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

Issue 1 – FMP and Regulatory Amendment Analysis

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

Purpose and Need

The current economic data reports (EDRs) provide valuable information for program evaluation and analysis of proposed conservation and management measures. However, after over ten years of operating the EDR programs, some revisions are needed to improve the usability, efficiency, and consistency of the data collection programs and to minimize cost to industry and the Federal government. Several revisions could be made to EDRs, specifically on the use of third-party audits and "blind-data" protocols that could reduce the cost of the data collection program to the industry and government while still maintaining the integrity and confidentiality of the data collection program. Several provisions were implemented to provide a higher standard of confidentiality for proprietary business information reported in EDRs, above those that apply to all other confidential fisheries information. In practice, these provisions have proven to reduce the usability of the data for analysis and increase the cost of the data collection programs without providing additional practical protections. In addition, confidentiality requirements that apply to all data collections provide sufficient protections for the EDR data.

The GOA trawl EDR program implemented in 2015 was designed to collect baseline information to assess the impacts of a future catch share program. Data has been collected under this program for 3 years and another year of data will be submitted in June 2019. The Council should re-evaluate the purpose and need for the GOA trawl EDR, and make adjustments as necessary in either the purpose and need for the program or in the data collection program itself.

Alternatives

Alternative 1: Status Quo

Alternative 2: Make revisions, where needed, in the EDR sections of the crab or groundfish FMPs and in the EDR regulations.

Component 1: Remove any requirements for third party data verification audits under the existing programs and reduce burdens associated with this process.

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

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

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

Issue 2 – Review Current EDR Programs

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

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

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

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

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

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

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