 am AKT as follows: Amendment 80 EDR on Monday 11/16, BSAI Crab Rationalization EDR on Tuesday 11/17, Amendment 91 Chinook Salmon EDR on Monday 11/23, and Gulf of Alaska Trawl EDR on Tuesday 11/24.

[2] The meeting agenda and materials, including the discussion draft of EDR revision alternatives, are available via the Council's eAgenda for this meeting: https://meetings.npfmc.org/Meeting/Details/1765

[3] Council motion April 2019

practical utility of data collected through EDR programs. The Council hosted a first stakeholder discussion in August 2020 that convened stakeholders from all four EDR programs and sectors to identify cross-cutting issues and concerns. The SSPT convened by webinar in September 2020 to discuss feedback and next steps.

The next step in this process is the SSPT's development of ideas for potential changes to purpose and need statements for EDR data collections, and a range of alternatives for the Council's consideration. The SSPT will convene in March 2021 and the Council's review of the SSPT's recommendations is tentatively scheduled for April 2021. At this time the Council will consider further action, which will include additional opportunities for public input.

Workshop approach

The four webinars followed a consistent format. Staff analyst Sarah Marrinan began by providing an overview of discussion draft EDR revision alternatives, which is included in the next Section. This set of draft alternatives was provided for discussion purposes only, to help frame the meeting tasks and elicit focused feedback from stakeholders.

Each group then discussed the following three tasks.

Meeting tasks

- Review EDR purpose and need
- Provide input on opportunities to improve consistency across EDRs
- Review EDR forms and variables

Participation in each meeting varied from approximately 10 to 20 participants, including industry and community stakeholders as well as additional Council staff, NMFS and Alaska Department of Fish and Game staff, SSPT members, and staff with the Pacific States Marine Fisheries Commission, which operates as NMFS' designated Data Collection Agent (DCA) for EDR collections. Each meeting had a small group of participants active in discussion (about 2-5), with additional participants in listen-only mode able to contribute questions and comments using the webinar's chat function. This summary includes perspective from participants but for the most part it was not feasible or very helpful to generalize comments by saying "most participants agreed," or "the majority," etc. both due to the number of participants and the format of the workshops. Comments in this summary are not necessarily representative of an entire sector's view; however, this discussion format allowed for more in-depth and candid responses from those active in the discussion.

The process for engaging stakeholders in the discussion of potential EDR revisions is being led by Sarah Marrinan, staff analyst and SSPT Coordinator; and SSPT Chair Steve Kasperski (NMFS Alaska Fisheries Science Center), with additional support and facilitation provided by an external consultant, Katie Latanich. Brian Garber-Yonts (NMFS Alaska Fisheries Science Center) and Scott Miller (NMFS Alaska Regional Office) also contributed to all four meetings.

The four stakeholder discussions were intended primarily as listening sessions. Council and NMFS staff (collectively referred to as "analysts") participated in discussion, provided context and responded to questions. The following summary 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.

Discussion draft alternatives for EDR revisions

Analysts provided the following draft set of EDR revision alternatives, which was developed with input from the SSPT. This draft was intended as a working document and describes a simplified range of EDR changes for consideration. **These discussion draft alternatives were provided to frame stakeholder discussions and are not comprehensive of all alternatives the SSPT could develop for the Council to consider.**

The Council's April 2019 motion identifies two related issues; Issue 1: FMP and Regulatory Amendment Analysis, and Issue 2: Review Current EDR Programs. Given the linkage between these two issues, the following set of discussion draft alternatives provides a structured approach to considering both issues in combination.

Alternatives and options that are underlined were part of the Council's Feb 2020 motion; however, these alternatives and options have been somewhat reorganized in this form.

Alternative 1. No action, status quo

Alternative 2. Smaller changes to existing EDRs (generally, under the current purpose and need statements). Make the following revisions, where needed, in the EDR sections of the crab or groundfish FMPs and in the EDR regulations. *(components not mutually exclusive)*

> Component 1. 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 all EDR programs to make those data aggregation and confidentiality protections comparable to the requirements under other data collection programs.
>
> Component 3. Revise EDR collection period to every (options: 2 years; 3 years; or 5 years)
>
> Component [x]: *Any additional small changes to one or more existing EDR programs, for example: pre-populating some data cells (for an individual/business's EDR, based on information provided in the previous year's EDR); adopting a minimum threshold requirement (e.g. lbs. landed or processed) to trigger EDR requirements, eliminating or revisiting certain questions*

Alternative 3. Holistic changes to EDRs (reconsider existing purpose and need statements)

> Option [x]. *For example, if the intention is for EDR data to more routinely inform Council decision documents, an EDR that is (relatively) consistent across fisheries may increase the utility for decision-making and analytical purpose while balancing considerations of reporting burden.*

Alternative 4. Remove reporting requirements for *(components not mutually exclusive)*

> Component 1. GOA Trawl
> Component 2. Crab Rationalization
> Component 3. Amend 80
> Component 4. Amend 91

Clarifications

Participants raised the following questions regarding the **structure** and **organization** of this draft set of alternatives. Additional discussion of the content of draft alternatives appears in later sections of this document.

Combinations of alternatives

Participants questioned whether draft alternatives are intended to be mutually exclusive or could be combined. Sarah Marrinan clarified that the alternatives are currently mutually exclusive, but that as they are further developed by the SSPT and Council one alternative could incorporate components of another. As one example, Alternative 3: Holistic changes to EDRs could also include amending the regulatory language in EDR programs regarding third party data verification audits (Alternative 2, Component 1).

Process for revising audit requirements (Alternative 2, Component 1)

Participants questioned the inclusion of Component 1 to revise authorization for third party data verification audits; their understanding was that the audit requirement had been discontinued. Scott Miller clarified the requirement for automatic audits has been suspended. Currently, EDR regulations do not require third party audits, but rather authorize NMFS to conduct audits via the DCA (i.e., PSMFC) or a contracted auditor (EDR regulations vary between programs in details regarding data verification audits). By suspending the use of third-party audits as a routine element of EDR data quality assurance procedures without amending EDR regulations, NMFS retains the regulatory authority to conduct audits but will only do so in cases of suspected gross misreporting. To date, no audit has found any cases of intentional misreporting. Scott Miller explained the Council could amend regulations to explicitly state that audits are authorized but not automatic and would be applied under specific and consistent circumstances.

Structure and scope of holistic revisions (Alternative 3)

Participants asked how holistic changes to EDRs could be structured. Holistic changes would involve reconsidering the existing purpose and statement for one or more EDR programs, for example to improve consistency across data collections. Analysts included this alternative in response to the Council's 2019 motion, which instructs staff to develop recommendations that consider alternatives for creating more consistency across EDRs. Analysts deliberately left Alternative 3 open-ended to elicit feedback from stakeholders before developing more specific examples of holistic revisions. Participants asked whether the scope of EDR revisions is limited to the four existing programs, or whether EDRs could potentially be extended to include other fisheries. This topic is discussed further in Section 2.

Discontinuing EDR collections

As part of the discussion of EDR purpose and need statements, participants questioned the intended duration of EDR collections. Scott Miller explained EDRs exist in regulation and would require a regulatory amendment to discontinue, but that this question merits additional analysis. As a possible exception, he noted that the original 2002 purpose and need statement for the BSAI Crab Rationalization specifies that the EDR will continue as long as there is a LAPP program in place, but that this language is not included in the second purpose and need statement adopted in 2012 in association with amendments to revise the Crab EDR program.

Discussion

1. Perspectives on EDR Purpose and Need Statements

Discussions began with each group reviewing the purpose and need statement for their sector's EDR program.[4] Each of the Council's EDR programs was developed under different circumstances and with a different intent. Purpose and need statements document the Council's rationale and data collection objectives for each EDR program and provide a frame of reference to assess whether these objectives are being met and continue to be relevant.

The Council's assessment of the relevance of EDR purpose and need statements will guide the next steps in the EDR revision process. The Council could make small adjustments to EDR programs to improve utility and reduce burden within the scope of existing purpose and need statements. However, significant revisions to EDR programs might entail revising or developing a new purpose and need statement for one or more EDR programs. For example, analysts noted that some EDR purpose and need statements are narrowly focused and would not be compatible with improving consistency across EDRs.

Participants considered the following two discussion questions. The purpose of this discussion was to reflect broadly on the relevance of EDR purpose and needs and not to offer specific suggestions for revisions or wording changes. Any revisions to purpose and need statements will be within the Council's purview and not the responsibility of the SSPT.

Discussion questions

- Is the original purpose still relevant to the Council's needs today?

  Why or why not?
- Do you feel the information collected through your sector's EDR is responsive to the purpose and need statement? Why or why not?

The four EDR purpose and need statements communicate the Council's rationale at the time each program was developed. EDR purpose and need statements were also shaped by other contexts, such as concurrent events and Council actions, that may not be explicitly captured. The Council record[5], institutional knowledge, and individual recollections can all provide additional insight to interpret the Council's intent. As part of the introduction to each EDR purpose and need discussion, analysts reflected on the history of EDR program development and evolution of purpose and need statements over time. The remainder of this section summarizes points from all four meetings to provide a more cohesive picture of how purpose and need statements evolved with each subsequent program.

Brian Garber-Yonts explained that each successive purpose and need statement reflects, to some degree, experience gained in the development and implementation of previous EDR programs. The first EDR for BSAI Crab Rationalization (implemented in 2005) had a very broad purpose and need statement, encompassing analytical objectives addressing the full scope of social and economic objectives in the

[4] EDR Program Purpose and Need Statements

[5] See Table 4 of the March 2019 Discussion Paper: Alaska Region Economic Data Reporting Programs for a comprehensive timeline

crab FMP. This resulted in highly detailed EDR forms that ultimately proved excessively burdensome for submitters and yielded substantial data quality limitations. Brian noted that the Council initially defined a broad purpose and need for the Amendment 80 EDR, similar to that developed earlier for the crab program, but ultimately chose to more narrowly address the economic efficiency effects of bycatch reduction measures within the sector in the purpose and need for the Amendment 80 EDR. This resulted in comprehensive, itemized cost and capital expenditure reporting (as well as production capacity and other variables) in the A80 EDR form approved by the Council in 2008, but at a level of detail that avoided the excessive reporting burden and data quality concerns attending the original crab EDR. In narrowing the purpose and need for the Amendment 80 EDR in 2006, however, the Council concurrently initiated the development of a comprehensive socioeconomic data collection program that would span multiple fisheries and sectors, formulating a standing committee for this purpose. This effort was ongoing between 2006 and 2010, when the initiative was suspended by the Council pending a review of the EDR program and revision of the crab EDR.

In stating its purpose and need for developing a revised crab EDR (implemented in 2012), the Council prioritized eliminating variables from crab EDR forms to reduce reporting burden and improve data quality. However, the Council did not explicitly redefine the scope of analytical objectives encompassed in the original purpose and need for the data collection itself and stated its intention to reconsider expanding the content of the crab and other EDR data collections to include additional information as analysts' knowledge and experience with collecting and using EDR data develops. Upon finalizing its preferred alternative for a substantially streamlined crab EDR in 2012, Brian noted that the Council adopted a "cooling-off period" in further development of EDR programs, suspending the comprehensive data collection committee. This experience led to the Council developing subsequently more focused purpose and need statements, first for the Amendment 80 EDR program and later for the Amendment 91 and the Gulf of Alaska Groundfish Trawl EDR programs.

Brian noted that the comprehensive data collection initiative was ongoing during the development of several EDR programs. From his perspective the existing EDRs were conceived as an initial approach pending the development of a more consistent and broadly conceptually founded data collection program.

Cross-cutting themes

The following themes came up consistently across most or all EDR program discussions.

Focus and scope of data collections

Groups considered whether their EDR programs are intended to be broadly informative to a range of council actions over time, or more focused on a particular question or analytical need, a Council action, or a point in time. Sarah Marrinan noted that EDR data collections are not necessarily designed to provide data that can be used in every analytical document; some are intended to understand the implications of a program as it develops. Analysts also noted the utility of EDR data for meeting broad Magnuson-Stevens Act analytical mandates and ongoing assessment of fishery management performance relative to FMP objectives, including assessing changes to net benefits and conducting catch share program reviews.

Participants in the Amendment 91 and GOA Trawl EDR Program meetings identified concerns specific to the focus of these two programs. Analysts and stakeholders agreed the relevance of the Council's stated purpose and need for the GOA Trawl EDR program has changed, given that the Council is no longer in the process of developing a rationalization program for the fishery. In addition, analysts and participants agreed the Amendment 91 purpose and need is narrowly focused on assessing the economic efficiency

of chinook salmon bycatch avoidance achieved under Incentive Plan Agreements and other measures established under Amendment 91, but that as implemented, the data collection does not provide adequate data to support that analysis. In its current form this purpose and need statement would not be compatible with consistency across EDRs.

Analysts also responded to questions and comments relative to the role of NMFS versus the Council in the design and implementation of the EDR Program. All EDR data collections were mandated and adopted by the Council, according to analytical questions and data collection objectives identified and prioritized by the Council. The Council's reliance on input from NMFS and other sources of relevant scientific and technical expertise has varied by program. Analysts remarked in some cases that the utility of EDR data is limited by the design of the data collection or the short time frame in which the data collection was developed. However, analysts felt that the design of EDRs could be improved to better achieve the stated objectives of the data collection and FMP.

Drivers and organizing principles for EDR programs

Groups reflected on the drivers and commonalities that link the four existing EDR programs. This discussion is relevant to the issue of consistency across EDRs, and the broader questions of which fisheries have (or should have) EDRs and why. Participants questioned whether the key commonality across existing EDR programs is their focus on Limited Access Privilege Programs (LAPPs), or the focus on assessing economic impacts of bycatch management. Analysts agreed both issues are linked to some degree; for example, consideration of GOA trawl rationalization was prompted in part by salmon bycatch.

One participant questioned whether there should be more consistency among purpose and need statements for similar purposes, with data collections tailored to the needs of each program. For example, there could be consistent purpose and need statements for EDRs focusing on the economic impacts of catch share programs, and those focusing on the economic impacts of bycatch management measures. Brian Garber-Yonts noted that the focus of purpose and need statements has progressively grown narrower, and that a generalized purpose and need statement could omit important history and context of each EDR.

Responsiveness and applications of EDR data

Managing expectations for the use of EDR data came up in multiple discussions. In response to the discussion questions for this task, participants considered whether the data collected through their sectors' EDR forms are responsive to the purpose and need statement for their EDR program. (In other words, do you believe we're collecting the right information?) Analysts commented that in considering responsiveness it's necessary to establish realistic expectations for how EDR data can be used for analysis. They explained EDR data is intended for monitoring and explaining the economic performance of the fisheries, but the level of detail in some EDRs may not be sufficient to support more complex analyses such as predicting the magnitude of a change in operating costs due to specific impacts of Council actions.

Duration of economic data collections

In all four discussions, participants wondered how long EDR programs should be in place to accomplish their objectives. In particular participants questioned how long it takes to establish a baseline for monitoring economic conditions, and whether the term baseline refers to a single snapshot in time or one that changes over time (i.e. a "rolling" baseline). Groups also questioned how long it takes to assess the economic impacts of implementing management measures, and suggested EDRs provide diminishing returns over time following the implementation of a new management measure.

Participants also asked whether the time frame for EDRs should be specified. A participant in the Amendment 91 discussion felt that the fact that it did not include duration of the program was a shortcoming of that program's purpose and need statement.

Finally, participants shared their concern about the perception that "more data is better." Several participants noted that once implemented, a data collection program is difficult to discontinue. These participants reiterated that data collections impose a burden in terms of cost and time commitment and should be objective oriented and address a clear need.

Discussions by EDR program

In addition to the cross-cutting themes above, participants discussed the following specific attributes of their EDR programs' purpose and need statements.

Amendment 80 EDR

The Amendment 80 group held an in-depth discussion of this sector's EDR purpose and need statement focusing on two topics: 1) the utility of EDR data for assessing the incremental economic impacts of bycatch reduction measures over time, and 2) whether this EDR is or should be focused on the economic impacts of bycatch reduction, or more broadly on the economic performance of the Amendment 80 fleet.

Economic impacts of bycatch reduction measurement

The group reflected on the responsiveness of the Amendment 80 EDR to the purpose and need statement. One industry participant questioned the utility of this EDR for assessing the incremental impacts of bycatch reduction measures over time. Prohibited species catch (PSC) reductions have been an ongoing process rather than a one-time change, beginning with the implementation of Amendment 80 in 2008, followed by additional phased-in bycatch reductions as part of this action, additional reductions in 2015, and potentially further reductions as part of the Council's consideration of abundance-based management (ABM) for Pacific halibut. This participant felt that in general it's important to assess the economic impacts of additional reductions to PSC but questioned whether EDR data enable analysts to assess the incremental impacts of bycatch reductions relative to the measures taken under Amendment 80, and specifically whether this data is sufficient to predict economic impacts associated with ABM.

Council staff economist Sam Cunningham commented that with regard to ABM of halibut, EDR data has primarily been used in terms of crew activity. He explained that the Council is broadly interested in practicability of bycatch reduction measures, and the industry's ability to accommodate PSC limits in the context of bycatch mitigation efforts the Amendment 80 sector has already undertaken. He encouraged industry participants to consider what is or could be included in an EDR to provide insight into these broad questions given that Amendment 80 companies each operate differently. Sam noted that while stakeholders have asked very specific questions (e.g., the level of PSC reduction at which companies can no longer cover their fixed costs) it may not be possible or necessary to reach this point analytically for the Council to make their best-informed decision.

EDR focus

Industry stakeholders and analysts observed the Amendment 80 purpose and need statement refers specifically to monitoring the economic impacts of bycatch reduction, and also establishes broader objectives for data collection. Some industry participants interpreted the purpose and need as being narrowly focused on bycatch. Analysts noted language in the purpose and need that speaks to the broader utility of EDR data and noted its use to fulfill MSA requirements for programmatic reviews.

Industry participants shared concerns relating to a narrower interpretation of the purpose and need focusing on bycatch. Comments included that the level of detail in the EDR is burdensome and may not be necessary to identify trends, that some variables are reported annually but change infrequently (discussed further in Section 3), and that it's unclear how some of the information (e.g. days inactive or offloading) is useful for assessing economic impacts of bycatch reduction. One participant highlighted information they believe provides useful insight (e.g., changes to catches and revenue, CPUE, increased expenses due to bycatch avoidance via behavior, decreased efficiency via deck sorting), most of which is already collected by NMFS through other means. Another observation was that it's difficult to tease out the impacts of bycatch reductions from other factors and ask the right questions; Steve Kasperski agreed that assigning causality between bycatch reduction measures and costs is difficult, but that is not necessary for the data collection to provide useful information about the economic performance of the fishery over time. Some felt that if the Council considers changes to the purpose and need statement for the Amendment 80 EDR program a broader focus on general trends in economic performance of the fleet would be appropriate.

BSAI Crab Rationalization EDR

Discussion of the BSAI Crab EDR focused primarily on the history of the two purpose and need statements for this EDR program. The Council drafted the original purpose and need statement when this EDR program was developed in 2002 and developed an updated purpose and need statement when they substantially revised the EDR program in 2012. Scott Miller described confirming with NOAA General Counsel that the 2012 purpose and need statement legally supersedes the 2002 version.

The group considered how the existence of these two purpose and need statements might inform the Council's consideration of revisions. Participants did not express any specific concerns about the relevance or responsiveness of the current purpose and need statement.

Scott Miller noted if there are elements of the 2002 purpose and need that were not expressly carried forward or unintentionally left out, such as the language about the EDR program continuing in perpetuity as long as there is a rationalization program, this EDR revision process is an opportunity for the Council to capture the elements they want to include moving forward.

Brian Garber-Yonts shared his perspective that the original 2002 purpose and need sets the council's intent for the EDR program, including monitoring the stability of harvesters, processors, and coastal communities; assessing performance and community impacts of the BSAI crab rationalization program, and supporting analysis of future fishery management plan amendments. He noted the 2012 revision addresses concerns about data quality and excessive burden in the original EDR design but does not explicitly state the intended use of the data beyond collecting "informative" data. His interpretation is the Council intended to address the immediate challenges of burden, level of detail, and accuracy, but also supported the idea of revisiting the EDR in the future and did not dismiss their broad information and analytical objectives. He felt the Council's current EDR revision process provides an opportunity to improve clarity and completeness of the information collected while also considering burden and implementation costs.

Amendment 91 Chinook Salmon EDR

Analysts and industry participants agreed the purpose and need statement for this EDR program should be revisited. Industry participants further stated the purpose and need are no longer relevant and that the EDR should be discontinued. This discussion focused on two themes: 1) the relationship between the EDR program and the incentive plan agreements (IPAs) and requirement for annual reports instituted under Amendment 91, and 2) managing expectations of the EDR program to provide insight into complex bycatch avoidance behavior.

Relationship of EDRs to IPA reports[6]

The Amendment 91 EDR and annual IPA reports are both intended to help the Council evaluate the effectiveness of IPAs as a bycatch management strategy. The EDR purpose and need also states the EDR program will "provide data for the agency to study and verify conclusions drawn by industry in the IPA annual reports." One participant felt strongly that the EDR program is duplicative of the annual IPA report requirement and the effort invested by industry to understand the effectiveness of IPAs. They felt the phrase "study and verify" implies the IPA data is not trusted. They noted IPA reports are made publicly available each year. They stated the industry has requested but not received feedback from the Council, agency, or public on how to improve IPA reports. They felt that given this lack of feedback, EDRs are no longer useful and that suggestions for better assessing the effectiveness of IPAs could be implemented through the IPA report process if needed.

Stakeholders and analysts had different perspectives on whether the Amendment 91 EDR program was designed with an understanding of the information that would be included in IPA annual reports.

Insight into bycatch avoidance behavior

The group raised concerns about whether EDRs in fact provide useful insight into bycatch avoidance behavior and costs to industry, and provided specific feedback on the three EDR forms that comprise this program. Brian Garber-Yonts commented that in his view the effectiveness of this EDR program has been limited by a lack of opportunity to fine-tune and adjust the objectives and design of the program.

Compensated transfer report: The group noted that the compensated transfer report has never been used. The intent of this form was to determine the value of salmon bycatch to the fleet. One industry participant stated that this approach does not align with how the industry operates; they would not assign a monetary value to bycatch and have other procedures for accomplishing a transfer of PSC.

Vessel master survey and vessel fuel survey forms. In combination, these forms are intended to provide insight into whether behavior changed due to bycatch avoidance, and enable analysts to estimate the cost of bycatch avoidance with information from the vessel fuel survey and Vessel Monitoring System (VMS) tracks. Brian Garber-Yonts noted this data collection has not functioned as intended, first because vessel movement data was not collected as anticipated and because vessels might move and incur bycatch avoidance costs for other reasons than a high-bycatch tow, such as word-of-mouth communication within the fleet. The group also discussed concerns about the qualitative format of the vessel master survey. Analysts felt the survey design could be changed or improved to improve efficiency and data quality while reducing burden. Brian Garber-Yonts suggested the survey protocol could be revised to ensure responses are collected independently and at the end of pollock A and B seasons. Steve Kasperski added that there could also be other, less burdensome methods for collecting information, such as through a voluntary post-season skipper survey.

[6] Amendment 91 provides an approach to managing Chinook salmon that combines a prohibited species catch limit with an incentive plan agreement and performance standard designed to minimize bycatch to the extent practicable in all years. The Council requests the submission of annual reports detailing the use of cooperative quota as a way to track the effectiveness of cooperatives and their ability to meet the Council's goals. Annual reports also enable cooperatives to provide feedback to the Council. Minimum information requirements are specified in regulation. The Council can choose to supplement this with additional information requests so long as these requests are approved by the Office of Management and Budget under the Paperwork Reduction Act.

Analysts and industry participants agreed it's necessary to revisit the expectations of this EDR program and consider whether they are realistic. One industry participant emphasized that bycatch avoidance is one of many factors that can influence vessel movement and fishing behavior, and that assessing behavior and evaluating the effectiveness of IPAs is a complex challenge. They felt NMFS was clear at the time of implementation that while it's possible to determine whether IPAs met the criteria for approval, but not to assess their effectiveness. Steve Kasperski and Scott Miller agreed with the importance of managing expectations, and in particular acknowledging that existing A91 EDR data is not sufficiently detailed to support answering specific, complex questions or informing predictive models.

Further discussion of the vessel master survey is highlighted in this outline under Section 3, EDR- and Sector-Specific Considerations.

GOA Groundfish Trawl EDR

Stakeholder participants and analysts agreed with the need to revisit the purpose and need statement given the Council's decision not to move forward with the GOA trawl bycatch management program. Industry participants felt the EDR is no longer relevant and that it has already served its purpose of establishing a baseline. Participants also raised concerns about data quality, including interpretation by- and consistency-across respondents as well as how the information can be used for analytical purposes. One participant voiced their concern that there is resistance to discontinuing a data collection once started, and stated they don't support changing the purpose and need to make it more relevant.

Stakeholders also shared concerns related to equity and inconsistency of purpose across all EDR programs. They questioned why this particular sector bears the burden of completing EDRs, when EDRs are not required consistently across all catch share programs or groundfish fisheries. Participants also emphasized the need to be mindful of burden. The cost of administering the GOA Trawl EDR is not supported through cost recovery. In addition, any data collection comes at the cost of time and foregone opportunities such as time with family, particularly since this sector includes smaller operations with less accounting support than corporate entities. They felt the burden of completing EDRs is exacerbated by concerns about data quality and the lack of a compelling reason why the need and utility outweigh the costs.

2. Consistency across EDR programs

The second workshop task asked participants to provide input on opportunities to improve consistency across EDR programs. This task specifically addresses draft discussion Alternative 3: Holistic changes to EDRs and would involve revisiting the purpose and need statements for one or more existing EDRs.

This discussion was responsive to guidance provided by the Council's 2019 motion as well as to stakeholder concerns regarding the utility of EDRs for informing analyses and supporting Council decision making. SSPT members and analysts have noted that inconsistency and fragmentation across EDRs is a primary challenge to using EDR data more routinely in analyses. Council actions and analyses often span multiple fisheries, and in these scenarios EDR data is typically not used in order to provide a consistent approach across sectors with and without EDR requirements. Sarah Marrinan pointed to the February 2021 analysis of crab PSC limits in BSAI groundfish trawl fisheries as an example of a scenario in which more comprehensive economic information is available for one fleet (in this case Amendment 80) but has limited utility for assessing impacts across sectors.

Discussion draft Alternative 3 was intentionally left open-ended for this round of stakeholder webinars to encourage participants to provide their own ideas. There are a number of ways EDR purpose and need statements and data collections could be structured to achieve greater consistency, depending on the desired comprehensiveness and use of the data collected. For example, a consistent EDR could

follow a streamlined approach focusing on a few consistent questions that come up routinely in the analytical process. A consistent EDR could also cover a more comprehensive range of variables to provide insight into trends and support long-term monitoring and evaluation of a variety of fishery performance indicators.

Participants in the Amendment 91 discussion asked whether the scope of EDR revisions is limited to the four existing programs, or whether EDRs could potentially be extended to include other fisheries. Sarah Marrinan clarified the Council's motion addresses the current EDR programs. However, expanding EDRs to other fisheries is one approach the Council *could* consider as a strategy to address the issue of fragmentation and improve the utility of EDR data. Analysts agreed further Council guidance is needed. One participant in the Amendment 91 group stated their perspective that this effort should focus on current EDR programs and not expand to other fisheries.

Groups reflected on the following discussion questions regarding consistency.

Discussion questions

- What information do you think would be most valuable to gather consistently across fisheries? *(For example, analysts pointed to crew compensation and employment data as information that EDR respondents believe is valuable to provide to the Council.)*
- Are there attributes of your fishery that you would like the Council and analysts to better understand?
- What other ideas and options would you like the Council to consider if they choose to continue exploring the idea of a consistent EDR form?

The discussion of consistency across EDRs was more open-ended than the other two meeting tasks. Participants noted that they have limited familiarity with the EDRs completed by other sectors, making it difficult to draw comparisons or comment on the utility or burden of collection-specific variables across sectors. Participants also found it challenging to address the issue of consistency independently of their perspective on the relevance and responsiveness of their sector's EDR program. The four discussions explored similar concerns and considerations, which are summarized below.

Linkage to purpose and need discussions

Each group's discussion of consistency was closely linked with the previous task of reviewing EDR purpose and need statements. The groups felt the concerns they raised about burden, utility, and clarity of purpose would also apply to the concept of consistency. In addition, participants observed their EDRs were designed to meet a specific purpose and need, and that EDRs generally have been designed for different fisheries and to meet different needs. Some felt the utility of a consistent EDR would be limited given differences in the programs, participants, and economic concerns of the fisheries with EDR requirements.

Need for simplification and consistency of interpretation

Participants commented EDRs would need to be simpler and more generalized if the intent is to allow for comparisons across sectors and gear types. In particular they felt data that is difficult or complex to report, and questions that may be interpreted differently by respondents, indicate a need for generalization. The issue of consistency across responses was identified as a particular concern by participants in the GOA Trawl and Amendment 80 discussions. The need for simplification also relates to reporting burden. Participants in the Amendment 80 discussion recognized this EDR is particularly

complex and detailed, and noted some fisheries have more resources and accounting support than others to support economic reporting.

Amendment 91 EDR

Industry participants and analysts agreed the Amendment 91 EDR program's sole focus on bycatch makes the program fundamentally different from the other three EDR programs, and that the current purpose and need statement does not align with the concept of consistency across EDR programs for broader program evaluations. An industry participant also noted the AFA requirement to provide annual co-op reports as an additional reporting requirement.

One interpretation of consistency could involve collecting more consistent economic information across catch share programs, including the AFA program. For example, Steve Kasperski noted that information about crew employment and compensation is not available for the AFA program. There was additional discussion of what information about crew is and is not available for the AFA program. Several participants felt strongly that consistency across programs is not the right approach for assessing different programs and purpose and need statements and expressed their concern about the general burden of data collection and collecting data for the sake of data. One participant felt there is limited utility to assessing the Congressionally mandated AFA program more broadly because the Council's ability to make changes is limited.

Steve Kasperski reinforced that EDRs are a Council-mandated data collection. Analysts use these data to inform the Council and fulfill their requirement to consider the impacts of regulations on the industry and changes to net national benefits and comply with the requirement to conduct allocation and program reviews. He reiterated that consistency across data collections can enhance the utility of EDR data and noted the recent BSAI Pacific cod mothership action as an example of fragmentation limiting the utility of EDR data; in this example detailed cost information was available for the Amendment 80 sector but not the AFA sector, and thus existing EDR data was not able to be effectively used.

GOA Trawl EDR

<u>Complexity of the GOA region</u>

One participant commented on the complexity of the Gulf of Alaska region as a contributor to the fragmented nature of EDRs and the difficulty of developing a consistent approach. The Gulf of Alaska is a complex region with a wide range of stakeholders including communities, fisheries, and other gear types, and in addition the different regions of the Gulf have distinctive characteristics. This participant felt collecting information just from the GOA trawl fishery has limited utility for any purpose, whether as a baseline and analytical input for rationalization or for informing broader analyses. They felt a baseline would need to include all fisheries in GOA, though qualified they are not advocating for this option. Furthermore, a more consistent EDR designed for broad utility across fisheries would be unreasonably lengthy and burdensome.

3. EDR and sector-specific considerations

The following section includes a detailed summary of sector-specific ideas and concerns. These points primarily came up under the third workshop task of reviewing EDR forms and variables. This was not a comprehensive review of all EDR forms and questions, but rather a participant-led exploration of "pain points" that could present opportunities for clarification, streamlining, or other changes under a range of EDR revision scenarios.

As an important caveat, the discussions below should not be construed as participant support for maintaining EDR requirements in general, or for Alternative 2 of pursuing minor changes within the

scope of existing purpose and need statements. These discussions provide additional context into fishery operations, recordkeeping practices, and reporting burden that can continue to frame the Council's exploration of EDR revisions.

Discussion questions

- How would changing the frequency of data collection (every 2, 3, or 5 years) change the burden of data collection for you and your company? How would it impact your recordkeeping practices?
- Are there other examples of small changes to your sector's EDR that you think could reduce burden to you, your business, or your sector?
- Are there specific questions you find vague, or that you are concerned other respondents may be interpreting differently than you do?

Frequency of data collections

Each of the four EDR meetings considered the frequency of EDR collections. This addresses draft Alternative 2, Component 3, which proposes revising the EDR collection period to every 2, 3, or 5 years, within the scope of the existing purpose and need statements for each program. This component was added by the Council in their February 2020 motion. The themes from these four discussions of frequency are combined in this section to provide a comprehensive summary of the questions and considerations discussed.

In all meetings, participants asked analysts to clarify whether adjusting the EDR collection period would mean reporting a single year's worth of data every 2, 3, or 5 years, or reporting multiple years' data (for example, reporting two years of data every two years). Analysts responded since the intent of this approach would be to reduce burden, they interpreted this as reporting on a single year. Brian Garber-Yonts added there are other ways of adjusting the frequency of EDRs to reduce burden. For example, Amendment 80 participants highlighted some information that does not change often and could be incorporated into the EDR with a different frequency.

The purpose of this discussion was to explore the assumption that adjusting the frequency of EDRs would reduce reporting burden, and to consider tradeoffs between reporting frequency and burden relative to data quality and utility. Brian Garber-Yonts observed that when an EDR program is initially implemented the first years of reporting are more burdensome than subsequent years. He suggested data quality improves and reporting burden decreases as respondents gain familiarity with the reporting process over time.

Analysts asked the groups whether administering EDRs less frequently could result in a loss of continuity that might increase burden and adversely impact data quality. For example, with a longer period between submissions respondents might find it more burdensome to recreate their process, or there could be turnover in the staff contributing to EDR reporting. Analysts also asked whether EDR respondents track information specifically for the purpose of completing EDRs, and whether altering the frequency of EDRs would impact their bookkeeping practices.

Themes of discussion relative to EDR frequency

Across the four discussions, industry participants felt reducing the frequency of EDR collections would reduce reporting burden. A participant in the Amendment 80 discussion noted there is some information they would continue to monitor annually to see if it is on trend. Participants in the BSAI crab discussion commented they do track some information and maintain recordkeeping with EDRs in mind but that information is generally drawn from routine annual bookkeeping.

Participants also felt completing EDRs less frequently should not contribute to data quality issues. The group felt EDRs should be sufficiently straightforward that a new bookkeeper could complete them without difficulty. GOA trawl participants questioned whether analysts have seen an improvement in data quality of the duration of the GOA Trawl and other EDR programs.

Multiple groups also recognized that less frequent EDR reporting could impact the utility of EDR data for monitoring and interpreting trends over time. Brian Garber-Yonts noted that year-to-year changes might not be captured, particularly if there is an event (e.g., Covid-19) that impacts the economics of a fleet in a year that data is not collected. Some participants agreed there is value in monitoring trends over time and understanding the impacts of anomalies and fishery events.

Some participants also felt reducing the frequency of data collection would be inconsistent with the purpose and need and objectives for their sector's EDR programs. Regarding the Amendment 91 fuel survey, one participant commented that less frequent reporting would be less valuable unless looking at an average over time. Another commented there is already a baseline for fuel costs in terms of vessel characteristics by mode, and that year-to-year differences are mostly a function of fuel price. In the GOA Trawl group a participant commented that a longer interval between data collections would not be consistent with the intent of establishing a baseline to monitor the impacts of fishery rationalization.

Discussions by EDR Program

Each of the four meetings had an in-depth discussion of attributes specific to that sector and the current EDR form(s).

Amendment 80 EDR

The Amendment 80 (Groundfish trawl CP) group reviewed the Amendment 80 EDR form and identified opportunities for streamlining and clarifying, focusing on variables that change infrequently and could potentially be reported on a less frequent or as-needed basis.

Components of burden

The conversation began with a high-level discussion of burden. Brian Garber-Yonts explained the Amendment 80 EDR form was designed to align with the way companies itemize costs and capital investment expenditures for tax purposes. He asked participants whether the information submitted in the EDR form is easily exported from accounting software, and if so, whether there is substantial incremental burden to reporting more complete cost information. One industry participant commented that there is some information they track specifically for the purpose of completing EDRs, such as fuel use by mode, that increases reporting burden. Another participant commented that some of the financial information reported in EDRs can be exported from accounting software, qualifying that over time their company has adapted their accounting procedures to streamline the process of completing EDRs. For other EDR fields the burden of reporting stems from the need to develop a strategy (e.g., how to calculate freezing capacity) or from tracking detailed information over the course of a year (fuel consumption). This participant noted there is time involved in compiling this information into a single document with explanatory comments for reference, particularly in the event of an audit.

EDR fields that change infrequently

The group discussed the following EDR fields that change infrequently.

Table 1 – Vessel Identification: This table includes vessel documentation and permit information, and physical characteristics such as tonnage and horsepower. Participants said this information generally does not change unless the vessel or permits change hands, or in the case of major vessel work such as repowering or lengthening.

Table 2.1 – Vessel Characteristics: Survey Value: One participant commented that surveys are primarily conducted for insurance purposes and not updated every year. They suggested this information could be updated when a new survey is completed.

Tables 2.2 – Vessel Characteristics: Fuel consumption: Fuel consumption rates should not change much over time unless significant capital investments are made. One participant added the breakdown of fuel consumption by mode is challenging and that any changes in efficiency are difficult to attribute; they felt reporting the total amount of fuel purchased and the cost would be less burdensome and still provide useful information.

Tables 2.3 – Vessel Characteristics: Freezer Space and Table 2.4 – Vessel Characteristics: Processing Capacity: This information should not change unless significant changes are made to a vessel, its factory, or fishing equipment.

Participants felt this information could be collected less frequently. Steve Kasperski suggested pre-populating these fields with the previous year's data and enabling respondents to confirm nothing has changed, or asking these questions periodically (e.g., every 2-3 years). Industry participants agreed that pre-populating and reviewing these fields, rather than entering this information annually, would help reduce reporting burden.

With regard to freezing and processing throughput capacity, and vessel fuel consumption rates in different activity modes (fishing and processing, steaming empty, etc) participants commented that this information is difficult to measure and could be interpreted and calculated differently by respondents. Suggestions included linking these variables to more clearly defined metrics (e.g., number of plate freezers) or deriving this information from other data reported to NMFS or the state of Alaska. Steve Kasperski questioned whether information about changes in freezing and processing capacity could be linked with a data collection only when capital expenditures are made, rather than reported annually.

Reporting capital expenditures

The group held an in-depth discussion of the complexity involved in reporting capital investment expenditures. This discussion relates to the above discussion of variables that change infrequently, as well as concerns specific to Table 4 – Capital Expenditures and Materials Usage and Table 5 – Expenses.

Analysts and participants noted the complexity of differentiating between investment and depreciation, and between capital expenditures and routine repair and maintenance. One participant noted that any expenditure in excess of the capitalization threshold must be reported as a capital expenditure, although many routine annual purchases in excess of this threshold are related to maintenance and upkeep rather than an improvement. They added that expenditure categories can include a number of items (e.g., conveyors, fish bins, freezing equipment, compressors). However, particularly in the A80 fishery, there have been a number of expensive vessel replacements that are only reported in an EDR for a single year even if the purchase was financed and regardless to how they are depreciating the asset, thus capital expenditures vary widely from year to year, and are often confidential due to their infrequency.

One participant commented that the format of EDRs may not necessarily align with how individuals track expenses in their accounting systems. They felt without a clear definition of what is being requested in a particular EDR field (with regard to capital investment vs. repair and maintenance), responses will reflect different interpretations.

The group also revisited the matter of frequency and considered whether some information could be collected periodically, e.g., every 3 or 5 years. Sarah Marrinan asked whether this periodic approach would impact how people report large expenditures and whether some expenditures could be missed. One participant noted that capital expenditures carry over from year to year and suggested the EDR could ask about total expenditures over a period of time (e.g., 3 years). This participant noted it would take additional time to compile multiple years of fixed asset data but that this is required for tax purposes. Participants also questioned how this information is used and observed that patterns and trends in expenses over time may be important.

Brian Garber-Yonts noted significant vessel-level changes tend to be infrequent. He suggested that rather than requesting a detailed explanation every year, one strategy could be to collect supplemental information from EDR submitters as needed to help interpret the data. For example, EDR submitters could request a follow-up interview to explain significant changes to variables including capital expenditures and throughput capacity. One participant agreed this approach could help in terms of providing context but was not sure it would help improve the data collection.

Brian also questioned whether there is a way to distinguish between routine and out-of-scale capital expenditures. For example, the acquisition or transfer of a vessel may be followed by a period of major capital improvements. It can be problematic to include these occasional outliers when the rest of the fleet is reporting amounts more consistent with a typical capital maintenance expenditure schedule due to the infrequent nature of these large investments. Brian explained that, in cases where there are a small number of observations, combined with one large reported investment value observation, NMFS may be unable to report these statistics in the economic SAFE report to ensure confidentiality.

The group again discussed whether pre-populating forms with the previous year's data could help reduce burden. Brian noted that data confidentiality could be an obstacle and that it would be difficult to ensure an EDR respondent has custody of the previous year's data. This would primarily be an issue when there is a change in vessel ownership. Brian questioned whether ownership of mandatory recordkeeping is transferred when a vessel changes hands. The group questioned whether the legal entity required to submit the EDR could request this information. One participant shared that when they acquired a new permit they were able to work with the previous owner to understand how they had calculated processing and freezer capacity in the past.

Other costs and context

Analysts prompted the group to provide feedback on any other costs and context they'd like the Council to understand about the Amendment 80 sector, such as impacts related to Covid-19 and economic contributions to coastal communities.

Covid-19: Brian Garber-Yonts asked the group whether the industry has experienced significant costs related to Covid-19 and whether they feel these costs are adequately captured in EDR data. One participant confirmed they have incurred additional costs, for example related to testing and crew transportation, and that they track this information for tax purposes, planning, and for potential relief funds. They observed that to identify Covid-19 related expenses it would be necessary to add an expense field or for respondents to provide additional explanation. Brian noted that given the comprehensiveness of the cost information collected by the Amendment 80 EDR, this year's data will likely reflect increased operating costs that can be further interpreted with qualitative input from EDR

submitters and the Amendment 80 sector. Steve Kasperski added that it takes time to make changes to EDR fields and that additional guidance could be provided for next year. By the time these changes are able to be made, there is hope these additional Covid-19 related costs would no longer be incurred.

Communities: Sam Cunningham asked whether participants felt the EDR form could be used to provide information on provisioning, explaining analysts draw on qualitative descriptions to provide the Council with insight into the economic contributions of the CP sector to local economies. One participant recalled that the EDR program initially attempted to link costs with communities, and that it was time consuming and doesn't necessarily provide insight into costs purchased inside and outside of Alaska. This participant felt existing social impact assessment methods used in prior analyses are sufficient to address this issue. Brian agreed it can be difficult to establish link invoices to actual purchase locations and noted in this case a respondent's best judgment (e.g., approximate proportion of expenditures by Alaska borough) could be sufficient to provide useful information. This information would not necessarily have to be collected annually via EDR and could be supplemented with surveys.

BSAI Crab Rationalization EDR

The participants active in this discussion indicated they participate in the crab catcher vessel (CV) sector (no participants from the crab processing or CP sectors were present in the workshop). The following comments focused on the crab CV EDR form.

Brian Garber-Yonts identified information on quota lease costs (Table 2) as an aspect of the Crab EDR that could be improved. The way quota is managed at the vessel level in practice may not align with the format in which data is requested and reported on the EDR form. He explained that the objective of collecting data on quota costs in this EDR is to obtain information on lease rates at the vessel level; i.e. the going rate as a fraction of ex-vessel price. Brian questioned the feasibility of reporting lease costs at the vessel level without differentiating by quota type and gaining a better understanding of the quota market and lease rates by collecting data directly from quota holders. He noted this would redistribute part of the reporting burden to the lessor side of the transaction. One industry participant commented that it's easier to collect this information at the vessel level. There are many more individual quota shareholders than vessels; additionally they may live elsewhere and not be active in the crab fishery.

Complexity of ownership information

Participants commented on the complexity of quota ownership information as an example of attributes of the crab rationalization program they would like the Council and analysts to understand. One participant mentioned linking harvest boats with quota share holders. For example, the cooperative may lease quota from a company in which it holds an ownership stake, and keep these business entities separated for liability reasons. The participant emphasized this is important to understand because some quota holders are actively engaged in the fishery.

Burden of reporting by CR quota type and fishery

Steve Kasperski observed that breaking out expenses by CR fishery adds to the burden of completing the CV EDR form. He asked participants whether they felt it was important to retain reporting by CR fishery (Tables 1, 2, and 4). One industry participant responded they felt this was a question for the Council, but assumed this information was separated because lease rates vary by CR fishery. They added it's not much harder to separate out this information by the 3-4 fisheries in which they participate in a year.

Brian Garber-Yonts asked about the burden of breaking out information by quota type as well as by CR fishery (Tables 1 and 2). The same participant felt this is burdensome but that they understood the reason for collecting this data. They noted there is a sub-distinction between northern and southern CVO-A quota shares that is not captured in the form. Brian observed this could be a gap; he felt this

distinction doesn't necessarily have to be in the EDR but questioned whether there's a way to get at this information.

Complex quota transfer situations

Industry participants shared examples of scenarios that can be complicated to account for when completing EDRs, and questioned whether double-counting could occur. Brian Garber-Yonts further prompted the group by asking how deliveries might get pooled in different co-ops, for example when a vessel is a member of one cooperative and may have a business relationship with another cooperative. Participants shared two examples.

- Overages and forfeitures: In the event of an overage, quota may be transferred between vessels within a cooperative or between different cooperatives. Participants suggested clarifying how to account for lease fees on pounds forfeited to and by a vessel. Brian noted that NMFS can verify EDR data by comparing with records of landings by vessel quota type collected by the region's Restricted Access Management (RAM) Program. The information usually aligns but discrepancies can arise. He suggested the EDR could be refined with clear direction on how to account for overages.
- Flow-through leases: One participant shared the examples of a situation where Vessel A may need to complete their season early and arrange for Vessel B to fish its remaining quota. In this situation Vessel B pays vessel A the same lease rate that Vessel A pays to the original leaseholder. They felt guidance for reporting in these situations could also be clarified in the EDR.

Participants also commented that it can be complicated to complete Table 1, "pounds sold", given that reported landings may differ from the basis on which crew are compensated, compared to fish tickets, particularly in complex quota transfer scenarios. One participant suggested requesting this information in terms of pounds allocated because this is how gross revenue is determined.

Participants said when they encounter complicated reporting situations they do their best and provide additional explanation using the comment fields available in the online version of the EDR form. Brian also suggested the possibility of including a checkbox on the EDR form that respondents could use to request a follow-up call to provide further explanation, adding that these follow-up conversations already often occur in complicated scenarios. He observed the inclusion of a check box could be a way to gauge whether the EDR is capturing most standard case scenarios; if not, a redesign may be needed. One participant felt this could be useful. Participants thought this could be a good idea but also that they find the comment boxes useful to provide documentation for their own reference.

Fuel costs

The group asked clarifying questions about Tables 4 and 5 of the CV EDR, which requests information on fuel costs by CR fishery (Table 4: Vessel Operating Expenses, by CR Fishery) and annual fuel cost and consumption (Table 5: Vessel Operating Expenses, Annual). One participant asked why these tables request information on fuel purchased across all fisheries and activities in which a vessel participates, including tendering, and noted that vessels have different consumption rates and participate in different fisheries.

Steve Kasperski and Brian Garber-Yonts explained that this approach provides a simple, more consistent approach for estimating fuel cost information, rather than having individual respondents differentiate fuel costs across fisheries and tending activity, and potentially following different approaches to report this information. Steve noted there are standard, scientifically defensible methods for disaggregating annual fisheries cost data across different fisheries. Brian Garber-Yonts added that this approach was

simplified from the earlier iteration of the Crab EDR, which requested more detailed itemization of costs, including the quantity and cost of fuel purchased by crab fishery in each community. The current approach enables analysts to identify an annual fuel cost per gallon for that year and attribute this to CR fishery based on the amount of fuel used.

One participant noted canneries sometimes pay directly for the fuel used by CVs during the tender season. Vessels may not have information about fuel use or costs during the tender season and be able to include this in their annual fuel costs. Brian reinforced that the annual fuel reporting in the crab EDR provides a simple approach to estimating average fuel cost per gallon over the vessel's annual fuel purchases, which is then used in combination with crab fishery-level fuel gallons consumed to estimate by-fishery fuel cost. The intent is not to capture total fuel use and cost for individual vessel's operations outside of crab; rather, it addresses a difficulty identified in the original crab EDR in attributing fuel expenditures to specific crab fisheries given the variable timing of fuel purchases.

Minor clarifications

One participant asked about the purpose for collecting crew license information and how this relates to costs. Brain Garber-Yonts clarified that this data does not relate to costs. The EDR collects crew license information for the purposes of linking to the ADF&G license database. This strategy minimizes the amount of information that must be collected via the EDR, while linking the EDR to valuable demographic information collected by the state.

Another participant questioned whether the EDR should be administered for the crab fishing year rather than the calendar year. Brian Garber-Yonts explained that aligning with the calendar was intended to facilitate the use of annual financial and tax records for EDR reporting. He acknowledged timing can be a challenge to using EDR data, but for the most part fisheries are differentiated by fishing year. The exceptions can include situations when there is a substantial amount of snow crab fishing before January, or king crab fishing after December.

Amendment 91 Chinook Salmon EDR

Participants in the Amendment 91 discussion focused on concerns about the relevance of the purpose and need statement. The group also discussed the vessel master survey, and how the format of this form could be adjusted to improve data quality and reduce burden.

General concerns about minor EDR changes

One industry participant felt it was difficult to respond directly to the task of identifying opportunities to reduce burden, without knowing what the solution or replacement could look like. They felt this process should begin with revisiting the viability of the purpose and need statement. It was suggested by one participant that the Amendment 91 EDR has served its purpose and is outdated, that it seems the group is advocating for Alternative 4 (discontinue), and they do not see the potential for small changes to reduce burden. Another participant confirmed this was their perspective, but that they continue to be interested in suggestions for evaluating the effectiveness of IPA incentives in the context of IPA annual reports.

Vessel Master Survey

Brian Garber-Yonts prompted participants to consider adjustments to the Vessel Master Survey form, if the Council retains the EDR and this component of the program. As an example, the survey could be administered immediately following the pollock A and B seasons, and potentially administered on a voluntary basis (e.g., a focus group). One industry participant felt this approach would be complicated given the way a pollock CP company operates. There may be multiple skippers onboard within a season,

and vessels often move directly from the pollock A and B seasons to fishing Pacific hake and may or may not change skippers. Steve Kasperski noted that a voluntary approach would not be considered part of the EDR, which is mandatory. This approach is just one example of a way to limit burden while providing the Council and others, such as stock assessment authors, local knowledge into that year's fishing conditions.

The group continued discussing the utility of the vessel master survey for providing descriptive context for stock assessment purposes. One participant commented their company's captains already do communicate directly with stock assessment authors. In response to a participant question Brian confirmed that EDR data is confidential and would not be provided to assessment authors in raw form unless they are authorized to access it.

Steve emphasized the purpose of this example was mainly to illustrate there are multiple approaches that could be taken to meet the Council's data collection objectives while minimizing burden, and that the format is not limited to mandatory surveys. Brian recognized that while providing information for stock assessment is not the purpose and need of the Amendment 91 EDR, it has been useful for this purpose. He believes that the data collection has not fulfilled the stated purpose and need due to shortcomings in the survey design and not because the purpose and need is unattainable.

Concerns about duplication

An industry participant said they feel it's important to understand what data streams and gaps exist before asking for more data. They noted a separate effort by the SSPT to assess data gaps. Steve Kasperski confirmed there are other sources that capture effort, catch, production, and revenue information and EDRs are not intended to duplicate other data collections. The Amendment 91 EDR looks specifically at the costs of salmon avoidance and this information is not available from any other source. Steve noted NMFS is beginning the process to reevaluate PRA packages including EDRs and co-op reports. That process will be seeking to reestimate the burden of each data collection and will also include opportunities for public input.

GOA Groundfish Trawl EDR

Brian Garber-Yonts framed this discussion by asking participants whether they felt the information collected in the GOA Trawl EDR is the right information to establish a baseline, and whether there are critical variables that weren't included. He emphasized that he was interested in how this group's insight could help improve the EDR program generally, and not necessarily to maintain or improve the GOA Trawl EDR.

Some participants commented it was difficult to comment on additions or improvements given their perspective that the EDR should be discontinued. In addition to their concerns about burden and relevance participants shared concerns about data quality, utility, interpretation and consistency of responses, the potential for duplication of information available from other sources. They felt that given these concerns and without a clear understanding of how the Council perceives the utility of EDR data, the burden outweighs the benefits. Within this broader context the group discussed specific concerns related to fuel costs and community impacts. For the GOA Trawl group in particular, discussions spanned all three meeting tasks.

Fuel costs

The GOA Trawl CV EDR requests combined annual fuel consumption and cost across all fishing and non-fishing activities (Table 1: Vessel Expenses, Annual.) An industry participant asked how this information is useful, and why this is inclusive of all activities when other questions in the EDR form are limited to the GOA trawl fishery.

Aggregation of fuel costs

Brian clarified that fuel costs are aggregated across all activities because this is a consistent way to request this information and allows pro rata estimation of fuel costs on a vessel operating-day basis. This approach also aligns with information respondents would track for tax purposes.

Brian also noted that because fuel and labor account for the majority of operating costs, this information provides insight into operating costs in the fishery. One industry participant questioned whether fuel costs tend to change due to rationalization and the purpose for collecting this information. They also noted there are other factors related to program rationalization can influence costs and behavior, such as the cost of observer coverage. Brian noted that changes to efficiency and crew composition are two common results of rationalization, and that monitoring fuel and labor costs provides a metric of changes in operating costs pre- and post-rationalization.

Reporting fuel costs and fuel-related purchases

An industry participant explained it can be burdensome to distinguish between fuel purchases and related items such as oil and filters that are often included on the same invoice, particularly because many of the EDR respondents in the GOA trawl fishery don't have the accounting support of reporting entities in other sectors. Brian asked whether these additional expenses are significant, and whether it would reduce burden to report combined fuel-related expenses. One respondent felt that as long as this information is consistently reported it would be less burdensome and still help represent operational costs. Another suggested the approach of requesting only gallons of fuel used and not costs.

The group also discussed whether EDR respondents report fuel used during tendering, which is used by the reporting vessel but often paid or reimbursed by a processing plant. Participants agreed this is a potential area of inconsistency because EDR respondents may interpret and report this information differently.

Communities and crew

There were multiple points in the discussion where this group discussed the utility of EDR data for understanding economic impacts to communities, and the concept of establishing a baseline to monitor changing conditions.

Use of EDR data for Social Impact Assessment

One participant noted the purpose and need for the GOA Trawl EDR refers specifically to communities, and asked what information is currently collected, or could be collected in the future, to assess impacts on communities. Scott explained that utility for assessing impacts at the community level has been limited given the purpose and need statement's focus on trawl rationalization. However, he noted crew and community data were to evaluate fishery dependence and engagement as part of the Social Impact Assessment for the Central Gulf of Alaska Rockfish Program Reauthorization.

Scott asked whether this use of the EDR data was of benefit to GOA trawl fishery participants. A participant responded that industry can comment on the burden, and felt from their perspective the cost outweighs the benefits, but ultimately it's a question for the Council as to whether they found this info useful in their decision-making. Another participant felt the information was useful in this example but that there aren't other major actions on the horizon that would use this data, and agreed that it's a question for the Council whether this information was useful and influential.

Community and crew information

Question 2 prompted participants to reflect on information that is valuable to gather across fisheries. Participants commented on the importance of crew information from both the harvest and processing sectors, though suggested looking at what data is already available. One participant observed communities change over time, for example due to the effects of consolidation and mechanization. They expressed concern about how to develop a representative picture of a changing community when individuals may have different objectives; as an example, they pointed to allocating quota in hopes of restoring a community to a past state.

The group also discussed community and crew information collected in the Shoreside Processing EDR form, including information on water and electricity use by Kodiak processors (Table 3 - Kodiak Processor Utility Consumption). One participant pointed to this as an example of data that has had limited utility due to confidentiality concerns. Another participant felt this information could be useful if confidentiality concerns can be resolved, particularly if this information can only be collected from shoreside processors via EDR because it is not available in other sources.

Participants also discussed information on crew labor and the distinction between resident and non-resident workers. Table 1 - Groundfish Processing Employment and Labor Cost distinguishes between "housed" and "unhoused" labor. One industry participant said their understanding from analysts was the information has had limited utility because respondents may interpret and report this information differently. The group questioned whether information on the breakdown between resident and non-resident labor is available from another source such as the Alaska Department of Labor. A participant felt it would also be valuable to have information on the number of crew family members.

The group shared additional concerns about the crew license lookup function, including difficulty finding crew members, the reason for separating captain and crew, and concern about submitting identifiable information. One participant suggested a minor improvement to (Table 3 of the GOA CV EDR) - numbering starts with 0 rather than 1 in the system, which can be confusing for bookkeepers.

Brian noted the GOA trawl CV and CP EDR forms request crew license numbers, which can be linked with ADFG crew license database to access information about residence and demographic information. He clarified the intent is to gain insight into demographic information and the impacts of crew employment on communities, not to look at individual information.