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# D5 – UNIVERSAL DATA COLLECTION DISCUSSION PAPER



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# INTRODUCTION

- Council changed EDR requirements in February 2022
  - GOA Trawl EDR requirement removed
- Universal Data Collection Components discussion paper presented in October 2022
- Motion in October 2022
  - 3 components brought forward
    - Crew licenses
    - Crew compensation
    - Crew positions
  - Scope of collection
  - Costs associated with the collection
  - Review NMFS' ability to collect lease costs



# DATA COMPONENTS IDENTIFIED

- Crew Licenses
  - Currently used in Council Analysis when available to show Community participation
  - Approximately 15,000-20,000 crew licenses used in federally managed fisheries
  - Improves Community Impacts Section
    - Currently relies solely on vessel owner's city of residence when crew is unavailable
- Crew Positions
  - Currently collected by eLandings, Production Reports and FMA however quality can be improved to show hired captains, support crew and/or processing crew
  - Approximately 8,655 crew positions in 2021
- Crew Compensation
  - \$563M 2021 estimate of total cost of crew in the North Pacific for federally managed vessels (based on A80 EDR)
  - Community Impacts can be directly tied from vessel revenue to communities via crewmembers



# DATA COLLECTION IMPLEMENTATION

- Similar to EDR an annual survey is currently the most effective way to collect the data components identified
  - Form made available electronically
  - Internal audit
  - PSMFC act as the independent third-party data collection agent (DCA)
- Existing infrastructure is not currently feasible (eLandings, logbooks or FFP applications)
  - eLandings would need significant work to collect crew licenses on each ticket
  - Logbooks are not reported for all sectors and are not electronically submitted
  - FFP Applications are submitted every three years



# ANNUAL SURVEY SCOPE

- 1,109 vessels in 2021 had a qualified landing in a federal or jointly managed fishery
  - Excludes charter halibut vessels
    - 1,204 vessels
    - Not required to have crew licenses
  - 1,050 vessels active in federal fishery
  - 775 vessels participated in federal waters
  - 343 vessels were less than 40' in length
- EDR vessels may be excluded
  - 87 vessels submit duplicative EDRs that contain crew information
    - 21 Amendment 80 vessels
    - 66 Crab Rationalization vessels
  - 98 vessels submit EDRs that do not contain crew information
    - Amendment 91/Chinook EDR for AFA vessels



# ANNUAL SURVEY SCOPE

Vessels Active by Fleet (2021)

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



# ADMINISTRATIVE AND REPORTING COSTS

- Costs estimated based on annual survey administered by PSMFC
  - Upfront costs to build infrastructure are estimated at \$23,000
  - Reoccurring administrative costs are estimated at \$113,069
    - Mailings and other services is estimated at \$10,000
  - Cost per survey estimated at \$102
- EDRs have been funded through NMFS data collection grant and cost recovery
  - AFSC manages the grant
- Total survey costs estimate at \$326,000
  - Below total EDR cost from 2007-2020



# ADMINISTRATIVE AND REPORTING COSTS

**Costs of the EDR Programs**

Year	Crab <sup>1</sup>	A80	AFA <sup>2</sup>	GOA Trawl <sup>3</sup>	Total EDR cost	EDR cost in 2021 dollars
2005	\$150,000				\$150,000	\$203,342
2006	\$150,000				\$150,000	\$197,321
2007	\$259,938				\$259,938	\$332,982
2008	\$338,276				\$338,276	\$425,216
2009	\$314,303				\$314,303	\$392,023
2010	\$352,508				\$352,508	\$434,598
2011	\$323,588				\$323,588	\$390,800
2012	\$373,316				\$373,316	\$442,342
2013	\$318,278				\$318,278	\$370,559
2014	\$342,703				\$342,703	\$391,628
2015	\$269,583			\$53,771	\$323,354	\$365,743
2016	\$345,509	\$88,254	\$62,114	\$73,221	\$569,098	\$636,765
2017	\$180,168	\$91,482	\$66,929	\$91,879	\$430,458	\$472,567
2018	\$202,012	\$92,462	\$40,631	\$61,765	\$396,870	\$426,220
2019	\$180,224	\$87,644	\$56,989	\$57,486	\$382,343	\$403,357
2020	\$91,620	\$72,976	\$48,194	\$107,459	\$320,250	\$333,968
2021	\$72,927	\$85,123	\$52,735	\$73,240	\$284,026	\$284,026

Source: EDR Amendment Final Action (February 2022)

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

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





# ADMINISTRATIVE AND REPORTING COSTS

- Cost to industry estimated at \$265,000
  - \$75 per hour to complete survey
    - 6 hours per catcher processor
    - 3 hours per catcher vessel
  - \$239 average industry cost per survey
- Difficult to estimate due to nature of the survey
  - Small vessels may have very limited burden with few crew
- Total cost to industry would increase from \$425,000 to \$625,000



# LEASE COST COLLECTION

- Leverage existing reporting requirements
  - Transfer applications
  - Cooperative reports
  - Permit applications



# LEASE COST COLLECTION (TRANSFER APPLICATIONS)

- Transfer applications allows for identification of arm's length transactions
- Halibut/Sablefish IFQ and Crab Rationalization report transfer values and prices
  - Values are not audited or validated by NMFS
- No transfer applications for intra-coop transfers except for Crab Rationalization

**Quota Share Transfer Form Requirements**

Program	Cooperative Management	Transfer Form	Intra Coop QS Transfer Form	Transfer Value on Form
AFA	Y	N	N	NA
Amendment 80	Y	Y	N	N
CDQ	N	Y	NA	N
Crab IFQ	Y	Y	Y	Y
Halibut/Sablefish IFQ	N	Y	NA	Y
CGOA Rockfish Program	Y	Y	N	N



# LEASE COST COLLECTION (COOPERATIVE REPORTS)

- AFA and CGOA Rockfish programs submit inter and intra coop transfers on cooperative reports
- Crab Rationalization has voluntarily reported lease values in the past
- Halibut/Sablefish IFQ and CDQ are not cooperatively managed
- May require more formal cooperative reports with an online form to be completed
  - Would benefit analysts that currently must glean information from reports
  - Formal reports could be audited
- Transfers aggregated at the cooperative level may not provide accurate price estimates due to non-arm's length transactions



# LEASE COST COLLECTION (PERMIT APPLICATIONS)

- Permit applications are submitted at the cooperative level or the quota holder level when required
  - Not required for CDQ and Halibut/Sablefish IFQ
- Similar to cooperative reports leasing would be aggregated at the cooperative level

**Annual Application Requirements**

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



# POSSIBLE SOLUTIONS

- In order to collect the data components identified (crew licenses, crew compensation and crew positions) currently an annual survey is the appropriate way to proceed
  - Current EDR requirements need to be considered
  - Vessel lengths, federal waters or fishery participation may be used to change the scope of the collection
- In order to collect lease costs it may be appropriate to consider enhancing cooperative reports when transfer applications are not required and auditing transfer applications when value is collected
  - Current reporting requirements have deficiencies in reporting

