

ADVISORY PANEL
Motions and Rationale
February 1-4, 2022 - Anchorage, AK

C1 EDR Amendments

The AP recommends that the Council take final action and select Alternative 3 with all four suboptions to eliminate all four EDRs as currently constructed and implemented.

Motion passed 13-3

Rationale in Favor:

- *There has been and continues to be broad industry support across sectors for eliminating the current EDRs and this motion is responsive to oral and written public comment from this and previous meetings. Each current EDR program has been constructed over the years for a specific purpose such that different information is being collected from four very different fisheries. This results in conflicting, inconsistent application and use of this data within the Council analytical and decision-making process.*
- *While it is generally agreed that the EDR information can be helpful and informative, especially crew-related data, it is not clear that the expense and burden of the current EDR programs outweigh the value to decision-making in the Council process. Some progress has been made at Social Science Plan Team meetings regarding what data collections/modifications could be more useful to the Council process, but unfortunately these are not able to be included as part of this final action. As such, eliminating the existing EDR programs and giving future consideration to the establishment of a brand new EDR program seems the most prudent course of action. This would allow the Council, should they choose, to develop a streamlined, consistent economic data collection program that can be applied to all fishing sectors in the Bering Sea and Gulf of Alaska (e.g., halibut/sablefish IFQ program, GOA Rockfish program, non-LAPP fisheries) that could be more fully utilized in Council analyses and decision-making process.*
- *Given the current piecemeal approach to and use of EDR data within the Council process, the loss of valuable data is not a primary concern under the selection Alternative 3. Industry supports providing needed economic information, whether it be under a future EDR collection program or for a specific action/purpose at the request of analysts. If the Council chooses to pursue the development of a new EDR program, needed data can be provided by industry as an interim measure, which would allow a functional program to be built with stakeholder support.*
- *Specific to the GOA EDR, this was originally implemented in anticipation of a trawl cooperative catch share program that has not come to be. There is six years of data that has been collected, which may have some use, but the voluntary catch share programs that have been adopted in the Gulf in recent years may actually provide an artificial look at the economics of the fishery because behaviors were different than they would have been under a race for fish. Further, the burden of this reporting requirement is especially significant on small independent trawl vessels for no perceptible benefit.*
- *Recent experience with the Amendment 80 EDRs demonstrates that this data collection is more burdensome and costly than the benefits derived for the Council decision-making process. EDR*

information was not weighed heavily and little data was used in the recent action on Halibut ABM (when compared to all other available data within that DEIS), which was one of the biggest issues to impact the Amendment 80 fleet in recent years. Further, there is 12 years of data collected from that program such that the upcoming required Amendment 80 program review will have the most recent data available.

- *Regarding the Amendment 91 EDRs, the compensated transfer report form has never been completed by a submitter because the fleet's incentive plan agreements essentially prohibit "compensated transfers" and an increasing proportion of answers on the vessel master survey are pro-forma (verbatim duplicates of other responses), which are not likely to provide much use for ongoing information collection. It is noted in the analysis that the vessel fuel survey information is the only data collected that has value ("the fuel rate data is accurate to a degree, annual fuel accurate to a higher degree, although neither are subject to verification audit", page 59); however, the analysis does not contain information on where this fuel data is used, which brings the value of this data into question.*
- *The elimination of crab EDRs is consistent with the other options for the three groundfish sectors. Future consideration of a more streamlined and consistent EDR program for crab and groundfish would allow economic information from these sectors to be more consistently analyzed, applied, and fully utilized in future Council analyses by eliminating the limitations and data quality challenges that currently exist. While some crab EDR information may be helpful in federal disaster assistance, most of the information that is used for these types of declarations can be found in other data sources. Additionally, with the current closure of the BBRKC fishery and the decline in the snow crab fishery, the time and cost burden of completing these EDRs becomes even greater.*

Rationale in Opposition:

- *Alternative 2 and its options better meets the P&N statement as it provides mechanisms to remove anonymization of data, improves application of standard data confidentiality for consistency, and reduces industry reporting cost burdens and cost recovery fees.*
- *EDRs provide important information, including a time series of baseline economic data and unique crew level data, that is used for a variety of purposes that are important for informing future Council analyses and programmatic reviews.*
- *Some level of economic data reporting requirements needs to continue from those that participate in Alaska's fisheries and have the privilege of harvesting public fishery resources. These resources generate hundreds of millions of dollars in revenue on an annual basis, and it is important that the Council, NMFS, and State of Alaska have information to assess the economic impacts and benefits of federal fishery programs.*