DRAFT FOR INITIAL REVIEW/FINAL ACTION

Regulatory Impact Review for Revisions to Federal Regulations for Economic Data Reporting Requirements for Groundfish and Crab Fisheries off Alaska and Amendment to the Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs

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Abstract: This Regulatory Impact Review analyzes proposed management measures that would apply exclusively to participants in the Bering Sea and Aleutian Islands management area (BSAI) crab Rationalization Program, the BS American Fisheries Act (AFA) pollock Program, and the BSAI Amendment 80 Program. These three Limited Access Privilege Programs (LAPPs) are the only LAPPs in the North Pacific that require participants to submit economic data reports (EDRs) to National Marine Fisheries Service (NMFS). The measures under consideration would remove the requirements to submit EDRs. The purpose of this action is to eliminate the administration costs and reporting burden associated with these data collections.

For definition of acronyms and abbreviations, see online list: https://www.npfmc.org/library/acronyms

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Executive Summary

This Regulatory Impact Review (RIR) examines the benefits and costs of proposed fishery management plan and regulatory amendments affecting Economic Data Reporting (EDR) programs in the Bering Sea and Aleutian Islands management area (BSAI) crab fisheries (Crab Rationalization Program), the American Fisheries Act (AFA) pollock fishery (AFA Program), and the BSAI Amendment 80 fisheries (Amendment 80 Program). The action alternative analyzed in this RIR would remove individual EDR program requirements.

Purpose and Need

The purpose and need of this action is to evaluate the costs and benefits of and whether to continue the EDR requirements for each of the three LAPPs that have implemented EDRs. The Council adopted the following purpose and need statement to initiate this action in April 2025.

> *The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. Given the substantial cost recovery fees for submitting and maintaining EDRs, their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.*

Alternatives

The Council adopted the following alternatives for analysis in April 2025:

Alternative 1: Status Quo

Alternative 2: Remove EDR requirements for LAPPs.

Alternative 1: No Action

Alternative 1 would retain EDR requirements for the Crab Rationalization Program, AFA Program, and Amendment 80 Program. Fulfilling EDR requirements would remain mandatory for fishery participation.

Alternative 2

Alternative 2 would remove EDR requirements for the three LAPPs. Regulatory language requiring EDR submissions at 50 CFR 679 and 680 and in the Crab FMP and BSAI FMP would be removed for all the EDRs. No other program changes would be implemented for the Crab Rationalization Program, AFA Program, or Amendment 80 Program. In addition, NMFS would eliminate the annual requirements for EDR submission, discontinue the information collection package under the Paperwork Reduction Act,

and the Alaska Fisheries Science Center (AFSC) would cease to collect new EDR data or maintain the EDR data.

Impacts of the Alternatives

Table 1 provides a summary of the costs saving from this proposed action versus the implications for available data. This is categorized as either cost savings (a benefit of the proposed action) or reduction of information (a cost of the proposed action).

Since the Council uses a variety of time series data, including EDR data, to evaluate its fisheries and the EDR program has had some longstanding limitations with respect to the utility of the EDRs (see section 3), the Council will need to decide if the benefit of retaining the EDR program outweighs the costs to industry.

Under **Alternative 1, No Action**, the current mandatory EDR requirements would remain in place for three LAPPs. This means industry participants would continue to complete EDR reporting requirements in order to receive their quota and continue to pay cost recovery fees to support the administration of the EDR Program. While this alternative continues status quo costs for industry participants, it ensures the continued collection of economic data among these three programs. These EDRs are the only data source in the North Pacific that provide census-level operational cost data for these fisheries. Despite some known limitations in the data, it remains the best available source for understanding the economics of these fisheries, which may be used for evaluating the long-term effects of fisheries management, and contributing to information used in the Council's decision-making.

In contrast, **Alternative 2,** would remove EDR requirements for these three EDR programs. This action would provide direct cost savings to the fishing industry by removing the annual burden and costs associated with EDR Program, collectively saving them an estimated $396,166 per year. However, this cost savings would have a tradeoff, reducing available economic data in fishery management and creating a gap in the understanding of operational costs and economic trends in the North Pacific.

Ultimately, the choice between the two alternatives presents a trade-off. **Alternative 1** prioritizes the long-term, public benefit of a consistent data collection for management and evaluation, at the expense of annual costs and paperwork for the industry. **Alternative 2** prioritizes immediate cost savings and reduced administrative burden for the fishing industry, but at the expense of the NMFS's and public's ability to monitor, evaluate, and adaptively manage these federally regulated fisheries. The policy decision hinges on whether the benefits of retaining the EDR data outweigh the costs to the industry.

Table 1 Summary of cost savings versus reduction in information from EDR removals

Alternatives		**EDR respondents** *A80 vessel owners and quota holders* *Crab vessels owners/leasers, CDQ groups, processors, & registered crab receivers* *AFA vessel owners/leasers, operators & cooperative managers*	**Managing agencies** *NMFS AKR* *AFSC* *PSMFC*	**Broader beneficiaries** *Interested fishery participants, communities, and the broader public*
Alternative 1: *No action*		No change	No change	No change
Alternative 2: *Remove EDR Requirements for Crab Rationalization Program, Amendment 80, and AFA Amendment 91*	**Cost savings**	Elimination of reporting burden for all respondents ~$97,290 Elimination of associated costs recovery fees ~ $298,876	Elimination of agency costs that are not absorbed by cost recovery Eliminate PRA requirements and renewal schedule	No
	Reduction in information	Less fleet-level information, to the extent the information is used	Less quantitative information with which to address MSA National Standards and EOs.	Lose access to these timeseries data and the public information that can be produced from it. For example, these data would not be available: • To contribute to public understanding of crab and A80 fishery trends previously provided in the Econ SAFE documents • For Council analyses, program reviews, or to contribute to Council decisions (e.g., crab actions and program review, chum salmon bycatch, A80 program review • For continued development and maintenance of a regional economic impact model for Alaska fisheries • For *ad hoc* projects related to these 3 fisheries (e.g., 2024 Alaska Seafood Snapshot)

1 Introduction

This Regulatory Impact Review (RIR) examines the benefits and costs of proposed fishery management plan and regulatory amendments affecting Economic Data Reporting (EDR) program[1] in the Bering Sea and Aleutian Islands management area (BSAI) crab fisheries (Crab Rationalization Program), the American Fisheries Act (AFA) pollock fishery (AFA Program), and the BSAI Amendment 80 fisheries (Amendment 80 Program). The action alternative analyzed in this RIR would remove individual EDR program requirements.

This RIR provides assessments of the benefits and costs of the alternatives, the distribution of impacts, and identification of the small entities that may be affected by the alternatives.[2] This RIR addresses the statutory requirements of the Magnuson Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act, MSA, 16 U.S.C. 1801, *et seq*.), the National Environmental Policy Act (NEPA), Presidential Executive Order 12866, and some of the requirements of the Regulatory Flexibility Act. A RIR is a standard document produced by the North Pacific Fishery Management Council (Council) and the National Marine Fisheries Service (NMFS) Alaska Region to provide the analytical background for decision-making.

The preparation of an RIR is required under Presidential Executive Order (E.O.) 12866. The requirements for all regulatory actions specified in E.O. 12866 are summarized in the following Statement from the E.O.:

> *In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider. Further, in choosing among alternative regulatory approaches agencies should select those approaches that maximize net benefits (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.*

E.O. 12866 requires that the Office of Management and Budget review proposed regulatory programs that are considered to be "significant." A "significant regulatory action" is one that is likely to:

- Have an annual effect on the economy of $100 million or more; or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, territorial, or tribal governments or communities;
- Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
- Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or
- Raise legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this E.O.

[1] Throughout this document, NMFS uses EDR Program to collectively describe the cumulative activities by the Agency and requirements for industry under the individual EDR requirements.

[2] NMFS has preliminarily determined this action does not have the potential to individually or cumulatively have a significant effect on the quality of the human environment and qualifies for a Categorical Exclusion under NEPA. The proposed action is expected to fall within Category A1 Trust Resource Management Action - an action that is a technical correction or a change to a fishery management action or regulation, which does not result in a substantial change in any of the following: fishing location, timing, effort, authorized gear types, or harvest levels. The action can be reviewed independently from other actions under NEPA, and there are no extraordinary circumstances that may require further analysis in an Environmental Assessment or an Environmental Impact Statement.

Under the Magnuson-Stevens Act, the United States has exclusive fishery management authority over all marine fishery resources found within the exclusive economic zone (EEZ). The management of these marine resources is vested in the Secretary of Commerce (Secretary) and in the regional fishery management councils. In the Alaska Region, the Council has the responsibility for preparing fishery management plans (FMPs) and FMP amendments for the marine fisheries that require conservation and management, and for submitting its recommendations to the Secretary. Upon approval by the Secretary, NMFS is charged with carrying out the Federal mandates of the Department of Commerce with regard to marine and anadromous fish.

The groundfish and crab fisheries in the EEZ off Alaska are managed under the Fishery Management Plans for crab (Crab FMP) and Groundfish of the Bering Sea and Aleutian Islands (BSAI FMP). The proposed action under consideration would amend the Crab FMP, BSAI FMP, and Federal regulations at 50 CFR 679 and 680. Actions taken to amend FMPs or implement regulations governing these fisheries must meet the requirements of applicable Federal laws, regulations, and Executive Orders.

1.1 Purpose and Need

On April 17, 2025, the President signed E.O. 14276 Restoring American Seafood Competitiveness (Executive Office of the President, 2025). This E.O. directs fishery management councils to provide a prioritized list of recommended actions to reduce burdens on domestic fishing and to increase production within sustainable fisheries. In April 2025, the Council initiated this action in response to E.O. 14276.

The purpose of this action is to evaluate the costs and benefits of and whether to continue the EDR requirements for each of the three limited access privilege programs (LAPPs) that have implemented EDRs. The Council adopted the following purpose and need statement to originate this action in April 2025.

> *The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. Given the substantial cost recovery fees for submitting and maintaining EDRs, their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.*

NMFS recommends that the Council amend its purpose and need statement in order to more accurately reflect the decision-making process that describes the evaluation of the costs and benefits of each EDR program to determine the continuing need for that program:

The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. ~~*Given*~~ ***In light of*** *the substantial cost recovery fees for submitting and maintaining EDRs,* ***the Council will evaluate whether to retain the EDR programs based on the value of and continuing need for each of the EDR programs*** *their* ~~*inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.*~~

1.2 History of Key EDR Actions at the Council

This section provides a summary of the history of the action and other actions the Council has taken on EDRs. See the 2019 EDR discussion paper (NOAA Fisheries, March 22, 2019) for a more comprehensive history.[3] The EDRs gather various levels of ownership, revenue, cost, vessel operations, and employment information from vessel owners, vessel operators, processors, permit holders, and leaseholders who participate in several of the catch share programs in the North Pacific fisheries. As described in the 2019 discussion paper, each EDR evolved through a specific Council action and is formed around its own purpose and need statement.

Implementation of EDRs

Starting in 1998, the Council directed the AFSC and the Social and Economic Data Committee to develop a cost, earnings, and employment survey for the BSAI pollock fishery. In 2002, the Council began development of the Crab Rationalization Program, which included an element to implement a mandatory economic data collection. In 2006, the first EDR submission was implemented for the Crab Rationalization Program. Starting in 2003, the Council directed analysts working on the Amendment 80 Program analysis to include an element for socioeconomic data collection to study the impacts of the program. In 2008, the Amendment 80 Program EDR submission was implemented.

In 2009, the Council initiated final action on Amendment 91, which included a data collection program for the pollock fleet to provide information necessary to evaluate whether the program is meeting the Council's intent for salmon bycatch management. By 2014, the Amendment 91 EDR collection took effect.

In 2012, the Council tasked staff to develop a baseline EDR program for the Western and Central GOA trawl fisheries, signaling interest in baseline data concurrent with the development of a GOA trawl catch share program. By 2016, the EDR program for the GOA trawl EDR and trawl CP EDRs were in effect. Also in 2016, the Council moved to postpone further work on the action. In 2023, the requirement to submit the EDRs for the GOA trawl fisheries was removed.

Recent Changes to EDRs

Starting in 2018, in response to E.O. 13771 (NOAA Fisheries, 2018), NMFS presented a discussion paper to the Council outlining deregulatory action ideas and EDR costs were part of the paper. Public testimony raised concerns about redundant reporting requirements, high industry costs, and limited utility of

[3] https://meetings.npfmc.org/CommentReview/DownloadFile?p=1f542e61-0dfc-465e-92eb-f7f00ab70edc.pdf&fileName=D5%20EDR%20Discussion%20Paper.pdf

collected data in the EDR programs. At the April 2018 meeting, the Council requested a comprehensive NMFS discussion paper evaluating the EDR programs' effectiveness, costs, and data use.[4]

NMFS presented this discussion paper to the Council in April 2019. Within this discussion paper, analysts recommended the following: 1) eliminate routine third-party audits, 2) re-evaluate blind data formatting requirements, 3) consider altering submission frequency, and 4) align confidentiality protocols with other fisheries data programs. The Council reviewed the discussion paper and requested further analysis under two issues within the April 2019 motion:[5] Under **Issue 1**, the Council adopted a purpose and need statement and the initial set of alternatives for specific changes to the EDR programs. Under **Issue 2**, the Council requested staff undertake a process to consider more holistic changes to the EDR including creating more consistency across EDRs to increase the utility of economic and social information in analyses of Council actions. In this motion the Council requested staff consult the Social Science Planning Team (SSPT), submitters and other data users in developing recommendations.

For the next few years, staff and the SSPT worked through the two requested components of the motion, providing updates to the Council along the way.[6] In February of 2020, the Council reviewed the Initial Review of the EDR amendment package and made several changes to the alternatives including considering changes to the frequency of EDRs and adding an alternative to consider removing all EDR requirements. At this meeting, the Council also requested the SSPT focus its efforts on recommending revisions to the current EDR requirements with the primary objectives to improve utility to inform Council decision documents and data quality

In April 2021, the SSPT provided recommendations to the Council after an ongoing series of stakeholder workshops held in 2020[7] and follow-up SSPT meetings. The SSPT report highlighted some of the challenges in providing improvements to the existing EDRs without consistency across LAPPs or a clear understanding of whether the Council objectives for the economic information collections had remained the same. At this meeting, the Council further amended the EDR alternatives to allow for the consideration of removing each EDR independently of one another, in line with the SSPT's recommendation.

In February 2022, the Council recommended final action on Amendment 52, which included removing the requirements for third-party data verification audits and changing the procedures for data aggregation and blind formatting for the crab EDR. This was done to make those data aggregation and confidentiality protections comparable to the requirements under other data collection programs. In addition, Amendment 52 removed reporting requirements for the GOA trawl EDR. The Council had stated that since it had not chosen not to continue with development of a catch shares program for the GOA trawl fishery at that time, this EDR was no longer aligned with its intended purpose and is eliminated to ease the reporting burden for respondents and eliminate agency management costs. The remaining EDRs, with revisions, were retained. In this decision, the Council members cited the recommendations of the SSC on the importance of maintaining these timeseries data through a transition to a replacement mandatory economic data program and in particular acknowledging the importance of crew data.[8] The final rule for Amendment 52 was implemented in 2023.[9]

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[4] https://meetings.npfmc.org/CommentReview/DownloadFile?p=86713013-8360-4fdc-81b2-eaac12796434.pdf&fileName=MOTION%20Economic%20Data%20Report%20discussion%20paper.pdf
[5] https://meetings.npfmc.org/CommentReview/DownloadFile?p=695c22f1-5139-4ea6-a7c4-7c92b5428cd2.pdf&fileName=D5%20MOTION.pdf
[6] The action memo from April 2021 provides a timeline of meetings and workshops considering both EDR changes as well as the consideration for a more comprehensive data collection.
[7] Link to the workshop report:
[8] Note that during this meeting, the Council also passed a motion during staff tasking to consider a few economic data components, including crew data that could be collected across all sectors. That effort led to several iterations of analysis with action tabled at the October 2024 meeting.
[9] The Notice of Availability published (87 FR 60638, October 6, 2022), followed by the proposed rule (87 FR 65724, November 1, 2022). The final rule published in 2023 (88 FR 7586, February 6, 2023).

In addition to the regulatory action on EDRs, the Council's February 2022 motion also requested AFSC implement non-regulatory changes to the EDRs to streamline and reduce reporting burden, as recommended by stakeholders during workshops and within the SSPT March 2021 report. These changes were made following the implementation of Amendment 52. AFSC staff presented on what changes they had implemented to the Council at the October 2022 meeting.

Current Action

In April 2025, in addition to its annual Cost Recovery Report, the Council received a discussion paper[10] that more broadly considered options to adjust the annual timing and administrative processes for all of the Council's cost recovery and fee collection programs. The paper identified inefficiencies and challenges faced by stakeholders and NMFS as well as opportunities to improve clarity, consistency, and efficiency within the cost recovery. The Council made a separate EDR motion[11] as an outgrowth from the cost recovery discussion paper looking at reductions in cost recovery fee collections.

Most recently at the June 2025 Council meeting, NMFS presented a discussion paper to the Council that served as a broad regulatory review and provides suggestions that may improve domestic fishing operations. This paper outlines possible changes to reduce regulatory burdens including removing EDR requirements.

1.3 Documents Incorporated by Reference in this Analysis

This RIR relies heavily on the information and evaluation contained in previous analyses and other government documents and these documents are incorporated by reference. The documents listed below contain information about the recent EDR changes and E.O. 14276, which seeks to reduce regulatory burdens for America's seafood industry.

EDR Revisions Discussion Paper

The 2019 discussion paper (NOAA Fisheries, March 22, 2019) provided information and recommendations about the four EDR programs that the Council and the NMFS have implemented in the federally managed groundfish and crab fisheries off Alaska.[12] As described in the 2019 paper, the intention of the EDRs is to gather information pertaining to ownership, revenue, cost, vessel operations, and employment from participants in several of the catch share programs in the North Pacific fisheries, including vessel owners, vessel operators, processors, and permit holders. In general, the goal of the EDR requirements is to use the collected information to improve the Council's ability to assess the economic effects of catch share or rationalization programs, to understand the economic performance of participants in these programs, and to help estimate impacts of future issues, problems, or proposed revisions to the programs covered by the EDRs.

EDR Revision Analysis; Am 52

The 2023 RIR (NOAA Fisheries, 2023) examined the benefits and costs of proposed fishery management plan and regulatory amendments affecting EDR programs in the Crab Program, AFA Pollock Program, GOA trawl fisheries, and the Amendment 80 Program with an intent to improve the usability, efficiency, and consistency of the data collection programs and to minimize cost to industry and the Federal

[10] https://meetings.npfmc.org/CommentReview/DownloadFile?p=06cfee5a-07a2-4650-ad13-82dc8c663e65.pdf&fileName=D1%20Annual%20Cost%20Recovery%20Discussion%20Paper.pdf
[11] https://meetings.npfmc.org/CommentReview/DownloadFile?p=ae4f0bd3-0590-45fc-8962-6331cd525278.pdf&fileName=D1%20MOTION%202%20EDRs%20FINAL.pdf
[12] https://meetings.npfmc.org/CommentReview/DownloadFile?p=1f542e61-0dfc-465e-92eb-f7f00ab70edc.pdf&fileName=D5%20EDR%20Discussion%20Paper.pdf

government.[13] The action alternatives analyzed in that 2023 RIR included (1) revising authorizations for third party data verification audits, (2) eliminating blind data formatting, (3) standardizing data aggregation procedures, (4) changing the frequency of EDR information collections, and (5) removing individual EDR program requirements.

Review of Regulations under Executive Order 14276 Restoring American Seafood Competitiveness Discussion Paper

To assist with implementing E.O. 14276, the 2025 discussion paper (NOAA Fisheries, May 29, 2025) serves as a broad regulatory review and provides suggestions that may improve domestic fishing operations for fisheries in the EEZ off Alaska under the authority of the Council.[14] Building upon previous efforts, NMFS Alaska Region outlined possible changes to reduce regulatory burdens and optimize seafood production while continuing to promote sustainability. The report identified current initiatives, such as modifications to Maximum Retainable Amount regulations and expansions in electronic monitoring, provided recommendations from NMFS such as modernizing recordkeeping and reporting regulations, and described other possible actions the Council could consider for recommendation to NMFS to implement. The Council's motion in response to E.O. 14276 can be found here.[15] Eliminating financial costs of EDR reporting was flagged as a possible initiative to reduce burden.

[13] https://www.fisheries.noaa.gov/resource/document/regulatory-impact-review-amendment-52-fishery-management-plan-bering-sea-aleutian
[14] https://meetings.npfmc.org/CommentReview/DownloadFile?p=b3d7fdc6-bf39-4f46-92c8-1fcb7c5e8290.pdf&fileName=B2%20NMFS%20Regulatory%20Review%20EO%2014276.pdf
[15] https://meetings.npfmc.org/CommentReview/DownloadFile?p=7428902e-ef1a-4af4-a221-6b552ff191ad.pdf&fileName=E%20Motion-%20EO%20FINAL.pdf

2 Description of Alternatives

The Council adopted the following alternatives for analysis in April 2025. It is within the Council's purview to consider other alternatives or suboptions, such as removing EDR requirements for fewer than all of the three LAPPs with EDR programs.

Alternative 1: Status Quo

Alternative 2: Remove EDR requirements for LAPPs.

2.1 Alternative 1, No Action

Alternative 1 would retain EDR requirements for the BSAI Crab Rationalization Program, AFA Program, or Amendment 80 Program. See Section 3 for an overview of these three EDR programs. Fulfilling EDR requirements would remain mandatory for fishery participation.

2.2 Alternative 2

Alternative 2 would remove EDR requirements for LAPPs. Regulatory language requiring EDR submissions at 50 CFR 679 and 680 and language in the Crab FMP and BSAI FMP would be removed for all the EDRs. No other program elements would be modified for the BSAI Crab Rationalization Program, AFA Program, or Amendment 80 Program.

3 Description of the Current EDR Programs

The following section provides a brief overview and background to the Council about the EDR Program, starting with an overview of the funding and administration of the EDR program followed by a summary each of the three EDR information collections. If the reader wishes to learn more about the specific data collected for each EDR program, they are referred to the Amendment 52 analysis referenced in section 0, which contains more detailed information about the background and history of each EDR.

In general, the purpose of the EDR requirements is to gather information to improve the Council's ability to assess the economic effects of the catch share or rationalization programs, understand the economic performance of participants in these programs, and estimate the fleet-wide impacts of future issues or proposed actions. However, each EDR is designed around its own purpose and need statement as described in the corresponding overview sections below. The first EDR requirements were initiated in 2006 under the Crab Rationalization Program. Generally, the Council wanted to have the EDRs collect usable data such as cost, revenue, ownership, and employment data that could be used to analyze the economic and social impacts of Council actions for each LAPP.

Unlike traditional fishery management, LAPPs introduce market-based allocation mechanisms that necessitate a deeper understanding of financial performance, quota trading impacts, and the economic sustainability of participants. Gathering financial performance data enables NMFS to assess the effectiveness of quota allocations, ensure that LAPPs meet economic efficiency goals, and provide an understanding of the distributional impacts of a program. This includes evaluating whether quota allocations create unintended market distortions or barriers to entry that could undermine program objectives. Ultimately, the EDR program provides information beyond what may be available from general fisheries monitoring or inseason management and is intended to meet program-specific goals.

Another general purpose of EDR data is to better satisfy the requirements of a variety of Federal laws and Executive Orders. As described in Section 3.1 of the April 2019 discussion paper, the Magnuson Stevens Act, NEPA, the Regulatory Flexibility Act (RFA), and E.O. 12866 all require written analysis of the economic impacts of proposed fishery conservation and management actions developed by the Council. These laws, E.O.s, and the associated agency guidelines strongly support the collection of high-quality economic data and the most robust quantitative analysis possible given the data and analytical methods available and the scope and complexity of the particular issue. These laws, E.O.s, and agency guidance do not *require* the collection of specific economic data or the application of specific quantitative methods to implement fishery conservation and management actions, including catch share and limited access programs. These programs may be implemented, managed, and evaluated using the best scientific data available and with both qualitative and quantitative analytical methods, as determined appropriate by the Council and NMFS, and consistent with the requirements of the applicable laws and E.O.s. However, depending on the type and quality of the data produced by the EDR for the analytical question at hand, these data collections can elevate the ability of an analysis to respond to these directives.

3.1 Overview of the Crab Rationalization Program EDR

Program	Annual burden hours	Annual burden cost	Annual administrative cost	Total Cost (Burden cost + administrative cost)	Per Capita Hours	Per Capita Total Cost
Crab Rationalization	1,449	$55,742	$130,256	**$185,998**	19	$2,416

The EDRs for the Crab Rationalization Program was designed by the Council as a component of the Program to improve its ability to monitor and assess the achievement of social and economic management objectives set forth in the FMP. The Council recommended EDR requirements in June 2002 along with the following purpose and need statement:

> *"A mandatory data collection program shall be developed and implemented as part of the crab rationalization program and continued through the life of the program. Cost, revenue, ownership and employment data will be collected on a periodic basis (based on scientific requirements) to provide the information necessary to study the impacts of the crab rationalization program as well as collecting data that could be used to analyze the economic and social impacts of future FMP amendments on industry, regions, and localities. This data collection effort is also required to fulfill the Council problem statement requiring a crab rationalization program that would achieve "equity between the harvesting and processing sectors" and to monitor the "...economic stability for harvesters, processors and coastal communities. Both statutory and regulatory language shall be developed to ensure the confidentiality of these data.*
>
> *Any mandatory data collection program shall include:*
>
> *A comprehensive discussion of the enforcement of such a program, including enforcement actions that would be taken if inaccuracies in the data are found. The intent of this action would be to ensure that accurate data are collected without being overly burdensome on industry for unintended errors."*

The EDR requirement has been in effect since 2005. The Crab EDR was implemented concurrently with the Crab Rationalization Program under Amendments 18 and 19 of the BSAI Crab FMP (70 FR 10174), effective April 1, 2005. Since the implementation of the program, EDR respondents have been divided between 1) catcher vessels, 2) processors, and 3) catcher/processors. PSMFC administers the crab EDR on this website: https://www.psmfc.org/alaska_crab/. Notification letters are mailed in May and participants must submit the EDR online by July 31 every year.

AFSC economists and analysts prepare an annual summary of the crab EDR data, which is incorporated into the Economic Status of the BSAI King and Tanner Crab Fisheries off Alaska (Crab Economic SAFE).[16] This report represents information on economic activity in commercial crab fisheries and includes the mandatory annual census reporting of detailed operational and economic information by owners and leaseholders of vessels and processing plants participating in CR program fisheries from EDRs. The current Crab Economic SAFE focuses on reporting summary statistics for values across EDR data elements identified as sufficiently accurate for public reporting. Prior to 2012, several key elements in the EDR collection were limited by data quality and these have not been used in analysis of the CR program and have been withheld from the current report; these include quantity and cost of fuel used in the fishery, prices and costs for leasing of IFQ, and other expenditures. Data elements collected in each of the Crab EDR forms are the following:

Crab CVs and CPs

- Estimated market value and replacement value of vessel;
- Crab landings volume (pounds) and ex-vessel revenue, by CR fishery and quota type;
- Annual total fuel cost and gallons;
- Fuel gallons consumed, by CR fishery;
- Provisions costs, by CR fishery;
- Bait costs, by CR fishery;
- Quota lease costs, by CR fishery and quota type
- Total labor payments to crew (total of final settlement payments), by CR fishery;

[16] https://www.npfmc.org/fisheries/bsai-crab/

- Total labor payments to captains (total of final settlement payments), by CR fishery;
- Annual total direct labor payments to crew (inclusive of crab settlements);
- Health Insurance and Retirement Benefits provided to crew; (Y/N), by fishing crew/captain
- Commercial crew license number or Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number, by individual crew member that worked on vessel during CR crab season; and
- Vessel used for tendering during calendar year, (Y/N)

Crab processors, RCRs, and CPs

- Estimated market value and Borough assessed value (shore plants) or Replacement value (floating processors);
- Crab product sales to affiliated/unaffiliated buyers, volume (pounds) and first wholesale revenue, by crab species, product code, process code, and box size (large/small);
- Custom processing services provided, revenue, raw pounds, and finished pounds, by CR fishery, product code, and process code;
- Crab purchased from landing vessels, pounds and cost, by CR fishery and quota type;
- IPQ leased, pounds and cost, by CR fishery and quota type; and
- Custom processing services purchased, raw pounds, finished pounds, and processing fees paid, by CR fishery, product code, and process code;

Crab processors and RCRs

- Processing labor gross wages and paid hours, by CR fishery (CPs report processing crew labor cost combined with fishing crew);
- Processing employee count, by location of residence, CR Crab total and Annual total
- Non-processing employment (annual total number employed), and total annual gross wages and salaries.

Below is an example of how Crab Rationalization Program EDR data was used in a recent amendment analysis on crab crew shares. EDR data is used here to demonstrate that there were 511 crab crew members active in 2021, relative to the 634 crew positions in 2021. C shares can only be sold to individuals who participated in the CR Program fisheries in the last 365 days. Some crew members will participate in multiple crab fisheries, so the distinction between individuals and positions is important in considering the pool of eligible C share buyers. This information is relevant for this action that proposed to relax active participation requirements, due in part, to the diminished pool of eligible buyers. Loss of EDR data means decisions would need to be made with only crew position information. These data show the same trends, but with less precision. The concerns may appear less acute if the number of crew positions are greater than the number of active crew members.

Excerpt from Final Action on Active Participation Requirements for Crab Crew Shares (Dec 2023; page 32-34)

Crab catcher vessels typically employ 5-7 crew members, with 6 being the most common in the Bristol Bay Red king crab, Bering Sea snow crab and Bering Sea Tanner crab fisheries. The AIG fisheries typically employ 7 crew members per vessel. Table 2 demonstrates the total number of crew positions across fisheries. In this table each crew position in a fishery is counted as a unique position, although when BBR, BSS, and BST fisheries are open many crew members participate in more than one of these fisheries. The percent change column shows the variability that has occurred over time in available crew positions, with a peak in the timeseries presented in 2015 at 1,349 crew positions and 2021 representing less than half of this number (634 positions) due to the closure of the BBR fishery. 2022 and 2023 are not shown, but these years will represent even further reduced crew positions due to the joint closures of the BRR and BSS fisheries.

Table 2 Crew positions in the crab harvesting sector

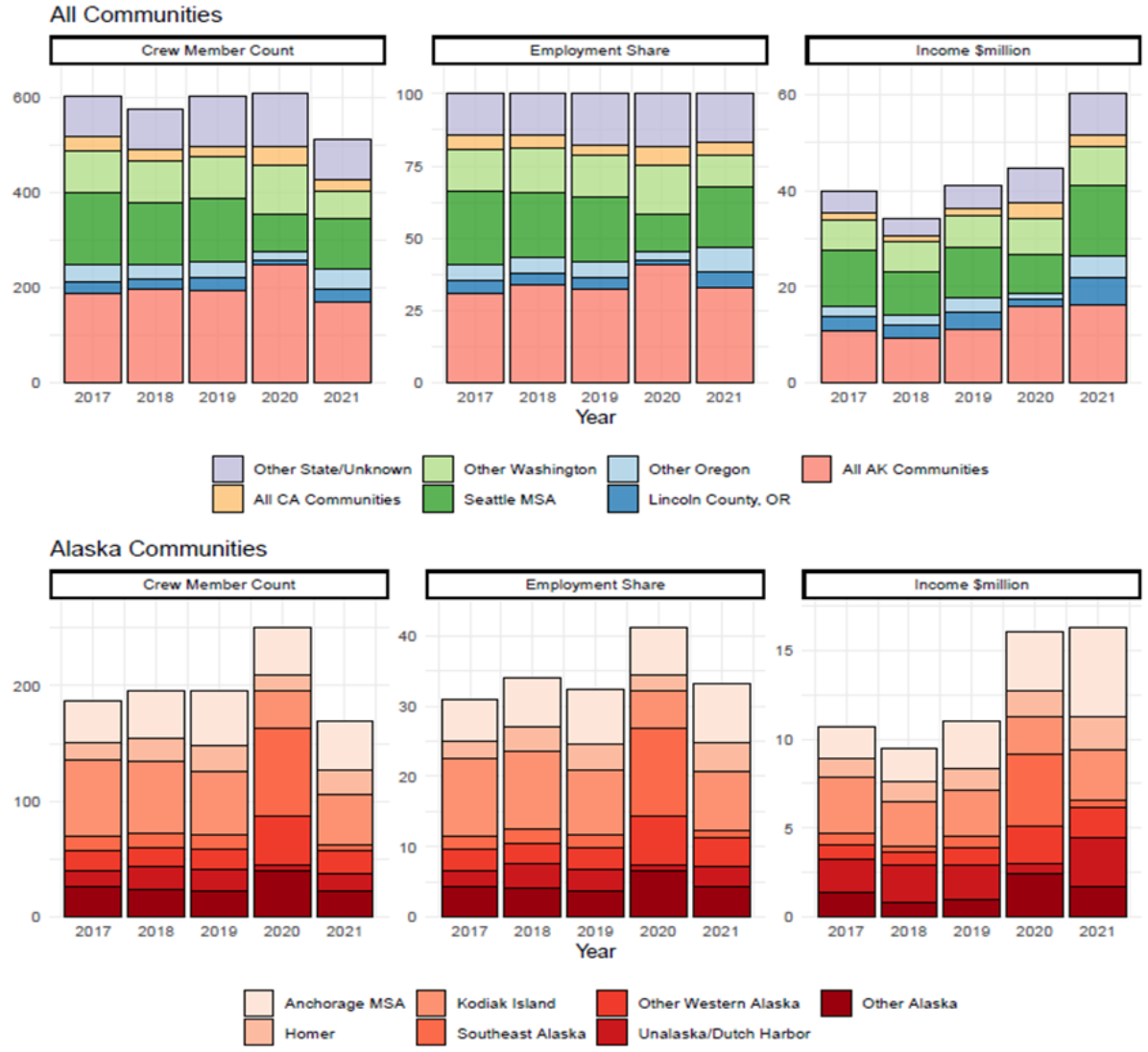
Year	AIG	BBR	BSS	BST	SMB	Sum of positions	Percent change
2009	35	443	536	102	39	1,155	
2010	35	422	444	21	63	985	-15%
2011	36	413	453	0	112	1,014	3%
2012	46	428	502	0	106	1,082	7%
2013	44	418	481	156	0	1,099	2%
2014	35	422	480	279	24	1,240	13%
2015	35	441	491	365	17	1,349	9%
2016	36	423	463	296	0	1,218	-10%
2017	36	419	441	100	0	996	-18%
2018	37	365	436	211	0	1,049	5%
2019	37	370	428	139	0	974	-7%
2020	35	333	417	163	0	948	-3%
2021	37	0	448	149	0	634	-33%

Source: From Table 4.13 in the Crab Economic SAFE (Garber-Yonts, et al. 2023)

Notes: Data shown by calendar year. Data are summarized over all harvesting sectors (CVCP) to preserve confidentiality. Crew positions are calculated using eLandings data on count of crew on-board reported by trip.

Figure 1 provides a geographical representation of the crew that have been employed and income generated in the CR Program fisheries, from 2017 through 2021. This information is important in understanding recent community connections to the CR fisheries, as well as the distributional impacts that have occurred from closed crab fisheries and the proposed actions. Figure 1 includes counts of individual crew members (including captains) by location of residence, the share (percentage) of total employment attributable to each location of residence, and the estimated amount of crew income flowing to communities/locations. The bottom figures demonstrate geographic distribution for Alaska residents in greater detail. Over the 2017 to 2021 period, Alaska and Washington have alternated between first and second largest state-level source for crab fishing crew members, with Alaska residents averaging a 34% share of crab crew employment over the period, and Washington state residents averaging 35%.

Figure 1 Estimated crew employment and income, by community/ region of residence



Source: Figure 1.8 in the Crab Economic SAFE; corresponding with Table 1.4 (Garber-Yonts, et al. 2023)

Source: Figure 1.8 in the Crab Economic SAFE; corresponding with Table 1.4 (Garber-Yonts, et al. 2023)

Notes: 'Crew member count' reports the number of individual vessel crew across all CR Crab fisheries identified as residents of the listed community or location. 'Employment share' reports the proportion of the total vessel employment pool associated by residence with the listed community or location. 'Income' (reported in $million, inflation-adjusted to 2021-equivalent value) is the estimated amount of vessel labor income, by community/location of residence, that is distributed to vessel crew members in aggregate. This estimate is derived by apportioning vessel-level fishing crew and captain labor payments among crew members reported in the EDR and CFEC gear operator permit holders with recorded landings of CR crab, then aggregating payments by community of residence. This method does not control for differential pay rates across positions, apart from deck crew and captain, or other differentiating factors, such as experience or length of employment.

3.2 Overview of the A80 Program EDR

Program	Annual burden hours	Annual burden cost	Annual administrative cost	Total Cost (Burden cost + administrative cost)	Per Capita Hours	Per Capita Total Cost
A80 Program	440	$16,927	$109,671	**$126,598**	20	$5,754

The EDRs for the Amendment 80 Program was designed by the Council as a component to assess the performance of the Amendment 80 Program fleet in meeting certain goals, including improving the retention and utilization of resources by fishery participants. The Council recommended an EDR requirement in June 2006 with the following purpose and need statement:

> *"The purpose of the data collection program is to understand the economic effects of the Amendment 80 program on vessels or entities regulated by this action, and to inform future management actions. The data is needed to assess whether Amendment 80 addresses some goals in the problem statement to mitigate, to some degree, the costs associated with bycatch reduction. Data will be used by Council and agency staff, recognizing that confidentiality is of extreme importance.*
>
> *Economic data collected under this program include employment data by vessel collected to determine the labor amounts and costs for the sector. In addition, revenue and cost data by vessel will be collected to evaluate trends in returns to the sector that may be compared with elements of the Amendment 80 program, such as bycatch reduction measures"*

The EDR requirement has been in effect since 2008 (72 FR 52668, September 14, 2007). Since implementation of the EDR requirement, permit holders who owned a vessel have been required to complete the entire EDR form while QS permit holders who did not operate a vessel have been required to complete portions of the form pertaining to QS permit sale and/or lease costs and revenues. PSMFC administers the A80 EDR on this website: https://www.psmfc.org/am80edr/. Notification letters are mailed in March and participants must submit the EDR online by June 1 every year.

As a requirement of the Amendment 80 Program designed by the Council, EDRs are submitted annually to NMFS by Amendment 80 vessel owners and QS permit holders, providing detailed data on vessel and QS-entity earnings, employment, QS lease transfers, operating costs and expenses, and capital improvements. The EDR is a mandatory annual reporting requirement for Amendment 80 entities, and supplements data provided by in-season monitoring and data collection programs, including eLandings, catch accounting, and the North Pacific Groundfish Observer program. Beginning with implementation of the Amendment 80 Program in 2008, the EDR program has collected annual economic census data. The current Groundfish Economic SAFE focuses on reporting summary statistics for values across EDR data elements identified as sufficiently accurate for public reporting.

The A80 EDR form has consistently collecting comprehensive, quantitative data for the following data elements:

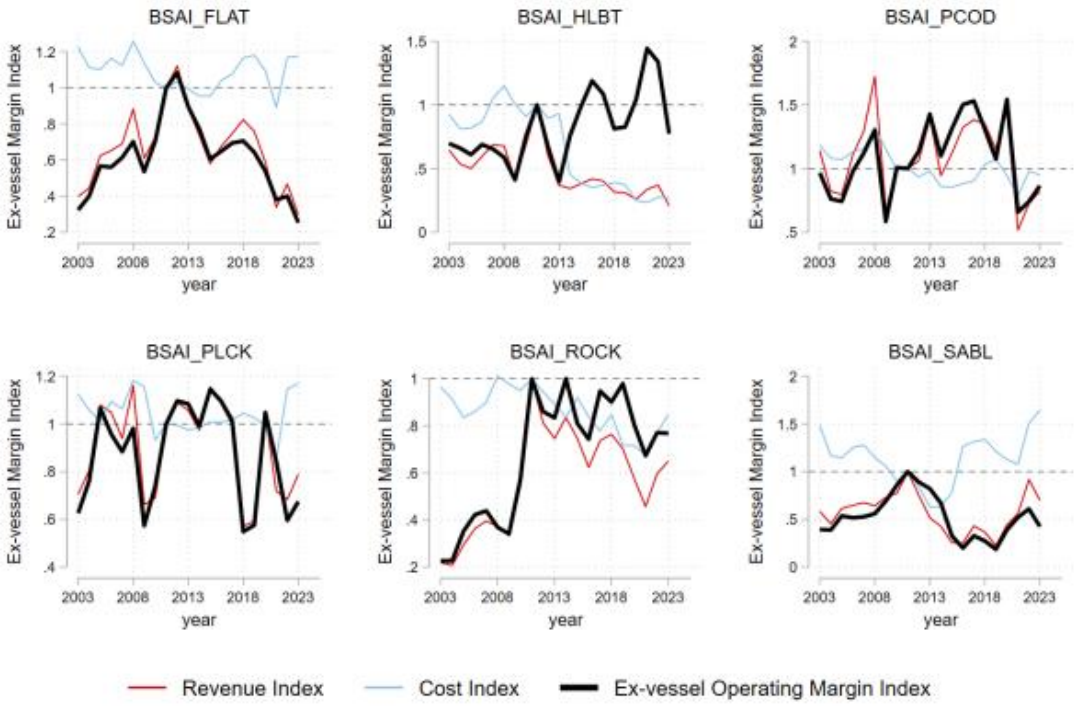
- Vessel characteristics and registry details (home port, tonnage, fuel capacity, shaft horsepower, year built);
- Survey value, date, and included assets;
- Fuel consumption rate (gal/hour), and annual total gallons consumed, by operating activity;
- Freezer storage and throughput capacity, and processing line throughput capacity, by A80 and GOA groundfish species and product code;
- Fishery product sales volume and revenue, LLP sale revenue, quota lease revenue and pounds, and other vessel operations income;
- Annual total capital expenditure, grouped by fishing gear, processing

equipment, other equipment, and other vessel capital;
- Non-labor vessel operating expenses, annual totals grouped by: fuel; lubrication; provisions, repair and maintenance, vessel/equipment lease costs, fishing gear purchases, leases and repair costs; freight and storage costs for product sales; other freight and storage; materials; observer fees and reporting/monitoring costs; cooperative fees, general administrative/management overhead, vessel insurance; fisheries landing taxes, total cost and volume of raw fish purchases; and QS lease quantity and costs by A80 species;
- Gross labor costs, grouped by: deck crew, processing crew, and all other on-board crew
- Average number of crew onboard and total crew members employed in year, grouped by: deck crew, processing crew, and all other on-board crew; and
- Use of share-system for crew compensation (y/n), by processing/non-processing crew
- Commercial crew license or CFEC gear operator permit numbers

Below is an example of how Amendment 80 EDR data was used in the Alaska Seafood Snapshot Report. EDR data is used here to demonstrate that operating margin indices for the BSAI fisheries have substantially declined in recent years. This is using A80 EDR data in addition to other sources. A80 EDR data is one of the only sources of cost data for BSAI fisheries.

Excerpt from Alaska Seafood Snapshot Report (August 2024; page 37)

Figure 2 Ex-vessel revenue, cost, and operating margin indices by fishery for BSAI groundfish species



3.3 Overview of the A91 Chinook Salmon EDR

Program	Annual burden hours	Annual burden cost	Annual administrative cost	Total Cost (Burden cost + administrative cost)	Per Capita Hours	Per Capita Total Cost
A91 Chinook bycatch	640	$24,621	$58,949	**$83,570**	4	$553

The A91 Chinook Salmon EDR requirement was implemented with a suite of Chinook salmon bycatch avoidance measures with a purpose and need made in December 2009, as follows:

> *"In April 2009 the Council approved Amendment 91 to the BSAI groundfish fishery FMP to reduce Chinook salmon bycatch in the Bering Sea pollock fleet. Under Amendment 91, the pollock fishery has the option of participating in a NMFS-approved Incentive Plan Agreement (IPA) to access a higher hard cap than is available in the absence of an IPA. The IPAs provide a new and innovative method of bycatch management. A data collection program is needed in conjunction with Amendment 91 to understand the effects and impact of the IPAs. The data collection program will focus on: (1) evaluating the effectiveness of the IPA incentives in times of high and low levels of salmon bycatch abundance, the hard cap, and the performance standard in terms of reducing salmon bycatch, and (2) evaluating how the Council's action affects where, when, and how pollock fishing and salmon bycatch occur. The data collection program will also provide data for the agency to study and verify conclusions drawn by industry in the IPA annual reports. To ensure that a full assessment of the program is possible, the data collection program should be implemented at the time Amendment 91 is implemented or as soon as practicable.*
>
> *To ensure that a full assessment of the program is possible from the start of the program, the data collection program should be separated into two phases, with a suite of data collection measures implemented at the time Amendment 91 goes into effect and sent to the Comprehensive Economic Data Collection Committee after IPAs have been fully developed and submitted to NMFS. The objective of this collection is to provide an improvement in the amount of data available to evaluate the effectiveness of incentives to minimize Chinook salmon bycatch under Amendment 91."*

The final rule for this data collection was and was published by NMFS (77 FR 5389, February 3, 2012) and effective March 5, 2012. The initial submission of EDR forms required under 50 CFR 679.65 were due on June 1, 2013, which reported data for the 2012 calendar year. PSMFC administers the A91 EDR on this website: https://www.psmfc.org/chinookedr/. Notification letters are mailed in March and participants must submit the EDR online by June 1 every year.
The A91 Chinook Salmon EDR applies to owners and leaseholders of AFA Program catcher vessels, catcher/processors, and motherships and entities eligible to receive Chinook salmon PSC apportionments (AFA In-shore Sector harvest cooperative representatives, sector-based Incentive Plan Agreement representatives, and Community Development Quota Program group representatives).

In addition, captains of AFA vessels who were active in the A or B season of the previous year pollock fishery are the focus of one of the three A91 EDR forms, but such forms are assigned by vessel owners; vessel captains are not directly required to submit EDR forms to NMFS.

There are three parts to the A91 EDR:

- **Chinook salmon PSC Compensated Transfer Report** (CTR)-Any person in the program who transferred Chinook salmon PSC allocation after January 20, and paid or received money for the transfer, must submit a completed CTR (Part 1 and Part 2) for the previous calendar year.
- **Vessel Fuel Survey**-An owner or leaseholder of an AFA-permitted vessel must submit all completed Vessel Fuel Surveys for each vessel used to harvest pollock in the Bering Sea in a given year.
- **Vessel Master Survey**-Each vessel master must complete the Vessel Master Survey, and the Vessel Master certification following the instructions on the form. An owner or leaseholder must submit all Vessel Master Surveys, and each Vessel owner certification form.

Despite limitations in the Chinook salmon EDR skipper survey, it is clear from the survey results that the pollock fishery is balancing a range of management challenges. Having a census of all skippers reveals that different fishers have very different experiences in any given year. The census shows that features such as the extent of sea ice, vary considerably within a year and impact fishing choices and the difficulty of avoiding Chinook salmon bycatch. This illustrates that some vessels may be much more flexible at moving in response to changing target and bycatch encounter rates. However, A91 data is not reported in an annual aggregated format and has only been reported on an ad hoc basis. The AFSC discontinued publication of the A91 Chinook Salmon EDR data in the Groundfish Economic SAFE in 2019 due to staff capacity constraints.

The A91 EDR is comprised of three separate forms: the Compensated Transfer Report, the Vessel Fuel Survey, and the Vessel Master Survey. The Compensated Transfer Report (CTR) is intended to collect transaction-level data on all bipartite transfers of Chinook PSQ allocation units during the pollock season in which monetary payment is included the transaction (i.e., “in-kind only” transactions are exempted). For each individual PSC transfer, the submitter is required to report: the NMFS id of the other party, the type of association between the submitter and the other party, the entity type of the other party, the number of Chinook salmon PSC transferred, the payment in $US transferred, and a Y/N indicator that other assets besides Chinook PSC were included in the transfer. It was the NPFMC’s intention that the CTR would capture "spot-market" PSC transfers, exempting pre-season or other transfers in which salmon PSC and pollock quota are coupled and avoiding revelation of pollock quota lease value. The form is to be completed by all entities participating as lessor or lessee in one or more "compensated transfers" of Chinook PSC; however, no such transactions have been reported, and all CTR form submissions to date have been “certification-only” submissions.

The Vessel fuel survey is required for all AFA vessels that harvested BSAI pollock during the previous year, and collects four data elements:

- Average hourly rate of fuel consumption for the vessel while operating in the BSAI pollock fishery, reported separately for fishing and transiting; and
- Total annual amount (in gallons) of fuel loaded to the vessel during the year, and total fuel cost.

The vessel master survey is comprised of a series of qualitative response questions regarding fishing and bycatch conditions observed by vessel masters during the BSAI pollock fishery and factors in effect that motivated Chinook bycatch avoidance (survey questions are listed below).

- If the vessel participated in an Incentive Plan Agreement, did the IPA affect your fishing strategy? If yes, please describe and discuss what incentives had the largest impact on your strategy.
- Did the amount and/or cost of Chinook PSC allocation available to the vessel lead you to make changes in pollock fishing operations? If yes, please describe.

- How would you compare the Chinook salmon bycatch and pollock conditions during the A and B seasons this year relative to the last two years? Please describe any unique aspects of the season.
- Did Chinook salmon bycatch conditions cause you to delay the start of your pollock fishing or otherwise alter the timing of your pollock fishing for some period during the past A and/or B season? If yes, please describe the Chinook salmon bycatch condition, when it occurred, and any change in your pollock fishing as a result.
- In the past year, did you end a trip and return to port early because of Chinook salmon bycatch conditions? [ ] YES [ ] NO. If YES, please indicate the number of trips that this occurred in each season (use a checkmark to indicate appropriate answer for each season).
- Please describe how any area closures or restrictions for the purpose of reducing Chinook salmon bycatch affected where and how you fished.
- Please describe how any regulatory or other area closures or restrictions for a purpose other than reducing Chinook salmon bycatch affected where and how you fished.
- Compared to a typical year, did weather or sea ice conditions have more, less or about the same impact on fishing as in a typical year? Please describe especially if there were particularly uncommon conditions at any point this year. If these conditions had an impact on your ability to avoid Chinook salmon bycatch, please describe.
- Were there exceptional factors that affected your pollock fishing this year? For example, were there unusual market or stock conditions, unusual pollock fishing conditions, or maintenance problems? Please describe.
- Separate from an Incentive Plan Agreement, were there other incentives for you to reduce Chinook salmon bycatch? If yes, please describe.
- Did actual or potential bycatch of species other than Chinook salmon cause you to change your harvesting decisions during the pollock season? If yes, please describe.

Below is an example of how Amendment 91 EDR data was used in a recent draft of the chum salmon bycatch management preliminary DEIS. Amendment 91 EDR fuel cost data is used here to characterize one of the larger operational costs for AFA vessels. Although the analysis cannot accurately predict the magnitude of change in fuel costs with the implementation of the proposed actions, these data provide context for the consideration of changes in operational costs from the proposed alternatives. These potential changes are also supported by statements made within the skipper surveys citing increased fuel use for avoidance of Chinook bycatch, with some skippers also citing increased fuel use from chum salmon avoidance.

Excerpt from Initial Review on Preliminary Draft Environmental Impact Statement Bering Sea Chum Salmon Bycatch Management (March 2024; page 243)

Increased Travel Costs

One of the primary tools of chum salmon avoidance moving fishing effort when certain rates of chum salmon bycatch occur. The movement could be relatively small, as in moving to the outside of a closure area or it could result in vessels moving to an entirely different area of the Bering Sea. When vessels move to avoid salmon or other PSC, they are likely using additional fuel (unless this was an area the vessels would travel regardless) and they may be giving up the opportunity cost of time (the value of the production and income to workers that could have occurred in the time they spent moving).

The fleets have different constraints in their ability to move that would likely result in a different level of impact. For instance, with an industry standard for the shoreside pollock sector of 48 hours between pollock catch and desired delivery in order to produce the freshest quality product, the shoreside fleet is constrained in their distance from port. Thus, depending on the caps and external conditions, the smallest, least mobile vessels could be effectively closed out of the fishery. Even vessels that have the capacity to reach open fishing grounds may incur prohibitively high operating costs (e.g., excessive fuel

consumption), increased risk (e.g., should sea or weather conditions change unexpectedly), and reduced product quality (i.e., as hold-time increases). The sectors are also constrained differently through differential area closures, such as the CVOA, which excludes the CP sector except when they are catching CDQ pollock.

Of all the categories of variable costs, fuel ranks at or near the top of the list of operating expenses for the fleets. An EDR was developed under Amendment 91 which requires AFA vessel owners or leaseholders to report on the quantity and cost of all fuel consumed by each AFA vessel harvesting or processing pollock during the calendar year. Table 3 demonstrates that for both CVs and CPs, the average rate of fuel burned while fishing has remained relatively consistent over the time series. The CP sector demonstrates much more inter-annual variation in average rate of fuel burned while transiting than the CV sector. Both sectors have variation in total gallons of fuel used annually with a declining trend from 2020- 2022 when considering annual fuel use (both A and B season).

Table 3 AFA vessel fuel use and costs, 2012-2022

	Year	Vessels	Annual average fuel consumption rate (gallons per hour), mean (sd)		Annual fuel use, mean (sd)	
			Fishing	Transiting	Gallons (1,000)	Cost ($1,000)
CP	2012	14	284 (40)	255 (59)	1,168 (181)	$5,258 (743)
	2013	15	290 (70)	249 (83)	1,171 (318)	$5,158 (1,308)
	2014	15	277 (61)	249 (79)	1,396 (395)	$5,773 (1,470)
	2015	14	284 (40)	270 (82)	1,438 (368)	$3,942 (856)
	2016	14	297 (32)	282 (85)	1,393 (378)	$3,050 (865)
	2017	14	279 (30)	285 (64)	1,570 (386)	$3,896 (887)
	2018	14	278 (34)	283 (52)	1,522 (306)	$4,523 (907)
	2019	14	278 (34)	284 (54)	1,641 (366)	$4,332 (991)
	2020	14	288 (29)	273 (67)	1,606 (386)	$3,073 (723)
	2021	13	285 (40)	279 (57)	1,252 (278)	$3,237 (725)
	2022	14	297 (47)	256 (47)	1,163 (306)	$4,797 (1,273)
CV	2012	90	75 (38)	51 (30)	163 (98)	$797 (488)
	2013	85	73 (34)	51 (28)	152 (84)	$739 (409)
	2014	85	74 (34)	51 (27)	143 (74)	$661 (342)
	2015	83	76 (36)	52 (29)	131 (52)	$441 (182)
	2016	87	75 (34)	51 (27)	117 (44)	$274 (102)
	2017	84	74 (34)	50 (27)	120 (53)	$312 (131)
	2018	80	75 (35)	51 (27)	139 (65)	$449 (215)
	2019	71	72 (34)	51 (28)	146 (67)	$433 (195)
	2020	79	76 (34)	50 (27)	193 (124)	$390 (176)
	2021	80	76 (35)	52 (30)	131 (67)	$361 (190)
	2022	79	73 (36)	49 (28)	106 (65)	$442 (239)

Source: Amendment 91 EDR fuel survey; sourced by AKFIN and AFSC
Notes: all dollar values are inflation-adjusted to 2022-equivalent values. Data reported for mothership vessels is excluded from the statistics reported in the tables above.

While it is difficult to isolate the impact of PSC avoidance from these values,[17] it is expected that a chum PSC limit that incentivizes avoidance would increase the status quo level of fuel use and fuel costs. This is supported by statements in the Vessel Master Survey, another component of the Amendment 91 EDR. In the 2022 vessel master survey many skippers cited burning more fuel in an effort to avoid Chinook as well as chum salmon.

[17] This specific type of analysis was conceptualized in the development of the A91 EDR, in that the fuel survey was meant to be pair with modifications of the Daily Fishing Logbook (DFL) for BSAI pollock trawl CVs and CPs. The Council specified modification of the DFL for BSAI pollock trawl CVs and CPs to add a ”checkbox” to the tow-level logbook record, requiring vessel operators to indicate, prior to each tow, instances when a vessel fishing for pollock in the BSAI changed fishing locations for the primary purpose of avoiding Chinook salmon PSC. However, vessel movement data collected to-date from CV’s is not captured in an electronic database available to analysts, and data reported by CPs has varied greatly in coverage. Thus, far this data collection component has not be able to be used to the intended effect.

4 EDR Program Management

4.1 Administration of Data Collection

Administration of the EDR program is funded by a combination of mostly cost recovery funds (see section 4.2) and ad hoc federally appropriated funds (see section 4.3). In the last few years, the administration of the EDR program has cost average of **$298,876** per year (2022-2024) that is subject to cost recovery.

The cost covers PSMFC's administration of the EDR Programs. The PSFMC staff provide administrative support for the data collections, software development, web services, and database administration. Table 4 below shows the administrative costs of the EDR programs' lifespans, not including the discontinued GOA Trawl EDR. Auditing of EDR submissions was reduced by PSFMC in 2017 to reduce some costs in administration before audits were formally removed from regulations in 2023.

Table 4 PSFMC Administrative Costs of the EDR Programs, 2005-2024

Year	Crab[1]	A80	AFA[2]	Total EDR cost[3]
2005	$150,000			$150,000
2006	$150,000			$150,000
2007	$259,938			$259,938
2008	$338,276			$338,276
2009	$314,303			$314,303
2010	$352,508			$352,508
2011	$323,588			$323,588
2012	$373,316			$373,316
2013	$318,278			$318,278
2014	$342,703			$342,703
2015	$269,583			$323,354
2016	$345,509	$88,254	$62,114	$569,098
2017	$180,168	$91,482	$66,929	$430,458
2018	$202,012	$92,462	$40,631	$396,870
2019	$180,224	$87,644	$56,989	$382,343
2020	$91,620	$72,976	$48,194	$320,250
2021	$72,927	$85,123	$52,735	$284,026
2022	$97,913	$80,256	$64,205	$242,374
2023	$145,209	$130,943	$63,378	$339,530
2024	$147,646	$117,814	$49,264	$314,724
3-Year Average	**$130,256**	**$109,671**	**$58,949**	**$298,876**

Source: Pacific States Marine Fisheries Commission (2024)
1 The year listed in this table reflects the first year of the crab fishing season.
2 Only includes costs associated with the inshore sector.
3 Does not include the GOA Trawl EDR costs.

4.2 Cost Recovery

The Magnuson-Stevens Act ensures that industry participants contribute to the expenses incurred by regulatory agencies in administering LAPPs and the CDQ Program, with a cap on fees set at a maximum of three percent of the total ex-vessel value of fish harvested under each program. 16 U.S.C. 1854(d)(2). Cost recovery fees recover the actual incremental costs that are directly related to the management, data collection, and enforcement of the programs.

According to the NOAA Technical Memorandum on *Design and Use of Limited Access Privilege* (Anderson & Holliday, 2007) only incremental costs—**those that would not have been incurred but for the existence of a LAPP or CDQ Program**—are eligible for cost recovery. NMFS's Alaska Region (AKR) has developed, and maintains, internal guidance for agency staff in tracking incremental costs, which describes specific administrative, compliance, and enforcement activities that arise due to the existence of a LAPP or CDQ Program. The *NMFS Catch Share Policy* (NOAA Fisheries, 2017) further clarifies that fees must be directly tied to the program's operation, ensuring that costs recovered do not extend beyond what is necessary to maintain the system.[18]

The incremental costs differ from general fisheries management expenses, which are typically covered by federally appropriated funds. More information about federally appropriated funds can be found in section 4.1. Cost recovery ensures that those who benefit from the privilege of access to a LAPP fishery contribute equitably to its administration. For an exhaustive discussion about cost recovery, please refer to this discussion paper.[19]

EDRs are partially funded by cost recovery fees and historically the Council and NMFS have determined the justification for EDRs are to ensure that LAPPs remain efficient, fair, and adaptive to industry needs. As with all data collections at NMFS, the EDR programs required high upfront implementation costs and long-term costs to maintain the collection. Upfront costs to data collections such as the EDR programs include database design, web application build, and form creation. Ongoing long-term costs would include salary at Pacific States Marine Fisheries Commission (PSFMC) to support the program, including analysis, capacity to send out surveys, and follow-up with compliance.

The AFSC costs that are recoverable include oversight of PSMFC work, performing additional data quality assurance/ quality control, survey development and refinement, collaboration with AKRO staff on Paperwork Reduction Act (PRA) clearance and publication of authorizing regulations, and associated public outreach (meetings, consultations, and user support). AFSC also provides office space, computer equipment, and other administrative services.

As shown in Table 5 below, the cost recovery fees associated with EDR programs for the three LAPPs that require them represent, on average, just 0.07% of the total fishery value. This table does not account for inflation, instead it illustrates the comparison of the costs to each fleet in comparison to the overall fishery value. These EDR costs are considered incremental costs that would not have been incurred but for the existence of a LAPP needed to manage each of the fisheries.

[18] The key criteria for a cost to qualify as incremental and therefore a recoverable expense include:
1. Direct Association with the LAPP or CDQ Program – The cost must be incurred specifically because the program exists and would not be necessary otherwise.
2. Beyond General Fisheries Management – The cost must exceed standard fisheries management practices, which apply to all fisheries.
3. Essential for Effective Program Oversight – The cost must contribute to the ongoing administration, monitoring, enforcement, or development of LAPP-specific policies.

[19] https://meetings.npfmc.org/CommentReview/DownloadFile?p=f9afe06e-11ec-400b-a174-7fff16574663.pdf&fileName=D1%20Annual%20Cost%20Recovery%20Report.pdf

Table 5 EDR Programs as Percent of Fishery Value, 2020-2024

Year	Fishery	EDR Cost	Fishery Value	EDR Program as % of Fishery Value
2020	Crab Program	$ 91,620	$ 185,616,712	0.05%
2021		$ 72,927	$ 268,067,389	0.03%
2022		$ 97,913	$ 80,150,470	0.12%
2023		$ 145,209	$ 88,885,388	0.16%
2024		$ 147,646	$ 101,351,356	0.15%
2020	Amendment 80 Program	$ 72,976	$ 123,869,002	0.06%
2021		$ 85,123	$ 73,808,145	0.12%
2022		$ 80,256	$ 138,054,805	0.06%
2023		$ 130,943	$ 126,970,552	0.10%
2024		$ 117,814	$ 127,092,592	0.09%
2020	AFA Program	$ 48,194	$ 201,766,245	0.02%
2021		$ 52,735	$ 206,199,143	0.03%
2022		$ 64,205	$ 213,096,103	0.03%
2023		$ 63,378	$ 217,219,279	0.03%
2024		$ 49,264	$ 229,142,945	0.02%

Source: AKFIN Cost Recovery
Note: Data in real prices and is in ex-value for the Crab Program, first wholesale for Amendment 80 Program and AFA Program.

4.3 Agency Costs

Since 2002, NMFS Office of Science and Technology (OST) has invested in cost data collection of commercial fisheries by providing dedicated funding to regional science centers (AFSC). This programmatic support has led to an expansion of cost data collections tailored to suit regional Council requirements. For more information, please see (NOAA Fisheries, March 22, 2019).

In addition to cost recovery fees, the EDR program have leveraged funding through NMFS' Data Collection Grant. AFSC manages the grant and oversees PSMFC's scope of work for each of the EDR projects. PSMFC submits annual expenditure reports to NMFS. NMFS then recovers the expended funds through cost recovery and disburses funds from the grant to PSMFC. The grant is annually requested and allocated.

To fund the non-reimbursable work performed by PSMFC/Alaska Fisheries Information Network (AKFIN), AFSC increased the request for FY25 funds from OST to include $97,068 for AKFIN support for data dissemination and report production associated with crab and A80 EDR data, in addition to the $14,700 non-recoverable at-sea portion of PSMFC's A91 EDR costs. After the GOA Trawl EDR removal, OST funding dropped down to cover the A91 EDR costs and in FY25 increased back to consistent historical amounts. OST funding in 2016 included funding support for implementation of the GOA Trawl EDR Program. Table 6 shows funding received from the NMFS HQ Office of Science and Technology from 2016 to 2025.

Table 6 NMFS HQ Office of Science and Technology Funding for EDRs, 2016-2025

Year	Funding from HQ OST
2016	$235,922
2017	$91,879
2018	$61,764
2019	$72,546
2020	$65,937
2021	$85,932
2022	$91,476
2023	$7,112
2024	$7,132
2025	$97,068

Source: AFSC

4.4 Paperwork Reduction Act Requirements

The Paperwork Reduction Act (PRA) was enacted to minimize the paperwork burden for individuals; small businesses; educational and nonprofit institutions; Federal contractors; State, local and tribal governments; and other persons resulting from the collection of information by or for the Federal government. The PRA generally provides that every Federal agency must obtain approval from the Office of Management and Budget before using identical questions to collect information from 10 or more persons. If NMFS decides to gather information, they must prepare an Information Collection Request (ICR), which describes the information to be collected, gives the reason the information is needed, and estimates the time and cost for the public to answer the request. After reviewing the request, OMB may approve or disapprove the ICR, or define conditions that must be met for approval. Examples of information collections include surveys, permits, questionnaires, and reports.

Shown below is the burden table for the PRA information collection by EDR program. These are the cost estimates for preparing, reviewing, and submitting the required information and do not include administration of the EDR Program. NMFS is currently in the process of renewing this PRA package and the numbers in Table 7 will be updated in early 2026. The total estimated burden cost to industry is **$97,290**.

Table 7 Estimated Number of Respondents, Burden Cost, and Respondent Total Cost Per Year Associated with Preparation and Implementation of Alaska Economic Data Reports

Program	Annual burden hours	Annual burden cost
Crab Rationalization	1,449	$55,742
A80*	440	$16,927
A91 Chinook bycatch	640	$24,621

* Includes GOA Trawl CP which has since been discontinued.
Note: 2020-2022 average annual implementation costs represent the most recent three-year average used in PRA renewal analyses and also represents average annual costs since suspension of automated audits.

NMFS solicits comments on these burden hour estimates and cost estimates in the proposed rule for the information collection requirement and again in each 3-year renewal. If specific comments are received on the burden hour or cost estimates, NMFS considers those comments in estimating the burden for the specific collection.

NMFS must resubmit PRA renewals for all their information collections, including the three EDRs. NMFS currently manages 29 information collections of varying sizes and the EDRs are three separate information collections. Parallel to this action, NMFS must also renew each of the EDR information collection packages to remain within compliance of the PRA. As such, PRA compliance for the EDR programs represent a substantial work load for NMFS Alaska Region staff.

4.5 Summary of EDR Program Management Costs

Overall, the costs associated with the EDR programs include costs to PSMFC/AFSC to administer the EDR Program and the burden to industry to respond to the reporting requirement. The administration of the EDR programs has cost an average of $298,876 per year that is subject to cost recovery (based on a 3-year nominal average from 2022-2024). For the most recent data on estimated burden to industry (based on a 3-year nominal average 2020-2022), the total annual cost was $97,290. **Therefore, the total annual cost to industry of the EDR Program is approximately $396,166.**

This number has some caveats: The administration costs are based on a 3-year nominal average from 2022-2024 and the PRA burden estimate is based on a 3-year average from 2020-2022. Comparing across different years was the closest NMFS could get to a reasonable annual estimate to determine costs for the EDR Program. Funding from HQ was not included in this estimate since it is variable year to year.

4.6 Usage of EDR data

EDR data is typically included as part of a broader set of background information to help inform the Council about the LAPP when the Council is considering changes to the program. As with other time series data, EDR data rarely plays a direct role in Council decision-making. This section looks at usage of EDR data since 2020, showing new usage after the Council had last seen Amendment 52 and its regulatory amendments to the EDRs.

Council staff
Council staff incorporate EDR data into analyses when they determine that the additional information will enhance the evaluation of action items presented to the Council. The list below highlights some of the action items from 2020 to 2024 that included EDR data, along with brief descriptions of how the information was used.

- BSAI Halibut Abundance Based Management (ABM) contained crew data pulled from the A80 EDRs to show the residency of crew members on Amendment 80 Catcher Processors.
- The Snow Crab Rebuilding Analysis pulled information from the BSAI Crab EDR. The analysis included payments to crew, captains, and processing workers, as well as the total number of positions, crew residency, estimated crew compensation by community, and lease rates and amounts of leasing.
- Amendment 91 EDR skipper surveys and fuel costs were utilized in the Chum Salmon Bycatch action item. The skipper surveys helped to describe the complex set of management and environmental challenges faced by skippers, including references to chum salmon avoidance. While these surveys generally corroborated testimony provided by skippers on this action, having a census of all skipper's accounts also reveals the different experiences by different vessels and in different years. Trends in fuel cost data was provided as an example of an operational costs that may be influenced by increased avoidance activity.
- Amendments to the Crab Rationalization program routinely include EDR data in some capacity. For example, Amendment 54 on Crab C Shares participation utilized the Crab EDR data to illustrate the number of crew members participating in the crab fishery, crew compensation and crew residency information. While the number of crew *positions* by vessel can be gleaned from eLandings, this may be different than the total number of people participating in the crab fisheries

in a season, which is only available with EDRs. This difference was relevant when considering the pool of people eligible for continuing to hold C shares prior to Amendment 54 and is relevant for the current action considering changing C share transfer requirements.
- BSAI Crab Program Review contained payments to crew, captains, and processing workers. The total number of positions, crew residency and estimated crew compensation by community as well. Lease rates and leasing were analyzed but not presented as part of the review.
- Amendment 80 Program Review contained a summary of key metrics of fleet structure, operations, economic performance, and employment and labor earnings based on A80 EDR data.
- Crew Data Collection and Universal Data Collection items contained EDR data to highlight examples of uses. The analysis emphasized how crew data is used to show crew compensation, crew positions and crew residency.

AFSC staff

As described in the previous section, AFSC Economics and Social Science Research Program economists analyze EDR data in two almanacs of data produced for the Council as appendices to the annual SAFE reports which present the data in tables for public use through the Economic SAFE documents for crab and groundfish, respectively. AFSC staff also use EDR data in a variety of applications and publications. In recent years, AFSC and AKFIN have collaborated on development of the Human Dimensions Data Explorer, which provides a platform for public access to AFSC's fishery management decision support tools and data reports, including the BSAI Crab Economic SAFE, Groundfish Economic SAFE and the Annual Community Engagement and Participation Overview reports in document form, as well as providing public, non-confidential access, in the form of customizable data queries, to the most current available statistical data published in the respective reports. The data explorer portal also provides access to other AFSC socioeconomic tools and information, including community profiles and a regional economic impact analysis web application jointly developed by AFSC and AKRO (Seung and Miller 2022) based on the multiregional social accounting matrix (MRSAM) developed by AFSC (see AFSC applications of EDR data in regional economic impact assessment below). The list below highlights NMFS-sponsored research projects and associated publications from 2020 to 2024 that depended on EDR data.

- Abbott, J.K., Leonard, B. and Garber-Yonts, B., 2022. The distributional outcomes of rights-based management in fisheries. Proceedings of the National Academy of Sciences, 119(2), p.e2109154119. https://www.pnas.org/doi/pdf/10.1073/pnas.2109154119.
- Punt, A.E., Dalton, M.G., Daly, B., Jackson, T., Long, W.C. Stockhausen, W.T., Szulwalski, C., Zheng, J., 2022. A framework for assessing harvest strategy choice when considering multiple interacting fisheries and a changing environment: The example of eastern Bering Sea crab stocks. Fish. Res. 252, 106388.
- Punt, A.E., Dalton, M.G., Foy, R.J., 2020. Multispecies yield and profit when exploitation rates vary spatially including the impact on mortality of ocean acidification on North Pacific crab stocks. Fish. Res. 225, 105481.
- Punt, A.E., Dalton, M.G., Long, C., Cheng, W., Hermann, A.J., Holsman, K.K., 2025. Identifying and reducing climate uncertainty in fisheries management reference points. Fish. Res. (*in review*).
- Punt, A.E., Dalton, M.G., Adams, G.D., Barbeaux, S.J., Cheng, W., Hermann, A.J., Holsman, K.K. Hulson, P.F. Hurst, T.P. Rovellini, A., 2024. Capturing uncertainty when modelling environmental drivers of fish populations, with an illustrative application to Pacific Cod in the eastern Bering Sea. Fish. Res. 272, 106951.
- Seung, C.K., 2024. Does factor mobility matter? A general equilibrium analysis of a fishery rationalization. Marine Resource Economics, 39(2), pp.123-144. https://www.journals.uchicago.edu/doi/full/10.1086/728701
- Seung, C.K. and Waters, E., 2024. Spatial distribution of economic multipliers for Southwest Alaska fisheries. Fisheries Research, 276, p.107035.

https://www.sciencedirect.com/science/article/pii/S0165783624000997?casa_token=KCGOrrNuuyoAAAAA:_c3G-hGmZrHdw261kBtw7AqOVgVOU9I1pIiEhtLYigxXq2C3JQJOLFWEwL2Mvmmx0rNYKi4Ka14

- Seung, C. K., and S. Miller. 2022. Regional economic analysis for fishery-dependent communities in Southwest Alaska. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-444, 51 p. https://nwecon.psmfc.org/
- Seung, C.K., Waters, E.C. and Barbeaux, S.J., 2021. Community-level economic impacts of a change in TAC for Alaska fisheries: A multi-regional framework assessment. Ecological Economics, 186, p.107072. https://www.sciencedirect.com/science/article/pii/S0921800921001300?casa_token=OPjXSeir3PIAAAAA:c-VUo1Iy0seHdumHKIUF_T1emf0WNK2WfIwPzK8RQyYRq0olfRv4kIMd_fo-JU-aK0gFq-3mvx8
- Kasperski et al, 2024. Alaska Seafood Snapshot https://www.fisheries.noaa.gov/s3//2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf

In addition to published work, the AFSC staff have multiple research projects that rely on EDR data. Several bioeconomic models for crab and cod use EDR data and it is unclear to what extent the research would be reduced or halted. The multi-regional social accounting matrix (MRSAM) modeling work at the AFSC uses EDR data and would need to conduct a voluntary survey to obtain similar data, which has its own limitations, or rely on national-level IMPLAN data which is unreliable for Alaska's small ports and communities.[20] The Alaska Seafood Snapshot, a standalone report describing the state of Alaska seafood and its impact on the economy, relied partially on EDR data. There are preliminary discussions to update the Alaska Seafood Snapshot and depending on when it is published, removal of annual EDR data may impact some of the report.

[20] https://nwecon.psmfc.org/

5 Impacts of the Alternatives

5.1 Impacts of Alternative 1, No Action

Alternative 1 would continue the current mandatory EDR submissions, ensuring consistent yet imperfect and limited EDR data for management but with an annual cost primarily funded by the annual cost recovery program. See more about each EDR requirements in section 3 of this analysis. If the Council decided to take no action on removing EDR requirements, each participant in each of the three LAPPs would continue to submit EDRs through the PSMFC website, which is a requirement for them to maintain their quota privileges.

The continued use of EDRs may be beneficial for addressing each data collection's purpose and need statement and evaluating long-term effects of fisheries management. For instance, the Crab Rationalization Program EDR is intended to help evaluate whether the Program has achieved its problem statement in providing, "equity between the harvesting and processing sectors" and to monitor the "...economic stability for harvesters, processors and coastal communities". The Crab Rationalization Program EDR provides consistent data on costs, revenue, and employment in response to this charge, and this information is made available through Economic SAFE documents and contributes to program reviews. The data contributes to the assessment of different sectors, from harvesters to processors, and for understanding how benefits and costs are distributed across fishing communities. When incorporated into analyses, EDR data typically contributes to the Council's decision-making along with other data sources to provide broader fleet-wide context for the fishery. For some specific examples, please see section 3, where there are three contemporary examples of EDR data in action. Section 4.6 describes specific, recent Council staff and AFSC staff projects where EDR is incorporated.

Despite the limitation in EDR data identified in Amendment 52 RIR (NOAA Fisheries, 2023), these data would continue to be the best available economic data for these North Pacific fisheries. Under Alternative 1, AFSC would continue to incorporate EDR data into the crab and groundfish Economic SAFE documents from the Crab Rationalization Program EDR and the Amendment 80 Program EDR. The data from the Amendment 91 EDR would likely not be used except on an ad hoc basis. AKRO would continue to renew the information collections under the PRA under a 3-year cycle. PSMFC would continue to bill cost recovery for the EDR program. As shown in section 4.1, the EDR requirements would continue to rely on an average of $298,876 a year to manage (includes cost recovery funds and funding from HQ).

Data collected in the EDRs have been used to develop analyses of Council actions, to monitor bycatch avoidance, and has demonstrated practical value in the fisheries management and the Council process, as supplemental information in Council analyses. However, it has been expressed by AFSC economists that the current EDR programs have flaws reducing their benefits. In addition, the EDRs are only a requirement for three out of eight LAPPs in the North Pacific and the data collected across the three EDR Programs is variable and specific to the LAPP. This inconsistency across programs has also been highlighted as one of the limitations in its use.

Since the Council uses a variety of time series data, including EDR data, to evaluate its fisheries and the EDR program have had some longstanding flaws, the Council will need to decide if the benefit of retaining the EDR program outweighs the costs to industry. In the past, the only EDR removed was the GOA trawl EDR. The Council chose to remove the GOA Trawl EDR requirements because the original purpose of this EDR was to collect baseline data to prepare for development of a GOA trawl catch shares program. The Council chose not to continue with development of a catch shares program for the GOA trawl fishery at that time and thus the EDR was no longer aligned with its intended purpose.

Similar to other revenue and cost data time series, EDR data provides context to understand fisheries over time but ultimately is not required for fishermen to harvest their quota. Fishermen know in real time (or

on an annual basis) their revenue and costs. The Council and the agency rely on time series data to review fleet-level trends and long-term trends in the fisheries.

5.2 Impacts of Alternative 2, Remove EDR requirements for LAPPs

This section describes the impacts of the action alternative to remove the EDR requirements, with a categorization of the impacts into two parts: (1) EDR program participants, and (2) NMFS, the Council, and the public. The impacts of this action represent a tradeoff with the benefits resulting in reduced costs to the program participants and negative impacts or reduced benefits to inform the evaluation of program success. In general, losing EDR data would result in:

- Diminished ability to quantify net economic benefits of the LAPP;
- Diminished ability to accurately assess and describe the economic contributions to Alaskan fishing communities;
- Diminished ability to assess the distribution of benefits of program among processors, harvesters, and fishing communities;
- Potential for gaps in understanding the economic trends to the extent they are currently used;
- Loss of data for AFSC economic modeling efforts (for example the Alaska Seafood Snapshot);
- No source of consistent, annual cost data for these fisheries;
- Loss of baseline fisheries descriptions and how they are integral to communities, processing sectors, and harvesting sectors;
- Loss of revenue, ownership, and employment data accessible to NMFS, the Council, and the public.

5.2.1 Impact to Program Participants

If the Council recommends removing the requirements for AFA, Amendment 80, and Crab Rationalization Program participants to submit EDRs each year, there would be cost savings by these fishery participants in two ways. First, the annual burden hours to complete EDR forms would be eliminated. As shown in Table 8, this has ranged from 440 hours per year to complete an A91 Chinook bycatch EDR to 1,449 hours per year to complete a Crab Rationalization EDR. The opportunity cost associated with this time is quantified as ‘annual burden cost’ in the table below. Second, as shown in Table 8, these participants would no longer be responsible for paying cost recovery fees associated with the administration of the programs as well as direct costs incurred to complete the reports. From these two categories of cost savings, the participants as a whole in the three LAPPs that require EDRs would save approximately $396,166 annually. As shown in Table 8, removal of EDRs is expected to result in reduced costs that translate to an increase of 0.07% of their overall fishery earnings. Additionally, submitting an EDR would no longer be a requirement of LAPP participants in order to receive their annual quota.

Table 8 Estimated Annual Cost Savings in Burden Hours, Burden Cost, and Administrative Cost

Program	Annual burden hours	Annual burden cost	Annual administrative cost	Total Cost (burden cost + administrative cost)	Per Capita Hours	Per Capita Administrative Cost	Per Capita Total Cost
Crab Rationalization	1,449	$55,742	$130,256	**$185,998**	19	$1,692	$2,416
A80*	440	$16,927	$109,671	**$126,598**	20	$4,985	$5,754
A91 Chinook bycatch	640	$24,621	$58,949	**$83,570**	4	$390	$553

Source: AKFIN Cost Recovery (2022-2024 average administrative costs) and PRA Supporting Statements for EDR Information Collections (2020-2022 average burden costs)
Notes: * Includes GOA Trawl CP which has since been discontinued.
Data for burden estimates based on 3-year nominal average from 2020-2022. Data for administrative cost based on 3-year nominal average from 2022-2024 and does not include administration of GOA Trawl EDR Program, which has been discontinued. The analyst acknowledges the discrepancy in comparing two sets of years to get to a total but this is the best available data.

5.2.2 Impacts to National Marine Fisheries Service, the Council, and the Public

Under Alternative 2, the elimination of EDRs would also eliminate or significantly reduce the information for NMFS, the Council, and the public to provide the evaluations envisioned in each EDR's purpose and need statement. These data collections were developed independently of each other to achieve the objectives stated in section 3. While the Crab Rationalization Program and A80 were being developed through the NPFMC, there was an interest in tracking and understanding the implications of these program designs. For instance, the Crab Rationalization Program EDR was intended to help illuminate changes in harvesting and processor dynamics following program implementation. The A80 EDR was intended, in part, to provide information on the extent to which the cooperative design of this fishery helped to minimize bycatch while also minimizing some of the costs of bycatch avoidance. The A91 EDR was implemented in conjunction with the IPAs and other Chinook salmon bycatch measures to provide a further dimension in evaluating their effectiveness, for instance, through direction feedback from skippers.

Data to assess gross revenue for Federal fisheries in the North Pacific are widely available; however, there is often insufficient data to assess costs. EDRs provide the only data collection available to NMFS to assess costs for specific fisheries, but the utility of such data varies by EDR program. Currently, analysts at the NPFMC and NMFS cannot quantitatively estimate the full impacts of a potential management action using EDR data. EDRs can provide helpful context within an analysis, but fall short of being able to directly explain how a management action would affect costs for participants or how costs could impact participation or operational decisions. Since analysts have often entirely relied on gross revenues and very minimally on cost data (since not all LAPPs have EDR data), there is a heavy reliance on public testimony and direct stakeholder engagement which provides a limited understanding of fleet-wide changes in profitability resulting from LAPPs.

Removing EDR requirements, however limited the data are, will further reduce the understanding of costs for LAPPs. Under Alternative 2, NMFS, NPFMC, and the public would not have access to consistent fleet-wide data on operational costs for Crab Rationalization Program, A80 and fuel costs in AFA. In addition, these entities will not be able to assess drivers of costs or understand economic trends for LAPPs. The elimination of the EDRs associated with these three programs makes the data unavailable for the Council and NMFS to create the annual reports on economic performance, for MSA-required LAPP review (e.g. Crab EDR, A80 EDR), and future Council actions on salmon bycatch avoidance in the Bering Sea, data (e.g., from A91 EDR) The Council is currently considering action on chum salmon bycatch management measures. The removal of the A91 EDR means these data would not be available to evaluate changes in AFA fuel costs or gleam an understanding on operational implications from the skipper surveys, to evaluate implications of these possible actions.

Ultimately, science-based economic information is important for evaluating and assessing various national standards including calculations of optimum yield, analysis of allocation decisions, efficiency, costs and benefits, and the impacts on fishing communities. Moreover, as dictated in the NMFS Catch Share Policy data collections should be implemented to monitor topics such as changes in profits and impacts on fishing communities. Harvest specifications, a key component of the Federal system of fishery management, do not generally rely on cost and earnings data and therefore, there are not expected to be impacts to harvest specifications if EDRs were eliminated.

Elimination of the EDRs would significantly hamper future analyses and research of the economics for these programs. It would result in analysts relying entirely on voluntary data collection efforts. Voluntary data collections have been shown to be more expensive to operate and can result in uneven representation of participants as opposed to a times series of standardized, consistent, and comprehensive annual economic data.

In particular, under Alternative 2, the three EDR programs would result in a reduction in specific data:

- Elimination of the Crab EDR would necessarily eliminate this annual reporting of economic performance parameters, and unique crew-level data that are not readily replaceable from other sources. Information would not be available to inform future CR Program Reviews and stock rebuilding bioeconomic analyses. It would also hamper continued development and maintenance of a regional economic impact model for Alaska fisheries and a Port-level model currently under development
- Elimination of the A80 EDR would necessarily eliminate this annual reporting of economic performance parameters, and unique crew level data that are not readily replaceable. Information would not be available to inform future program reviews. It would also hamper continued development and maintenance of a regional economic impact model for Alaska fisheries and a Port level model currently under development.
- Elimination of the A91 EDR will also eliminate collection of fuel cost data, which is presently the best scientific information available on the operating costs of AFA pollock vessels. In addition, elimination of the A91 Chinook salmon EDR will necessarily reduce analysts' insights and understanding of the diversity within the fleet and that may affect analysis of future Bering Sea salmon bycatch issues.

5.3 Affected Small Entities (Regulatory Flexibility Act Considerations)

Section 603 of the Regulatory Flexibility Act (RFA) requires that an initial regulatory flexibility analysis (IRFA) be prepared to identify whether a proposed action will result in a disproportionate and/or significant adverse economic impact on the directly regulated small entities, and to consider any alternatives that would lessen this adverse economic impact to those small entities. NMFS prepares the IRFA in the classification section of the proposed rule for an action. Therefore, the preparation of a separate IRFA is not necessary for the Council to recommend a preferred alternative. This section provides information about the directly regulated small entities that NMFS will use to prepare the IRFA for this action if the Council recommends regulatory amendments.

This section also identifies the general nature of the potential economic impacts on directly regulated small entities, specifically addressing whether the impacts may be adverse or beneficial. The exact nature of the costs and benefits of each alternative is addressed in the impact analysis sections of the RIR and is not repeated in this section, unless the costs and benefits described elsewhere in the RIR differ between small and large entities.

Identification of Directly Regulated Entities

The alternatives considered in this analysis would directly regulate (or technically deregulate) the owners of vessels or processors, or leaseholders of vessels, required to submit EDRs to NMFS. These include 1) AFA CVs, AFA CPs, AFA Motherships; 2) Crab Rationalization CVs, CPs, and shoreside processors; 3) Amendment 80 Trawl CPs; and 4) the six Western Alaska CDQ organizations. Many of the directly regulated entities potentially affected by this action are considered to be large entities based on cooperative affiliations.

The thresholds applied to determine if an entity or group of entities is a small business under the RFA depend on the industry classification for the entity or entities. Businesses classified as primarily engaged in commercial fishing are considered small entities if they have combined annual gross receipts not in excess of $11.0 million for all affiliated operations worldwide (81 FR 4469; January 26, 2016).

If a vessel has a known affiliation with other vessels (through a business ownership or through a cooperative), these thresholds are measured against the small entity threshold based on the total gross revenues of all affiliated vessels. From 2020 to 2024, 70 vessels participated in the Crab Rationalization Program, of those, 44 were active in 2024. Of the 44 active vessels in 2024, 13 are classified as small entities based on 2024 revenue being less than $11 million.

Entities that custom process crab are affiliated with other seafood businesses through business ownership and they are measured against the small entity threshold based on the total gross revenues ($11 million) of all affiliated businesses. This measure was used for businesses that utilized custom processing because not all of these entities own a processing facility. From 2020 to 2024, 16 entities utilized custom processing arrangements. In 2024, 10 of the 16 entities utilized custom processing agreements to have their crab processed. Seven of those firms are defined as small entities.

The SBA's final rule (81 FR 4469, February 26, 2016) modified the size standard for "seafood product preparation and packaging" (NAICS code 311710) that applies to seafood processors. SBA's final rule modified the definition of a small entity operating as a seafood processor to include all entities that are independently owned and operated, not dominant in their field of operation, and have a combined annual employment of fewer than 750 employees. From 2020 to 2024, 12 processors actively processed CR Program crab. Three of the twelve were active in 2024. Only one of the three is considered a small entity based on combined annual employment.

Count of Small, Directly Regulated Entities

Shoreside processors participating in the Crab EDR Program are considered to be directly regulated small entities and can include "shore based" custom processors that do not operate out of a shoreside plant. The numbers of directly regulated small entities can vary considerably year to year but in 2024, 8 shoreside crab processors and custom processors are considered small entities. In addition, the six CDQ groups are directly regulated small entities within one or more of the EDRs. In addition, the two motherships that operate in the BSAI do not individually, nor collectively, exceed the 750-employee threshold and may be considered directly regulated small entities under that threshold. However, the motherships are members of the Mothership Fleet Cooperative and participate, along with multiple large CVs in the Mothership Salmon Savings Incentive Plan agreement and would be considered large by cooperative affiliation with the CVs, as the $11 million revenue threshold applies to the affiliated entities.

Impacts to Small, Directly Regulated Entities

The proposed Action Alternative would reduce the costs to industry by removing the burden of the EDR requirements.

5.4 Alternatives with Respect to Net Benefits to the Nation

This section provides a qualitative assessment of the potential net benefit of Alternative 2 to the Nation (relative to the no action baseline).

Alternative 2, the action alternative, is expected to provide neutral benefits to the Nation by reducing annual costs for participants in LAPPs and eliminating agency costs associated with implementing the EDRs. However, removing the EDRs from LAPP requirements would also eliminate a unique source of data used by the Council and NMFS to produce annual reports on economic performance (Economic SAFE documents), to conduct program reviews required under the Magnuson-Stevens Act (e.g., the Crab EDR and Amendment 80 EDR), and to evaluate the net benefits to the Nation of individual LAPPs.

Without these data, the Council would lack important insights into fleet operations and information that has proven valuable when evaluating future management actions, such as salmon bycatch avoidance in the Bering Sea (e.g., the Amendment 91 EDR). Data collected through EDRs have supported analyses of Council actions, contributed to bycatch monitoring, provided practical value in the fisheries management process, and in the evaluation of the economic contribution of the Alaska fishing industry to the Nation.

While Alternative 2 would result in easily quantifiable cost savings for both industry and the agency it is not possible to quantify the cost associated with the loss of key economic data for these three programs. EDR data are an integral component for program evaluations, annual Economic SAFE reports, the overall contribution of the fishing industry to the Nation, and in evaluating rapidly changing economic conditions in North Pacific LAPPs. The benefit of having a transparent and scientifically driven fisheries management process that utilized the best available scientific information, including economic and social information, at the regional and national level has long been demonstrated via the sustainability of our fisheries as provided by this well-informed management process. Even though this action saves money, it is considered to have a neutral overall effect to the Nation. While the financial benefits are clear because of reduced costs for both the public and government agencies, it is impossible to accurately measure these gains against the loss of scientific and management data. The negative impact on science and management is a qualitative cost. Therefore, we cannot truly compare the cost savings (a quantitative benefit) to the potential harm caused by losing the data. With that being said, the overall benefit to the Nation may be the explicit cost savings of $396,166 and the reporting burden per year to participants.

6 Magnuson-Stevens Act and FMP Considerations

6.1 Magnuson-Stevens Act National Standards

Below are the 10 National Standards as contained in the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act). In recommending a preferred alternative, the Council must consider how to balance the national standards.

National Standard 1 — Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.

The proposed alternatives are administrative in nature and would not directly affect conservation and management measures presently in place to ensure achieving optimum yield on a continuing basis. Alternative 2 would eliminate the economic and data gathering burden of compliance with an information collection that the Council may recommend is unnecessary for the management and monitoring of these fisheries.

National Standard 2 — Conservation and management measures shall be based upon the best scientific information available.

Alternative 2 would eliminate EDRs, which would reduce the collection of data that currently is available. Consideration of future management actions would continue to be based on the best scientific information available at that time, but there would be less economic data available. The action alternative could eliminate a method of collecting economic data that was created to provide data that would allow the Council, management entities, and the interested public to better understand the impacts of a LAPP. This data is also used to evaluate regional economic contributions of the fishery.

National Standard 3 — To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

The proposed alternatives are administrative in nature and would not directly affect how individual fish stocks are managed. The alternatives are consistent with management of individual stocks as a unit or interrelated stocks as a unit or in close coordination.

National Standard 4 — Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be; (A) fair and equitable to all such fishermen, (B) reasonably calculated to promote conservation, and (C) carried out in such a manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

The alternatives address data collection and do not discriminate between participants in the fishery or allocate or assign fishing privileges. The action alternative intends to minimize cost to industry and the Federal government. With regard to allocation of fishing privileges, the purpose of the EDR requirements is to gather information to improve the Council's ability to analyze the economic effects of the catch share or rationalization programs, to understand the economic performance of participants in these programs, and to help estimate impacts of future issues, problems, or proposed revisions to the programs covered by the EDRs.

National Standard 5 — Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources, except that no such measure shall have economic allocation as its sole purpose.

The alternatives do not affect the utilization of the fishery resources or involve allocations of any fishery resources. The action alternative proposes eliminating the economic and data collection burden on participants for which the Council may determine that the collected data is not necessary to manage and monitor the fishery in question.

National Standard 6 — Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

None of the alternatives would be expected to affect changes in the availability of fishery resources in the Alaska EEZ each year. Any such changes would be addressed through the annual allocation process, which is not affected by the alternatives.

National Standard 7 — Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

The objective of this action alternative is to minimize the cost of compliance with information collection programs and ensure that there is sufficient value to any costs in light of the benefits of the information collected by the EDR requirements.

National Standard 8 — Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of National Standard 2, in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

The alternatives are administrative in nature and seek to reduce the burden of compliance with EDR requirements where appropriate. The purpose of the EDR requirements is to gather information to improve the Council's ability to analyze the economic effects of the catch share or rationalization programs, to understand the economic performance of participants in these programs, and to help estimate impacts of future issues, problems, or proposed revisions to the programs covered by the EDRs. Removing requirements for the individual EDRs would discontinue the collection of data that has contributed to economic and social analyses and would discontinue annual reporting (Crab EDR, A80 EDR) and the collection of unique crew level employment data (Crab EDR, A80 EDR).

National Standard 9 — Conservation and management measures shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

The alternatives do not directly address regulations governing bycatch management. The management of bycatch and/or prohibited species catch is conducted via the annual TAC specifications process and bycatch management measures in effect in 50 CFR part 679.

National Standard 10 — Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

The alternatives would not change safety requirements for fishing vessels and would not impact safety of human life at sea.

6.2 Section 303(a)(9) Fisheries Impact Statement

Section 303(a)(9) of the Magnuson-Stevens Act requires that a fishery impact statement be prepared for each FMP or FMP amendment. A fishery impact statement is required to assess, specify, and analyze the likely effects, if any, including the cumulative conservation, economic, and social impacts, of the conservation and management measures on, and possible mitigation measures for (a) participants in the fisheries and fishing communities affected by the plan amendment; (b) participants in the fisheries conducted in adjacent areas under the authority of another Council; and (c) the safety of human life at sea, including whether and to what extent such measures may affect the safety of participants in the fishery.

The RIR prepared for this proposed action constitutes an initial draft of the fishery impact statement that will be finalized if and when an FMP amendment occurs. The likely effects of the proposed action are analyzed and described throughout the RIR. The proposed action will not have adverse effects on participants in the fisheries and fishing communities. There are no effects of the proposed action on safety of human life at sea. Based on the information reported in this section, there is no need to update the Fishery Impact Statement included in the FMP.

The proposed action affects the groundfish and crab fisheries in the EEZ off Alaska, which are under the jurisdiction of the North Pacific Fishery Management Council. Impacts on participants in fisheries conducted in adjacent areas under the jurisdiction of other Councils are not anticipated as a result of this action.

6.3 Council's Ecosystem Vision Statement

In February 2014, the Council adopted, as Council policy, the following:

Ecosystem Approach for the North Pacific Fishery Management Council

Value Statement

The Gulf of Alaska, Bering Sea, and Aleutian Islands are some of the most biologically productive and unique marine ecosystems in the world, supporting globally significant populations of marine mammals, seabirds, fish, and shellfish. This region produces over half the nation's seafood and supports robust fishing communities, recreational fisheries, and a subsistence way of life. The Arctic ecosystem is a dynamic environment that is experiencing an unprecedented rate of loss of sea ice and other effects of climate change, resulting in elevated levels of risk and uncertainty. The North Pacific Fishery Management Council has an important stewardship responsibility for these resources, their productivity, and their sustainability for future generations.

Vision Statement

The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats.

Implementation Strategy

The Council intends that fishery management explicitly take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, fluctuations in productivity for managed species and associated ecosystem components, such as habitats and non-managed species, and relationships between marine species. Implementation will be responsive to changes in the ecosystem and our understanding of those dynamics, incorporate the best available science (including local and traditional knowledge), and engage scientists, managers, and the public.

The vision statement shall be given effect through all of the Council's work, including long-term planning initiatives, fishery management actions, and science planning to support ecosystem-based fishery management.

In considering this action, the Council is being consistent with its ecosystem vision statement. This action does not affect the tools available for appropriate and conservative monitoring of fishing activities, including species caught incidentally and discarded at sea. This action could eliminate the individual EDRs, which could also eliminate the time series data collection, which may have negative implications for maintaining collection of the best scientific information. However, this action considers these negative implications against the annual costs for fishermen.

7 Past SSC Comments on Economic Data Report Processes

As described below, the SSC has been extensively engaged on the EDR in recent years, and this input was considered in drafting the analysis. Past SSC reports generated during the previous Council process that considered changes to the economic data collections are summarized below.

7.1 April 2019 SSC Report

In response to reviewing the discussion paper on EDR adjustments, the April 2019 SSC report recommends:

EDRs provide critical information about the level and distribution of benefits from North Pacific fisheries among the fleets and communities that are engaged in them. Experience has demonstrated that it is possible to gather data that are of sufficient accuracy and precision to support scientifically valid analyses for which there are not substitute data sources or proxies available. Further, EDR designers and users have learned many, and implemented some, lessons that have led subsequent EDR programs to improve upon earlier ones. However, the North Pacific is far behind the national norm in the portion of the fleet about which we have cost data that allow us to fulfil regulatory requirements for conducting cost-benefit, impact, and distributional analyses. To address this gap, **the SSC concurs with the sentiment that there are further opportunities to reduce the agency and respondent reporting burden, increase data usefulness, and expand data utilization.**

- The SSC concludes that EDR programs are essential to meeting National Standard 2 requirements for the application of the best available science, including data collection practices, in support of National Standard 4's fairness of equity provisions, National Standard 5's efficiency provision, and National Standard 8's mandate to provide for the sustained participation of [fishing] communities and … minimize adverse economic impacts on such communities.
- The SSC supports efforts to identify and evaluate these improvements, and suggests consultation with the Social Science Planning Team, which is tasked with evaluating data streams in the context of broad social and economic data gaps.
- Acknowledging the limitations of standardization among diverse fleets and FMP objectives, the SSC recommends efforts to reduce these barriers to using EDR data.

To reduce the collection burden and improve the utility, transparency and accessibility of the EDR data, the SSC supports several specific recommendations made by the analysts:

- The third-party auditing process creates a context of potential "violations" for misreporting when questions are misinterpreted, when in fact this is an administrative data collection which NWFSC has more constructively pursued by working with and training the submitters to obtain good faith, accurate reporting.
- Each EDR should be reviewed for duplication of reporting material with other data sources.
- NMFS should work to clarify the goals of the EDR programs so that industry perceives minimal disincentives to reveal management-relevant financial information to the federal government.

The SSC further suggests that the analysis, and the ensuing process for improving EDR practices, could be enhanced by:

- Specifically stating lessons learned in the North Pacific historical review.
- Drawing on lessons learned from other regions, most of which have now eclipsed the North Pacific in gathering useful EDR data, especially on vessel and processing costs.

- Revisiting the quinquennial program reviews to identify questions that have been raised but were not adequately addressed by EDR information.
- The importance and utility of EDRs can be more easily demonstrated to industry through routine, systematic inclusion of more EDR metrics in fishery monitoring data products, such as annual SAFE reports. This would also help fulfill the National Standard 2 mandate of incorporating social and community information into SAFE reports, make EDR data more directly accessible to a wider range of user groups, and provide an opportunity to develop a standard set of key indicators of community engagement, dependency, and sustained participation in an annually refreshed time series format. These data could, in turn, serve as early indicators of changing trends in community participation in, for example, those years between program reviews or FMP amendment analyses in a given fishery.

7.2 February 2020 SSC Report

In response to reviewing the initial analysis on EDR adjustments, the February 2020 SSC report recommends:

After moderate revisions, the SSC recommends the analysis can be advanced for final action. The SSC finds the first two components of Alternative 2 to be sensible regulatory cleanup, which will enhance the ability to do insightful regulatory analyses without reducing data quality, validity, or reliability within standard confidentiality practices for similar data.

Specific to this action, the SSC found that the third component of Alternative 2 (to eliminate EDR requirements) would eliminate a data program that has proven its utility in a number of key Council analyses, and that is central to complying with National Standard 2 in pursuit of National Standard 8, as well as human benefits expressed in optimum yield in National Standard 1. The SSC recommends modifying the analysis to highlight the value of this information as well as its costs.

In addition to the SSC recommendations on the analysis, the Council also heard minutes from the April 2019 SSPT teleconference.

7.3 April 2021 SSC Report

The April 2021 SSC report had the following for recommendations:

The SSC fully supports the collection of socio-economic data to meet National Standards and best available science requirements while avoiding duplicative data analyses, eliminating collections of data that are not used, and working to limit the burden of such data collections on stakeholders.

- To collect and utilize data efficiently, the questions for which the data are collected need to be identified first.

The SSC supports the SSPT recommendation that the Council revisit the purpose and need statements of EDR programs to see whether the goals of each of these individual data collection programs have changed and to clarify data collection objectives.

Therefore, the SSC joins the SSPT in recommending the Council explore a more holistic program for collecting baseline socio-economic data as raised in Issue 2 of the Council's April 2019 motion. However, before standardizing elements across EDRs as suggested by the SSPT, the SSC recommends the Council address the larger issue of what questions the Council needs to answer across all fisheries.

The SSC recommends the Council identify the needs for broad data collections across fisheries before discontinuing specific EDR data collections.

The SSC encourages the collection of broad information across fisheries for Council decision informing analyses and recognizes that a framework for doing so is a critical first step. The need for such a framework and data collection for both economic and socioeconomic data are highlighted in the top 10 research priorities recommended by the SSC at this meeting. In addition to revisiting the purpose and need for individual EDRs and considering holistic changes to the EDR program, the SSC finds the small changes suggested by the SSPT for each EDR within the existing purpose and needs are valuable and suggests that these be considered by the Council.

7.4 February 2022 SSC Report

The February 2022 SSC report had the following for recommendations:

The SSC expresses concern that the analysis does not completely characterize the current use of subsets of the EDR data collected in the Council process, which is necessary for the Council to evaluate this newly added alternative. While acknowledging that EDRs could be streamlined, some data categories from the EDRs are the best scientific information available on social and economic conditions required for inclusion in SAFEs under National Standard 2, to document sustained participation of fishing communities under National Standard 8, and support Council decisions in a number of specific and programmatic ways.

If the Council chooses to discontinue some or all EDRs, the SSC has the following suggestion:

- Consider ensuring that high value time series are maintained through a transition to a replacement mandatory economic data program

If the Council chooses to continue some or all EDRs, the SSC has the following suggestions for further refinement. Most recently, responsibility for exploring means to streamline EDRs has been assigned to the Social Science Planning Team (SSPT). The SSPT is balancing developing a unified approach to economic data collection, with the potential for fishery-specific supplements, with investing in refining individual EDR programs (see SSC recommendations in this regard in the April 2021 SSC report). To accelerate this process, the SSC suggests that the Council:

- Provide additional specific information about EDR variable category use to facilitate evaluation of the extent to which each EDR data category supports the Council in science-based management in pursuit of National Standards 1 and 8 in compliance with National Standard 2. Specifically, develop a clearer mapping of which variable categories (i.e., which EDR form fields) from each EDR have been used: in SAFEs, ACEPO, and other products; in Council analyses; and in other research. In instances where EDR variable categories are used, describe the quality of the EDR data. Also indicate whether alternative data sources are available, and the relative quality of the alternative source(s).
- With knowledge of how catch share programs have evolved, identify specific outcomes and broader questions that have arisen and align EDR data to understand them.
- Explore the use of very small groups of key individuals, including AFSC staff, Council staff and industry representatives, to work out an initial plan to revamp the EDR process in a way that produces the best data feasible while reducing industry and government burden. The SSC continues to support the collection of social and economic data across all fisheries (see April 2021 SSC report). If the Council chooses to, or not to, continue EDRs, the SSC suggests the Council:

- Consider a mandatory data collection plan with a reduced set of variables collected consistently from all fleets. Based on EDR variables that are most extensively used, and data gaps seen in Council analyses, data on crew, fuel use, and community engagement would be an important starting point. Consistent, comparable data will allow similar measures to be derived for multiple fleets affected by a Council action, enhancing the utility of EDR data.

7.5 June 2023 SSC Report

The following SSC recommendations are from the June 2023 SSC Report.

The SSC strongly supports the collection of socioeconomic data to enable documenting performance for monitoring, program reviews, and as inputs for adaptive management in a dynamic natural environment. A strong socioeconomic data program supports science-based management in pursuit of the goals of National Standards 1 and 8, and in compliance with National Standard 2 (e.g., community-level crew data would be responsive to National Standard 8 through tracking the sustained participation of fishing communities). Specific uses include community impacts sections within Social Impact Assessments and reports such as the Annual Community Engagement and Participation Overview (ACEPO) and Economic Stock Assessment and Fishery Evaluation (SAFE) analyses, among others. The SSC also notes that this effort supports management in the face of changing environmental conditions and increasing variability.

7.6 October 2024 SSC Report

Note: These were recommendations in response to an initial review of a uniform crew data collection. However, the recommendations are relevant to the scope of this analysis.

The following SSC recommendations are from the October 2024 SSC Report.

The SSC is strongly supportive of efforts to collect data that describes crew participation and dependence in a consistent, comprehensive way. The SSC recommends that the information in this document be reorganized and supplemented to more explicitly represent how the costs and benefits of collecting crew data vary based on the data elements and resolution collected. This is necessary for the Council to provide guidance on target data that strikes the desired balance between cost and benefit.

In assessing the costs and benefits for each data element and resolution, the SSC suggests considering the following:

- Much of the information and analysis necessary to characterize costs and benefits is already present in this document, but needs to better reflect the differences in costs and benefits of including specific elements.
- In characterizing the analytical benefits of each set of data elements, seeking to identify specific types of Council actions where crew data would have had probative value will be more meaningful than identifying generally where it could be reported or included. The existing analysis of how crew data from EDRs has appeared in Council reports and RIRs for Council actions is useful in this regard, but needs to be associated with incremental data elements.
- The SSC appreciates the thought that has gone into storing and linking potential crew data to other databases to support Council documents and encourages inclusion of additional detail on this process. This would both serve to highlight the feasibility of data analysis and also provide a structure through which to identify any assumption that will be required to create non-confidential aggregates that can be used in Council documents.

- One of the impacts of implementing a uniform crew data collection would be the loss or change in information available to EDR fisheries that collect crew data, and those analytical benefits and costs should be reflected.
- Different fleets may experience different costs for reporting the same information. A particularly important distinction is between large, corporate owned vessels and small family-owned vessels, who will have dramatically different recordkeeping practices and relationships with their crew members. It may be helpful to explicitly describe the requirement of a crew license for a crew member that is not paid (potentially a family member) and implications of zero pay for aggregate or community statistics.
- Some elements will have alternative ways of accessing them, rather than asking vessel owners to report directly as part of this collection. For example, the crew license number could be used as a key to access basic demographic information from the crew license database. The costs and likely feasibility of these alternative approaches should be characterized alongside those of direct collection.
- The SSC supports the current effort to create a durable ID for crew members and notes that this would provide additional benefits from crew data collection.

Key elements of best practice include partnering with experts in designing data collections to draft and refine the data collection instrument itself, drawing on national efforts to design crew information surveys (which may expedite PRA analysis), and thorough beta testing of the instrument across the range of respondents.

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