

**Economic Data Reporting (EDR) Stakeholder Discussion**  
**Webinar #1 – 8/26/20**  
Meeting Summary

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**EDR revision process and stakeholder engagement**

The North Pacific Fishery Management Council held the first in a series of virtual stakeholder discussions to consider potential revisions to the Council’s Economic Data Reporting (EDR) programs.<sup>1</sup> The meeting was held on Wednesday, August 26<sup>th</sup> from 2-4 pm AKDT using Adobe Connect. This document captures themes of discussion and will support the Council’s Social Science Planning Team (SSPT’s) next steps.

The Council originally intended to hold a two-day in-person workshop for stakeholders, SSPT members, analysts, and others to discuss potential EDR revisions based on SSPT recommendations. Due to ongoing concerns with COVID-19 and the Council’s transition to online meetings this workshop and EDR revision process were adapted to a virtual format. This approach will enable the Council to adhere to their intended timeline for addressing EDR revisions.

**Background**

The Council is considering modifying and/or removing EDR program requirements and has initiated two actions related to EDRs.<sup>2</sup> There are currently four EDR programs.<sup>3</sup> Each program was developed independently to meet a specific purpose and need. The four data collections were not created to provide consistent information across EDRs and are therefore different from one another. The Council tasked its Social Science Plan Team (SSPT) with helping it identify any changes to the purpose and need statements for the current EDR programs as well as developing a range of potential alternative ways to change these data collections to reduce burden and improve the practical utility of the information collected. For example, this may include 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. Within its range of alternatives, the Council will also consider whether to discontinue one or all of the of the EDR programs.

EDRs are a flexible tool that the Council can leverage to improve their understanding of social and economic context within fisheries, support the analytical needs of the management process, and inform decision-making. EDRs are not intended to be static and can be updated in response to the Council’s

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<sup>1</sup> The meeting e-agenda includes power point presentations as well as public comments:

<https://meetings.npfmc.org/Meeting/Details/1564>

<sup>2</sup> Council motion from April 2019 describing two paths of EDR revisions:

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

Council motion from February 2020 revising the purpose and need and alternatives for the issue #1:

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

<sup>3</sup> EDR data collections include the Bering Sea and Aleutian Islands Crab Rationalization Program EDR, implemented in 2005; Trawl Catcher/Processor (CP) EDR implemented in 2007 for Amendment 80 vessels, and in 2015 for CPs operating in the Gulf of Alaska (GOA) groundfish fisheries; Bering Sea (BS) Chinook salmon bycatch management program EDR for participants in the BS pollock fishery, implemented in 2012; and GOA trawl EDRs for trawl catcher vessels operating in the GOA and processors taking deliveries from these vessels, implemented in 2015.

objectives and information needs. While the Council's motions and consideration of EDR revisions originate with the current EDR programs, stakeholder and SSPT discussions will include a comprehensive exploration of EDRs as a data collection tool, including the usability, efficiency, and consistency of EDRs and their cost and burden to industry and government, and options for revising the program to balance and improve both utility and burden of the data collections.

### **Stakeholder process and timeline**

The Council's consideration of EDR revisions is intended to be a collaborative process, and dialogue with EDR stakeholders is an important component to the SSPT's development of options. Stakeholders are the experts regarding their business models and how they experience the burden of reporting economic data. In addition, stakeholders' support for EDRs and perception of the utility of these data collections is influenced by their expectations for how EDR data is used. For their part, SSPT members and NMFS analysts contribute their knowledge of how EDR data collections can inform the Council process, as well as specialized subject matter expertise in the field of data collection science. The August 26<sup>th</sup> webinar was the first step in an iterative process that will provide the opportunity for dialogue between stakeholders and the SSPT over the next several months.

The SSPT will meet via teleconference on Monday, September 21 from 9am – 1pm AKDT to discuss next steps and determine how to structure a more focused round of stakeholder discussions (for example, by EDR sector or topic). Interested stakeholders are encouraged to call in for the SSPT's teleconference and provide public comment. The second round of stakeholder discussions will likely take place in late October or early November following the October Council meeting. The SSPT anticipates convening a longer meeting later in November and focusing on the topic of EDR revisions. This process will culminate in the SSPT's development of ideas for any changes to purpose and need statements for EDR data collections, and a range of alternatives for the Council's consideration. The Council's review of the SSPT's recommendations is tentatively scheduled for February 2021.

The process for engaging stakeholders in the discussion of potential EDR revisions is being led by staff analyst and SSPT Coordinator Sarah Marrinan and SSPT Chair Steve Kasperski (NMFS Alaska Fisheries Science Center), with additional support and facilitation provided by an external consultant, Katie Latanich. Brian Garber-Yonts (NMFS Alaska Fisheries Science Center) and Scott Miller (NMFS Alaska Regional Office) also contributed to the August 26<sup>th</sup> webinar.

### **Webinar objectives and participation**

The first EDR stakeholder discussion convened interested members of the public to provide a high-level overview of the EDR program and issues that are general to all four EDRs and facilitate a discussion of general issues regarding the Council's EDR revision process. This meeting was also an opportunity for stakeholders to provide the SSPT with input on topics for focused stakeholder discussions, and other ideas for how to approach the EDR revision process. The meeting had two objectives:

1. Discuss the Council's existing EDR programs, including their objectives, the use of EDR information to support decision-making, and the relationship between the data elements collected, economic performance metrics, and the management questions they can inform.
2. Generate ideas for improving the usability, efficiency, and consistency of existing EDR programs while minimizing their cost and burden to industry and the government.

The agenda for this discussion included a presentation by Brian Garber-Yonts on the objectives and use of EDR data (see Appendix), opportunities for Q&A, and facilitated discussions. The webinar hosts used

interactive polls and short anonymous answer questions to generate additional ideas and discussion. Oral comments and typed answers to short answer questions have been summarized in the stakeholder discussion that follows.

The webinar included approximately 60 participants, in addition to the webinar hosts and administrative staff. Participants included members of the public, SSPT members, Council, Advisory Panel, and Scientific and Statistical Committee members; and Council and NMFS analysts. Of this group, 26 indicated (through a voluntary multiple-choice poll) that they participate in a fishery with EDR requirements, provide data or complete EDR forms, and/or represent an industry with EDR requirements. Participating stakeholders included representatives from all four fisheries with EDR requirements.

### **Themes of discussion**

The webinar began with a short reflection on the economic dynamics and concerns that stakeholders consider important to their businesses or communities. This introductory discussion was not specific to EDRs. Participants shared a wide range of responses including general reasons for collecting economic data (e.g., to understand the impacts of management decisions), fishery and community-specific topics, and concerns that are specific to the Council's consideration of EDR revisions. Responses specific to EDRs are incorporated into the summaries below. Several participants highlighted the importance of the Council and NMFS understanding industry costs associated with management decisions. One participant observed that fleets with EDR requirements, particularly the Amendment 80 groundfish fleet, have changed substantially since EDRs were first implemented but now operate more consistently, and that it would be useful to re-evaluate the information that is collected through EDRs since some of it may not be as important as when EDRs were first implemented.

In the second half of the webinar, participants engaged in a longer facilitated discussion to generate ideas and inform the SSPT's next steps. This portion of the webinar included written short-answer forms paired with short discussions. Discussions explored the following three open-ended questions:

1. What do you feel are the biggest factors contributing to the time and burden of EDR data collection?
2. What do you think it means to use EDR data effectively?
3. What else? What other questions should we ask about EDR programs?

Responses to each question are summarized. Participants' comments are not attributed to specific EDR sectors. This section also incorporates comments from other points in the discussion that are relevant to the topics of burden and utility.

### **Time and burden**

*Question 1: What do you feel are the biggest factors contributing to the time and burden of EDR data collection?*

Stakeholders identified the following components to time and burden.

- Duplication: Participants felt that information collected through EDRs is duplicative of or reorganizes information collected by NMFS and/or the state of Alaska using other means, such as the region's eLandings system for reporting commercial fishery landings, Commercial Operator's Annual Report (COAR) forms required by the state, and by the NMFS Alaska region's Restricted Access Management (RAM) program.

- Frequency/time frame: Participants noted the annual frequency of data collection and observed that some data that doesn't change unless capital investments are made (e.g., freezer or processing capacity).
- Recordkeeping: Several participants commented on the recordkeeping burden imposed by EDRs including time and complexity of extracting relevant data as well as the process of recordkeeping to facilitate the completion of EDR forms (for example, some information must be tracked specifically for EDRs). Comments also noted the level of detail and resolution, requests for data that is not collected or cannot be estimated, and differences in business plans among vessels and processors.
- Accuracy and representativeness: Some participants were doubtful that the information being collected would ultimately represent what it was intended to represent. For instance, a participant indicated that some of the questions ask for information they didn't have and couldn't reliably estimate. Some participants' comments showed concern that other respondents would interpret the questions the same way; indicating that some EDR questions are very specific while others are more vague and qualitative in nature. One commenter noted that the data requested is open to interpretation, particularly for boats that fish multiple fisheries. Another participant questioned whether the Council understands the full costs of minimizing salmon bycatch in the Bering Sea pollock fishery, beyond the fuel costs provided in EDR surveys.
- Other concerns: Participants also commented on the following topics
  - Costs to companies and participants of providing EDR data
  - Audits (the automated audit requirement has been suspended)
  - Privacy/invasiveness of questions
  - Equity; why a fishery without a catch share program (i.e., GOA trawl) would have a reporting requirement when other catch share programs (e.g. Halibut and Sablefish IFQ fisheries) do not have a requirement

This discussion provided the opportunity to document stakeholders' concerns about cost and burden in a comprehensive way for future reference. This question helped elicit the range concerns about cost and burden, though it does not indicate how widely these concerns are shared or whether stakeholders experience burden in the same way. This list is aggregated across the four EDR programs though some concerns are specific to the format or data fields of a particular EDR. Some participants commented on the utility of EDR data, demonstrating that how stakeholders perceive burden can be influenced by how they perceive the utility of the data they provide.

One participant commented that they are interested to understand what information is provided through other methods such as co-op reports, how it is used, and where there is a gap in data availability and/or a need to report data in a different format to be useful. Steve Kasperski noted that while some of the data collected through EDRs may seem duplicative of other sources, there may be limitations to how these other sources can be used.

## **Utility**

*Question 2: What do you think it means to use EDR data effectively?*

Stakeholders responded to this question by sharing questions, concerns, and expectations. Most responses illustrate three categories or vantage points for considering the utility of EDR data.

- The attributes of EDR data/data collections; e.g., quantitative, inform performance metrics, relevant, unique and not duplicative of other sources, objective and not subjective, reliable and accurate, serving intended purpose
- The metrics EDR data helps inform: e.g., performance metrics linked to decisions, long term trends, identifying unanticipated changes not anticipated during program or amendment development, providing a quantitative understanding of the effects of management decisions; whether EDR data is interpreted correctly and represents the information it is intended to represent
- The management applications of EDR data: e.g., analysis of economic effects of management actions, discussion documents, regulatory decisions; illustrating tradeoffs between alternatives in a Council action; directly used to inform decision making and referenced in decisions and discussion papers, benefits to stakeholders and communities, not used to publish papers.

Some participants commented that this question was difficult to answer and responses to this question demonstrated varying levels of optimism that EDR could be used effectively. Some also commented that they don't believe EDR data is reliable or useful, for example due to differences in business models.

Steve Kasperski noted that many responses relate to using EDR data more, or more reliably, in the Council process, and encouraged the group to describe their expectations for how they perceive utility (i.e. monitor, explain, predict). One participant commented that it's difficult to describe expectations, because it depends on the purpose of the EDR and how the Council intends to use the information. Another participant added that economic data that supplements administrative data collections can be useful by providing context for decision-making and helping the Council better understand the fisheries they manage, indirectly informing decisions. For instance, baseline crew data is often unavailable and often relevant to a management action. This participant was concerned about attempting to build an EDR framework around very specific Council questions.

### **Questions and discussion opportunities**

*Question 3: What else? What other questions should we ask?*

This question was included to elicit broad feedback on questions that could be explored as the Council and SSPT consider EDR revisions, as well as feedback on attributes of the EDR revision process. Responses are aggregated by topic. While some topics elicited more feedback than others, these responses are meant to capture the range of ideas shared and not the relative importance of each topic.

Timing: One participant asked whether EDRs must be collected annually to be effective.

Relevance: One participant questioned whether EDR data are answering the questions originally intended, and whether EDRs are still useful after each program has been in place for several years. Another asked how questions should be framed to collect the data most pertinent to the goal of each EDR.

Utility/use in Council process: Participants asked several questions about the use of EDR data in council analyses, including whether the data are truly necessary and whether the Council finds them useful, why they aren't used in every analysis, and how the Council uses specific information (e.g., IFQ leaseholder vs. vessel percentages of income).

Duplication: One participant suggested confirming that EDR data is not already accessible or collected through other means.

Consistency vs. specificity: Several participants questioned whether the utility of EDRs could be improved by address consistent questions and analytical needs across some or all of the council's managed fisheries, potentially in a more general and less burdensome way. This could potentially involve expanding the use of EDRs beyond the existing programs. For example, participants suggested collecting data from all fisheries that have been or may be rationalized under IFQ programs or from all license limitation program (LLP) permit holders.

Others emphasized that fisheries operate differently and suggested that a tailored and/or modular approach to EDRs is more appropriate. Another commenter added that it is unclear whether the intent is to revise the four existing EDR programs, or to entirely redo the EDR program for all federal fisheries.

Burden and equity: Some participants raised questions of burden; for example, whether there should be a minimum threshold (e.g., lbs. landed or processed) that triggers the requirement to submit an EDR. The comments above regarding which stakeholders and fisheries are required to submit EDRs also invoke concerns about burden and equity.

Scott Miller responded to questions about the timing of EDR collections, noting that NMFS must follow Paperwork Reduction Act procedures that require renewing data collections every three years to justify the time and burden of collecting data from the public. The current mid-year timing of EDR collections is meant to provide enough time for stakeholders to compile the previous year's data.

Brian Garber-Yonts commented that while EDRs may seem duplicative of other data collection methods, EDRs typically collect additional detail that enhance the utility of this data. While there may be some examples of data duplication, EDRs are designed to leverage other administrative data sources and are designed to minimize the amount of data collected. He also reflected on a comment about the frequency of EDR collection and observed that less frequent data collection could introduce data quality concerns. For example, EDRs could potentially be more difficult and burdensome to complete, and less accurate as a result, if stakeholders aren't compelled by annual EDR requirements to keep up with tracking the relevant data on an annual basis. However, some data such as vessel maintenance costs might not need to be reported annually and it may be more valuable to understand the cyclical nature of maintenance costs rather than annual expenditures.

One participant agreed that this meeting validated overarching concerns and feedback from stakeholders across EDRs but questioned where there would be an opportunity for discussions specific to each EDR program. Sector-specific conversations would provide the opportunity for stakeholders to share concerns and identify where they perceive a mismatch between the data collected and how it is applied.

Sarah Marrinan concluded by noting that discussions from this webinar will help the SSPT think about next steps, which may include stakeholder discussions organized by EDR or by topic. She reiterated that stakeholders are the subject matter experts as to what data they have available and the burdens imposed by providing it and encouraged participants to continue participating in the collaborative EDR revision process.

## Appendix: Objectives and use of EDR data

Brian Garber-Yonts provided an overview of the role of EDRs as a data collection tool, the opportunities and constraints to using EDR data, and the types of changes that the Council could consider making to their EDR programs. This section summarizes key points from the presentation and incorporates additional information and clarifications provided by webinar contributors Sarah Marrinan, Steve Kasperski, and Scott Miller. This section also complements the 2019 discussion paper developed by NMFS staff describing the current EDR requirements and explain how the data are used.<sup>4</sup>

*EDRs are specifically designed to support decision-making.*

EDRs are a unique Council-mandated economic data collection tool that are intended to be designed and customized to meet the Council's analytical needs, objectives, and questions. The Council and NMFS are required by multiple regulations and by statute to analyze the social and economic dimensions of the effects of regulatory alternatives and ongoing management. Social and economic dimensions of interest include net benefits, equity, efficiency, safety, community effects, and more. Council and NMFS analysts are tasked with using the best available information to prepare the suite of documents used to meet these needs, including analyses for fishery management plan (FMP) and regulatory amendments, white papers, and discussion documents.

The information most frequently used by analysts is generated by recordkeeping and reporting systems. This includes self-reported data such as landings reports and logbooks, as well as observer and Vessel Monitoring System (VMS) data. The primary purpose of this information is support administrative needs (e.g. permitting, enforcement, taxes and fee assessment) at the permit holder or company level, and to generate fishery-dependent data that can be used for in-season management and stock assessment. While the Council does use recordkeeping and reporting data for regulatory analysis and program review, these information collections are not specifically designed to inform decision-making. By contrast, EDRs (and other industry-generated reports including cooperative and sector reports) are intentionally developed to support the Council process.

*EDRs can help build the foundation for targeted economic analysis.*

EDRs and other economic data collection tools generate raw data, which can be combined and aggregated into performance metrics to provide information about questions and topics of interest. For example, data on fuel, labor costs, and ex-vessel revenue can be used to estimate annual operating profit at the average vessel level. Data collected in EDRs reporting vessel-level crew share costs and crew license numbers can be used to estimate annual share earnings for the average crew member, and by linking these estimates to zipcodes in ADFG's crew license registry, can provide insight into how crew income is distributed down to the community level.

The purpose and function of statistical data collection for analysis can be described in order of increasing complexity:

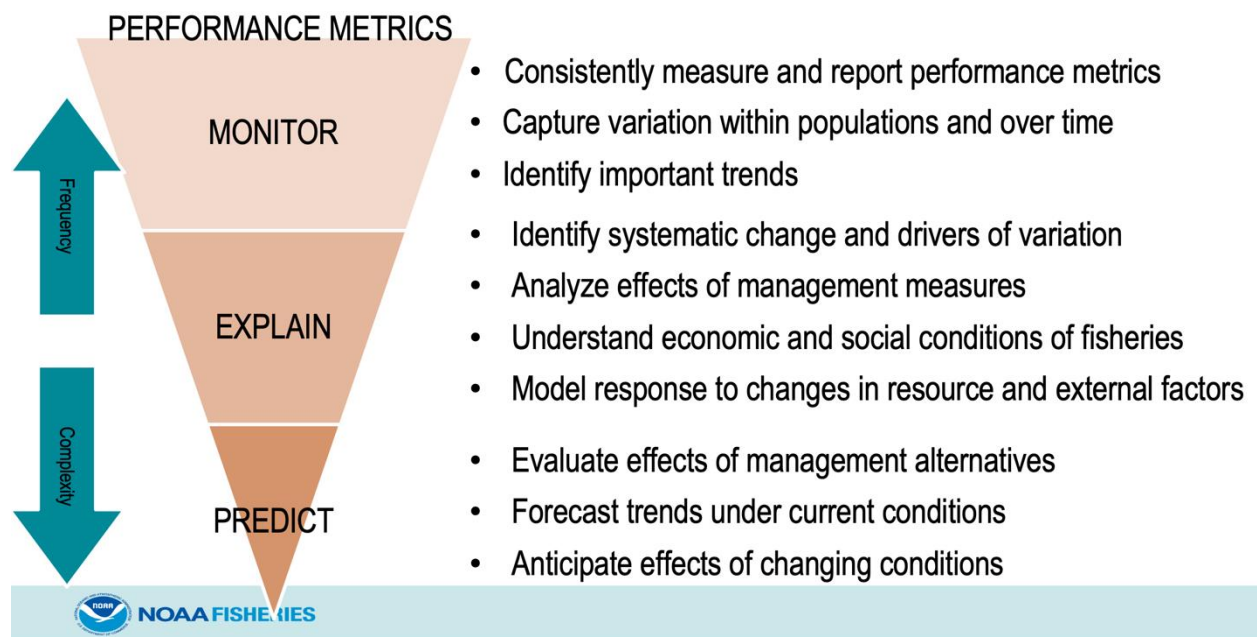
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<sup>4</sup> [Discussion Paper: Alaska Region Economic Data Reporting Programs](#). Prepared by Brian Garber-Yonts (Alaska Fisheries Science Center (AFSC), Economics and Social Science Research Program (ESSRP)), Stephen Kasperski (AFSC ESSRP), Sally Bibb (NMFS Alaska Region, Sustainable Fisheries Division (AKR)), and Scott Miller (AKR). March 22, 2019.

1. Monitor: Consistently measure and report performance metrics, capture variation within populations and over time, and identify important trends.
2. Explain: Identify systematic changes and drivers of variation, analyze effects of management measures, understand economic and social conditions of fisheries, and model response to changes in resource and external factors.
3. Predict: Evaluate effects of management alternatives, forecast trends under current conditions, and anticipate effects of changing conditions.

These functions build on one another and can be envisioned as a pyramid (Figure 1). Monitoring and routine reporting through EDRs and other statistical data collection tools help build the foundation of raw data that can be used to develop performance metrics and in turn support higher levels of analysis. Increasingly sophisticated and targeted levels of analysis depend on having a broad base of monitoring and explanatory analyses. While future analytical needs can't necessarily be anticipated, a robust and consistent foundation of statistical data collection can help analysts be responsive to emerging questions and concerns.

Figure 1: Purpose and functions of statistical data collection



Presentation by Brian Garber-Yonts, NOAA Fisheries Science Center, 8/26/20

*The purpose and need of EDRs can be customized and revised.*

The social and economic goals of FMPs, and the social and economic effects of interest, can be generally categorized as: efficiency (e.g., as indicated by profit, operating profit, net cost per unit bycatch avoided), equity (e.g., crew share, quota share value, ownership concentration), and stability (e.g., local and regional employment and income, profitability, capital maintenance and investment). FMPs do not typically link these attributes with specific performance measures or provide a systematic way of measuring them. As a Council-mandated data collection tool, EDRs can be designed to be linked directly to social and economic goals. They are most effective when the connection between specific performance metrics and these goals can be deliberate.



The four existing EDR programs have different purpose and need statements that are tailored to one or more of the three categories of metrics (Table 1). This table is a simplification but illustrates how EDRs may be designed to be more or less comprehensive of these three categories of metrics.

Table 1: Management effects and performance metrics of interest by EDR program

EDR Program/Fishery	Management effects and performance metrics		
	Efficiency	Equity	Stability
Crab CV, CP, and Processor EDR	x	x	x
Amendment 80 Trawl CP EDR	x		x
Amendment 91 Vessel Fuel Survey, Compensated Transfer report, and Vessel Master Survey	x		
GOA Trawl CV EDR and Shoreside Processor EDR	x		x

The purpose and need statements and structure of EDRs can be revisited periodically to assess whether EDR collections are aligned with the Council’s objectives and management needs, whether the specific metrics and analyses they were originally designed to support are still relevant, and to consider how fisheries are managed, conducted, and change over time. The context underlying the development of some EDRs has since changed. For example, the Amendment 91 EDR includes a compensated transfer report designed to monitor transfers of Chinook salmon PSC. However, the transactions and market that were anticipated at the time did not ultimately develop. The GOA Trawl CV EDR was developed to provide baseline information in anticipation of GOA groundfish trawl rationalization, an action that has since been tabled indefinitely. These examples demonstrate that developing narrowly targeted purpose and need statements and EDRs in the context of particular management measures can sometimes limit their utility, whereas a broad-based monitoring and reporting data collection can provide a more versatile foundation of information to draw from.

*EDR data are used for analysis but the potential utility of EDR data is constrained.*

Analysts have used EDR data to inform several types of analyses and documents, including the following.

- Economic SAFE (stock assessment and fishery evaluation) reports: All four EDR programs
- Program reviews (periodic reviews required by the MSA for limited access privilege programs): Amendment 80 5-year review and Crab 10-year review
- Regulatory analyses for specific actions:
  - Halibut deck sorting regulatory impact review (2019)
  - Catcher/Processor mothership restrictions social impact assessment (2019)
  - Gulf of Alaska trawl bycatch preliminary analysis (2016)

There are two primary reasons why EDR data is not used more often for regulatory analysis. The first challenge is fragmentation. EDRs are limited to the subset of fleets and fisheries with EDR requirements and are not linked with broadly informative performance metrics that support baseline economic monitoring or higher levels of analysis. The second challenge is inconsistency. To the extent that individual variables are collected in more than one EDR form, they may not be measured in the same way. As a result, EDR data is most useful for management actions that affect a specific EDR sector. For actions that affect multiple programs or fleets, EDR data is not typically used so that the quantification of impacts is more consistent across all fleets/sectors including those with and without EDR requirements.

*The Council community has the flexibility to consider a wide range of changes to balance the utility and burden of EDRs.*

There are several additional design elements that could be considered as the Council, SSPT, and stakeholders continue discuss weighing burden and utility relative to the purpose and need for EDRs.

- Participation: EDRs are currently mandatory. Other possibilities could include a voluntary approach, a hybrid approach combining the standard EDR and a voluntary supplement, and the use of interviews to complement the standardized data collected in EDRs.
- Data source and reporting entity: most EDRs are currently conducted as complete censuses of the sector-based (vessel or processor) target populations associated with the respective programs. A more modular approach could be considered to collect data from particular places or entities. (E.g., the Amendment 91 EDR includes modular components: the compensated transfer report form, vessel fuel survey, and skipper survey.)
- Reporting frequency and timing: The Council currently requires EDR forms to be submitted annually. Some information could potentially be collected less frequently, e.g. capital investment expenditures
- Sample design: EDRs are currently administered as a census because each program targets a small number of entities. If there were more standardized and broadly applied EDR a representative sampling approach or case studies could be used.

Through the iterative process of considering EDR revisions, the Council and its stakeholders have an opportunity to reflect on what they would like to accomplish with the capabilities EDRs provide. The examples above are not comprehensive of all changes the Council could choose to consider, and illustrate the flexibility that exists to consider how the purpose and need and format of EDRs can be developed to meet the Council's needs, provide useful information to support the Council process, and consider the cost and burden of data collection.