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C6: Economic Data Reporting Requirements Removal Initial/Final Review

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Council Presentation
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Introduction

The action alternative analyzed in this Regulatory Impact Review (RIR) would remove individual EDR program requirements.

Initial/Final Action due to:

- Recent implementation of Amendment 52, which included removing EDRs within the suite of alternatives,
- Simple choice set,
- An efficient way to consider action that may be in line with E.O. 14276.

Introduction

The RIR examines the benefits and costs of proposed fishery management plan and regulatory amendments affecting Economic Data Reporting (EDR) programs in the Bering Sea and Aleutian Islands management area (BSAI) crab fisheries (Crab Rationalization Program), the American Fisheries Act (AFA) pollock fishery (AFA Program), and the BSAI Amendment 80 fisheries (Amendment 80 Program).

There are 3 EDR collections:

1. BSAI Crab Rationalization Program EDR
2. Amendment 80 Program EDR
3. Amendment 91 EDR for the AFA Vessels and Participants

Presentation Outline

History of the Action

Purpose & Need and Alternatives

EDR Programs

EDR Program Management

Usage of EDR data

SSC Report Recommendations

Impacts of the Alternatives

Summary of Impacts

History of the Action

(Section 1.2, pp. 9-11)



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History of this Action: Implementation of EDRs

1998: AFSC and Social and Economic Data Committee starts development of cost, earnings, and employment survey for BSAI pollock

2001: HQ OST initiative began to increase regional funding of cost data collection

2006: First EDR submission for Crab Rationalization Program

2008: First EDR submission for Amendment 80 Program

2013: First EDR submission for Amendment 91 Chinook bycatch avoidance

2016: First EDR submission for now discontinued GOA Trawl Program

History of this Action: Recent Changes to EDRs

2018: First round of deregulatory action ideas that included EDR costs

2019: NMFS/AFSC presented discussion paper on EDRs and provided recommendations.

2019-2021: Social Science Planning Team met, stakeholder workshops commenced

2022: Council recommended final action on Amendment 52:

- Removed third-party verification audits

- Modified procedures for data aggregation and blind formatting

- Removed EDR requirements for GOA Trawl Program

2023: Amendment 52 was effective.

History of this Action: Current Action

April 2025: NMFS presented a paper that considered cost recovery and options to adjust annual timing and administrative processes. The Council recommended a motion to remove EDR requirements as an outgrowth from this action, stemming from the discussion paper and public comment.

June 2025: NMFS presented a discussion paper that was responsive to E.O. 14276 that provided suggestions that may improve fishing operations or reduce regulatory burden in the North Pacific. Removing EDR requirements was recommended.



Purpose & Need and Alternatives

(Sections 1.1 and 2, pp. 8-9 and p. 13)



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Purpose & Need Statement (pp. 8)

The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. Given the substantial cost recovery fees for submitting and maintaining EDRs, their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.

NMFS Recommended Changes to Purpose & Need Statement (pp. 9)

*The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. ~~Given~~ **In light of** the substantial cost recovery fees for submitting and maintaining EDRs, **the Council will evaluate whether to retain the EDR programs based on the value of and continuing need for each of the EDR programs.** ~~their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.~~*

Alternatives Analyzed

Alternative 1, No Action

Alternative 1 would retain EDR requirements for the BSAI Crab Rationalization Program, AFA Program, or Amendment 80 Program. See Section 3 for an overview of these three EDR programs. Fulfilling EDR requirements would remain mandatory for fishery participation.

Alternative 2

Alternative 2 would remove EDR requirements for LAPPs. Regulatory language requiring EDR submissions at 50 CFR 679 and 680 and language in the Crab FMP and BSAI FMP would be removed for all the EDRs. No other program elements would be modified for the BSAI Crab Rationalization Program, AFA Program, or Amendment 80 Program.

EDR Programs

(Section 3, pp. 14-24)



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BSAI Crab Rationalization EDR

(section 3.1, pp. 14-18)

Purpose (page 15): Designed to provide the information to study the impacts of the CR Program and analyze the economic and social impacts of future amendments on industry, regions, and localities. Information intended to aid in evaluating whether the program has achieved the goals from the problem statement, such as “equity between the harvesting and processing sectors” and to monitor the “...economic stability for harvesters, processors and coastal communities”.

Implemented: 2005

Respondents: 1) catcher vessels owners and lease holders, 2) processors, and 3) catcher/processors.

Deadline: July 31.

Presentation of data: The results are tabulated and incorporated into the Crab Economic SAFE annually.


Revised: 3/6/2024

OMB control No: 0648-0518
Expiration Date: 03/31/2026

Annual Catcher Vessel Crab Economic Data Report (EDR) Form

CALENDAR YEAR 2024

This form can be downloaded from
<http://alaskafisheries.noaa.gov>



PUBLIC REPORTING BURDEN STATEMENT
Public reporting burden for this collection of information is estimated to average 20 hours per response, including time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden to Assistant Regional Administrator, Sustainable Fisheries Division, NOAA National Marine Fisheries Service, P.O. Box 21668, Juneau, AK 99802-1668.

ADDITIONAL INFORMATION
Before completing this form, please note the following: 1) Notwithstanding any other provision of law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number; 2) This information is mandatory and is required to manage commercial fishing efforts for crab under 50 CFR part 680 and under section 402(a) of the Magnuson-Stevens Act (16 U.S.C. 1801, et seq.) And 16 U.S.C. 1862(j); 3) Responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act. They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

BSAI Crab Rationalization EDR

Number of respondents:	Total burden hours:	Per capita hours:
77	1,449	19
Burden cost estimate:	Administrative cost estimate:	Total cost estimate:
\$55,742	\$130,256	\$185,998

Amendment 80 Program EDR

(section 3.2, pp. 19-20)

Purpose (page 19): Designed by the Council to understand the effects of A80 and to assess whether A80 addresses some goals in the problem statement including mitigating the costs associated with bycatch reduction

Implemented: 2008

Respondents: A80 vessel owners/lesors and QS holders


Deadline: June 1.

Presentation of data: the results are tabulated and incorporated into the Groundfish Economic SAFE annually.

Annual Trawl Catcher/Processor EDR
Calendar Year January 1 – December 31, 2024

**ANNUAL
TRAWL
CATCHER/PROCESSOR
ECONOMIC DATA REPORT (EDR)
CALENDAR YEAR 2024**

This form can be downloaded from
<http://www.alaskafisheries.noaa.gov>



Amendment 80 Program EDR

Number of respondents:	Total burden hours:	Per capita hours:
22	440	20
Burden cost estimate:	Administrative cost estimate:	Total cost estimate:
\$16,927	\$109,671	\$126,598

Amendment 91 Chinook (AFA Program) EDR

(section 3.3, pp. 21-24)

Purpose (page 21) : Implemented along with Amendment 91 and Chinook salmon bycatch measures. Intended to evaluate the effectiveness of the IPAs, the hard caps, and performance standards, as well as how these measures affect avoidance behavior.

Implemented: 2012

Respondents: Vessel owners/ leasers, vessel masters, and coop managers

Deadline: PSMFC administers the EDR through their website and it is due every year by June 1.

Presentation of results: Previously summarized in the Groundfish Economic SAFE (2019 and prior years). More recently, information used ad hoc.

ANNUAL CHINOOK EDR: VESSEL MASTER SURVEY PART 2: Pollock Fishing and Salmon Bycatch Avoidance	
Each Vessel Master on the AFA-permitted vessel must complete the Hired Master information and sign and date the certification. <i>Duplicate Part 2 if additional entries are needed.</i>	
Hired Master Certification	
Vessel Master Name	CFEC Gear Operator Permit Number
I certify under penalty of perjury that I have reviewed all the information in this report and that it is true and complete to the best of my knowledge.	
Signature (Vessel Master)	Date signed

Please consider the following questions carefully and provide the most complete answers you can. Where applicable, please note any differences between the A and B pollock seasons. Please attach extra sheets if more space is needed to complete your answers.

1. If the vessel participated in an Incentive Plan Agreement (IPA), did the IPA affect your fishing strategy?
☐ YES ☐ NO
If YES, please describe and discuss what incentives had the largest impact on your strategy.
2. Did the amount and/or cost of Chinook PSC allocation available to the vessel lead you to make changes in pollock fishing operations?
☐ YES ☐ NO
If YES, please describe.
3. How would you compare the Chinook salmon bycatch and pollock conditions during the A and B seasons this year relative to the last two years? Please describe any unique aspects of the season.
4. Did Chinook salmon bycatch conditions cause you to delay the start of your pollock fishing or otherwise alter the timing of your pollock fishing for some period during the past A and/or B season?
☐ YES ☐ NO
If YES, please describe the Chinook salmon bycatch condition, when it occurred, and any change in your pollock fishing as a result.

Chinook EDR: Vessel Master Survey
Page 4 of 5

Amendment 91 EDR

Number of respondents:	Total burden hours:	Per capita hours:
151	640	4
Burden cost estimate:	Administrative cost estimate:	Total cost estimate:
\$24,621	\$58,949	\$83,570

EDR Program Management

(Section 4, pp. 25-31)



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Administration of the EDR Program

Table 4. Pacific States Marine Fisheries Commission administrative costs of the EDR Program, 2005-2024* (pp. 25)

*Corrected to exclude GOA trawl EDR costs from 2015-2021

- PSMFC handles the majority of the EDR submission and data, with oversight from AFSC.
- The administration of the EDR program has cost \$298,876 per year (based on a 3-year average).

Year	Crab ¹	A80	AFA ²	Total EDR cost ³
2005	\$150,000			\$150,000
2006	\$150,000			\$150,000
2007	\$259,938			\$259,938
2008	\$338,276			\$338,276
2009	\$314,303			\$314,303
2010	\$352,508			\$352,508
2011	\$323,588			\$323,588
2012	\$373,316			\$373,316
2013	\$318,278			\$318,278
2014	\$342,703			\$342,703
2015	\$269,583			\$269,583
2016	\$345,509	\$88,254	\$62,114	\$495,877
2017	\$180,168	\$91,482	\$66,929	\$338,579
2018	\$202,012	\$92,462	\$40,631	\$335,105
2019	\$180,224	\$87,644	\$56,989	\$324,857
2020	\$91,620	\$72,976	\$48,194	\$212,790
2021	\$72,927	\$85,123	\$52,735	\$210,785
2022	\$97,913	\$80,256	\$64,205	\$242,374
2023	\$145,209	\$130,943	\$63,378	\$339,530
2024	\$147,646	\$117,814	\$49,264	\$314,724
3-Year Average	\$130,256	\$109,671	\$58,949	\$298,876

Source: PSMFC

NMFS OST Funding for EDRs, 2016-2025

Table 6. NMFS HQ Office of Science and Technology Funding for EDRs, 2016-2025 (pp. 28)

Year	Funding from HQ OST
2016	\$235,922
2017	\$91,879
2018	\$61,764
2019	\$72,546
2020	\$65,937
2021	\$85,932
2022	\$91,476
2023	\$7,112
2024	\$7,132
2025	\$97,068

Source: AFSC

- Since 2002, NMFS Office of Science and Technology (OST) has invested in cost data collection of commercial fisheries by providing dedicated funding to regional science centers (AFSC).
- In addition to cost recovery fees, the EDR program have leveraged funding through NMFS' Data Collection Grant. AFSC manages the grant and oversees PSMFC's scope of work for each of the EDR projects. PSMFC submits annual expenditure reports to NMFS. NMFS then recovers the expended funds through cost recovery and disburses funds from the grant to PSMFC. The grant is annually requested and allocated.

Paperwork Reduction Act requirements

- The Paperwork Reduction Act requires that federal agencies must obtain approval from the Office of Management and Budget to collect information from 10 or more persons.
- In submitting information collections to OMB for approval, NMFS must develop burden estimates.

Table 7. Annual respondent burden hours and cost associated with EDR submissions

Program	Annual burden hours	Annual burden cost
Crab Rationalization	1,449	\$55,742
A80	440	\$16,927
A91 Chinook bycatch	640	\$24,621
Total	2,529	\$97,290

Total Estimated Costs

Caveats: The administration costs are based on a 3-year nominal average from 2022-2024 and the PRA burden estimate is based on a 3-year average from 2020-2022. Comparing across different years was the closest NMFS could get to a reasonable annual estimate to determine costs for the EDR Program.

The administration of the EDR programs has cost an average of **\$298,876** per year that is subject to cost recovery (based on a 3-year nominal average from 2022-2024).

For the most recent data on estimated burden to industry (based on a 3-year nominal average 2020-2022), the total annual cost was **\$97,290**.

Therefore, the total annual cost to industry of the EDR Program is approximately \$396,166.

Usage and Examples of EDR data

(Section 4.6, pp. 29-31)



BSAI Crab Rationalization EDR

Excerpt from recent action using Crab Rationalization EDR data:

Final Action on Active Participation Requirements for Crab Crew Shares (Dec 2023; pp. 32-34)

BSAI Crab Rationalization EDR

Excerpt from recent action:

Crew positions in the crab harvesting sector (pp. 17)

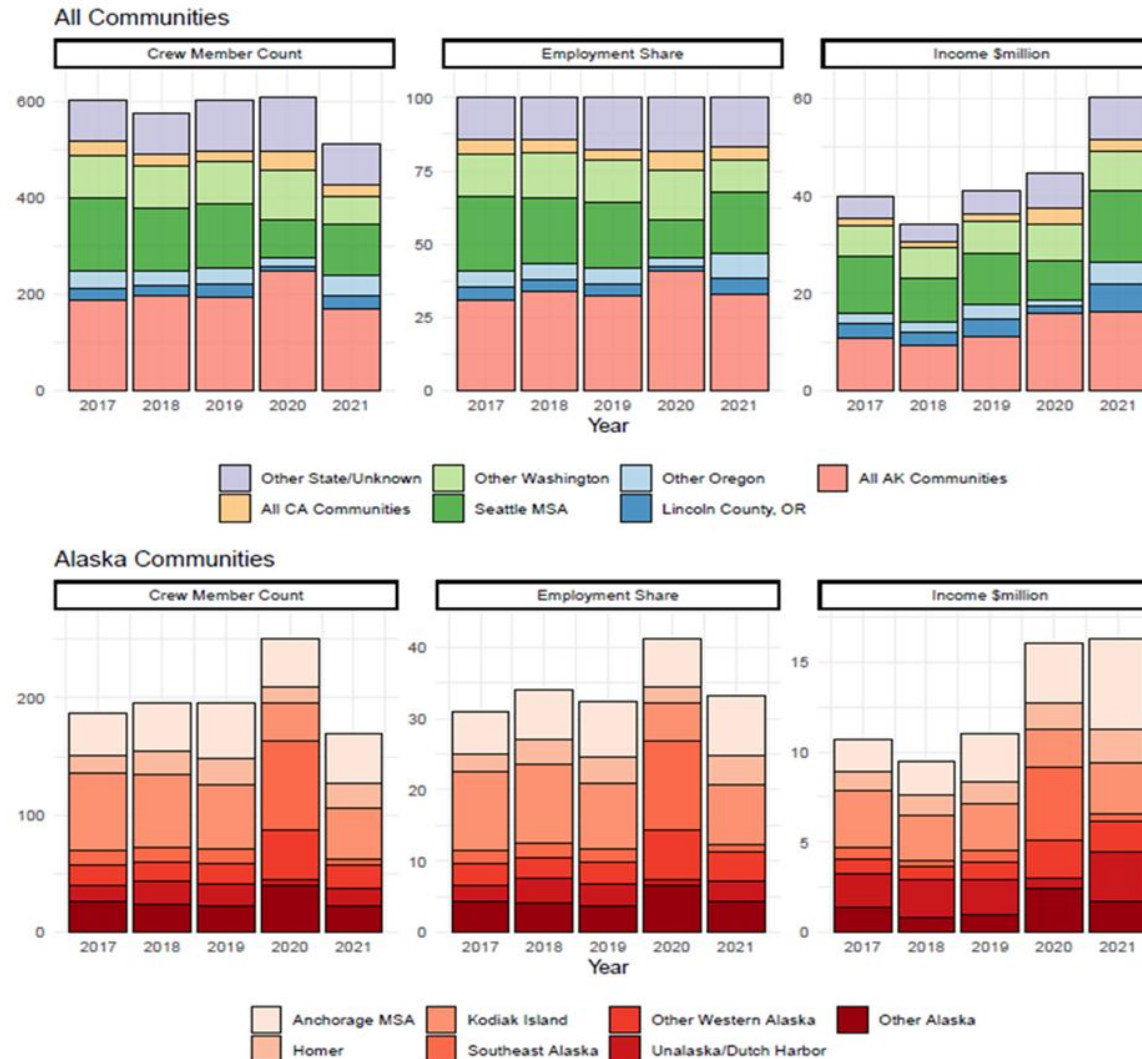
Source: eLandings data incorporated into the Crab Economic SAFE, , used in RIR for C Share Active Participation Requirements - Dec 2023

Year	AIG	BBR	BSS	BST	SMB	Sum of positions	Percent change
2009	35	443	536	102	39	1,155	
2010	35	422	444	21	63	985	-15%
2011	36	413	453	0	112	1,014	3%
2012	46	428	502	0	106	1,082	7%
2013	44	418	481	156	0	1,099	2%
2014	35	422	480	279	24	1,240	13%
2015	35	441	491	365	17	1,349	9%
2016	36	423	463	296	0	1,218	-10%
2017	36	419	441	100	0	996	-18%
2018	37	365	436	211	0	1,049	5%
2019	37	370	428	139	0	974	-7%
2020	35	333	417	163	0	948	-3%
2021	37	0	448	149	0	634	-33%

BSAI Crab Rationalization EDR

Excerpt from
recent action:

Estimated crew
employment and
income, by
community/region
of residence (pp. 18)



Source: EDR data incorporated
into the Crab Economic SAFE,
and used in RIR for C Share
Active Participation
Requirements - Dec 2023

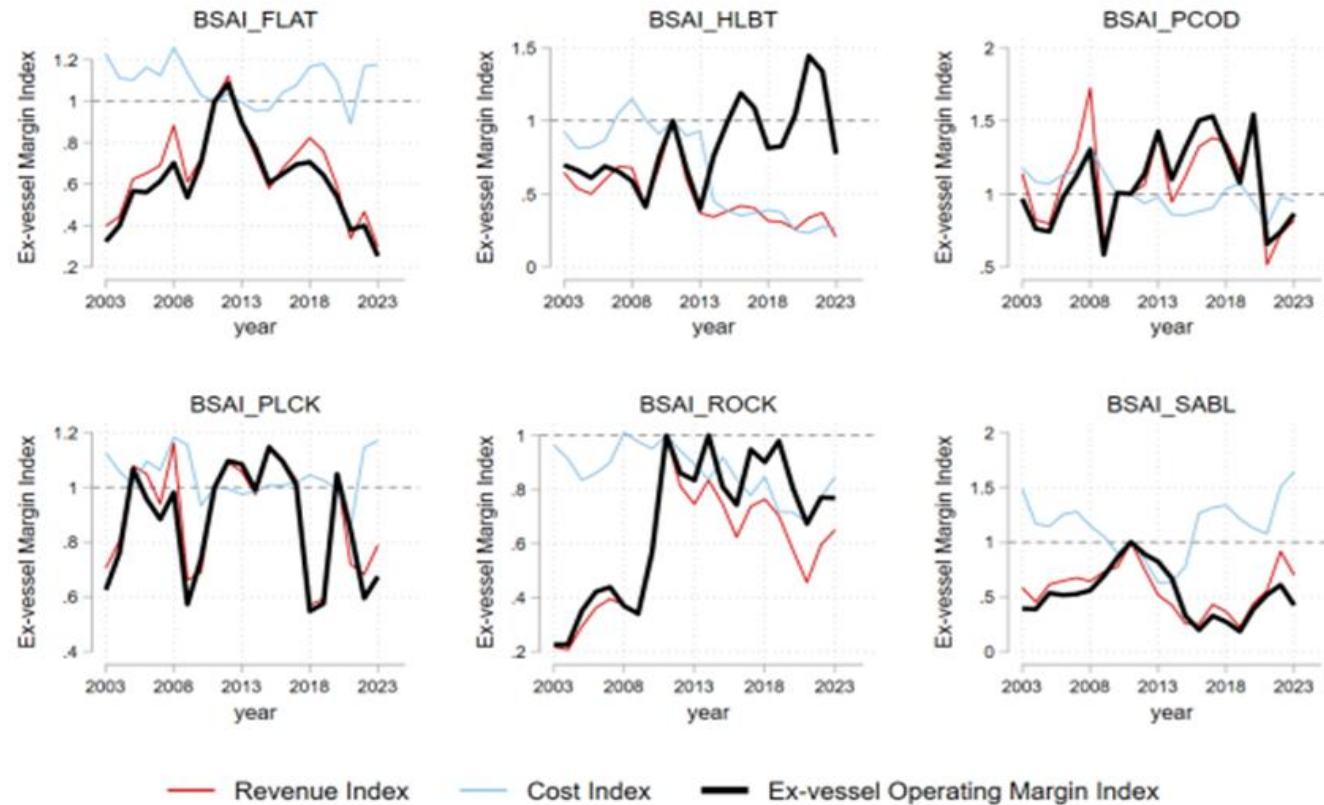
Amendment 80 Program EDR

Excerpt from recent action using EDR data:

Alaska Seafood Snapshot Report (August 2024; pp. 37)

Amendment 80 Program EDR

Excerpt from recent report using EDR data:



Amendment 91 EDR

Excerpt from recent action using EDR data:

Initial Review on Preliminary Draft Environmental Impact Statement Bering Sea Chum Salmon Bycatch Management (March 2024; pp. 243)

Amendment 91 EDR

Excerpt from recent action using EDR data:

AFA vessel fuel use
and cost (pp.24)

	Year	Vessels	Annual average fuel consumption rate (gallons per hour), mean (sd)		Annual fuel use, mean (sd)	
			Fishing	Transiting	Gallons (1,000)	Cost (\$1,000)
CP	2012	14	284 (40)	255 (59)	1,168 (181)	\$5,258 (743)
	2013	15	290 (70)	249 (83)	1,171 (318)	\$5,158 (1,308)
	2014	15	277 (61)	249 (79)	1,396 (395)	\$5,773 (1,470)
	2015	14	284 (40)	270 (82)	1,438 (368)	\$3,942 (856)
	2016	14	297 (32)	282 (85)	1,393 (378)	\$3,050 (865)
	2017	14	279 (30)	285 (64)	1,570 (386)	\$3,896 (887)
	2018	14	278 (34)	283 (52)	1,522 (306)	\$4,523 (907)
	2019	14	278 (34)	284 (54)	1,641 (366)	\$4,332 (991)
	2020	14	288 (29)	273 (67)	1,606 (386)	\$3,073 (723)
	2021	13	285 (40)	279 (57)	1,252 (278)	\$3,237 (725)
	2022	14	297 (47)	256 (47)	1,163 (306)	\$4,797 (1,273)
CV	2012	90	75 (38)	51 (30)	163 (98)	\$797 (488)
	2013	85	73 (34)	51 (28)	152 (84)	\$739 (409)
	2014	85	74 (34)	51 (27)	143 (74)	\$661 (342)
	2015	83	76 (36)	52 (29)	131 (52)	\$441 (182)
	2016	87	75 (34)	51 (27)	117 (44)	\$274 (102)
	2017	84	74 (34)	50 (27)	120 (53)	\$312 (131)
	2018	80	75 (35)	51 (27)	139 (65)	\$449 (215)
	2019	71	72 (34)	51 (28)	146 (67)	\$433 (195)
	2020	79	76 (34)	50 (27)	193 (124)	\$390 (176)
	2021	80	76 (35)	52 (30)	131 (67)	\$361 (190)
	2022	79	73 (36)	49 (28)	106 (65)	\$442 (239)

Source: EDR data provided by AKFIN, and used in the Preliminary DEIS for Chum salmon bycatch - March 2024

Council staff usage of EDR data: Recent Actions

- Halibut Abundance Based Management: A80 EDR crew data
- Snow Crab Rebuilding: Crab EDR payments to participants, total number of positions, crew residency, crew compensation by community, and leasing activity.
- Chum Salmon Bycatch: A91 EDR skipper surveys and fuel costs
- Most Amendments to Crab Rationalization Program: include crab EDR data, such as Amendment 54 used crew members, crew compensation, and crew residency information.
- BSAI Crab Program Review: Crab EDR data such as payments to participants, crew residency, and crew compensation by community.
- Amendment 80 Program Review: A80 EDR data such as fleet structure, employment, labor earnings.
- Crew Data Collection and Universal Data Collection: EDR data to highlight examples of uses and emphasized how EDR crew data is used to show crew compensation, crew positions, and crew residency.

AFSC staff usage of EDR data

AFSC Economics and Social Science Research Program economists analyze EDR data in two almanacs of data produced for the Council as appendices to the annual SAFE reports which present the data in tables for public use through the Economic SAFE documents for crab and groundfish.

AFSC staff also use EDR data in a variety of applications and publications. In recent years, AFSC and AKFIN have collaborated on development of the Human Dimensions Data Explorer, which provides a platform for public access to AFSC's fishery management decision support tools and data reports, including the Annual Community Engagement and Participation Overview reports.



AFSC staff usage of EDR data: Recent Research Projects and Annual Projects

- Alaska Seafood Snapshot
- Multi-regional social accounting matrix modeling
- Bioeconomic models for crab and cod
- Distributional outcomes of rights-based management

Specific journal article publications can be found on p. 30.



SSC Report Recommendations

(Section 7, pp. 42-46)



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Past SSC Comments on EDR Processes

The SSC finds that EDRs are generally critical, irreplaceable socioeconomic data that help meet National Standards while also acknowledging industry sees them as burdens without clear goals.

The SSC has not recommended to remove EDRs and would prefer the Council take a more holistic approach to streamline the EDRs and make them more useful in meeting scientific and regulatory needs and mandates.

Impacts of the Alternatives

(Section 5, pp. 32-37)



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Impacts of Alternative 1: No Action

Table 5. EDR Programs as a percent of fishery value, 2020-2024 (pp.27)

Alternative 1 would continue the current mandatory EDR submissions.

Costs would continue:

- As shown in section 4.1, the EDR requirements would continue to require an average of \$298,876 a year to manage (includes cost recovery funds and funding from HQ).
- Continue to represent a reporting burden for respondents.

Year	Fishery	EDR Cost	Fishery Value	EDR Program as % of Fishery
				Value
2020	Crab Program	\$ 91,620	\$ 185,616,712	0.05%
2021		\$ 72,927	\$ 268,067,389	0.03%
2022		\$ 97,913	\$ 80,150,470	0.12%
2023		\$ 145,209	\$ 88,885,388	0.16%
2024		\$ 147,646	\$ 101,351,356	0.15%
2020	Amendment 80 Program	\$ 72,976	\$ 123,869,002	0.06%
2021		\$ 85,123	\$ 73,808,145	0.12%
2022		\$ 80,256	\$ 138,054,805	0.06%
2023		\$ 130,943	\$ 126,970,552	0.10%
2024		\$ 117,814	\$ 127,092,592	0.09%
2020	AFA Program	\$ 48,194	\$ 201,766,245	0.02%
2021		\$ 52,735	\$ 206,199,143	0.03%
2022		\$ 64,205	\$ 213,096,103	0.03%
2023		\$ 63,378	\$ 217,219,279	0.03%
2024		\$ 49,264	\$ 229,142,945	0.02%

Source: PSMFC

Impacts of Alternative 1: No Action

These data would continue to contribute to the best available economic data for these North Pacific fisheries and may be beneficial in addressing each EDR's purpose and need statement.

Under Alternative 1, AFSC would continue to incorporate EDR data into the crab and groundfish Economic SAFE documents from the Crab Rationalization Program EDR and the Amendment 80 Program EDR. The data from the Amendment 91 EDR would likely not be used except on an ad hoc basis. AKRO would continue to renew the information collections under the PRA under a 3-year cycle.

Impacts of Alternative 2: Remove EDR requirements

Trade-off:

- **Benefit:** Reduced costs for program participants (Earliest estimate for effective date is 2027).
- **Cost:** Loss of data, which is applied in a variety of analyses and reports.

Consequences of Losing EDR Data:

- Diminished ability to quantify economic benefits and assess contributions to fishing communities.
- Reduced understanding of how benefits are distributed among harvesters, processors, and communities.
- Loss of consistent and annual cost, revenue, ownership, and employment data used for economic modeling and analysis.

Impacts of Alternative 2: Impact to Program Participants

Elimination of Burden Hours

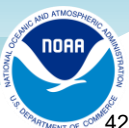
- Participants would no longer spend time completing EDR forms.
- Estimates currently are between **440 and 1,449 hours** per year.

Elimination of Cost Recovery Fees on EDR Program

- Participants would no longer pay cost recovery fees for administration of the EDR Program
- Direct costs associated with completing the reports would also be eliminated.

Annual Cost Savings for Fishery Participants

- Removing the EDR requirement would save participants in the EDR program a combined total of approximately **\$396,166 annually**.



Impacts of Alternative 2: Impact to Program Participants

Table 8. Estimated annual cost savings in burden hours, burden cost and administrative cost (pp.34)

Program	Annual burden hours	Annual burden cost	Annual administrative cost	Total Cost (burden cost + administrative cost)	Per Capita Hours	Per Capita Administrative Cost	Per Capita Total Cost
Crab Rationalization	1,449	\$55,742	\$130,256	\$185,998	19	\$1,692	\$2,416
A80*	440	\$16,927	\$109,671	\$126,598	20	\$4,985	\$5,754
A91 Chinook bycatch	640	\$24,621	\$58,949	\$83,570	4	\$390	\$553

Impacts of Alternative 2: Impacts to National Marine Fisheries Service, the Council, and the Public

Removing EDRs would create an information gap for management, analysts, and the public.

EDRs are the only tool NMFS has to consistently track operational costs (like fuel, crew pay, etc.) for these fisheries. Without them, it's more difficult to get a clear picture of fleet-wide profitability.

These data can be used in program reviews and Council analyses and are annually published in the economic SAFEs. These will continue on, but EDR data would be removed.

In the future, AFSC would have to rely on voluntary data collections, which is more expensive, short-term, and often provides an incomplete or biased picture compared to the consistent data from EDR data.

Net Benefits to the Nation

- While financial savings are clear, the negative impact of losing data for science and management cannot be quantified.
- The tangible benefit (cost savings) cannot be accurately weighed against the intangible cost (loss of information).
- Because of this, the overall net benefit to the Nation is considered neutral.

Summary of Impacts

(Executive Summary, pp. 6)



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Alternatives		EDR respondents <i>A80 vessel owners and quota holders Crab vessels owners/leasers, CDQ groups, processors, & registered crab receivers AFA vessel owners/leasers, operators & cooperative managers</i>	Managing agencies <i>NMFS AKR AFSC PSMFC</i>	Broader beneficiaries <i>Interested fishery participants, communities, and the broader public</i>
Alternative 1: No action		No change	No change	No change
Alternative 2: Remove EDR Requirements for Crab Rationalization Program, Amendment 80, and AFA Amendment 91	Cost savings	Elimination of reporting burden for all respondents ~\$97,290 Elimination of associated costs recovery fees ~ \$298,876	Elimination of agency costs that are not absorbed by cost recovery Eliminate PRA requirements and renewal schedule	No
	Reduction in information	Less fleet-level information, to the extent the information is used	Less quantitative information with which to address MSA National Standards and EOs.	Lose access to these timeseries data and the public information that can be produced from it. For example, these data would not be available: <ul style="list-style-type: none"> To contribute to public understanding of crab and A80 fishery trends previously provided in the Econ SAFE documents For Council analyses, program reviews, or to contribute to Council decisions (e.g., crab actions and program review, chum salmon bycatch, A80 program review For continued development and maintenance of a regional economic impact model for Alaska fisheries For <i>ad hoc</i> projects related to these 3 fisheries (e.g., 2024 Alaska Seafood Snapshot)

Questions?