

Status Update on Economic Data Reporting (EDR) Program Revisions¹

October 2020

The Council is in the process of considering revisions to its Economic Data Reporting (EDR) Programs. The Council currently has two outstanding motions on EDRs² which include considering levels of revision that span smaller changes (e.g. removing third party audit requirements, as included in “issue 1”), broad-scale changes (e.g. implementing more standardized EDRs with appropriate variations to address different operation and gear types- as included in “issue 2”) and considerations for removing the GOA trawl EDR Program or all EDR Programs (as included in “issue 1”). Along with its April 2019 motion, the Council requested its Social Science Planning Team (SSPT) assist with the review and revisions to the EDRs, while incorporating opportunities for public input.

The SSPT discussed EDRs at its Nov 2019 teleconference,³ along with reviewing an EDR conceptual framework document. The SSPT identified a need to connect variables to performance metrics to analytical questions, in order to identify if pertinent Council questions could be addressed with the available information. The team highlighted the need to incorporate industry perspective on the needs and uses of social and economic data and recommended an EDR workshop for 2020.

The Council supported a concept of a workshop in Feb of 2020, but due to COVID-19 the workshop was not able to occur in person. Instead a series of virtual meetings have been scheduled to provide an opportunity for back-and-forth “dialogue” between SSPT members and stakeholders through iterative meetings. The intention is to hone questions from broad concepts of economic data value and burden, to specific changes that could be included in an alternative set for Council consideration.

The first opportunity for stakeholder engagement was the virtual EDR stakeholder workshop held August 26. This discussion was focused broadly and across all fisheries with EDRs to allow for a more high-level discussion about cost/ burden and utility among economic data collections. The meeting had over 60 participants, including those who complete EDRs and other stakeholders. The meeting report documented a host of the current concerns and perspectives on EDR.⁴ For example, stakeholders expressed concerns with the level of recordkeeping burden, the accuracy and representativeness of the data collected, and lack of connection to the Council process. In discussing what would be effective use of economic data participants mentioned specific ways EDR data could be applied, including to identify unanticipated changes not expected during program or amendment development. The group also shared concerns, including whether EDR data represent what they are intended to represent, and their perspectives on what utility means in practice; for example, data are used to inform decision making and referenced in decisions and discussion papers. Stakeholder responses demonstrated different degrees of confidence that this could be accomplished through revisions to the current data collections. Several participants questioned whether the utility of EDRs could be improved by addressing consistent questions and

¹ NPFMC staff contact is Sarah Marrinan.

² Council Motion from April 2019: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=695c22f1-5139-4ea6-a7c4-7c92b5428cd2.pdf&fileName=D5%20MOTION.pdf>

Council Motion from February 2020: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=1d14dd02-387e-4d61-9ff5-9e6071686ce2.pdf&fileName=C4%20MOTION.pdf>

³ Report from the SSPT meeting November 2019: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=657f0df4-db02-4840-a32c-d13db6070a3f.pdf&fileName=D6%20SSPT%20Report.pdf>

⁴ EDR Stakeholder Meeting Report Aug 2020: <https://www.npfmc.org/wp-content/PDFdocuments/meetings/EDRwebinar9.14.20.pdf>

analytical needs across some or all of the council's managed fisheries, potentially in a more general and less burdensome way. Others emphasized that fisheries operate differently and suggested that a tailored and/or modular approach to EDRs is more appropriate. Several stakeholders, particularly related to the GOA trawl fisheries, felt any type of economic data collection was unwarranted at this time.

The SSPT held a follow-up meeting on September 21 to discuss reactions to this meeting, SSPT perspectives on use of economic data in the Council process, and a framework for organizing stakeholder questions moving forward. In response to some stakeholder's views that any economic data collected should be relevant for Council decisions, SSPT members noted that EDRs were not specifically designed to be informative for every FMP/ regulatory amendment. These data collections were designed independently to accomplish their own purpose and need statements. They were primarily developed in tandem with implementation or consideration of a catch share program, to monitor and evaluate the effects of the program (except for the Amend 91 EDR which was intended to evaluate the cost of salmon bycatch avoidance). Thus, these data have been used in program reviews, but less often in analyses of specific Council decisions. The compartmentalized nature of the current EDRs (i.e. different reporting requirement across EDR fisheries and lack of reporting in other fisheries) is one of the principle limitations in improving their regular use in Council analyses, which tend to span multiple fisheries. SSPT notes this will continue to be a limitation so long as we do not collect economic data across all fisheries. If the objective is to improve the useability of data coming from the current EDRs for Council decision documents, as stakeholders suggested, this may be accomplished by considering consistent questions that are routinely needed to describe potential impacts of a proposed Council action.

SSPT members felt identifying these regularly occurring economic questions was within the groups' expertise and discussed some of the common topics. Follow-up with stakeholders could help inform the level of burden and nuanced points related to a more consistent data collection on these topics, which could hone if and how the information might be collected. It was noted that it would also be useful to follow-up on potential smaller changes to EDR to lower burden and improve utility as well in order to be responsive to the Council's motion and ensure it has a range of alternatives for consideration. The SSPT felt future stakeholder discussions were best organized by specific EDR to allow for more focused questions.⁵

As outlined in the timeline below, the next step is to establish dates with stakeholders for four follow-up discussions (one for each EDR) in November.⁶ These discussions will still be open to the public, but they will include more EDR-specific targeted questions, and likely a sub-group of SSPT members. The SSPT members are generating meeting materials for these discussions which will highlight specific follow-up topics for stakeholders to consider prior to the meetings.

The SSPT will then reconvene via teleconference in late November to finalize a range of alternatives to forward to the Council for consideration. This is intended to be responsive to the Council's two outstanding motions on EDRs, by including a range of no action, small changes, larger changes, and options for eliminating one or more EDR programs. These options will not be analyzed when they are presented to the Council (as the Council will determine what to submit for further analysis), but the SSPT may include justification for the consideration of the different alternatives. The Council is tentatively scheduled to receive these recommendations in February 2021 along with meeting summaries and context from each stage of discussion.

⁵ When available, an SSPT meeting report will be posted here: <https://www.npfmc.org/committees/social-science-planning-team/>

⁶ During the SSPT meeting an October timeline was noted; however, Federal Register deadlines require the target dates to be pushed back.

Projected timeline for SSPT/ public consideration of EDR Program changes

- August: Stakeholder webinar (hosted 8/26)
 - *Task: Have big-picture discussion about economic data burden and value among stakeholders and generate ideas for further discussion*
- September: SSPT meeting (hosted 9/21)
 - *Task: Have big-picture discussion about economic data burden and value among SSPT members and identify topics for in-depth stakeholder discussions*
- **November: Four focused stakeholder meetings**
 - *Task: provide feedback on specific issues related to large program changes and more detailed program changes*
- **November (anticipated in late Nov or Jan): SSPT meeting**
 - *Task: provide a range of alternatives on EDR revisions for the Council to consider, identify alternatives that would constitute changes to the current purpose and need statements*
- **February 2021 meeting (T): Final report and Council discussion**
 - *Task: The Council will receive full meeting reports/ materials and recommendations on a range of changes to consider. The Council may choose which alternatives to forward for staff analysis*