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# EDR Revisions Update

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# Council Request (February, 2022)

... request for AFSC staff to implement changes to the EDR identified in the stakeholder workshops, March 2021 SSPT report, and/or others in consultation with stakeholders, with the expectation that changes should take effect prior to the 2023 data submissions.

... should include a comprehensive listing of the recommended changes from the workshops, SSPT report and consultations, and contain the rationale for the treatment of each of the recommended changes, describing whether the EDRs were modified to incorporate them or if they were not implemented.

# Outline

Report on implementation of EDR changes identified in stakeholder workshops (November, 2020) and SSPT report (March, 2021)

- Review specific recommended revisions and rationale for treatment
- Scope – “small changes” in content of EDR forms
- Outside scope of update
  - Regulatory amendments (proposed rule pending)
  - Reconsideration of P&Ns for respective EDRs
  - Options not recommended by Council (e.g., change in frequency of EDR submission)

# EDR Audits - Discontinued

- Regulatory amendments removing verification audit provisions (pending)
- Third-party (CPA) audits discontinued as of 2018
- Revisions (All Crab and A80 EDR forms) - Directions to submitters
  - Removed reference to audits
  - Describes current validation process/submitter requirements
  - Emphasize accuracy without undue burden
  - Broadened supporting/source records to include non-financial records and qualified judgement

# Amendment 80 EDR

## Recommendations

- Revise EDR webform to pre-populate data entry fields for EDR, Tables 1, 2.1, 2.2, 2.3, and 2.4
- Assess data quality impacts of eliminating days fishing and days processing data elements from Table 2.5
- Assess modifications to Table 4 (Capital expenditures) to distinguish (and potentially exclude) major investment expenditures (e.g. vessel replacement, structural hull modification) from capitalized expenditures associated with routine/cyclical capital maintenance and improvement

# Amendment 80 EDR

## Revisions - Prefilled portions of online EDR forms

- Certification (Submitter/Entity identification and contact information) – 10 items
- Table 1: Vessel Identification – 14 items
- Table 2.1 - Vessel Characteristics: Survey Value – 5 items
- Table 2.2 - Vessel Characteristics: Fuel Consumption (by vessel activity)
  - Fuel use rate (gal/hour) – 3 items prefilled
  - Fuel gallons consumed – 3 items deleted (now reported as total annual fuel gallons purchased in Table 5: Annual Expenses)
- Table 2.3 - Vessel Characteristics: Processing Capacity and Freezer Space – 3 items



# Amendment 80 EDR

## Revisions - Removal of EDR sections/data elements where alternate data sources are available

### Table 2.4 - Vessel Characteristics: Processing Capacity

- Reporting of processing throughput by product/process is dropped in revision, and number of processing lines is moved to table 2.3
- Processing throughput by Species/Product code is reported in eLandings At-sea Production Reports; maximum realized throughput extracted from production data replaces estimated throughput capacity reported in EDR

### Table 2.5 – Vessel Activity

- Days Fishing and Days Processing by Fishery/Management Area is dropped in revision – 6 data elements deleted
- Daily vessel activity fishing and processing is reported greater detail in eLandings; number of days by fishery/management area extracted from eLandings replaces reporting in EDR
- Vessel Days Transiting or Offloading and Inactive – data elements retained in EDR (now Table 2.4)

# Crab EDR

## Recommendations

- Assess modifications to Table 1 (Ex-vessel sales) and Table 2 (Quota lease costs) to account for inconsistencies associated with ex-vessel sales and IFQ lease costs as reported in crab EDR forms compared to 1) the gross revenue basis for crew settlements and 2) NMFS Alaska Region records of vessel landings and IFQ permit deductions.
- Assess modifications to crab CV and CP forms to associate joint ownership of active crab vessel and QS holdings.



# Crab EDR

## Revisions

- Prefilled data elements in EDR forms
  - Certification section (Vessel information, owner/leaseholder identification and contact) – 15 items

## Recommendations not implemented

- Ex-vessel sales and Quota lease costs (Tables 1 & 2) - unchanged
  - Revisions to address concerns would require a) changing instructions to report different information (ex-vessel and lease costs as basis for crew settlement), or would add more detail/burden
  - Inconsistencies mainly due to pooling landings/lease costs by multi-vessel owners
  - EDR is only source of ex-vessel sales/quota lease costs by quota type, post-settlement
- Accounting for joint ownership of vessel and QS
  - Would require additional detail/burden in current Crab EDR reporting
  - Joint ownership would be more readily identified by QS holders



# Amendment 91 EDR

## Recommendations

- No recommendations for changes in EDR forms identified by stakeholders or SSPT

## Revisions

- Prefilling – not practical for EDR portal design
- No changes in Amendment 91 EDR forms

# Implementation timeline

- Prefilling implemented for 2022 EDR collection
- Revised Crab and Amendment 80 EDR forms currently undergoing Paperwork Reduction Act review
- Expected to be implemented for 2023 EDR collection

# Questions?



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