AGENDA ITEM C-3(e)
FEBRUARY 2012

Public Review Draft

REGULATORY IMPACT REVIEW

and

INITIAL REGULATORY FLEXIBILITY ANALYSIS

MODIFICATION OF ECONOMIC DATA REPORTS

For a proposed Amendment _____ to the Fishery Management Plan for the

Bering Sea and Aleutian Islands King and Tanner Crab Fisheries

February 2012

EXECUTIVE SUMMARY

In August of 2005, fishing in the Bering Sea and Aleutian Island crab fisheries began under a new share-based management program (the "program"). As a part of the program, the Council developed an economic data collection program (referred to as "economic data reports" or EDR) to provide information to analysts to assess the effects of the program and future amendments to the program. Based on reviews of the data, it has been established that certain data elements collected are not accurately or consistently reported across respondents, preventing their use for some of their intended purposes, and other elements are wholly or partially redundant with other data collection. To address these shortcomings, as well as to address what is perceived excessive costs associated with the data collection, the Council has initiated this action to revise the data collection program.

Purpose and Need Statement

To guide its action to revise the data collection program, the Council has developed the following purpose and need statement:

> *As a part of its Bering Sea and Aleutian Island crab rationalization (CR) program, the Council developed a comprehensive economic data collection ("EDR") program to provide information to analysts to assess the effects of the CR program and identify problems that may require future amendments to the EDR program.*
>
> *Council review of the EDR program, development of the EDR metadata through PNCIAC and testimony from the industry has resulted in the identification of substantial portions of the EDR data that are inaccurate. In addition, several elements are wholly or partially redundant with other existing data collection requirements, and some components may not further the Council's objectives. The cost to industry, both directly through data submission, and indirectly through cost recovery funding of program administration, outweigh the benefits of the resultant data and greatly exceed estimates provided in the initial analysis of the EDR program and in the accompanying regulatory analyses.*
>
> *To address these problems, the Council intends to amend the EDR process so that the data collected is accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost.*
>
> *The Council expressly wants to limit the EDR to the collection of data that have been demonstrated, through the development of the EDR metadata, and other reviews of the data, to be sufficiently accurate. Data collection should be structured and specific elements identified, to minimize costs while maintaining accuracy and providing the greatest information value to the management decision making process.*
>
> *As analysts develop, refine, and verify methods for accurately collecting additional informative data elements the Council will consider expansion of the data collection program to include those elements. This process can also inform the future Council action regarding other existing and future EDR programs.*

Alternatives

Catcher Vessel Alternative 1 (status quo)

The status quo alternative would maintain the current catcher vessel data collection program, which collects data from all catcher vessels participating in any program fishery. Data are collected in several categories. Fishing data, such as days fishing and days traveling between port and grounds are collected

for each fishery. Delivery and revenue data are collected for each fishery by share type, with leased shares identified. IFQ use is collected with the vessel owner's shares distinguished from those leased from others. Crew data are collected, including payments to crew and captain by fishery, typical factor deductions and charges, and net revenue shares. Crab fishery costs (such as insurance costs and pot and gear purchases) are collected, most of which are aggregated across all crab fisheries. Fuel and bait purchases are also collected by crab fishery. Annual vessel costs (aggregated across all vessel activities) are collected including investments and repairs and maintenance, as well as fuel and fluid purchases. In addition, general annual data are also included in the collection, including all revenues and harvests, as well as days at sea and annual labor costs.

Catcher Vessel Alternative 2

The second alternative excludes many of the variables collected under the status quo. Fishing data are removed. Landings and revenues by share type would be collected along with leased quota and lease costs. In addition, a count of the number of crew contributing shares to the vessel's harvests would be collected. Payments to captains and crew would be collected, along with all unique crew contracts and settlement sheets. Purchases of new pots would be collected along with gallons of fuel aggregated across all fisheries. Vessel investment, repair, and maintenance costs would be collected, along with annual insurance costs and fuel costs. The vessel's annual gross revenues and payments to labor would also be reported.

Catcher Vessel Alternative 3

Alternative 3, is similar to Alternative 2, but further reduces the data collection, limiting reporting to deliveries and revenues and crew data. Deliveries and revenues would be submitted by share type, along with pounds of shares and monetary costs of arms' length leases. Fuel use in gallons by fishery would be collected along with total fuel use and costs annually.

Shore Plant and Floating Processor Alternative 1 (status quo)

The status quo collects data from every plant that operates in a crab program fishery. Production data are collected, including processing days and the amount of raw crab processed and finished pounds, as well as products by type, box size, and size. Revenue data collected include first wholesale sales by species, product, grade, size, and box size, distinguishing sales to affiliated entities from sales to unaffiliated entities. Custom processing revenues are also collected. Labor data are collected by crab fishery, including average processing positions, number of man hours, total payments to labor, and processing employee residence. Custom processing services purchased are collected by fishery, including raw and finished pounds by size, grade, and box size, as well as payments. Crab purchases are collected by share type, size, and grade. Crab processing costs are collected including fees and taxes, lease costs, and observer costs by fishery, along with processing materials, food and provision, repackaging, freight, and storage costs aggregated across all crab fisheries. General plant costs are collected, including annual fuel and fluid, investment, and repair and maintenance costs. In addition, general processing information is collected, including processing days, total gross revenues, total finished product pounds, and total labor costs.

Shore Plant and Floating Processor Alternative 2

As with the catcher vessel sector, many of the variables collected under the status quo are omitted from the second alternative. The first and last day of processing is collected. Revenues by fishery are collected, with transactions with affiliated entities separated from transactions with unaffiliated entities. Custom processing revenues are also included, along with quantities of custom processed crab products. Labor man hours by crab fishery are collected, as are total payments to processing labor and crab processing crew by residence, each on a crab fishery basis. Custom processing services purchased are collected by crab fishery, identifying pounds of raw crab processed and finished product amounts together with the payments for services. Crab purchase data also included, by fishery and share type. Costs of IPQ leases

are also collected, but processing operational costs are largely excluded from this alternative. Salaries of foremen, managers and other salaried employees, aggregated across all fisheries, are also collected. General plant costs are collected, including annual fuel and fluid, investment, and repair and maintenance costs. In addition, general processing information is collected, including processing days, total gross revenues, total finished product pounds, and total labor costs.

Shore Plant and Floating Processor Alternative 3

Alternative 3 is very similar to Alternative 2. Under this alternative plant labor information is aggregated across all crab fisheries (as opposed to being collected on a crab fishery basis under Alternative 2). In addition, IPQ lease data collected will be only monetary payments for arm's length transactions. Crab size and grade will be eliminated from revenue data and box size information will be across various size categories. Revenues for all sales will be reported FOB Alaska. Reporting will also be required by any company contracting for custom processing, as those companies are not currently required to report custom processing costs or revenues from sales.

Catcher Processor Alternative 1 (status quo)

The status quo catcher processor data collection is similar to the status quo data collection of the other sectors. Fishing data, such as days fishing and days traveling between port and grounds are collected for each fishery. Production data are collected including processing days and the amount of raw crab processed and finished pounds, as well as products by type, box size, and size. Revenue data collected include first wholesale sales by species, product, grade, size, and box size, distinguishing sales to affiliated entities from sales to unaffiliated entities. Custom processing revenues are also collected. Harvest crew data are collected, including payments to crew and captain by fishery, typical factor deductions and charges, and net revenue shares. Data are also collected on processing crew, including number of processing crew and their payment. Custom processing services purchased are collected by fishery, including raw and finished pounds, as well as size, grade, and box size, as well as payments. Crab purchases are collected by share type, size, and grade. Crab fishery costs, such as insurance costs, pot and gear purchases, are collected, most of which are aggregated across all crab fisheries. Fuel and bait purchases are also collect by crab fishery. Crab processing costs are also collected including processing materials, repackaging, freight, and storage costs aggregated across all crab fisheries. Annual vessel costs (aggregated across all vessel activities) are collected including investments and repairs and maintenance, as well as fuel and fluid purchases. General annual data are also included in the collection, including all revenues, together with total pounds of raw fish and crab and total pounds of finished product, as well as days at sea, days of processing, and annual labor costs.

Catcher Processor Alternative 2

The second alternative scales back the data collection considerably. One notable addition is the collection of landings and revenues from the vessel, in the event it makes deliveries to another processor. Revenue data (from both sales of products and custom processing) are collected, as under the status quo. Leasing information is collected by crab fishery, as well as a count of the crew on the vessel who contribute shares to the vessels harvests. Payments to captains and crew are collected, along with harvesting crew license information and processing crew residence information. In addition, captain and crew contracts and settlement sheets are collected. Custom processing services purchased are collected by crab fishery, identifying pounds of raw crab processed and finished product amounts together with the payments for services. Crab purchase data are also included, by fishery and share type. Purchases of new pots would be collected and fuel use aggregated across all fisheries. Vessel investment, repair, and maintenance costs would be collected, along with annual insurance costs and fuel costs. The vessels annual gross revenues and payments to labor would also be reported. General annual data are also included in the collection, including all revenues, together with total pounds of raw fish and crab and total pounds of finished product, as well as days at sea, days of processing, and annual labor costs.

Catcher Processor Alternative 3

Alternative 3 is very similar to Alternative 2. Under this alternative, sales would be reported using boxes size categories and using Alaska as the free on board (FOB) location. Custom processing activity would include both the pounds of raw crab processed and pounds of product. Alternative 3 also differs in that it collects only leasing costs for arm's length leases and omits the collection of the number of crew contributing shares to a vessel's harvests, but includes a check box to indicate whether the skipper is a vessel owner. Alternative 3 also excludes the collection of crew license numbers and processing crew residence information. Pot purchase data are also omitted from the collection under Alternative 3, as well as vessel investment, repair, and maintenance costs, and insurance information. Gallons of fuel for each crab fishery and IPQ lease costs would be collected under this alternative, but not under the second alternative. The general annual data reported under Alternatives 2 is also excluded from this collection.

Effects of the alternatives

Under the status quo catcher vessel alternative, analysts are provided data to understand whether different share types bring different landings prices in the fisheries. In addition, captain and crew compensation levels are available, which can be examined relative to vessel revenues, vessel harvests, and fishing time. By combining vessel investment costs and repairs and maintenance costs, analysts can gain a perspective on the relative spending for vessel upkeep and improvements. These can be examined across the fleet and over time to understand spending patterns relative to effort in the fisheries. The last section of the data collection provides data concerning overall activities of a vessel. These data are the only source of data concerning total days at sea, total vessel revenues, and total labor costs. Through these elements, analysts can compare operations in crab fisheries with a vessel's total operations to develop a basic understanding of the role crab operations relative to a vessel's total operations for these factors. While the status quo alternative provides these benefits, a substantial portion of the submitted data are of poor or unknown quality, and thereby, little benefit in their current form. The burden associated with reporting under the status quo alternative is high (relative to the other alternatives). In the case of vessels that pool shares for fishing in a cooperative, developing lease data often requires several simplifying assumptions and substantial effort to unbundle cooperative fishing records. Location of purchase information requires respondents to sift through records to attempt to separate purchases by location. These data are also problematic, as matching acquisitions to location of purchase may not be possible through some invoices. Processing these data also is a substantial burden on agency staff and contractors. Although some elements of the status quo alternative provide data that are useful for examining some factors in the fisheries, a large share of the data elements collected currently provide little information, at a substantial cost to submitters and the agency.

The second catcher vessel alternative would reduce the reporting and management burdens substantially from the status quo. The decrease in analytical utility of the data collection from the status quo is mitigated, as many of the omitted elements are deemed to be unreliable. Analysts would be able to examine landings revenues by share type, crew compensation, and certain cost elements. Although fuel costs by fishery would be eliminated, pot purchase information would be improved, by removing the purchase of used pots (which are not very informative of vessel level operations due to pot sharing arrangements).

The third catcher vessel alternative is similar to the second alternative, with a few specific differences. Lease data reporting is limited to arm's length leases, which should improve the informativeness of those data, as well as reduce the burden associated with reporting. On the other hand, the omission of all collection of cost data leaves analysts to draw inferences from other data to assess cost changes in the fishery. While it may not be feasible to collect reliable comprehensive cost information, certain reliable elements (including those collected under the second alternative) may provide some direct information concerning operational cost changes in the fishery. The costs of this alternative are reduced, by

elimination of comprehensive lease information and all cost elements; however, the elimination of all cost information from this alternative reduces the information available to analysts under this alternative.

Under the status quo shore-based and floating processor alternative, production and sales data are collected by crab grade and size and box size. Although these data appear to provide little information under current processing and grading practices, should those practices change in the future, it is possible that these data could be informative. Revenue data also distinguish sales to affiliated companies, which reveal differences in pricing practices for internal sales. Custom processing revenues, which are not collected elsewhere, provide some information concerning the price of processing services and their value in the fisheries. Crab purchase data provide information concerning landing prices by share type, which are unavailable from other sources. In addition, total plant labor costs provide data concerning payments to labor that cannot be obtained otherwise. The status quo also collects substantial data that are not reliable, including processing costs and labor data by crab fishery. In many cases, these data reporting requirements impose a substantial burden, as efforts must be undertaken to develop a method of apportioning costs to different fishery operations. These require processors to review not only crab operational data, but also data from those other fisheries. These data also impose a substantial burden on the agency, which must process those data for use by analysts.

The second shore-based and floating processor alternative maintains the collection of most revenue data and custom processing services purchased, but eliminates the collection of production and most labor data. Scaling back from the status quo would prevent analysts from examining changes in production by box size or crab size or grade. Crab purchase information would continue to be collected allowing analysts to examine purchases by share type. Almost all crab processing and plant costs would be eliminated. The loss arising from excluding these elements is mitigated as they are typically pro rated and not reported consistently or accurately. Labor data would continue to be collected under this alternative, but (as noted) these data are not accurately reported, limiting their value.

The third shore-based and floating processor alternative is similar to the second processor alternative. The third alternative differs in that it collects aggregate labor data, which are likely to be more accurate and informative (although these data will not be informative concerning crab fishery operations specifically). These data will also be less burdensome to report and process, in comparison to the second alternative, since they will not require proration or division by fishery.

Under the status quo catcher processor alternative, catcher processors report fishing data and production data that are largely duplicative of (or which may be estimated using data available from) other reporting requirements. Revenue data are reported with the only current distinguishing characteristic being sales to affiliates. Data concerning IFQ (both held by a vessel owner and used by a vessel) are reported, but not accurately enough for those data to be reliable. Crew compensation under the status quo is believed to be accurate, but distinctions between harvesting and processing crews are unlikely to be accurate. Custom processing services purchased and crab purchase data are not applicable to catcher processors in most cases, but a burden arises only when they are applicable and these data are believed to be accurately reported. The extensive crab fishery and vessel cost information collected under the status quo is largely inconsistently and inaccurately reported, limiting the information value to analysts for fishery analysis. These data also are time consuming to report for respondents and require costly administrative processing by the agency. These factors curtail the benefits of the status quo.

The second catcher processor alternative (in a manner similar to the second catcher vessel alternative and second processor alternative) eliminates several data elements collected under the status quo. The elimination of most fishing and cost data will not only reduce industry and administrative burdens, but the decline of information is mitigated due to the poor quality of these data currently. IFQ data are scaled back, but some of the data included in the collection are unlikely to provide useful information. Removal

of some labor data from the collection could reduce the information concerning that important aspect of the fishery.

The third catcher processor alternative is very similar to the second alternative. The third alternative removes some elements that may be useful for analyses, such as information concerning the number of crew working on a vessel (both fishing and processing). At the same time, this alternative also improves on some elements, such as lease reporting, which is limited to arm's length leases only.

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1 INTRODUCTION

In August of 2005, fishing in the Bering Sea and Aleutian Island crab fisheries began under a new share-based management program (the "program"). As a part of the program, the Council developed an economic data collection program (referred to as "economic data reports" or EDR) to provide information to analysts to assess the effects of the program and future amendments to the program. Based on reviews of the data, it has been established that certain data elements collected are not accurately or consistently reported across respondents, preventing their use for some of their intended purposes, and other elements are wholly or partially redundant with other data collection. To address these shortcomings, as well as to address what is perceived excessive costs associated with the data collection, the Council has initiated this action to revise the data collection program.

This document contains a Regulatory Impact Review (Section 2) and an Initial Regulatory Flexibility Analysis (Section 3) of the alternatives to modify the application deadline for IFQ, IPQ, and cooperatives under the program. Section 4 contains a discussion of the Magnuson Stevens Act National Standards and a fishery impact statement.[1]

This document relies on information contained in the Bering Sea/Aleutian Islands Crab Fisheries Final Environmental Impact Statement/Regulatory Impact Review/Initial Regulatory Flexibility Analysis/ Social Impact Assessment (NMFS/NPFMC, 2004).

2 REGULATORY IMPACT REVIEW

This chapter provides an economic analysis of the action, addressing the requirements of Presidential Executive Order 12866 (E.O. 12866), which requires a cost and benefit analysis of federal regulatory actions.

The requirements of E.O. 12866 (58 FR 51735; October 4, 1993) are summarized in the following statement from the order:

> In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nonetheless essential to consider. Further, in choosing among alternative regulatory approaches agencies should select those approaches that maximize net benefits (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.

E.O. 12866 further requires that the Office of Management and Budget review proposed regulatory programs that are considered to be "significant". A "significant regulatory action" is one that is likely to:

- Have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, local or tribal governments or communities;

[1] The proposed action is a minor change to a previously analyzed and approved action and the proposed change has no effect individually or cumulatively on the human environment (as defined in NAO 216-6). The action will not directly affect management of the fishery, but only has an indirect effect through its effect on the data available for future analysis of management actions. As such, it is categorically excluded from the need to prepare an Environmental Assessment.

- Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
- Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or
- Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this Executive Order.

2.1 Purpose and Need Statement

To guide its action to revise the data collection program, the Council has developed the following purpose and need statement:

> *As a part of its Bering Sea and Aleutian Island crab rationalization (CR) program, the Council developed a comprehensive economic data collection ("EDR") program to provide information to analysts to assess the effects of the CR program and identify problems that may require future amendments to the EDR program.*
>
> *Council review of the EDR program, development of the EDR metadata through PNCIAC and testimony from the industry has resulted in the identification of substantial portions of the EDR data that are inaccurate. In addition, several elements are wholly or partially redundant with other existing data collection requirements, and some components may not further the Council's objectives. The cost to industry, both directly through data submission, and indirectly through cost recovery funding of program administration, outweigh the benefits of the resultant data and greatly exceed estimates provided in the initial analysis of the EDR program and in the accompanying regulatory analyses.*
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> *To address these problems, the Council intends to amend the EDR process so that the data collected is accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost.*
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> *The Council expressly wants to limit the EDR to the collection of data that have been demonstrated, through the development of the EDR metadata, and other reviews of the data, to be sufficiently accurate. Data collection should be structured and specific elements identified, to minimize costs while maintaining accuracy and providing the greatest information value to the management decision making process.*
>
> *As analysts develop, refine, and verify methods for accurately collecting additional informative data elements the Council will consider expansion of the data collection program to include those elements. This process can also inform the future Council action regarding other existing and future EDR programs.*

2.2 Description of Alternatives

Three alternatives are defined for each of four sectors: catcher vessels, catcher processors, shore-based processors, and floating processors. Due to the complexity and breadth of the alternatives, the Council used tables for defining the alternatives. This section briefly summarizes the alternatives for each sector (as defined in the Council's tables). The tables fully identifying the alternatives, as specified by the Council, are included in Appendix A. All alternatives collect annual reports of the preceding year's activity.

In addition to the alternatives defining data to be collected under this action, the Council has included for consideration an **option to remove blind formatting** of the data. In adopting the crab data collection program, the Council elected to require additional confidentiality protection for these data by requiring an independent third party to collect the data and permitting its release to analysts only in a 'blind format' that does not reveal to analysts the name of the submitter. The option would remove that blind formatting requirement.

2.2.1 Catcher vessel alternatives

Alternative 1 (status quo)

The status quo alternative would maintain the current catcher vessel data collection program, which collects data from all catcher vessels participating in any program fishery. Data are collected in several categories. Fishing data, such as days fishing and days traveling between port and grounds are collected for each fishery. Delivery and revenue data are collected for each fishery by share type, with leased shares identified. IFQ use is collected with the vessel owner's shares distinguished from those leased from others. Crew data are collected, including payments to crew and captain by fishery, typical factor deductions and charges, and net revenue shares. Crab fishery costs (such as insurance costs and pot and gear purchases) are collected, most of which are aggregated across all crab fisheries. Fuel and bait purchases are also collected by crab fishery. Annual vessel costs (aggregated across all vessel activities) are collected including investments and repairs and maintenance, as well as fuel and fluid purchases. In addition, general annual data are also included in the collection, including all revenues and harvests, as well as days at sea and annual labor costs.

Alternative 2

The second alternative excludes many of the variables collected under the status quo. Fishing data are removed. Landings and revenues by share type would be collected along with leased quota and lease costs. In addition, a count of the number of crew contributing shares to the vessel's harvests would be collected. Payments to captains and crew would be collected, along with all unique crew contracts and settlement sheets. Purchases of new pots would be collected along with gallons of fuel aggregated across all fisheries. Vessel investment, repair, and maintenance costs would be collected, along with annual insurance costs and fuel costs. The vessel's annual gross revenues and payments to labor would also be reported.

Alternative 3

Alternative 3, is similar to Alternative 2, but further reduces the data collection, limiting reporting to deliveries and revenues and crew data. Deliveries and revenues would be submitted by share type, along with pounds of shares and monetary costs of arms' length leases. Fuel use in gallons by fishery would be collected along with total fuel use and costs annually.

2.2.2 Shore plant and floating processor alternatives

Alternative 1 (status quo)

The status quo collects data from every plant that operates in a crab program fishery. Production data are collected, including processing days and the amount of raw crab processed and finished pounds, as well as products by type, box size, and size. Revenue data collected include first wholesale sales by species, product, grade, size, and box size, distinguishing sales to affiliated entities from sales to unaffiliated entities. Custom processing revenues are also collected. Labor data are collected by crab fishery, including average processing positions, number of man hours, total payments to labor, and processing employee residence. Custom processing services purchased are collected by fishery, including raw and finished pounds by size, grade, and box size, as well as payments. Crab purchases are collected by share

type, size, and grade. Crab processing costs are collected including fees and taxes, lease costs, and observer costs by fishery, along with processing materials, food and provision, repackaging, freight, and storage costs aggregated across all crab fisheries. General plant costs are collected, including annual fuel and fluid, investment, and repair and maintenance costs. In addition, general processing information is collected, including processing days, total gross revenues, total finished product pounds, and total labor costs.

Alternative 2
As with the catcher vessel sector, many of the variables collected under the status quo are omitted from the second alternative. The first and last day of processing is collected. Revenues by fishery are collected, with transactions with affiliated entities separated from transactions with unaffiliated entities. Custom processing revenues are also included, along with quantities of custom processed crab products. Labor man hours by crab fishery are collected, as are total payments to processing labor and crab processing crew by residence, each on a crab fishery basis. Custom processing services purchased are collected by crab fishery, identifying pounds of raw crab processed and finished product amounts together with the payments for services. Crab purchase data also included, by fishery and share type. Costs of IPQ leases are also collected, but processing operational costs are largely excluded from this alternative. Salaries of foremen, managers and other salaried employees, aggregated across all fisheries, are also collected. General plant costs are collected, including annual fuel and fluid, investment, and repair and maintenance costs. In addition, general processing information is collected, including processing days, total gross revenues, total finished product pounds, and total labor costs.

Alternative 3
Alternative 3 is very similar to Alternative 2. Under this alternative plant labor information is aggregated across all crab fisheries (as opposed to being collected on a crab fishery basis under Alternative 2). In addition, IPQ lease data collected will be only monetary payments for arm's length transactions. Crab size and grade will be eliminated from revenue data and box size information will be across various size categories. Revenues for all sales will be reported FOB Alaska. Reporting will also be required by any company contracting for custom processing, as those companies are not currently required to report custom processing costs or revenues from sales.

2.2.3 Catcher processor alternatives

Alternative 1 (status quo)
The status quo catcher processor data collection is similar to the status quo data collection of the other sectors. Fishing data, such as days fishing and days traveling between port and grounds are collected for each fishery. Production data are collected including processing days and the amount of raw crab processed and finished pounds, as well as products by type, box size, and size. Revenue data collected include first wholesale sales by species, product, grade, size, and box size, distinguishing sales to affiliated entities from sales to unaffiliated entities. Custom processing revenues are also collected. Harvest crew data are collected, including payments to crew and captain by fishery, typical factor deductions and charges, and net revenue shares. Data are also collected on processing crew, including number of processing crew and their payment. Custom processing services purchased are collected by fishery, including raw and finished pounds, as well as size, grade, and box size, as well as payments. Crab purchases are collected by share type, size, and grade. Crab fishery costs, such as insurance costs, pot and gear purchases, are collected, most of which are aggregated across all crab fisheries. Fuel and bait purchases are also collect by crab fishery. Crab processing costs are also collected including processing materials, repackaging, freight, and storage costs aggregated across all crab fisheries. Annual vessel costs (aggregated across all vessel activities) are collected including investments and repairs and maintenance, as well as fuel and fluid purchases. General annual data are also included in the collection, including all

revenues, together with total pounds of raw fish and crab and total pounds of finished product, as well as days at sea, days of processing, and annual labor costs.

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The second alternative scales back the data collection considerably. One notable addition is the collection of landings and revenues from the vessel, in the event it makes deliveries to another processor. Revenue data (from both sales of products and custom processing) are collected, as under the status quo. Leasing information is collected by crab fishery, as well as a count of the crew on the vessel who contribute shares to the vessels harvests. Payments to captains and crew are collected, along with harvesting crew license information and processing crew residence information. In addition, captain and crew contracts and settlement sheets are collected. Custom processing services purchased are collected by crab fishery, identifying pounds of raw crab processed and finished product amounts together with the payments for services. Crab purchase data are also included, by fishery and share type. Purchases of new pots would be collected and fuel use aggregated across all fisheries. Vessel investment, repair, and maintenance costs would be collected, along with annual insurance costs and fuel costs. The vessels annual gross revenues and payments to labor would also be reported. General annual data are also included in the collection, including all revenues, together with total pounds of raw fish and crab and total pounds of finished product, as well as days at sea, days of processing, and annual labor costs.

Alternative 3

Alternative 3 is very similar to Alternative 2. Under this alternative, sales would be reported using boxes size categories and using Alaska as the free on board (FOB) location. Custom processing activity would include both the pounds of raw crab processed and pounds of product. Alternative 3 also differs in that it collects only leasing costs for arm's length leases and omits the collection of the number of crew contributing shares to a vessel's harvests, but includes a check box to indicate whether the skipper is a vessel owner. Alternative 3 also excludes the collection of crew license numbers and processing crew residence information. Pot purchase data are also omitted from the collection under Alternative 3, as well as vessel investment, repair, and maintenance costs, and insurance information. Gallons of fuel for each crab fishery and IPQ lease costs would be collected under this alternative, but not under the second alternative. The general annual data reported under Alternatives 2 is also excluded from this collection.

2.2.4 Alternatives considered, but not advanced for analysis

The Council elected not to consider an alternative that would end the data collection program. The Council continues to value improving and expanding economic data and information available for analysis of management actions. Terminating this data collection initiative entirely would be inconsistent with that objective. Instead, the Council wishes to use this action only to improve the quality of the data collected and eliminate redundancies with other collections, as described in the purpose and need statement.

2.3 Development of data collection regulations

Mandatory data collections require two elements for NMFS to implement: (1) regulations requiring submission of the data, and (2) approval from OMB for the information collection under the PRA. Proposed regulations are submitted to the Department of Commerce for review and ultimately published in the *Federal Register*. Requests for approval of information collections and the associated "PRA analyses" are submitted for approval through NOAA to OMB.

OMB requires that the PRA analysis include a description of the data are requested, why the data are needed, what the data will be used for, and an estimate of the cost, in terms of time and money, of the data collection to the industry and the Federal government. OMB approval for a data collection is indicated by

an OMB "control number" and expiration date. When forms are involved in a collection, the OMB control number and expiration date must be displayed on the form.

Requests for OMB approval pertaining to information collections under the PRA may take one of five forms:

1. new collection-of-information (usually associated with a proposed/final rule);
2. renewal of an existing collection every three years (with or without revisions to the requirements through a proposed/final rule),
3. revision of an existing collection (usually associated with a proposed/final rule),
4. change request of an existing collection, or
5. removal of an existing collection.

The first three formats are formal and require submittal of a PRA analyses and public comment on the proposed information collection. A change request is less formal and is used for what NMFS determines are minor changes to an existing collection, with or without a proposed/final rule. Removal of a collection-of-information consists of submitting a specific form to OMB.

NMFS Alaska Region submits a PRA analysis through NOAA and DOC for OMB review and approval when the draft proposed rule is submitted to NMFS Headquarters for review. NMFS may not require the submission of data until OMB approval is obtained. Public comments are sought by OMB for each information collection. When the information collection is associated with a proposed/final rule, comments are solicited through the proposed rule published in the *Federal Register*. When the information collection is not associated with a proposed rule, a notice is published in the *Federal Register* soliciting comments on the proposed information collection. Public comments are not solicited on change requests for revisions NMFS determines are minor or non-substantive and are not associated with a proposed rule.

Generally, revisions to NMFS regulations governing the fisheries off Alaska are approved by the Council. Council review occurs either because a regulatory amendment was developed and approved by the Council or because NMFS requested review of the proposed regulatory amendment by the Council. In recent years, and by agreement of the Council, most revisions to recordkeeping and reporting (R&R) regulations have been done by NMFS without review and approval by the Council. NMFS reports to the Council about the status of the proposed R&R regulatory amendment in its management report, but the Council does not agenda these proposed regulatory amendments for review, public comment, or Council action. This procedure is followed primarily to save the Council the time of reviewing routine or non-controversial revisions to regulations. The PRA analyses associated with requests for OMB approval of information collections have never been reviewed and approved by the Council. However, the Council used a different procedure in the collection of economic data in the Bering Sea pollock fishery.

In that case, the Council suggested that NMFS develop more general regulations for the data collection program allowing a more flexible, adaptable program because future revisions to the elements of the data collection that are not specified in regulation could be implemented through OMB approval only, which could be less time consuming than a rulemaking process. The council noted, however, that this process could lead the Council to sacrifice its involvement in substantive program changes, if it was not aware of proposed revisions to the data collection being initiated by NMFS or if NMFS determined that a revision to a data collection was non-substantive, when the Council or the industry would consider the revision substantive. These circumstances have occurred previously with the crab data collection program,

causing considerable concern in the crab industry. To prevent similar circumstances from arising, in the action establishing a data collection from participants in the Bering Sea pollock fishery, the Council recommended a process under which it would review any changes to the pollock fishery data collection forms prior to their submission to the Secretary and Office of Management and Budget to ensure that those changes are not inconsistent with the Council's intent for the action. This process is intended to allow regulatory flexibility to adapt the forms to ensure they are effective, but retain Council oversight of those modifications.

This process will provide the Council with an opportunity to review and approve changes that might appear to be insignificant, but, in fact, make substantial changes in the nature of the information collected and the burden of that reporting. For example, a direction to collect annual fuel costs could be interpreted in a few different ways. Under one interpretation, a vessel owner could be required to report all fuel purchases in a year, by simply consolidating fuel invoices from the year. Alternatively, an owner could be required to report the cost of all fuel used in a year, requiring the vessel owner to monitor fuel consumption, particularly at the start and end of the year and pro rate costs of its initial and final tank of fuel during the year. Modification of the reporting requirement between these two interpretations would change both the burden associated with reporting and the nature and uses of the data reported. Substantial changes to the data collection between these interpretations could be costly to industry and, if undertaken in a piecemeal fashion over time, could confuse both those submitting data reports and data users. Also, the Council analysis of the data collection program is likely predicated on the data reporting taking on a certain form and level of detail. Modification to reporting requirements that substantially change the reporting requirements may substantially change the effects of the data collection described in a Council analysis. Whether a particular modification to data reporting requirements is within the scope intended by the Council could be debated under such circumstances.

Council review of the PRA analysis (including its accompanying forms) and any subsequent changes to those forms could ensure that the Council is the arbiter of disputes over the scope of data collection that might otherwise be decided through a public comment process employed by NOAA Fisheries and the Office of Management and Budget. Council involvement in these determinations may not only ensure that the Council's intent is followed, but might also provide a forum that achieves greater stakeholder acceptance. To date, the process of modifying data collection has been contentious, with industry and NOAA Fisheries both expressing concern that the other has overreacted to issues and proposed changes to forms. To some extent, review and approval by the Council of any changes in the data collection forms would provide a more deliberative forum that minimizes unnecessary contention. Review of proposed regulations and the PRA analysis (including data collection forms) in this manner should provide the Council with assurances that no changes would be made to the data collection without Council and industry review.

2.4 Existing Conditions

2.4.1 Management of the fisheries

The following nine crab fisheries are managed under the rationalization program:

Bristol Bay red king crab,
Bering Sea *Chionocetes opilio,*
Eastern Bering Sea *C. bairdi,*
Western Bering Sea *C. bairdi,*
Pribilof red and blue king crab,
St. Matthew Island blue king crab,

Western Aleutian Islands red king crab,
Eastern Aleutian Islands golden king crab, and
Western Aleutian Islands golden king crab.

Under the program, holders of License Limitation Program (LLP) licenses endorsed for a fishery were issued owner quota shares (QS), which are long term access privileges, based on the license's qualifying harvest histories in that fishery. Catcher processor license holders were allocated catcher processor vessel owner QS for their LLPs' histories as catcher processors; catcher vessel license holders were issued catcher vessel QS based on their LLPs' histories as a catcher vessel. These owner QS comprise approximately 97 percent of the QS pool. The remaining three percent of the initial allocation of QS was issued to eligible captains, as crew QS or "C shares", based on the individual's harvest history as a State of Alaska permit holder who signed fish tickets for qualifying historical crab deliveries. QS annually yields individual fishing quota (IFQ), which represent privileges to harvest a specific amount of crab IFQ (in pounds) in a given crab fishing year (based on the total allowable catch of the program). The size of each annual IFQ allocation is based on the amount of QS held, in relation to the QS pool in the fishery (with C share IFQ issued for 3 percent of the total annual IFQ allocation). So, a person holding 1 percent of the owner QS pool would receive IFQ to harvest 0.97 percent of the annual total allowable catch (TAC) in the fishery. Ninety percent of the "catcher vessel owner" IFQ are issued as "A shares", or "Class A IFQ," which must be delivered to a processor holding an equal amount of unused individual processor quota (IPQ).[2] The remaining 10 percent of these annual IFQs are issued as "B shares", or "Class B IFQ," which may be delivered to any processor.[3] Processor quota shares (PQS) are long term shares issued to processors. These PQS yield annual IPQ, which represent a privilege to receive a certain amount of crab harvested with Class A IFQ. IPQ are issued for 90 percent of the catcher vessel owner TAC, creating a one-to-one correspondence between Class A IFQ and IPQ.[4]

2.4.2 The economic data collection program

The current data collection program is intended to provide comprehensive data to analysts to examine the economic and social effects of the rationalization program on harvesters, processors, regions, and communities. Based on the Council's purpose and need statement, analysts identified the primary issues to be addressed by data collection as excess harvesting and processing capacity, as well as low economic returns, and the lack of economic stability for harvesters, processors and coastal communities. Based on these identified problems, analysts suggested a number of measures that could be used to examine the success of the program in achieving those objectives. In addition, analysts identified data necessary to estimate these measures. These measures and data include:

<u>Excess harvesting and processing capacity and low economic returns</u>
For both the harvest sector and processing sector:

1) capacity and capacity utilization
2) profits

[2] C shares issued to captains are an exception to this generalization. Those shares are not subject to IPQ and regional landing requirements.
[3] The terms "A share" and "Class A IFQ" are used interchangeably in this paper, as are the terms "B share" and "Class B IFQ".
[4] Although 90 percent of IFQ issued each year are issued as A shares, individual allocations can vary from 90 percent. Holders of PQS and their affiliates receive their IFQ allocations as A shares only to the extent of their IPQ holdings. The rationale for issuing A shares to PQS holders and their affiliates to offset IPQ holdings is that these persons do not need the extra negotiating leverage derived from B shares for these offsetting shares. To maintain 10 percent of the catcher vessel owner IFQ pool as B shares requires that unaffiliated QS holders receive more than 10 percent of their allocation as B shares (and less than 90 percent as A shares).

3) quasi-rents
4) productivity
5) technical efficiency
6) allocative efficiency

Computation of these measures requires the following data:

a) variable input quantities and prices
b) capital quantities and fixed costs
c) catch quantities and prices (species)
d) input quantities and prices
e) output quantities and prices by product form

Lack of economic stability for harvesters, processors, and coastal communities

For both the harvester sector and processor sector:

1) Distribution of ex vessel revenue
2) Distribution of product revenue
3) Distribution of profits and quasi rents within and between harvesters and processor
4) Distribution of privileges within the harvesting and processing sectors
5) Seasonality of catch and revenues by location
6) Vertical integration
7) Domestic and foreign ownership
8) Harvesting employment and payments to harvesting crews
9) Processing employment and payments to processing crews
10) Involvement of crab fishery participants in other fisheries
11) Value of privileges
12) Regional economic impacts

Computation of these measures requires the following data:

a) Vessel owner information
b) Plant owner information
c) Catch
d) Landings
e) QS and PQS ownership information
f) Harvester crew employment and compensation
g) Processor crew employment and compensation
h) QS and PQS prices and quantities transferred
i) Expenditures by location
j) Crew residence information

The current data collection program omits non-variable (or fixed) cost data from the collection, except to the extent necessary to understand variable costs. In addition, the data collection focuses on crab fishery data with much of the data collected on an individual crab fishery basis, to provide more detailed information for analyses, as crab fisheries differ in their prosecution. Other data are aggregated across all crab fisheries, while some additional data are aggregated across all fisheries.

The collection is implement by requiring that any owner (or lessee) of a catcher vessel, catcher processor, shore plant, or floating processor that participates in one or more of the rationalized crab fisheries complete a form reporting specific economic data concerning their operations. Forms are tailored to collect specific data from the applicable operation type (see Appendix B). Reports are annual, based on the calendar year, with submissions for each calendar year due on June 28th of the following year.

As a part of the program, data submissions are subject to both random and "outlier" audits. Outlier audits are conducted on submissions including data that appear "odd or suspicious" (i.e., possibly incorrect or inconsistent with other submissions). The audit process is similar to a financial audit, which relies on supporting documentation, such as internal accounting records and invoices, to validate submissions. Errors are determined based on the existence and quality of supporting documentation and the correspondence of the responses with those supporting data. Errors are revealed in the audits are noted and corrected, if possible.[5]

In addition to this audit process, several other assessments of data quality have been conducted. In the fall of 2007, shortly after completion of the collection of data from 2006, staff began its first assessment of the quality of the data collected. The assessment was intended not only to evaluate the accuracy of data submitted under the program, but also to document data limitations and provide recommendations concerning data interpretation for users. The assessment drew on audits, as well as information gleaned from meetings with submitters and preliminary examination of the data by staff. The results of this initial assessment were presented to the Council in December of 2008. The product of this initial assessment is the Bering Sea and Aleutian Islands crab Economic Data Report Database Metadata Documentation, which is posted on the NOAA Fisheries website.[6] Since this initial assessment, industry and staff have devoted substantial efforts to additional assessments of the data. These assessments, which were presented to the Council over the course of several meetings, were intended to aid Council efforts to improve the data collection program and are the foundation for the assessment of the data collection alternatives in this analysis.

Overall, the data assessments have concluded that approximately one-third of the collected data elements are of high quality (with the element accurately representing the factor as described; one-third of the data elements have significant quality limitations, provided analysts carefully understand the nature of the limitations and adjust analytical methods and modify interpretations in a manner consistent with and addressing those limitations. The remaining third of the data are considered to suffer from quality limitations to a degree that they may not be reliably used for analyses. A summary of the most recent data assessment presented to the Council is attached as Appendix C.

In large part due to the shortcomings identified in the reviews, data collected in the economic data collection program have had very limited use. Few Council documents have used data from the collection, with use limited to an examination crew information and data concerning the differences in ex vessel pricing of landings of the various share types. Data were used in one academic publication and a draft of the Economic Stock Assessment and Fishery Assessment (SAFE). The academic publication examined crew data. The draft of the Economic SAFE presented summary tables of the data, excluding

[5] In considering audit results, it should be noted that certain inconsistencies or errors are unlikely to be revealed through audits. For example, one participant may generate "days processing" using a worksheet based on fish tickets by simply count processing days, as those days on which a landing was received. Another participant may use a more detailed operational log from its plant showing actual calendar days on which processing occurred to estimate processing days. The choice of methods is likely change the reported result. The different methods of calculation are likely to be noted in the auditor's reports, both responses would be characterized as having adequate supporting documentation.

[6] See http://www.fakr.noaa.gov/sustainablefisheries/crab/rat/edr/default.htm.

only those elements that could not be released because of the need to protect confidentiality and those data determined to be unreliable for use in analyses.[7]

2.4.3 Center for Independent Experts Review of the data collection program

In October of 2011, the Center for Independent Experts, an independent agency that provides independent peer reviews of NOAA Fisheries science, completed a review of the data collection program. The review examined several aspects of the program, including survey design, program administration, data quality assessments, quality control standards, analytical methodologies and treatment of uncertainty, interpretation and conclusions of data analyses, and whether the project presented the best available science. Although the review was purported to have no relevance to this Council action, certain findings and recommendations pertain to issues that are before the Council. The panel included four experts, each of which drafted a separate report presenting findings and recommendations. Those reports are available in their entirety at: http://www.afsc.noaa.gov/REFM/Socioeconomics/Projects/2011Crab_EDR_CIE_announcement.php. This section summarizes the relevant findings and recommendations from those reports. Since panelists developed findings and recommendations independent of the other panelists, the conclusions and recommendations overlap, but in places are conflicting.

Reviewer 1

One reviewer recommends that the data collection be maintained at its current scope and scale. This reviewer identifies the collection of cost data through a mandatory and comprehensive program as providing a substantial improvement over standard fishery economic data collection. This reviewer questions the Council's role in the development of the data collection program. In the reviewer's opinion, the Council should define the objectives for the data collection program and subject matter experts (i.e., economists), with advice from industry members with expertise in fishery operations and financial accounting, should define the data elements needed to meet those objectives.[8] The reviewer contends that this approach is followed for the collection of biological data. Although some data collections (such as trawl surveys) may be defined by biologists, the collection of other biological data (which may be used for management and science) are typically defined by the Council. For example, observer data, which are used for both management and scientific purposes, are defined through the Council process. In addition, to the extent that the Council develops Fishery Management Plans, and the data collection is a part of those plans, it is clear that data collection is within the purview of the Council.

The reviewer suggests that the process of defining data collection could be facilitated through a committee of economists that could serve a broad role with respect to economic analyses, similar to the role served by Plan Teams with respect to biological analyses. This team could be charged with several tasks, including defining data needs for management issues and data products that address regulatory needs, as well as defining appropriate levels of data aggregation, options for data disaggregation, standards for data accuracy, acceptable levels of uncertainty, and the means of addressing uncertainty. While the reviewer suggests that a committee of economists could be developed to define standards of accuracy and data uncertainty, it should be noted that such a process was undertaken by the workgroup meeting that included Council and agency staff analysts and PNCIAC. This group, by a consensus of staff analysts and PNCIAC, assigned the "A/B/C error" rankings to each data element, which were intended to

[7] Data that were included in the SAFE include 1) data with "minimal known data quality limitations" and 2) data that have "significant quality limitations", but are "reliable for use…, provided adjustments to analytical methods or interpretation are undertaken to the overcome the noted data quality concerns."

[8] This reviewer also questions the role of the Council's industry advisory panel in the development of the program, suggesting that their involvement should be limited to the specification of objectives for the data collection program.

identify reliable elements and limitations of the use of certain elements. In addition, it should be noted that this reviewer suggests that the quantitative estimates of error accurately portray of the degree of error of the various elements. Yet, the quantitative estimates of data error are derived using estimates of data values assigned in audits (i.e., the difference between the reported value and the audited value). Since the audit process largely mirrors a financial audit, that process does not account for error that arises from estimation of operational factors. As a result, the "true value" used in the quantitative estimates may contain error from non-financial, operational sources. In other words, the quantitative estimate of error should be viewed as an estimate of the lower bound (or the minimum) expected error of a data element. For example, as noted elsewhere in this analysis, an audit would likely consider accurate an apportionment of fuel use based, simply on days at sea. Such an apportionment between the Pacific cod fishery and crab fisheries is likely to mislead analysts with respect to changes in fuel use in the crab fishery that arise from slowing operations under the rationalization program. This element, however, would be considered to be accurate for purposes of the quantitative estimates of error. This is not to say that the audits have not improved data accuracy or that audits do not serve a valuable role in ensuring compliance with the reporting requirement, only that audits (at least in their current form) should not be viewed as resolving fully data accuracy issues. Resolving those issues requires a more complete, practical consideration of the particular data element and the factor it represents. Such a process was adopted by staff and PNCIAC in the workgroup (which had considered the quantitative reports available at that time, as well as other sources of information in assigning the various ratings). That process could be viewed as inconsistent with the reviewer's recommendation, since its product was arrived at through a consensus among economists and industry, rather than by economists alone.

This reviewer contends that the data collection program provides the best available science, but means of improving data quality are also suggested. The reviewer suggests redundancies in various collections should be eliminated. The reviewer also recommends that issues with allocating fixed and variable cost elements across multiple activities can be resolved by increasing the level of aggregation at which reporting takes place and allowing analysts to perform data disaggregation. For example, fuel data could be collected on an annual basis and disaggregated by fishery by analysts. The reviewer suggests that a single analyst could derive disaggregated values, which could then be reviewed by submitters who could be asked to comment on the reasonableness of the estimates. As others have suggested, this reviewer contends that this data collection program should serve as a pilot for the development of data collection programs in all fisheries under the Council's management. The reviewer suggests that efficiencies in reporting could be gained by having submitters report data from all fisheries, recognizing that analysts would disaggregate those data across the various fisheries. This approach could be used to simplify extension of economic data reporting to all Council managed fisheries.

Although it may be conceivable to modify the program to collect data at a disaggregated level and develop techniques for disaggregation, as the reviewer suggests, in many instances, information needed to support that disaggregation is not currently available. For example, attempts to disaggregate annual fuel use at a processing plant would require, at a minimum, a full accounting of plant activities that draw on the fuel supply (including housing facilities, cold storage facilities, and fuel supplied to vessels) and certain operational characteristics of the plant (such as information concerning personnel levels throughout the year, and possibly inventory and shipping information). Most of this information is not currently available. Similarly, quota pooling and pot sharing arrangements in the fleet suggest that data should be aggregated across not only fisheries, but also vessels. A system for collection of information concerning these arrangements would likely require considerable development. While the reviewer's perspective is that maintaining access to cost data is important, it is unclear how analysts could derive use from the data currently collected, in the absence of the collection of additional elements that would be used for the disaggregation. While it may be possible to collect data to support disaggregation of this type, that collection would likely broaden the data collection program increasing the associated burden

(rather than decreasing the data collection burden). As demonstrated by the lengthy time to develop this amendment package, defining these additional disaggregation elements is likely to require an extended time.

Reviewer 2

Only a few of the second reviewer's findings and recommendations are directed at issues pertinent to this Council action. This reviewer also cites concerns with inaccurate and inconsistent disaggregation of elements by submitters, suggesting that interviews concerning recordkeeping practices could improve data submissions. While these comments are largely directed at revising survey questions and format, they could also be used in the development of consistent disaggregation methods. The reviewer's opinion is that data quality is improved by the audit process, but that process also shows auditors could not always reconstruct the submitters' responses. These cases suggest that problems exist with the questions and that some requested data elements are unknown or are not kept in the manner requested. Auditors, in these instances, could not verify the accuracy of the data. The reviewer suggests that a possible solution in these cases could be achieved through redesigning the collection of these variables or looking for alternative sources of the same information.

Reviewer 3

A third reviewer cites some concerns similar to those expressed by the first reviewer. This reviewer suggests that industry burden could be reduced through elimination of the collection of elements that are redundant with other collection programs. This reviewer also cites as a concern the submitters' perspective that certain elements cannot be reported accurately enough to reflect their true values and that these inaccuracies could, in turn, lead to poor management decisionmaking. The reviewer suggests that development of a consistent method of data disaggregation will improve data consistency and accuracy, as well as increase the acceptance of the program by submitters. A working group tasked with the development of these methods could also be used to identify existing data sources (such as elandings and logbook data) that may reasonably substitute for certain elements of the economic data collection program.[9] The reviewer emphasizes the importance of development of a collaborative effort to revise the program that is acceptable to all stakeholders. The reviewer suggests that to achieve this end, industry must be a full partner in that process. The reviewer concludes by suggesting that the revised program be implemented in phases with a pilot that first focuses on data elements that are most important to decisionmaking and that are likely to achieve a consensus.

Reviewer 4 (Chair)

The chair's report contains many comments included in the reports of other reviewers. To the extent that those comments are addressed above, they are not included here. The chair states a general finding from the review that the data collected by the program is the 'best available science', at the same time emphasizing that fisheries economic data in general are so poor that this is not a very high standard. Although the report states that the data has not achieved the goal of providing data that to assess progress on all goals of the program, the data are suitable for use by any analysts sophisticated to manage limitations inherent in any field data. The report states that portions of the collection are difficult to interpret, costly to report, and of undesirable reliability. The report suggests that the reporting burden could be reduced for some variables by collecting data at the level at which participants maintain their

[9] This reviewer also puts great weight on the audit process, which is said to be unique in terms of data quality management. As noted previously, the audits may substantially improve the quality of these data; yet, it should be recognized that for certain elements, particularly those that involve disaggregation of data concerning operational costs, audits may provide a false sense of confidence in the data's accuracy.

business records, which is likely to be more aggregated.[10] Analysts, after discussion with industry, could then determine an appropriate basis for disaggregation, which can be uniformly applied across all observations. The reviewer cites the three methods by which quality are examined as a strength of the quality review. Two aspects of the commentary suggest some misunderstanding of the process and quality issues with the data (similar to those arising in the commentary of the first reviewer). First, it should be noted that the statistical analysis of errors relies on estimated error discovered in the audits. Those audits are unlikely to identify errors arising from operational factors (as opposed to errors identified by financial audits), and therefore, underestimate the error in reported data.[11] Second, the reviewer attributes the quality ratings from the PNCIAC process to industry alone. Those findings were a consensus of analysts and industry, based on audit results, statistical estimates of error, and industry and analysts scrutiny of the surveys and industry's survey response methods. These quality grades relied on both more information and expertise (both analytical and industry) than is ascribed by the reviewer's comments. The reviewer cites the suggestion of the first reviewer to establish a panel of economic scientists to advise the Council concerning economic analyses and data collection in a manner similar to that of plan teams concerning stock assessments. To allay industry concerns over the use of the data to force program modifications, the reviewer proposes that NMFS or the Council define certain metrics and acceptable changes in those metrics. In the absence of changes in excess of those limits, changes in certain aspects of the program would not be considered.[12] At the same time, the reviewer cautions that the nature and scope of changes arising from management actions may not be fully predictable. Consequently, the scope of the data collection should extend beyond core metrics identified for the management program (i.e., a comprehensive collection program is necessary). Whether it would be appropriate for these unpredicted changes to trigger management changes (in the absence of exceeding the specified limits) is not discussed.

The chair suggests that the data quality issues confronted to date are normal for this stage in the development of a novel data collection program. While acknowledging that some elements of the collection are not achieving their intended purpose, the chair also suggests it is premature to discontinue collection of those elements based on the cost and burden of their collection exceeding their analytical benefit. Instead, the chair's report suggest that continued work, perhaps through several more iterations of the survey, is more appropriate.

2.5 Analysis of alternatives

The analysis begins with by considering the option to remove the requirement of blind formatting, which currently applies and is intended to increase the protection of confidentiality. The analysis goes on to examine the various alternatives that modify the scope of the data collection.

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[10] The review also suggests that part of the contention arises from unrealistic expectation of precision in reporting. Precision is the smallest increment at which measures differ from one another (i.e., should a number be reported as pounds or tons). The report contends that reasonable apportionments likely fall within 10 percent of each other and that such variation is an adequate level of precision for analytical tests of large changes. This basis for this contention is not provided. It is also not clear whether reviewers considered discrepancies observed in the data (such as variation in estimated average annual processing worker hourly pay from approximately $10 per hour to over $20 per hour in each fishery). In addition, it is unclear what other findings in the report are based on this contention.

[11] The reviewer notes that differences in apportionment of values are accepted in the audit to the extent those differences are tolerated by generally accepted accounting practices. This methodology (ilel, may fail to distinguish operational differences, which are likely to be important to developing datasets that accurately separate of data for rationalized fisheries from non-rationalized fisheries.

[12] It is unclear how these proposed limits would be administered with respect to unanticipated changes arising from the management program. In other words, it is not clear whether the Council would be expected to refrain from changes, if the thresholds are not exceeded, but other unanticipated changes occurred.

2.5.1 Option to remove blind formatting requirement

Under the **status quo**, data are maintained by a third party data manager, who provides those data to analysts in a blind format that does not allow analysts to directly identify the source of any observations. As an alternative to this data management, the Council has included an option that would remove the requirement for blind formatting of data.

This protection is unique to this data collection and is intended to safeguard information that is perceived to be highly proprietary.[13] While the use of the blind formatting may be intended to protect confidentiality, it likely provides only minimal additional protection beyond the general protection of other confidential data.[14] Analysts (including contractors) are bound by rules governing confidentiality to protect data of submitters. These rules require aggregation of data across multiple respondents for their release in analyses. Analyst releases of confidential data are subject to punishment under federal law. While the threat of federal penalties creates a substantial disincentive against disclosure of data, the removal of blind formatting may increase the vulnerability of data to disclosure. Some agency analysts and contractors use the same computers for both agency and non-agency (including personal) purposes. In addition, emails are sent frequently to a variety of people, many of whom have no authority to access confidential data. Although not highly likely, it is possible that persons without authority to obtain confidential data could inadvertently be provided access to data through these activities. The likelihood of release may be higher for Council and NMFS contractors, many of whom also work for private sector interests (including the crab industry), as well as the Council or NMFS. These persons may be more likely to inadvertently release data (or information generated from those data) when communicating with persons (including clients) without access to confidential information, as a result of the potentially conflicting interests that arise from their private research and advocacy.

The status quo blind formatting increases the burden for analysts, who cannot easily integrate data from this collection with data and information from other sources. Instead, the third party data manager must integrate data sets for analysts and respond to analyst questions concerning data merges. This structure may contribute to less accurate analyses, in cases where an analyst would be able to detect errors if identifiers were available. For example, an analyst with specific knowledge of a participant's fishing activity may be able to identify inaccuracies associated with that participant, if the participant were identified. Alternatively, the analysts may be unable to identify inaccuracies because of the blind formatting. This effect, however, is likely to be limited, as few analysts are likely to have such specific information concerning the fisheries. The submission of data in a blind format may also contribute slightly to data management costs, as additional costs are incurred to maintain the blind formatting. Much of the management costs, however, are likely to be required for maintaining the dataset and integration of the dataset with data from other sources. The overall costs may be reduced slightly, if analysts have full access to the data.

Removal of blind formatting would not reduce the extent of protections below that typically applicable to proprietary data. So, the protections applied to these data would be comparable to the protections applicable to other proprietary data. Some participants, however, may perceive a greater potential harm arising from disclosure of these data, as their release could jeopardize certain business relationships. In the absence of blind formatting, the likelihood of release of information remains low. The potential for release is likely greatest when data are used by contractors (particularly those who also work for private industry interests) who may be more likely to inadvertently disclose data (or use information derived from

[13] Cost data may be considered highly proprietary, as some of these data pertain to negotiated prices.

[14] These data, as with other confidential data, are protected from disclosure through Freedom of Information Act requests.

confidential data to serve interests of private clients). These disclosures (or uses) may be more likely, if data are not blind formatted. In addition, if data are released, the removal of blind formatting may increase the resulting harm. If blind formatted, the data will not reveal the specific source. In a few cases, a participant may be able to identify data of another participant, based on their knowledge of that persons operations. With release of identifiers, the sources of data could be easily identified.

2.5.2 Approach to the analysis of alternatives

Alternatives under consideration in this analysis are relatively expansive in scope and complexity. A few steps are taken in the layout of this analysis to make consideration of the alternatives more manageable.

First, each of the alternatives is comprised of a set of data elements. Each element has certain individual characteristics that contribute to its informativeness. To simplify consideration of the alternatives, the analysis first assesses each data element in isolation. The analysis then goes on to consider each alternative as a collection of elements, as the utility of a data element may vary with other data availability. For example, pot purchases may provide useful and relevant information concerning a vessel's expenditures, but without knowing whether the vessel shares pots owned by other vessels in its cooperative, these costs are less informative (and possibly provide misleading information) concerning the vessel's operation and costs.

Second, the analysis of elements for catcher processors includes several elements that are also included in other sector alternatives. In the case of the catcher vessel sector, some of these elements are comparable for analytical purposes. For example, reporting and analytical issues related to pot purchases and fuel use by these two sectors are fairly similar. Consequently, the analysis of elements evaluates these elements in a single discussion (citing any differences between the sectors within that discussion). A similar approach is taken with elements that are included in both the catcher processor sector and the two processing sectors. To aid the reader in considering the element/alternative structure, the analysis of elements is divided into three sections: 1) harvesting elements, which includes all catcher vessel elements and applicable elements of the catcher processor sector; 2) processing elements, which includes all shore-based processor and floating processor elements and applicable elements of the catcher processor sector; and 3) additional catcher processor elements, which includes elements that are unique to the catcher processor sector. For each element, the alternatives that include the element are identified in the heading. For example, "CV-1 and CP-1" indicates that catcher vessel alternative 1 and catcher processor alternative 1 both contain the element.

Third, the differences between catcher vessels, catcher processors, and the processing sectors are considerable; however, the shore-based processing sector and floating processing sector are very similar. To streamline this document, the analysis of alternatives examines the shore-based processing alternatives and floating processing sector alternatives in a single section. Within that section, relevant distinctions between the sectors are noted, where applicable.

In considering the benefits arising from the data collection, it should be noted that the data convey benefits indirectly, by informing decision making. As such, the benefits of the data are analyzed through considering their utility and information value in analyses. An assessment of the utility of the data collected poses certain challenges. The utility and informativeness of a data element is dependent on several aspects of that element and its collection. The information value of a data element often arises directly from the nature of the factor that it represents. For example, landings by a vessel are particularly informative, as they are representative of a vessel's production from the fishery. Spending on paper supplies used to maintain logs and business records is less fundamental to understanding the fishery. Utility is also dependent on the accuracy of the data. Inaccuracy (or even unknown accuracy) can substantially diminish utility by leaving analysts and policymakers uncertain of the reliability of

analytical results. In addition, a data element's utility will also depend on the information of the element relative to other data currently collected. For example, data concerning product forms and sizes may be informative, but (depending on the fishery) may represent only a marginal improvement over existing data on product form alone. These different aspects of the utility of the data are the primary focus of the analysis of individual data elements. Insights gained concerning the utility of individual elements are then carried over to the analysis of alternatives that follows. The analysis also examines the costs associated with the various alternatives, including fishery participants' reporting costs and costs to managers of administering the collection and processing the data for use.

In assessing the elements under consideration, particularly those that are included in the status quo, it should be noted that revisions may be possible to correct data shortcomings. In some cases, it might be possible to correct an element by providing improved instructions or revising the element slightly. In developing this action, the Council expressed an interest in having the opportunity to make such revisions for incorporation into its preferred alternative and requested that the analysis include a discussion of possible revisions to existing elements that may overcome shortcomings. In response, this analysis includes discussions of possible revisions to elements that the Council could consider in development of its preferred alternative. Those discussions are shown in bold.

2.5.3 Harvester elements – catcher vessels and catcher processors

This section first examines harvesting elements, including all catcher vessel data elements under consideration. The catcher vessel and catcher processor alternatives to which an element applies are identified. Harvester elements under consideration can be separated into the following six categories: 1) fishing, 2) deliveries and revenues, 3) crew, 4) crab costs, 5) vessel costs, and 6) all fishery activities.

Fishing elements

Fish ticket numbers by crab fishery – CV-1

Fish ticket numbers are currently collected for each catcher vessel for all crab fishery harvests. These numbers are intended to facilitate the merging of data from this collection with data from other sources, primarily fish tickets. Although fish ticket data are currently believed to be accurately reported they are not a necessary component, as data can easily be merged using other identifiers, such as permit numbers and Alaska Department of Fishing & Game vessel numbers. Fish ticket numbers collected, consequently, have no utility.

Days fishing by crab fishery – CV-1 and CP-1

Under the current data collection, catcher vessels must report fishing days for each crab fishery. Days fishing are an important component that may reveal operational and efficiency changes in the fishery that arise from changes in management or other factors.

Instructions currently direct the respondent to exclude time traveling to and from fishing grounds, but do not provide direction concerning partial days. The absence of direction on the treatment of partial days may affect the accuracy of these data. Transiting on the grounds between strings of pots is included in fishing days. Audit reports suggest that many respondents estimate fishing and transiting time based on their records (including fish tickets), although those audits do not show whether those estimates are consistently developed across respondents.

Other sources are currently available for estimating fishing days, including fish tickets (which count fishing days from the date of first deployment of gear to the date of landing) and logbooks (which include

date and time of setting and hauling each string and date of delivery). Currently, logbook data are not maintained in a format that lends itself to use by analysts.

Days traveling and offloading by crab fishery – CV-1 and CP-1
As with fishing days, changes in days traveling to and from fishing grounds and offloading may indicate operational and efficiency changes in the fishery that arise from operational changes.

Reported traveling and offloading days, however, may not be revealing to the extent that traveling and offloading time are operationally very different. A vessel that spends 5 days total, four of which are traveling and one is offloading, will have the same reported value as a vessel that travels one day and spends four queuing and offloading. By combining these two elements, some important operational differences may be obscured. Whether collection could be adapted to distinguish these transiting from offloading is not known. Such a distinction would likely require vessel operators to compile these estimates using their logbooks (which are separately reported to the agency).

Although slightly different in nature, fish ticket data (which includes fishing days from gear deployment until the date of delivery) and logbook information (which includes date and time of setting and hauling gear and offload dates) provide data concerning these activities. Logbook data are not maintained in a format that lends itself to use by analyst. It is not likely that the economic data reporting of days traveling and offloading provides any notable improvement over these existing data sources.

Delivery and revenue elements

Landings by share type and fishery – including pounds and revenues – CV-1, CV-2, CV-3, CP-2, and CP-3
Currently, the only quantitative source available for analyzing the ex vessel prices (including post-landing payments) by share type is this data collection. Although fish ticket landings and IFQ data could be used to examine revenues by share type, post-landing payments are not included in those reported prices. Commercial Operator's Annual Reports (COAR) include all payments (including any post-landings payments), but those data do not identify landings by share type.

The creation of different types of shares (or IFQ) under the rationalization program was critical to protecting various interests, including harvesters, processors, captains and crew, and communities. In part, to address vessel owner concerns that the Class A IFQ/IPQ landing requirements would be an obstacle to resolving price disputes, the Council made an arbitration program available to holders of Class A IFQ to settle terms of delivery. Landings prices for the different share types are important for assessing whether these aspects of the program are functioning as intended. Consequently, the collection of landings data by share type has great utility to policymakers.

Extension of this reporting requirement to catcher processors that make deliveries to shore plants will ensure that comprehensive landings and revenue data are collected.

Deadloss pounds by share type and fishery – CV-1
Information showing the distribution of deadloss in landings by share type can be examine whether participants are choosing to disproportionally account for deadloss across share types. For example, routinely counting deadloss against Class B IFQ could result in a different distribution of benefits under the program than if deadloss is routinely distributed against either Class A IFQ or C share IFQ. Although this distribution of shares use is important, the data are currently available from Restricted Access Management (RAM) Division data, which administers share distributions and use in the fishery.

Vessel owner's IFQ used on the vessel by share type – pounds by fishery/Vessel owner's shares used on other vessels by share type from these transfers IFQ - pounds and revenues by fishery – CV-1 and CP-1
The current data collection includes in each catcher vessel report, the use of the vessel owner's IFQ on the vessel, the use of the vessel owner's IFQ by other vessels, and the revenues from these transfers to other vessels. These elements are intended to provide information concerning the extent to which a vessel uses its owner's shares or transfers (or leases) those shares for use on another vessel.

Leasing and the redistribution of shares among vessels are an important component of any catch share program that permits share transfers. In the crab fisheries, efficiency gains may be realized through distribution of shares within the operating fleet. Coordination of harvests (such as sweep up trips, in which vessels consolidate remaining shares for a single trip by one vessel, at the end of a season) may save on operating costs. Consolidation of shares free of IPQ delivery restrictions (such as Class B IFQ) on a single vessel may allow for better marketing opportunities. Likewise, fishery specialization (such as consolidation of shares from the relatively small Western *C. bairdi* fishery on a few vessels to allow other vessels to target *C. opilio* exclusively) can contribute to efficiency gains. Data showing the distribution of a vessel owner's shares may be expected to reveal these distributions.

While the data sought by the current collection may be important to understanding facets of fishery operation, the structure of the current reporting requirement is unlikely to capture data that are reliable or revealing. First, the current reports do not define the term "vessel owner". Absent a definition, it might be assumed that only in circumstances shares are held by the vessel owner, only in cases where the named owner of shares is the same as the named owner of the vessel. Yet, it is not uncommon for vessel owners to form separate entities, which each serve a different role in their business. One entity may hold shares, while another owns the vessel. These types of arrangements are an obstacle to the use of simple reporting structures, such as the structure currently employed.

Cooperative structures (and the increasing tendency to use those structures to coordinate activities across a number of quota holders and vessel owners) also present a challenge to any collection of data intending to reveal the redistribution of shares across holders and the fleet. In addition, as partnerships, pooling arrangements, and in-kind transfers become more prevalent, more complex and overlapping ownership arrangements will arise. Many of the "transfers" represented in the simple data collection proposed for this element are unlikely to be simple arm's length share transfers, but are influenced by other arrangements and the exchange of other interests, assets, and services among the parties. For example, two partners that share ownership of a vessel, each of which leases independently held shares to the vessel could choose to receive payments either as a vessel owner or as a share holder. Separating these interests for purposes of reporting the value of shares "leased" cannot be accomplished with a simple reporting form of the type proposed. The variety of arrangements used by vessel owners and share holders for coordinating share use and harvest activity prevent any data collection based simply on use of a "vessel owner's" shares from providing reliable information to analysts.[15] Audits suggest that respondents have difficulty reporting this element, as audit reports commonly cite misinterpretation of the question.

Although IFQ are typically held by cooperatives (obscuring member share holdings), quota share holdings and vessel ownership of record data are available. These data can be used to examine the extent

[15] To collect comprehensive ownership data concerning vessel ownership and share holdings likely will require an extensive effort and a substantially longer and more detailed form. Vessel ownership, as well as "share holdings", must be defined in a manner that reveals the extent of a person's interest in a vessel or share holding, which, in turn, would allow analysts to clearly define when shares are used on the vessel of the share holder and when those shares are used on a vessel owned by someone else.

to which share holdings correspond to amounts harvested by the named vessel owner. These existing data would provide information concerning common share holdings and harvests that are similar to those available through the data collection in its current form (as identified by the element).

Shares leased to and harvested by the vessel by share type and fishery (pounds and cost) – CV-1, CV-2, CP-1, and CP-2

Share transfer data is also collected under the current collection for shares leased by a vessel owner from others for harvest on the vessel. This approach shares the pitfalls of the previously discussed element, as it would collect data concerning transfers of shares from another share holder and the payments made to those other persons. The array of business arrangements in the fishery, many of which would lead to transfers at non-market rates (as described for the preceding element), will prevent consistent reporting, leaving the data unreliable for analysts to develop share price estimates. In addition, cooperatives often move shares among vessels for harvest management purposes. These transfers may be for no cost, which is likely to mislead analysts who may assume that all transfers to a vessel are for value under the current reporting. Under the current collection, analysts attempting to understand the transfer market and understand lease rates should not rely on the lease payments reflected in these reports to ascertain market lease rates. These data are not available from any other sources.

Shares leased to and harvested by the vessels by share type and fishery – only arm's length transactions and monetary payments (pounds and cost) – CV-3 and CP-3

This element would limit the collection to share transfers to a vessel to those that are arm's length transfers. The purpose of narrowing the scope under this element would be to remove transfers that are not likely to reflect market prices. Including only share transfers for monetary payments would avoid collecting information concerning assets that are more difficult to value. The inclusion of transfers at non-market rates (i.e., non-arm's length transactions) and non-monetary assets (as suggested by the other options for lease elements) could complicate reporting requirements, as each exchange may need to be reported separately to isolate transactions that are non-market or that would require the valuation of non-monetary assets. This element would remove those complications by limiting reporting to market transactions for exclusively monetary compensation.

Although this collection would not provide comprehensive information concerning leasing of shares under the program, data collected should be sufficiently accuracy to support reliable analyses, assuming a reasonable number of qualifying transactions occur. More comprehensive collections are likely to result in data that cannot be accurately interpreted by analysts.

Leased quota – number of crew contributing C shares by fishery (with pounds and revenues) – CV-1 and CP-1

The collection of data concerning crew that provide C share IFQ to a vessel for harvest is intended to provide additional information concerning the effects of C shares on benefits derived by crew. The cooperative structure used by most participants, however, may prevent these data from accurately reflecting the effects of C shares on relationships between vessel owners and their crews. Specifically, cooperatives are increasingly pooling IFQ, which are then distributed among member vessels for harvest. Consequently, crew may contribute C shares to a cooperative, but those shares may not be harvested by the vessel the crewmember works on.[16] In addition, since a cooperative's IFQ may not be specifically

[16] It should be noted that during the development of the data reporting program, it was anticipated that C share IFQ would be subject to an "owner on board" requirement. Under such a requirement, C share contributions could be associated with specific crewmembers on the vessel. Without that requirement, the connection between the harvesting vessel and C share holder is lost. In other words, a report of the number of crewmembers contributing C

associated with the QS holder once allocated, tracking of IFQ contributions to specific crew may be dependent on the accounting arrangements of the cooperative. In considering data collected under this element, it should also be noted that C share royalty rates could be distorted, as crewmembers are compensated for work on a vessel, as well as their C share contributions.

Count of crew holding C shares – aggregated across all fisheries – CV-2 and CP-2
This element would simply require each vessel to report the number of active crewmembers that contribute C shares to the vessel or its cooperative. This element clearly would lack the detail sought by other proposed elements to collect data concerning crew C shares contributions. This element, however, would provide some insights concerning the extent to which C share holders are employed in the fisheries and their distribution across participating vessels. Specifically, these data should reveal whether some vessels disproportionately employ C share holders, as well as the extent to which C share holders are active in the fleet.[17]

Crew elements[18]

Number of crew by fishery – CV-1
The current collection includes reporting of the number of crew on each active vessel in each fishery. Since the instructions lack some specificity, vessel owners may report either the number of active crew on the vessel during a fishery in total or the average number of crew on the vessel during the season. These responses would differ, if some crew did not participate in all trips on the vessel during a season. Submitters who have raised this issue with the administrator of the collection are advised to include a count of the total number of unique persons that have worked on the vessel during the fishery (including persons that only worked partial seasons).

Comparable crew data are also available from elandings, which include the number of crew on a vessel at the time of each landing. These elandings data may be preferable, as they provide greater detail, which may allow analysts to examine changes in crew levels throughout a season and across trips. The elandings data, however, do not provide a count of the number of unique persons that worked on a vessel during the fishery (including persons that did not work the entire season).

Payments to captains by fishery – CV-1, CV-2, and CV-3
Payments to captains by fishery are also included in the current collection and are believed to be accurate. These data have also been used by analysts to examine compensation levels in the fishery. These data are unavailable from any other source. Bias in these data may arise in circumstances where the captain is also the vessel owner. The data collection could be expanded to identify circumstances where the vessel owner is also captain of the vessel. These data are not available from any other source.

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share IFQ to a vessel's harvest could be interpreted as requesting either 1) the number of C share QS holders that contributed C shares to a vessel for harvest, 2) the number of persons who crewed on a vessel during a year that contributed C shares to a vessel for harvest, or 3) the number of persons who contributed C share QS to a vessel for harvest that were on the vessel for the harvest of those C share IFQ. These different interpretations could lead to inconsistent reporting across data submitters.

[17] Depending on the specific reporting requirements established for crew under the revised C share active participation requirements adopted by the Council and pending Secretarial approval, this information could be available through other sources. Regulations for that action should be finalized in early 2012.

[18] All catcher processor crew elements are discussed in the additional catcher processor elements section, as the interaction of harvesting and processing crew elements are unique to that sector.

Check box to identify whether a captains is also a vessel owner by fishery – CV-2

This reporting requirement would be intended to rectify the problem identified in the previous element. Specifically, the check box is intended to identify circumstances in which the captain is not a vessel owner, in which case compensation paid to the captain may not be at a market rate. For example, a captain may receive some compensation as the vessel operator and some as the vessel owner. The distribution of these payments may be affected by several factors, including the captain's preferences and accounting practices. A threshold vessel interest (such as a percentage of the vessel ownership) could be used to define the circumstances in which a person is determined to have a qualifying ownership interest in the vessel.[19] This information is not available from any other source.

Payments to crew by fishery – CV-1, CV-2, and CV-3

The current collection includes payments to crew by fishery. These data are believed to accurately represent compensation to crewmembers in the fishery. Analysts have used these data to examine changes in compensation over time (including comparing pre- and post-rationalization crew compensation) and across the fleet. These data are unavailable from any other source.

Labor payment details – charges and deductions categories – across all fisheries – CV-1

Under the status quo, vessel owners report whether certain operating costs are typically deducted from revenues or charged to crew as a part of computing crew payment. Most crew contracts compensate crew with a share of net revenues (after deductions) less charges. Crew compensation is calculated by first subtracting deductions from gross revenues. The remaining net revenues are then multiplied by an agreed crew share percentage (which is the crew's share of gross revenues). Any crew charges are then subtracted from the crew share amount to determine the payment to crew.

Data collected under this element indicate the deductions and charges used by each vessel in its crew contracts. The data, however, do not show amounts deducted or charged and also may inaccurately depict the use of deductions and charges, to the extent that a vessel may have different practices in different fisheries. These shortcomings prevent these data from being used for purposes other than simply depicting general deduction and charging practices across the fisheries. Quantitative data reflecting this information are not currently available from any other source; however, anecdotal information is readily available (and is consistent with the information reported).

All unique crew contracts and settlement sheets by fishery – CV-2 and CV-3

This element would collect all unique crew contracts and settlement sheets from each vessel in each fishery. These data would be intended to provide information concerning changes in the structure of crew contracts, and allow analysts to examine the sources of any changes in crew compensation that might arise. By comprehensively collecting contracts and settlement sheets, the collection would be intended to avoid the potential for partial collection (such as collection of deductions and net revenue shares) from misleading analysts.[20]

While the information should provide analysts with an ability to examine all aspects of crew contract arrangements, the amount of information and its form could present some challenges to administrators of

[19] In other actions and reporting, a 10 percent ownership interest has been regarded to establish an affiliation. This percentage could be established as a part of the development of the revised data collection form.

[20] The collection is intended to apply only to unique contracts and settlement sheets. While it is possible that several crewmembers are subject to similar contracts, it is possible (and perhaps likely) that most vessel owners would submit all contracts to avoid the potential that differences in contracts (such as different crew percentages) are interpreted as creating different contracts. To avoid potential non-compliance, a vessel owner would likely submit all contracts and settlement sheets.

the collection and analysts. Data processors, in conjunction with analysts, will need to incorporate data into a workable format. Analysts will likely need to read each contract to identify the various factors included in contracts.[21] Most, if not all vessel owners pay crew a share of the vessel's adjusted gross revenues. Revenues may be adjusted based on several factors, most commonly operating costs and crew expenses (such as food). Adjustments may be either deducted from revenues prior to applying crew share percentages or charged to crew after computing crew shares. Post season adjustments, which may result in additional payments to crew, also complicate these data. The diversity of contractual arrangements will require some discretion on the part of analysts and data managers, who must read each contract and the accompanying settlement sheets, identify salient elements in those documents, accurately and consistently categorize those elements, and incorporate each entry into a workable data set. Interpretation of contracts is likely to be a significant challenge in some cases and may be misleading in some instances.

Data management will be complicated by structural changes (such as changes in not only the amounts of deductions, but also the types of deductions and method by which deductions are made). Data managers will likely need to work closely with analysts in developing a system for managing the variety of contractual structures. After data management issues are addressed, analysts will need to interpret these changes. While a change in the amount of a deduction, charge, or crew share percentage may be simple to interpret in isolation, changes in several of these factors simultaneously may be difficult to interpret or, in some cases, misleading. When change in contract structures are made, a greater challenge will arise. Reconciling these changes across segments of the fleet, as would be needed for interpretation of these data, is unlikely to be simple and could lead to some diversity of conclusions from different analysts.

A further challenge will arise from the volume of data to be collected. Approximately six persons crew each vessel in each fishery. Each person will likely have a separate contract and settlement sheet for each fishery. Under recent participation, between 750 and 1000 unique contracts and settlement sheets would be created in the fisheries annually, not counting any in season turnover. With each contract containing several relevant elements, it is possible that the volume of data could exceed the volume of data in the current catcher vessel collection. Data management challenges in the current collection are being addressed through the development of an online data entry system. Such a system could not be used for entering these crew data, since the collection requires the submission of contracts and settlement sheets. As a result of the requirement for crew contract and settlement sheet submission, data administrators would be required to enter these data. This process would not only increase administrative costs substantially, but also increase the potential for errors, as settlement sheets are frequently hand written and may be difficult to read. This element of the program would likely have the largest data administration and management costs of any element of the program and could equal the cost of all other elements of the program combined.

The information on compensation would provide for much more detailed analyses of factors affecting crew compensation. The information in crew contracts and settlement sheets extends beyond compensation (and may include information on working conditions and benefits) which would provide analysts with an very expansive resource to understand a variety of aspects of crew employment.

[21] It should be noted that, if the current blind formatting is maintained, the development of a system for data management will be greatly complicated. The third party data manager would likely need to contract an independent analyst who would work with agency analysts to develop the dataset annually. This contracted analyst would be tasked with reading contracts and discussing the management of data collected under the various contractual provisions with agency analysts. Once a process is agreed upon, data could then be entered into a workable dataset. While such a process is possible, it would likely prevent agency analysts from examining specific contract provisions. In other words, the blind formatting requirement would be very problematic, if crew contracts and settlement sheets are collected.

Developing this understanding of crew employment, however, will require substantial administrative and analytical resources. The costs of administration and data management are likely to be substantially greater than under the status quo or other proposed crew data elements.

Revenue shares – owner/captain/crew – CV-1

As a part of most captain and crew contracts, captains and crew receive a percentage share of net revenues (after deductions). This element collects the percentage shares applied to determine captain and crew compensation (with the remaining portion assumed to go to the vessel owner).[22] As noted, previously revenue share percentages are a factor in determining captain and crew compensation. These percentages, however, may be misinterpreted by analysts that do not have complete information concerning other aspects of crew compensation. For example, a change in a crew contract that includes a decrease in the revenue share paid to crew could result in greater pay to crew, if that change also reduced deductions or charges. In addition, in some instances, vessels are known to pool revenues to ensure that compensation is more equitably distributed among crews on vessels within a single owner's fleet. Unless the collection is broadened to collect data concerning these types of arrangements, analysts are likely to misinterpret this element. These data are not available from any other source.

Crew license numbers/Commercial Fisheries Entry Commission (CFEC) permit numbers – CV-1 and CV-2

This element collects crew license numbers and Commercial Fisheries Entry Commission permit numbers, which uniquely identify crew for purposes of tracking individual crewmembers across fisheries and vessels and accessing demographic data concerning crew. These data can provide important information concerning the crew longevity and movement among vessels, as well as demographic information that can be useful for understanding the distribution of impacts geographically. These data are not available from any other source.

Crab fishing cost elements

Insurance premium – crab only – CV-1 and CP-1

The current data collection includes an element to collect crab specific insurance premiums. The rationale for collecting these data is to understand operating costs and the magnitude of and changes in insurance costs. Since some vessels do not pay separate premiums for crab fishing and other fishing, the current collection also requires respondents to report annual insurance premiums that cannot be attributed exclusively to crab fishing elsewhere in the report. Although headings suggest that hull, property and indemnity, and pollution insurance should be reported, many vessels carry other types of insurance such as cargo insurance, commercial liability, and breach of warranty. This variety of insurance types and insurance arrangements prevents any consistent and accurate interpretation of these data. In addition, to the extent that these data are intended to provide an understanding of changes in vessel operating costs, the absence of information concerning insurance claims and incidents may frustrate attempts to understand changes in those costs. For example, substantial changes in insurance costs could arise from factors under an operator's control (such as a vessel's poor safety record) or from factors outside of the operator's control (such as inflation or changes in repair costs). Additional information concerning these factors (particularly those within the operator's control) are necessary to understand these changes. Data collected under this element are not available from any other source.

[22] It should be noted that in some instances, share holders who lease IFQ to a vessel may receive payment as a percentage of net revenues. These payments would be assumed to go to the vessel owner under the current structure. The structure used for the collection is beneficial in that it ensures consistent reporting across respondents by requiring that reported share percentages sum to 100 percent.

Paid insurance deductibles – crab only – CV-1 and CP-1

This element is intended to capture any costs related to the payment of insurance deductibles arising under claims associated with crab fishing. Understanding these data may not be possible without expanding the collection to include additional information concerning the type of claim to which the deductible applies, as most vessels carry insurance to cover several types of risk. Interpreting this element is also complicated by several other factors. The collection is intended, in part, to show relationships between insurance costs and deductibles. To the extent that premium payment data are unreliable and inconsistent, information may not be available to understand these data. These challenges are compounded by the potential that incidents may not occur in the same year as payments. In addition, payments could overlap with other costs (such as vessel repairs and maintenance). Additional information concerning these data and the incidents that they are intended to cover are needed to allow for reasonable interpretation. Data collected under this element are not available from any other source.[23]

Pot purchases – number of pots and costs – CV-1 and CP-1

Pot purchases, in both numbers and costs, are collected from each vessel under the status quo. Pots are an important operational expense for participants in the crab fisheries. A few aspects of the fisheries, however, make these data difficult to collect consistently and interpret. First, pots are often used in multiple fisheries, including groundfish fisheries. Since the pots may be used in groundfish fisheries, attributing their cost to the crab fisheries may not be accurate. In addition, most of the pots currently on the market are used pots. Information concerning their condition is not collected. In some instances, pots are purchased from long term storage. A portion of these pots may not be serviceable, and may be discarded. Whether vessel operators report these discarded pots in the sale is not known, and may depend on the timing of their disposal. Others pots included in such a sale may be repaired or refurbished. These servicing costs are reported as "other crab-specific costs". Due to their state, the remaining life of these pots is also unknown. Fishing practices further complicate interpretation of these data. In some cases, vessels pool pots sharing them in operations. So, vessels may avoid purchases by using pots owned or purchased by another vessel.

Substantial data are currently available from logbooks, pot registration, and ADF&G dockside interviews concerning the use of pots in the fisheries. State registration data authorize gear sharing among vessels. Logbooks and dockside interviews include pots pulls, identifying the number of pots pulled daily by each vessel. In some cases, vessels will report pot sharing arrangement in logbooks or as part of a dockside interview. These data also provide some insight into pot sharing arrangements, but do not provide comprehensive, detailed information concerning pot use. Pot costs are not collected through any of these other initiatives.

Pot purchases - location CV-1 and CP-1

The status quo alternative collects location of purchase of pots from both catcher vessels and catcher processors. Pots are a primary input for crab fisheries. In general, location of purchase data collected as a part of the data collection program are believed to be of poor quality. Many of the business that sell to crab vessels have operations in several locations. These operations often have billing operations in a single location, which is represented on invoices. Year-end accounting used to prepare data reports relies on these invoices for attributing purchase locations. The result is relatively unreliable location of purchase information.

[23] Discussions with respondents suggest that, at times, the reported values are only deductible amounts in insurance contracts (rather than paid deductibles). If this element is retained, instructions should be revised or supplemented to avoid this inconsistency.

In the case of pot purchases, interpretation of location of purchase information is further complicated by the nature of these purchases. The objective of collection these location data is to develop an understanding of the effects on local economy. The purchase of used pots from storage areas will have a very different effect on the economy than purchase of new pots. In addition, pots that are refurbished would have yet another economic effect. Current data, however, does not distinguish these purchases.

Although these specific data are unavailable from any other source, efforts are taken by analysts to obtain information concerning the effects of the fisheries on local economies through those persons in those localities. In several instances, local government representatives and business owners and managers have been interviewed as a part of the preparation of community profiles. In some instances, these persons may be consulted by analysts examining certain management actions. Although these initiatives may be less structured than annual reporting, the information yielded by these studies may be more useful, as the circumstances of the different businesses, their operations, and the effects on the local economy may be more fully understood. Under the data collection program, isolated data are collected from participants in crab fisheries only, which may not reflect overall circumstances in the community, as they fail to capture the interactive effects arising from other fisheries and other aspects of the local economy. Information from local government and community businesses may provide better context and a more complete understanding of the role of the crab fisheries in the local economy.

Pot purchases- newly manufactured pots only – number of pots and cost - CV-2 and CP-2

An alternative to the collection of comprehensive information on pot purchases is to collect information on newly manufactured pot purchase only. Limiting the collection to newly manufactured pot purchases could address the potential inaccuracy that might arise from purchases of used pots of unknown condition (some of which might be unserviceable). Although few purchases might be reported at the outset, this reporting should provide analysts with a count of pots being introduced to the fishery.

Line and gear purchases – costs and location – CV-1 and CP-1

Line and gear purchases for crab fisheries are also currently collected from catcher vessels and catcher processors. As with pots, line and gear are important inputs to the harvesters. Data collected under this element suffer from similar shortcomings as pot purchase data. First, gear and line may be used in multiple fisheries (including groundfish fisheries). Attribution of these costs to crab fisheries may be an incorrect characterization of the expense. Location information also may be inaccurate to the degree that invoicing is from a different location than the sale.

Bait used – species, pounds, cost, and location of purchase – CV-1 and CP-1

Bait use is reported in the current data collection including the species, pounds, cost and purchase location. Bait is another important input in the crab harvesting operations. With the slowing of the race for fish under the rationalization program, it is uncertain whether harvesters might change baiting practices (with longer soak times) to reduce operating costs. Information on bait use could be used to examine these possible changes (or other changes in bait use that could arise with bait price changes or changes in the prices of other inputs).

Bait data collected under the program are believed to be inaccurate, since most harvesters maintain inventories that are carried over between fisheries (including crab and groundfish fisheries). In addition, many vessels catch a substantial portion of their bait. This harvested bait is omitted from reporting under this element. Without understanding the role of bait caught by a vessel, the bait costs of the vessel cannot be understood. Direct estimates of bait use are not available from any other source. Estimates are available for the number of pot pulls by each vessel, providing some insight into bait usage, but these pot pull data do not provide any information on the quantity and types of bait used or the costs of that bait.

Analysts may be able to generate estimates based on typical bait usage, but could not compare bait usage across vessels or understand any changes in baiting practices through such estimates.

As with other factors, location of purchase information have are believed to be inaccurate because of differences in invoice addresses and location of purchase.

The Council could consider collecting bait information on a less detailed basis than the current data collection. This could simply include bait costs for each fishery. The burden associated with tracking specific amounts and costs of each different bait species would be reduced significantly, while still providing analysts with some information concerning a vessel's bait costs. These data are unlikely to perfectly reflect the costs associated with a vessel's catches, as many vessels have remaining inventories at the end of each season and some vessels share pots with other vessels. In addition, most vessels catch some of their bait and some vessels receive bait from processors as a part of their relationship with the processor. Overall, the data concerning bait costs in each fishery are likely to be representative of fleetwide costs for bait purchases before and during a season.

Fuel, lubrication, and fluids – fuel gallons and total cost by crab fishery and location of purchase – CV-1 and CP-1

Fuel, lubrication, and fluid costs and fuel use in gallons by location of purchase are currently collected. Fuel is an important input in the fishery over which participants may have better control in a rationalized fishery. The added security of exclusive harvester privileges could allow vessels to operate at slower speeds to conserve fuel. In addition, changes in fuel prices could induce changes in fishing behavior to reduce its use.

A few factors contribute to inaccuracy of reported gallons of fuel costs and use by fishery. Since some vessels purchase lubricants and fluids simultaneously with fuel, the costs of those items may be included in the reported costs (with the participant noting their inclusion). This may prevent analysts from examining fuel costs variations across participants and time directly. Although reporting distinguishes location of purchase for each fishery, inventories are typically carried over between fisheries. The means of reconciling this reporting requirement with a participant's purchases and use may be inconsistent across participants.

Participants use a variety of methods to make estimates, such as gauge readings and transfers of fuel among tanks. Despite these inconsistencies, most participants believe fishery season fuel use can be estimated to within approximately 10 percent of the correct value. While many vessels make fuel use estimates for crew settlements, the starting and ending points for those estimates may differ across vessels. For example, some vessels may deduct fuel used in transiting, while others do not. Some vessels deduct fuel use from the loading of the first pot until storing of the last pot. If the starting and ending points of the seasonal use are clearly defined in the instructions, it may be possible to collect fuel use by fishery (in gallons) of reasonable sufficient accuracy.

Fuel cost estimates, however, would require that specific accounting instructions be provided to ensure consistent treatment of inventories across participants. A simpler approach could be to collect only fuel use in gallons and have analysts use average annual fuel price information for the vessel (or prevailing fuel prices) to estimate costs. While such an approach sacrifices the specificity of more complete reporting of costs, it avoids the challenges and uncertainties associated with attempting to impose consistent accounting practices across participants.

As with other factors, location of purchase information have are believed to be inaccurate because of differences in invoice addresses and location of purchase.

Fuel, lubrication, and fluids –gallons by crab fishery – CV-3 and CP-3

The third alternative would collect gallons of fuel used in each crab fishery. This element is believed to eliminate some of the inaccuracies that arise under the status quo related to integration of fluids and lubrication and the estimated costs. Participants are believed to be able to estimate fuel use within approximately 10 percent, provided adequate instructions are included. Removing cost is intended to remove the accounting irregularities that may arise from different vessel owners applying different pricing protocols to their fuel use. When used together with either annual fuel purchases for the vessel or fuel market price information, an estimated cost can be developed for each fishery.

Food and provision costs – CV-1 and CP-1

Food and provisions, collected under the status quo data collection, are another variable cost input intended to inform analysts concerning variable operating costs. These costs are believed to be subject to some degree of inaccuracy, as inventories are carried over between groundfish and crab fisheries and from year to year. Although many vessels may draw estimates from their settlement sheets, these costs may not be fully accurate, due to inventory issues, and practices of charging crews daily food costs or having crews purchase their own food. Collection of food and provision data on a fishery basis may provide a reasonable general fleetwide estimate of expenditures prior to the season specifically for the season, despite the a variety of practices for charging for food and provisions and carryover of inventories.

Other crew expenses – CV-1 and CP-1

The collection of other crew expenses is a catchall category intended to ensure that variable costs are fully captured in the status quo data collection. These costs, however, are not well-defined, so participants likely have inconsistent practices for completing this reporting.

Freight costs for landed crab – CV-1

Freight cost of landed crab by catcher vessels is collected under the status quo. This element is rarely, if ever reported, and is generally not a relevant cost, as few, if any, catcher vessels maintain an interest in any crab once it is delivered for processing.

Storage, wharfage, and delivery costs for gear aggregated across all crab fisheries – CV-1 and CP-1

Storage, wharfage, and gear delivery costs are currently reported by catcher vessels and catcher processors. These data are believed to be inconsistently reported, as some vessels operating in crab and groundfish fisheries must attempt to apportion costs between crab and groundfish fisheries. In addition, multiple vessel operations also must apportion costs among vessels, which may be arbitrary, particularly if those vessels share pots. While these cost data are unavailable from any other source, substantial information concerning pot usage is available from pot registration, logbooks, and port sample interviews.

Observer costs – CV-1 and CP-1

Observer costs are incurred by catcher vessels only in the Aleutian Islands golden king crab and Saint Matthew Island blue king crab fisheries. These costs can be ascertained or approximated through other sources, including ADF&G reports to the crab observer task force.

Crab landing taxes and fees – CV-1 and CP-1

This element of the current data collection is intended to identify all taxes and fees charged on landings, including state and local fish taxes, cost recovery and buyback fees, and cooperative and buyback fees. The variety of charges included in this category makes these reported fees difficult to interpret. In addition, some of the charges to be reported may be subject to adjustments, after the year end,

complicating reporting requirements. Estimates of these amounts can be produced by analysts based on state and local tax rates, cost recovery and buyback fees, and arbitration association assessments.

Crab cooperative fees – CV-1 and CP-1

Cooperative costs are collected under the status quo. These may include both costs of cooperative membership and also costs associated with arbitration fees, if the cooperative participates directly in arbitration proceedings. The data, however, do not provide insight into the differences in costs across the fleet, as the method used by cooperatives for charging members with cooperative costs and arbitration costs are not reported and all such costs are aggregated across all fisheries into a single cost. In addition, quota holders that do not fish also are cooperative members and may participate in arbitration proceedings and costs. The absence of information concerning the method of charging costs to members and non-vessel operating participants make these data incomplete and misleading.

Other crab specific expenses – CV-1 and CP-1

Other crab specific costs are a catchall category similar to other crew costs. Instructions suggest this category could include pot and gear repairs, association and marketing fees, vessel communications, vessel leasing costs, pot truck fees, accounting fees, and vessel moorage). The open ended nature of this element is believed to result in very inconsistent reporting across participants.

Vessel cost elements

Investments in the vessel and equipment – costs and location – CV-1 and CP-1

This element of the status quo collects the cost amount and location of purchase of any investments in the vessel and equipment. This element is intended to inform analysts concerning vessel owner's expenditures to upgrade a vessel. The element includes any item that is subject to depreciation or that are exclusively for purposes other than crab fishing. Excluding items that are depreciated is intended to distinguish repair and maintenance from investments. This distinction can lead to discrepancies among participants based on their tax position, which can be somewhat arbitrary. In addition, using depreciation as the defining characteristic will not inform analysts of whether the acquisition is an upgrade or replacement of obsolete or worn equipment. Participants are also asked to report whether these costs are exclusively for crab fishing. The distinction of crab and non-crab costs under this element could lead to inconsistent reporting based on a vessel's operations. These changes could lead to differences in reporting based on the vessels operations at the time of reporting. For example, a vessel may report a crane as a crab only cost. If the vessel begins operating as a tender in a later year, the crane is likely to be used in, and a benefit to, those operations.

As with other factors, location of purchase information have are believed to be inaccurate because of differences in invoice addresses and location of purchase. Data collected under this element are not available from any other source.

Repair and maintenance – costs and location – CV-1 and CP-1

The status quo data collection includes collection of vessel repair and maintenance costs and the location of purchase, with expenses unrelated to crab fishing excluded. These data are intended to inform analysts of ongoing costs of vessel upkeep. Repair and maintenance related solely to vessel operations other than crab fishing are excluded. Assignment of items to either repair and maintenance or investments is somewhat discretionary and may result in the assignment of basic upkeep costs to the investment category. In addition, this item is to be identified as either exclusively for crab fishing or for use in crab and other operations. As with investment costs, the nature of these costs, as crab only or for crab and other uses could change over time with the vessel's activities.

As with other factors, location of purchase information have are believed to be inaccurate because of differences in invoice addresses and location of purchase. Data collected under this element are not available from any other source.

Vessel and equipment investments, repairs, and maintenance costs – CV-2 and CP-2
Under this element, investments would be combined with repairs and maintenance to avoid the potential for inconsistent assignment of cost to these two different categories. In many cases, worn or damaged equipment is upgraded during the repair process making it difficult to differentiate between investment and maintenance expenditures, so combining these elements should improve accuracy in reporting.

Insurance premiums - CV-1, CV-2, CP-1, and CP-2
This element of the current data collection records all insurance premiums. The rationale for collecting these data is to understand operating costs and the magnitude of and changes in insurance costs. This element differs from the prior insurance element, in that all insurance costs are included here. By collecting all insurance costs, this element is intended to overcome the difficulty arising from insurance premiums that are not separated for crab fishing and other fishing or activities.

Although this element may provide participants with a relatively straightforward element for reporting insurance costs, analysts may not have adequate information to apportion those costs among activities, as would be needed to analyze insurance costs associated with crab fishing. The absence of information concerning insurance claims and incidents may frustrate attempts to understand whether cost changes are attributable to changes in insurance costs generally or whether those cost changes arise from a vessel owner's claim history. Additional information concerning these factors (particularly those within the operator's control) are necessary to understand cost changes. As with the preceding insurance item, the variety of insurance types (some of which may not be carried by all vessels) and insurance arrangements prevents any consistent and accurate interpretation of these data. Data collected under this element are not available from any other source.

Fuel, lubrication, and fluid purchases – all fisheries aggregated – CV-1 (with location), CV-2, CP-1 (with location), and CP-2
This element of the status quo collects fuel, lubrication and fluid costs (but not gallons) associated with non-crab fishing activities - all vessel activities (including transiting to and from the vessel's homeport and other fishing and tendering activities) and the location of purchases. These data, together with the previously reported crab fishing fuel, lubrication, and fluid, may be intended to total to the vessel's fuel costs for the year. The reporting for this variable, however, is vessel fuel purchases (not use), which may result in some carryover inventories being omitted and could result in some inconsistencies, since the collection of crab fishery fuel is based on fuel used in those fisheries. In addition, this element collects fuel purchases, while the preceding crab fishery element collects fuel use.[24] These could lead to further inconsistencies in the elements arising from the carryover of inventories. Given these inconsistencies, it is unclear whether analysts could determine either annual fuel purchases or annual fuel use by a vessel. Data collected under this element are not available from any other source.

[24] These data are further complicated, as some salmon tenders may have fuel provided by the processor contracting their services. These vessels, however, likely receive less compensation for their services. Since salmon tendering activity and revenues are not reported in this collection and whether fuel is provided by another entity as a part of a contractual arrangement, the specific effects of those arrangements cannot be examined. In general, analysts can compare revenues (from any source) with fuel costs (from all purchases). Other operational costs (which are not collected for activities other than crab fisheries), however, affect the vessels net revenues.

It should be noted that the second alternative would exclude location of purchase reporting. Excluding location would simplify reporting and avoid potential errors that arise from inconsistencies in invoice addresses and address of the purchase location.

Fuel purchases (gallons and costs) – all fisheries aggregated – CV-3 and CP-3
This element of the status quo collects fuel costs and gallons associated with all vessel activities (including transiting to and from the vessel's homeport and other fishing and tendering activities). These data, together with the previously reported crab fishing fuel may be used to examine a vessel's to total fuel costs for the year, as well as to approximate costs in each crab fishery. The reporting for this variable, however, is vessel fuel purchases (not use), which may result in some carryover inventories being omitted and could result in some inconsistencies, since the collection of crab fishery fuel is based on fuel used in those fisheries. Data collected under this element are not available from any other source.

Other vessel specific costs – CV-1 and CP-1
This element of the status quo is a vessel level catchall, intended to capture all additional vessel related costs not reported elsewhere. This element is intended to ensure that all vessel costs are captured to allow for comprehensive cost modeling. As with other catchall elements, this element is likely too discretionary to be consistently reported across participants. Since the element is discretionary, it is uncertain whether the failure to report a specific cost reflects the absence of that cost or the choice of the participant to not report the cost. Data collected under this element are not available from any other source.

All fishery activity elements

Days at sea – CV-1
This element requires participants to report a count of all days at sea in all activities (including transiting, tendering, fisheries other than crab fisheries). This element can provide analysts with some perspective on the extent to which a vessel is used outside of the crab fisheries. The specific uses, however, are not identified. The time a vessel is engaged in other fisheries in most cases will be available from other sources. Time transiting and tendering will not be available from other sources. These two different activities are not distinguished under this reporting requirement.

Gross revenue – all activities – CV-1 and CV-2
This element is intended to provide an overview of total gross revenues generated by a vessel during a year. This can be contrasted with the vessels revenues in the crab fisheries as a measure of the vessel's dependency on the crab fisheries. Although fishing revenues are available from other sources, revenues from other activities (such as tendering) are not available from other data sources. It is unclear whether a vessel owner should report revenues from leasing IFQ in this section. Any such reporting would require the owner to make a determination of when the vessel is considered to have leased quota, which is problematic given the absence of a definition of that term. The revenues from different activities are not distinguished under this reporting requirement.

Total pounds landed – all fisheries – CV-1
This element is intended to provide a measure of the dependence of a vessel on the crab fishery in terms of pounds of harvests relative to other fisheries. Since pounds do not necessarily ascribe any value to the catch, this measure is relatively crude. In addition, the measure, by its nature, omits any activities other than fishing. These data are available with substantially greater detail (and information) from other sources.

Tendering check box – CV-3

This element would require vessel operators to check a box, if the vessel was used for tendering. Historically, tendering has been an important part of annual operations for many crab vessels. Yet, little information is available concerning tendering. The element would not only help analysts understand the number of vessels that are used for tendering, but would also provide limited information by informing analysts of whether a crab vessel engaged in tendering. The element could help analysts understand whether certain annual expenses (such as vessel expenses and fuel usage) are affected by the use of the vessel in tendering). The burden of responding to and administering this element would be almost negligible.

Labor costs – all activities – CV1, CV-2, and CV-3

This element requests the vessel owner to report payments to labor in all activities (including tendering and other fisheries). These data provide analysts with a perspective of the total labor payments by the vessel and allow an analyst to understand the scale of payments in the crab fishery relative to other activities. These data are not available from any other source.

2.5.4 Processor elements – shore plants, floating processors, and catcher processors

This section first examines each processor data element under consideration, identifying the shore plant, floating processor, and catcher processor alternatives that include the element. Processor elements under consideration can be separated into the following eight categories: 1) production, 2) revenues, 3) labor, 4) custom processing services purchased, 5) crab purchases, 6) crab processing costs, 7) general plant costs, and 8) general processing information.

Production elements

Production – dates covered by fishery – SP-1 and FP-1

The status quo alternative directs shore plants and floating processors, to report the beginning and ending dates of production for each fishery. The shore plants and floating processors are requested to report separate periods for the spring and fall. Analysts can reconstruct these time periods based on deliveries using fish ticket or RAM data. Consequently, these data are fully available from other sources.

Processing days by fishery – SP-1, FP-1, and CP-1

This element requests processors to report the number of days during which crab was processed. No instruction is given concerning the treatment of partial days, which may lead to inconsistent treatment of partial days by participants. Since delivery dates are available through fish ticket and RAM data, this reporting provides no additional information is available through these data.

First and last day of processing and number of processing days by fishery – SP-2, SP-3, FP-2, and FP-3

This element is comparable to the first two elements, in that processors report their first day of processing activity, last day of processing activity, and the number of days the plant was active during that time period. As noted, analysts can reconstruct these data from fish ticket and RAM data; therefore, these data may be available from other sources.

Raw crab processed by fishery – SP-1, FP-1, and CP-1

Under the status quo, for each fishery, each processor (including each catcher processor) reports the total amount of raw crab processed. These data are also available from fish ticket and RAM data.

Product, process, crab size, grade, box size, custom process identifier - pounds by fishery – SP-1, FP-1, and CP-1

The current data collection includes a requirement that processors (including catcher processors) report pounds of product (e.g., whole crab, sections, legs, etc.) and process (e.g., frozen, fresh, etc.) by fishery. In addition, the processor is requested to report whether the production was undertaken for another person under a custom processing agreement. These aspects of the current reporting are also available to analysts through COAR reports.[25]

An additional part of this data collection is the reporting of crab size and grade and box size. Box size is very inconsistently reported, as production box sizes vary considerably, including some variations that are in increments of less than one pound. Some production is reported simply as bulk or in very large box sizes (e.g., in excess of 500 pounds). Given the breadth of box sizes, it is not certain whether box sizes are reported based on primary production or repackaging.[26] Crab size reporting consists of three possible categories – large or standard, small, or mixed. Most participants anecdotally report that size distinctions are not important in the fisheries, as size and market limits constrain the harvest of small crab. Reporting to date show a variety of crab size distinctions, ranging from less than one-third to over one-half of the annual total production from a fishery being reported as mixed size. Whether processors are reporting mixed size to simplify their reporting or to make an actual distinction in their production process is not known. The reporting of grade is also simplified with responses limited to standard, lower quality, or mixed. Quality distinctions are not consistently reported across processors or time. Yet, some processors do distinguish low quality crab. A preliminary examination of data from the reports suggests that slightly less than 10 percent of the annual production from each fishery is rated as either low or mixed quality in recent years.

Processors must also identify production that is under custom processing arrangements. Reporting of custom processing activity is available through COAR, but that reporting excludes crab size and grade and box size.

Revenue elements

Sales by product, process, crab size, grade, box size – revenues and pounds by fishery – distinguishing sales to affiliates from non-affiliates – SP-1, SP-2, SP-3 (use box size categories and FOB Alaska), FP-1, FP-2, FP-3 (use box size categories and FOB Alaska), CP-1, CP-2, and CP-3 (use box size categories and FOB Alaska)

Under the status quo, sales of crab by product, process, size, grade, and box size are required to be reported. As with the preceding element, the product and process information are currently available from COAR reports. The reporting in COAR reports differs in a few ways. First, sales to affiliated entities are not distinguished. If prices paid by affiliated companies differ from those paid by independent buyers, that difference will not be known to analysts. A second difference is that the details concerning box size, grade, and crab size are not available through COAR reports. While reported box sizes show a wide range of sizes, most crab is packed in bulk box sizes. A preliminary review of the data suggests that price

[25] **As currently specified, many processors report multiple process codes (e.g., 1) cooked, 2) salted or brined and 3) frozen) for each production entry. While this reporting may provide more information than COAR reporting (which allows only a single process), information is likely not consistent across processors as currently reported, since a processor may choose to enter one or more product codes. Modification of the form to conform to specific crab product forms (such as cooked blast frozen, cooked brine frozen, etc.) could ensure consistent reporting, if this process reporting is maintained.**

[26] If box size reporting is maintained, establishing ranges of box sizes (rather than reporting specific sizes) could simplify and standardize reporting.

differences across various box sizes (or size categories) can be revealed through these data. Grading practices and reporting are likely not consistent across processors. A preliminary review of the data shows that in several instances, the highest average price is for "mixed grade" sales, not for "high quality" sales. Crab sizes distinctions are also not specific, with standard crab distinguished from smaller crab and mixed size crab. A preliminary review of the data suggest that this distinction may not be consistently followed, as in some cases, mixed sized sales are approximately 50 percent of the sales in a fishery, while other times mixed size sales are less than 10 percent of the sales in the same fishery. In addition, prices vary greatly with mixed size sales some times more than standard and small crab sales and other times less than standard and small crab sales. A third difference with COAR data is that these data include only actual sales, while COAR data include estimated value in sale for any crab remaining in inventory at the time of reporting.

It should be noted that Alternatives SP-2, SP-3, FP-2, FP-3, CP-2, and CP-3 all exclude the collection of processing outputs, as a less specific version of those data are available through other sources. The data from other sources, however, exclude production by crab size, grade, and box size. Consequently, under those alternatives, revenues from crab sales by crab size, grade, and box size would be collected, but production by those factors would not be available.

Under alternatives 1 and 2, processors report sales by box size. As discussed under the preceding element, to date, reporting has included "bulk" and weights in kilograms and pounds. To simplify reporting and data usage, the third alternative would create box size categories that would distinguish bulk production from small sizes and specialty packages. This change in reporting will simplify both reporting and use of the data, as almost all analysts would categorize by box size for analyses.

Under alternatives 1 and 2 for each sector, processors are permitted to report one of two FOB (free on board) locations for revenues from sales – Alaska or Seattle. In reality, sales may be FOB at any location, so processors have adjusted revenues for shipping costs from the location of transfer to the reported location. Although allowing two locations may provide some information concerning differences in costs based on the location of delivery, processors likely adjust prices to reconcile delivery locations as required to complete the report. The use of two locations complicate analysis, as adjustments must be made by analysts to reconcile values to common locations.

Under the third alternative for each sector, all reporting is FOB Alaska. This reporting provides analysts with a consistent dataset that does not need adjustment for FOB location. The requires processors that sell at locations other than Alaska to adjust prices, but some of these adjustments are required under the other alternatives.

For species with fisheries divided by management area (*C. bairdi* and golden king crab), distinguishing production by fishery is not likely possible, as sales of crab are not distinguished by two management areas (but only species). Consequently, the Council could consider modifying the reporting of revenues from sales to be on a species basis, rather than fishery basis. This modification would simplify reporting and improve accuracy, as the current distinction is likely illusory.

<u>Custom processing revenues – product and process by fishery – SP-1, SP-2, SP-3 (include raw pounds and pounds of product), FP-1, FP-2, FP-3 (include raw pounds and pounds of product), CP-1, CP-2, and CP-3 (include raw pounds and pounds of product)</u>

This element, which is part of the status quo and all other processing sector alternatives, collects revenues received by a processor for custom processing performed for other crab buyers. These revenues are of increasing importance under the rationalization program, where many PQS holders have used custom

processing arrangements to achieve efficiencies. While amounts of crab processed for other buyers can be determined from COAR data, the revenues from that activity are not available. The reporting under this program, however, omits pounds of product produced for the revenues. This reporting prevents the use of the status quo reporting alone for determining custom processing payments on a per pound basis.[27]

Alternatives 1 and 2 exclude pounds of product and crab size, box size, and grade, which are collected in other revenue and production elements. Excluding those items prevents analysts from examining the custom processing revenues on a per pound basis and any understanding of how those values differ across plants. Alternative 3 includes raw crab and production pounds to facilitate this analysis. Inclusion of these items increases the reporting burden slightly.[28]

Labor elements

Processing labor – average number of crab processing positions – by fishery – SP-1 and FP-1
Under the status quo, processors are required to report the average number of crab processing positions on processing lines during processing periods by crab fishery. This element is intended to provide analysts with information concerning the normal processing crew for a processor. Most processors reportedly compute this estimate based on the number of processing days and man-hours (both of which are reported as separate elements). To the extent that other processors may report this element differently, inconsistencies may arise in the data. Given that the most common method of producing this element can be replicated by analysts using other data elements, this element is unnecessary and can be removed from the reporting requirement.

Crab processing man-hours and payments to labor by fishery – SP-1, SP-2, FP-1, and FP-2
These elements are intended to provide analysts with information concerning the amount of labor used by processors and its cost in each of the crab fisheries. These data could reveal changes in processing labor efficiency over time. Most processors are reported to maintain some estimates of man-hours and payments to labor, which are used for company management purposes. These estimates are subject to some degree of error, particularly at multispecies plants, as processors frequently move crews among lines to address demands from deliveries from the different fisheries. Differences in data collection and reporting conventions across processors may lead to some inconsistencies in cross-processor data comparisons. Data collected to date for this element suggest that the element are not be accurately reported, as annual payments to labor show variations in average hourly wages vary by more than 100 percent annually in each fishery on average. At the extreme, estimates of average hourly wages in a fishery vary by over 700 percent. These data are not available from any other source.

Processing man-hours and payments to labor aggregated across all fisheries – SP-3 and FP-3
These elements would differ from the preceding elements in that each processor would be asked to report all man-hours at its plant and all payments to labor. This structure would be intended to avoid accounting problems arising from moving crews among processing lines for different fisheries at multispecies plants. These movements are said to prevent processors from accurately attributing hours and payments on a fishery basis. These data would allow analysts to examine total man-hours and payments to labor by each

[27] Although these data may be linked to production reports, since poundage is not reported here, it is possible that mismatches may be made. An alternative could be to integrate custom processing revenues into the production report. This would ensure that revenues are accurately assigned to production.
[28] The Council should consider that COAR data requires only that the company purchasing custom processing services report the specific custom processing activity. The company providing processing reports only the companies that it contracted with to provide those services. This reporting eliminates the duplication of requiring both parties to report the specific amounts of crab processed under the arrangement.

plant, but would not provide the detail needed to examine the man-hours and payments to labor for any crab fishery or crab fisheries, as a whole.

Crab processing employee residence – SP-1, SP-2, FP-1, and FP-2
This element collects residence information for all crab processing workers. Analysts could use these data to understand the distribution of employment revenues by residence. Most processors have limited information concerning plant worker residences, limiting the reliability of these data. In addition, processors active in multiple fisheries typically cannot isolate crab processing workers, since plant labor typically moves between processing lines. These characteristics of processing activity complicate reporting and contribute an unknown degree of inaccuracy in these data. In addition, these data do not indicate the amount of compensation to any employees; therefore, the data will not allow analysts to directly examine local or regional impacts of compensation for crab processing.

Processing employee residence – all fisheries – SP-3 and FP-3
This element collects residence information for all processing employees at each plant processing crab. The lack of reliable information concerning employee residence complicates this element. In addition, this element does not provide information on the amount of compensation paid to employees from any location, limiting the scope of local and regional impact analyses that may be supported by the data.

Custom processing services purchased elements

Reporting required of companies that contract custom processing – SP-3 and FP-3
Alternatives 1 and 2 do not require PQS holders who do not actively process crab, but contract custom processing services, to report revenues from crab sales. To make a more comprehensive collection of revenues from processing, alternative 3 extends the reporting requirement to any entities that purchase crab landings. These data are currently reported through COAR, as companies contracting for custom processing services are required to report; however, COAR data does not distinguish sales to affiliates. By adding this requirement, the data should provide more complete information concerning the crab markets (for landings and products). This requirement would increase the reporting burden of entities to which it applies and administrators. These costs will depend on the operations of the entities that report; however, a company that contracts in multiple fisheries may spend between 10 and 20 hours to complete its reports.

Custom processing services purchased – raw crab, product, process, **crab size, box size, grade**, finished pounds, processing fee by fishery – SP-1, FP-1, and CP-1
This section of the current data collection requires active processors to report custom processing services that they have purchased from other processors. These reports parallel the reports of active processors that perform the custom processing under these arrangements. These reports may be intended to allow analysts to directly link sales to production from custom processing services purchased. That linkage, however, may not be possible, since inventories may be retained at the end of each year and products may be repackaged prior to sale. This section does allow for analysts to examine processing costs per pound, which is not possible with the other custom processing reporting section. In addition, examination of the variations in these costs with changes in box size is possible.

This element requires reporting by crab size, box size, and grade, which would not be available from other sources. In addition, custom processing fees are not available from any other data collection.

As noted in the discussion of revenues, the Council should consider revising the alternatives to consistently collect (or omit) data concerning production and revenues based on crab size, box size, and grade.

Custom processing services purchased – raw crab, product, process, ~~**crab size, box size, grade,**~~ finished pounds, processing fee by fishery – SP-2, SP-3, FP-2, FP-3, CP-2, and CP-3

This section of the data collection would require active processors to report custom processing services that they have purchased from other processors. These reports are the same as the preceding element, except that this element does not distinguish production by crab size, box size, and grade. Changes in costs with box size changes could not be examined with this collection. Those data are not available from other sources.

The Council could consider including box size categories in this collection for consistency with production elements and to allow examination of changes in custom processing costs with production box size.

Crab purchase elements

Raw crab purchases – by fishery, **size, grade,** pounds, and share type – SP-1, FP-1, and CP-1

This element provides the processor equivalent of data reported by catcher vessels on landings and ex vessel revenues by share type. The data collected under this element differ in their detail by incorporating crab size (standard, undersized, or mixed) and grade (standard, low quality, or mixed) into the report. This added information could be useful for examining whether substandard sized or grades of crab are disproportionately applied to certain share types or whether pricing by grade or size varies by share type. Data reported may not be comparable across processors, as grading practices are known to differ. In addition, most processors currently allow for a certain percentage of each landing to be lower quality without any price adjustment. A review of the data shows little price distinction by grade, with low and mixed grade prices often exceeding standard grade prices. This suggests that either grading distinctions are not made in the manner described in the collection or that grade has no effect on pricing. Sizing practices are also consistent across processors. With the exception of the Bering Sea *C. opilio* fishery (and in the Bering Sea *C. bairdi* fisheries starting in 2011-2012), any crab of legal size is considered standard. In the *C. opilio* fishery, only crab above a certain size (slightly larger than the legal size limit) are accepted as marketable. Since these requirements are anticipated (not only by harvesters, but also managers), both harvest practices and total allowable catch setting account for this sizing. Data reported to date show "mixed size" deliveries often of greater value than standard size, suggesting that some processors may not distinguish landings in the manner described by the collection.

Although comparable to the catcher vessel reported price by share type, having a parallel processing requirement reporting requirement could provide additional insights concerning price variation across processors.

Crab purchases – by fishery, ~~**size, grade,**~~ pounds, and share type – SP-2, SP-3, FP-2, FP-3, CP-2, and CP-3

This element is identical to the preceding element, except that purchases are not distinguished by grade and size. Omitting those characteristics will simplify reporting. In addition, it is not clear that the distinctions of size and grade drawn in the status quo capture any characteristic of current pricing. In the absence of a change in pricing practices, the collection of this element is comparable to the collection under the status quo.

Although comparable to the catcher vessel reported price by share type, having a parallel processing requirement reporting requirement could provide additional insights concerning price variation across processors.

Crab processing cost elements

Crab fishery taxes and fees – SP-1 and FP-1

The current collection includes an element for the collection of fish taxes from shore plants and floating processors that result from the processing of crab. The instructions do not suggest that arbitration fees be included in this element. In addition, the payments made by companies that contract other processors to custom process on their behalf are currently omitted, as those entities are not currently required to submit data. These data may be misinterpreted, if an analyst assumes that the costs are associated with a particular year's landings, as payments are often made outside of the year in which the liability is incurred. Although these data are not directly available from other sources, taxes and fees can be estimated based on landings prices and local and state tax rates. These estimates may more closely approximate taxes and fees associated with specific landings. In addition, the absence of information concerning the specific fees and taxes that are included in a response, it is possible that the responses may be misinterpreted.

Processing and packaging materials, equipment, and supplies by location – SP-1, FP-1, and CP-1

Data are currently collected for all processing and packaging materials, supplies, and equipment by location. The item is relatively open-ended, as instructions include gear, boots, knives, banding, strapping, and pallets. Some of these costs are typically associated with all of a plant's operations, including both crab and fin fish fisheries. In these instances, processors are required to pro rate costs associated with crab fisheries, but no consistent method of prorating costs is defined. In the case of floating processors and catcher processors, some equipment may be stored onshore and primarily serve the plant through its shore operations. Whether the processor should report these items is unclear. Equipment costs required to be submitted here may have some redundancy with later reporting of plant equipment costs. This overlap may mislead analysts attempting to interpret these data. Location data are time consuming to participants that must sort through invoices to prepare this section. In addition, location data often is of limited accuracy, as invoices may not show the location of purchase.

Food and provision costs – aggregated across all crab processing – SP-1 and FP-1

Food and provisions costs aggregated across all crab processing are also currently reported as a part of the processor data collection. Food and provisions are rarely (if ever) purchased exclusively for use in crab fisheries. Consequently, responses to this element require processors to pro rate these costs based on other elements (such as estimated man-hours). Since food and provisions are often provided during periods when the plant is idle, attribution of costs to either crab processing or other processing is somewhat arbitrary. To the extent the basis for proration is inaccurate, that inaccuracy is carried over to this element. These data are not available from other sources.

Other direct costs for crab labor – aggregated across all crab processing – SP-1 and FP-1

This element, collected in the current data collection program, is intended as a catchall for labor costs that are not captured in other elements. Instructions direct the participant to include costs of transportation, housing, payroll taxes, unemployment insurance, workmen's compensation, medical expenses, social security and insurance benefits, recruitment, training, and education. Given the role of crab fisheries in processing company and plant operations, it is not possible for any processor to directly report these items. Most plant workers are hired through recruiting efforts intended to support all company operations. As noted earlier, many plants cannot directly measure man-hours for crab processing because crews move between lines. Given these staffing practices most of these costs (such as recruiting, housing, food, and transportation costs) cannot be directly attributed to any fishery, but must be prorated based on other factors (most often estimated man-hours). Prorating costs will carry over any error associated with the basis for proration. Additional error is likely to be introduced by differences in the nature of operations. For example, apportioning housing and food costs based on man-hours may add error, if crab fishery

operations are typically are more concentrated, with crews working more man-hours each day. As a catchall variable with no specific definition of the costs included (and excluded), it is not known whether processors consistently report the same cost elements. These data are not available from other sources.

Insurance deductibles – aggregated across all crab processing – SP-1 and FP-1
Insurance deductibles are reported as a part of the current collection. The instructions suggest that this element should include deductibles paid for accidents occurring in crab production. Some inconsistencies could arise as deductibles may not be paid in the year of the accident. In addition, at multispecies plants, it can be difficult to determine whether deductible payments are associated with crab processing incidents or incidents associated with processing in other fisheries. These data are not available from other sources.

Re-packing costs – aggregated across all crab processing – SP-1, FP-1, and CP-1
Re-packaging costs are reported for all crab processing products from the plant repackaged in the year. Repackaging products for sale can be an important component of processing operations, particularly in fisheries dominated by bulk production. Reporting of these costs in an aggregated form prevents analysts from associating these costs with production and sales from any specific crab fishery (or species). In addition, repackaging occurs almost exclusively outside of Alaska plants, requiring processors to collect information from other plants. The extent to which a processor incorporates particular costs into this aggregated cost is largely discretionary, as instructions provide no guidance concerning costs that should be included or omitted. Consequently, differences in these costs across processors (or over time) may not be attributable to differences in production, but to differences in reporting. These data are not available from other sources.

Broker fees and promotions for Bering Sea and Aleutian Island crab sales – by fishery – SP-1, FP-1, and CP-1
Broker fees and promotions are currently reported for crab sales by fishery; however, these costs are very difficult to separate out, even to the level of distinguishing crab fishery expenditures from expenditures for other fisheries. Most spending on brokers and promotions is incurred for products from several fisheries simultaneously. In addition, most processors use internal sales staff, whose time and costs are very difficult to separate by fishery. With no clearly identified means of apportioning these costs across fisheries, data are very likely to be inconsistently reported across processors. These data are not available from other sources.

Leased pounds and lease costs of processor shares by fishery – SP-1, SP-2, FP-1, FP-2, and CP-2
This element of the current data collection requires processors to report all lease payments for processing shares for each fishery. Leases and lease prices are both important indicators of the functioning of the program. Lease prices provide a direct indicator of the value of IPQ in the program. These data may not accurately represent IPQ values since transfers that are not arm's length, in-kind transfers will not be distinguished. Consequently, analysts may not be capable of discerning market values of IPQ.

Leased pounds and lease costs of processor shares by fishery only arm's length transactions and monetary payments (pounds and cost) – SP-3, FP-3, and CP-3
This element would limit the collection to share transfers to a vessel to those that are arm's length transfers. The purpose of narrowing the scope under this element would be to remove transfers that are not likely to reflect market prices. Including only share transfers for monetary payments would avoid collecting information concerning assets that are more difficult to value. The inclusion of transfers at non-market rates (i.e., non-arm's length transactions) and non-monetary assets (as suggested by the other options for lease elements) could complicate reporting requirements, as each exchange may need to be reported separately to isolate transactions that are non-market or that would require the valuation of non-

monetary assets. This element would remove those complications by limiting reporting to market transactions for exclusively monetary compensation.

Although this collection would not provide comprehensive information concerning leasing of shares under the program, data collected should be sufficiently accuracy to support reliable analyses, assuming a reasonable number of qualifying transactions occur. More comprehensive collections are likely to result in data that cannot be accurately interpreted by analysts.

Observer costs by fishery – SP-1 and FP-1
The current program includes the collection of observer costs by fishery from all shore plants and floating processors. This collection is currently unnecessary, as these processors have no direct observer costs.

Freight costs for plant supplies – aggregated across all crab fisheries – SP-1 and FP-1
Data are currently collect showing freight costs for bringing supplies to the plant for processors. Most processors must prorate these costs between crab and non-crab fisheries, as most plants are active in several non-crab fisheries and integrate shipments. Since no method of prorating is specified in the instructions, reports are likely inconsistent across processors. In addition, some processors use their own vessels for transporting supplies. These processors estimate freight costs based on market rates and estimated quantities of supplies. These data are not available from other sources.

Freight and handling costs for products – aggregated across all crab fisheries – SP-1, FP-1, and CP-1
The current collection includes reporting of product freight and handling costs for products from the crab fisheries. As with supply freight costs, most processors integrate crab products with other products when shipping. These arrangements require that processors prorate costs between crab and non-crab products. In addition, some processors ship products in their own vessels. The costs for those shipments are estimated based on market rates and estimated quantities of products shipped. Whether methods of estimating and apportioning costs are consistent across processors in not known. These data are not available from other sources.

Product storage – aggregated across all crab fisheries – SP-1, FP-1, and CP-1
Product storage costs are also collected under the status quo. Since most processors store product at their own facilities, a large portion of these costs are typically estimated by each processor. Estimates may be inconsistent across processors, because no method for estimation is provided in the instructions. In addition, many plant costs such as payments to labor and fuel costs could overlap with estimated product storage costs, leading to double counting of those costs. Processors also store product at locations away from the plant that processed the product. The extent to which processors include these costs in their estimates is not known and could be inconsistent across processors. These data are not available from other sources.

Water, sewer, and waste disposal costs – aggregated across all crab fisheries - SP-1 and FP-1
Plant water, sewer, and waste disposal costs arising from crab processing are required to be submitted as a part of the current data collection. Apportioning these costs between crab processing and other processing activities requires proration of costs. Whether processors consistently prorate costs or are capable of estimating the differences in uses of these services for different plant operations is not known. Most processors incur these costs for both processing operations and housing. Whether these costs associated with housing should be included here or as a housing cost is not clear. Since housing services are provided during periods when the plant is not actively processing crab, attribution of costs during those periods can be particularly arbitrary. These data are not available from other sources.

Other crab specific costs – SP-1 and FP-1
This element of the current data collection is an open ended request for costs arising from crab processing that are not collected elsewhere in the report. Because of its catchall nature, it is not known whether this element is consistently reported across processors. These data are not available from any other source.

General plant cost elements

Annual fuel electricity, lubrication, and hydraulic fluids – all fisheries – SP-1 and FP-1
The current data collection requires processors to report total annual fuel, electricity, lubrication, and hydraulic fluid costs. The instructions do not specify the extent of costs that should be reported for this element, which may lead to some inconsistencies across processors. For example, processors may (or may not) report costs associated with housing and certain equipment and vehicles (such as fork lifts). In some instances, reporting could overlap with other elements (such as housing and food costs), which may lead to either double counting or inconsistencies across processors. In addition, some processors produce fish oil that is used in plant operations, which is not accounted for in these data. The integrity of these data may be further compromised, as some processors sell fuel to vessels. Whether (or how) these sales are accounted for in the current reporting is not apparent. As a result of these ambiguities, analysts may be unable to appropriately interpret these data. These data are unavailable from any other source.

Investments in the plant and equipment – by location – SP-1 and FP-1
Processors currently report plant and equipment investments annually. These elements are also have some ambiguity, as housing and support facilities may (or may not) be considered investments for reporting purposes. In addition, processors may also exercise some discretion in choosing whether to consider certain expenses investments or repairs and maintenance. Some inconsistencies (and incompleteness) likely arise from these ambiguities. Attribution of costs to specific locations is problematic, as invoice addresses may differ from the location of purchase. These data are unavailable from any other source.

Repair and maintenance costs – by location – SP-1 and FP-1
Plant repair and maintenance costs are reported under the status quo. These elements are of a discretionary nature, similar to investment costs. Whether expenditures on ancillary facilities and equipment should be considered plant repair and maintenance costs is not clear and could be interpreted differently across processors. Participants could also choose whether to consider an expense an investment or a repair and maintenance cost. The degree of choice permitted processors in electing how to complete this entry likely leads to inconsistencies across processors. These data are not available from any other source.

Number of foreman, managers and other salaried employees and wages and salaries - – SP-1, SP-2, SP-3, FP-1, FP-2, FP-3, CP-1, CP-2, and CP-3
The status quo alternative requires each plant to report the number of foreman, managers, and other salaried employees at the plant and the wages and salaries paid to those employees. The count of employees could be interpreted in a few different ways. The plant could report the typical number of such employees at the plant (with double counting in the case of turnover). Since plant staff may change seasonally, it is also possible that some plants may report average staffing levels. These uncertainties prevent consistent interpretation of the responses across processors. Payments to these employees may be subject to a more consistent interpretation, but to the extent that a processor chooses to use onsight management instead of off sight management, responses may not be consistent across processors. In addition, in cases of processors having management staff at plants for intervals of the year and working at an offsight location, estimates of payments for onsight work must be generated. These estimates not only increase the burden of responding, but also could contribute to inaccuracies. These data are not available from other sources.

Other plant specific costs – SP-1 and FP-1

This element of the current data collection is an open ended request for additional plant specific costs not included elsewhere in the report. Because of its catchall nature, it is not known whether this element is consistently reported across processors. These data are not available from any other source.

All activities

Processing days – SP-1, SP-2, FP-1, and FP-2

This element requests processors to report the total number of days in which processing takes place at the plant during the year. This element requires processors to either count daily processing throughout the year or estimate processing days based on landings records. Either method could be inconsistently applied across processors. For example, a processor may interpret minimal processing activity at the start or end of a day as not counting as a day of processing, while another processor may consider preparation or clean up activities as processing. Processors making estimates based on fish tickets could reasonably differ in their estimates, if quantities of a landing affect whether processing is reported as occurring on one or more days. Although no direct reporting of processing days are available from other sources, analysts could reasonable generate consistent estimates based on landings records available through fish tickets or catch accounting data.

Gross FOB revenues – SP-1, SP-2, FP-1, and FP-2

Under the first and second alternatives, processors are required to report annual plant gross revenues. This element is comparable to the aggregate of reported gross revenues from all products reported in in COAR data; however, unlike COAR data, these data do not value all of a year's production, only sales. COAR data provides substantially greater detail concerning the sources of revenues, as species and product information is included in those data. In addition, COAR data has consistent pounds and revenues reporting, as values are reported for all finished pounds, not only sold pounds.[29] Revenues from sales of fuel, custom processing revenues, or leased IFQ should be included in this element.

Processors have a choice of reporting revenues FOB Alaska or Seattle. The Council should consider whether stating a single FOB location for all processors would be beneficial. Such a limitation would streamline use of the data.

Finished pounds – SP-1, SP-2, FP-1, and FP-2

Under all alternatives, processors are required to report annual total pounds of finished products from all fisheries. This element is comparable to aggregated finished pounds of all products reported in COAR data and can be accessed in substantially greater detail by analysts from COAR data. **In addition, analysts must note that finished pounds will not necessarily account for all gross FOB revenues, since some inventories may be carried over from the previous year and other inventories may be carried over to the following year.**

Processing labor costs – SP-1, SP-2, FP-1, and FP-2

This element of all alternatives collects total processing labor costs from each plant. This collection is intended to provide analysts with information to assess the total payments to processing workers by each

[29] If a processor realizes revenues through other activities and those revenues are reported, this reporting would be different from COAR. As structured, the reporting requirement suggests that revenues are from sales of processed products only.

plant. Some inconsistencies may arise in these data, as some plants report management salaries associated with plant operations. These data are not available from any other source.

2.5.5 Catcher processor elements

Many of the catcher processor elements are also applicable to either the catcher vessels or processors. Those elements are discussed above. Three types of elements apply differently to catcher processors. Those elements are discussed in this section.

Harvesting and processing elements

Dates covered by fishery – CP-1

The status quo alternative directs catcher processors, to report the beginning and ending dates of operations in each fishery. It is unclear that these data provide any improvement over existing data sources, as analysts can reconstruct these time periods based on fish ticket and RAM data. Consequently, these data are available from other sources.

Days fishing by crab fishery and days traveling and offloading by crab fishery – CP-1

As with catcher vessels, under the current data collection, catcher processors must report fishing days for each crab fishery, as well as days traveling and offloading by crab fishery. Considerations for catcher processors are similar to those cited for catcher vessels above. In addition, estimates of the combined fishing, transiting, and offloading can be developed from other sources. It is not likely that the economic data reporting provides any improvement over these existing data sources.

Processing days by fishery – CP-1

Catcher processors are required to report the number of days during which crab was processed. In the case of catcher processors, these data will overlap with fishing data reported by the vessel. As a consequence, it is likely that days reported for fishing and processing will sum to a number substantially greater than the days of activity in the fisheries. Although it is possible that crab may not be processed on all days of fishing, a general pattern of vessel activities can be reconstructed from data reported in fish tickets and RAM data. Given the absence of direction on partial days of activity, these approximations may be no less accurate than data reported in this element.

Crew elements

Number of harvest crew by fishery – CP-1

The current collection includes reporting of the number of crew employed primarily for harvesting on each active vessel in each fishery. As noted in the discussion of catcher vessel options, the lack of specific instructions create uncertainty concerning whether this represents the number of active crew on the vessel during a fishery in total or the average number of crew on the vessel during the season. This uncertainty is compounded for catcher processors, as harvest crew may not be specifically or consistently defined. Instructions define harvest crew as those crew that are active primarily in harvesting. Typically, crews are deployed to harvesting and processing as needed on a vessel. It is very common for licensed crew to move between the deck and processing lines as needed. **The movement of crews among the different operations prevents any consistent identification of crew as either harvesting or processing crew. Combining data for all crew on the vessel (except the captain) may allow for more consistent estimation of crew effects. To overcome these inconsistencies, the Council could consider changing this report to require the vessel to report all crew (excluding captain).**

Currently, no accurate data source exists for identifying crew on catcher processors. Landing reports identify all licensed crew. Currently, licenses are required for all persons employed on a vessel, except

that engaged exclusively in processing. Although the requirements are somewhat vague, the landing report counts will include all harvesting crew and likely some processing crew (excluding those without licenses).

Number of processing crew by fishery – CP-1

As with harvest crew, the distinction of between processing and harvester crew is largely based on an estimate of typical activity, which may not comport with practices on the vessel. Crews too often move between harvesting and processing to categorize positions consistently. As a result, this variable is most useful when combined with the number of harvesting positions to identify the total number of crew on the vessel. As noted previously, **this inconsistency could be removed by requiring catcher processors to report a count of all crew (excluding the captain) in a single entry.**

Payments to captains by fishery – CP-1, CP-2, and CP-3

Payments to captains by fishery are also included in the current collection and are believed to be accurate. These data have also been used by analysts to examine compensation levels in the fishery. These data are unavailable from any other source. Bias in these data may arise in circumstances where the captain is also the vessel owner. The data collection could be expanded to identify circumstances where the vessel owner is also captain of the vessel. These data are not available from any other source.

Check box to identify whether a captains is also a vessel owner by fishery – CP-2

This reporting requirement would be intended to rectify the problem identified in the previous element. Specifically, the check box is intended to identify circumstances in which the captain is not a vessel owner, in which case compensation paid to the captain may not be at a market rate. For example, a captain may receive some compensation as the vessel operator and some as the vessel owner. The distribution of these payments may be affected by several factors, including the captain's preferences and accounting practices. A threshold vessel interest (such as a percentage of the vessel ownership) could be used to define the circumstances in which a person is determined to have a qualifying ownership interest in the vessel.[30] This information is not available from any other source.

Payments to harvest crew by fishery – CP-1, CP-2, and CP-3

As noted previously, the distinction of harvest crew from processing crew is likely not consistently applied or an accurate characterization of crew employment in the fishery. These data are believed to accurately represent compensation to the crewmembers identified as harvesters. **Consistent reporting, however, may be more likely, if the harvesting/processing distinction is not attempted, but compensation to all crew are aggregated.** These data can be used to examine changes in compensation over time (including comparing pre- and post-rationalization crew compensation) and across the fleet, but may mislead analysts who rely on the harvest crew/processing crew distinction. These data are unavailable from any other source.

Harvest labor payment details – charges and deductions categories – across all fisheries – CP-1

Under the status quo, catcher processor owners report whether certain operating costs are typically deducted from revenues or charged to crew as a part of computing harvest crew payment. Most crew contracts (including processing crew contracts) compensate crew with a share of net revenues (after deductions) less charges. Crew compensation is calculated by first subtracting deductions from gross revenues. The remaining net revenues are then multiplied by an agreed crew share percentage (which is

[30] As noted in the catcher vessel provisions, this percentage could be established as a part of the development of the revised data collection form.

the crew's share of gross revenues). Any crew charges are then subtracted from the crew share amount to determine the payment to crew.

As noted in the discussion of catcher vessel provisions, these data do not include deduction and charge amounts. and may inaccurately depict the use of deductions and charges, to the extent that a vessel may have different practices in different fisheries or among different crew. Consequently, these data provide only very general information concerning deduction and charging practices. Quantitative data reflecting this information are not currently available from any other source; however, anecdotal information is readily available (and is consistent with the information reported).

All unique crew contracts and settlement sheets by fishery – CP-2 and CP-3

This element would collect the all unique crew contracts and settlement sheets from each vessel in each fishery. **This provision is interpreted as applying to all contracts on catcher processors, as distinguishing contracts as harvesting or processing is not believed to be possible.** As discussed under the catcher vessel alternatives these data would be intended to provide comprehensive information concerning crew contracts for examining differences in crew compensation over time and across vessels. This information is likely to be challenging to work with and understand, as a variety of contracts will require review and incorporation into workable datasets. Data management is likely to be costly, since a separate contract may be submitted for each crewmember in each fishery. Data entry must be undertaken by managers, since contracts and settlement sheets would be required to be submitted. As a result, this element would likely have very large administration and management costs (possibly equal to the cost of all other elements of the program combined).

The information collected under this element would allow for detailed examination of many factors affecting crew compensation and employment, but will likely be challenging to correctly interpret.

Average processing positions – CP-1

The average number of processing positions is identified under the status quo alternative. This variable is unlikely to be consistently reported, as crews often move between harvesting and processing. The number of processing positions will vary throughout the season, the depending on circumstances, including the vessel's catch rate and the timing. When combined with harvesting crew, an estimate of total crew on the vessel may be derived. **Given the lack of a true distinction between harvesting and processing crews and the resulting inconsistency in reporting, the Council could consider combining this element with the collection of harvesting crew counts to collect a single count of all crew on the vessel.** These data are not available from any other source.

Payments to processing crew by fishery – CP-1, CP-2, and CP-3

As noted for the previous element, the processing crew cannot be fully distinguished from harvesting crw and participants likely inconsistently apply the distinction. These data are believed to accurately represent compensation to the crewmembers identified as processors. **Consistent reporting, however, may be more likely, if the harvesting/processing distinction is not attempted, but compensation to all crew are aggregated.** These data can be used to examine changes in compensation over time (including comparing pre- and post-rationalization crew compensation) and across the fleet, but may mislead analysts who rely on the harvest crew/processing crew distinction. These data are unavailable from any other source.

Crew license numbers/Commercial Fisheries Entry Commission (CFEC) permit numbers – CP-1 and CP-2

This element collects crew license numbers and Commercial Fisheries Entry Commission permit numbers, which uniquely identify crew for purposes of tracking individual crewmembers across fisheries

and vessels and accessing demographic data concerning crew. The distinction of harvesting crew from processing crew by this element in comparison to other elements may not be clear. In many cases, persons work in both harvesting and processing. Only persons who exclusively work in processing are exempt from the crew license requirement. Consequently, some crew considered processing crew by other elements may have harvest crew licenses, which could be reported under this element. The Council could consider removing the distinction. This element could be clarified to require crew licenses to be reported for all crew with a license (regardless of the work performed on the vessel).

These data can provide important information concerning the crew longevity and movement among vessels, as well as demographic information that can be useful for understanding the distribution of impacts geographically. These data are not available from any other source.

Processing employees by residence – CP-1 and CP-2
This element collects residence information for workers that participate in processing. The element is intended to provide demographic information that can be used to assess the geographic distribution of benefits from catcher processor processing jobs. This element clearly overlaps with the previous element, since some harvest crew work in processing and have crew licenses. Clarification of the instructions could ensure that duplicate information is not provided for individuals that have harvest crew licenses and also work in processing. These data are not available from any other source.

All fishery activity elements

Processing days – CP-1 and CP-2
Annual processing days are reported by catcher processors under the status quo. Although this element is intended to draw more precise information concerning processing activities than are accessible through other reports.

Although slightly different in nature, fish ticket data (which includes fishing days from gear deployment until the date of delivery) and logbook information (which includes date and time of setting and hauling gear and offload dates) provide data that can be used to estimate processing activity. Logbook data are not maintained in a format that lends itself to use by analyst. It is not likely that the economic data reporting of days processing provides any notable improvement over these existing data sources.

Days at sea – CP-1 and CP-2
This element requires participants to report a count of all days at sea in all activities. This element can provide analysts with some perspective on the extent to which a vessel is used outside of the crab fisheries. The specific uses, however, are not identified. To the extent that fishing and processing are the activities of the vessel, those activities can be approximated with other sources. Other activities, such as transiting to and from homeport, are not be available from other sources. The types of these other activities are not distinguished, so analysts may misinterpret these data without added information.

Gross FOB revenues – all activities – CP-1 and CP-2
This element is intended to collect all revenues of a catcher processor. This element is comparable to the aggregate of reported gross revenues from all products reported in in COAR data; however, unlike COAR data, these data do not value all of a year's production, only sales. COAR data provides substantially greater detail concerning the sources of revenues, as species and product information is included in those data. In addition, COAR data has consistent pounds and revenues reporting, as values are reported for all

finished pounds, not only sold pounds.[31] Revenues from leased IFQ might (or might not) be included in this element.

Catcher processors have a choice of reporting revenues FOB Alaska or Seattle. The Council should consider whether stating a single FOB location for all processors would be beneficial. Such a limitation would streamline use of the data.

Finished pounds – all fisheries – CP-1 and CP-2
This element is intended to provide a measure of the dependence of a vessel on crab fisheries in terms of pounds of products relative to other fisheries. This element is comparable to aggregated finished pounds of all products reported in COAR data and can be accessed in substantially greater detail by analysts from COAR data. **In addition, analysts must note that finished pounds will not necessarily account for all gross FOB revenues, since some inventories may be carried over from the previous year and other inventories may be carried over to the following year.**

Labor costs – all activities – CP-1, CP-2, and CP-3
This element requests the vessel owner to report payments to labor in all activities. These data provide analysts with a perspective of the total labor payments by the vessel and allow an analyst to understand the scale of payments in the crab fishery relative to other activities. These data are not available from any other source.

2.5.6 Structural issues in the alternatives analysis

Consideration of inaccuracy and redundancies in the alternatives analysis
Based on experiences with data collection to date, in considering the benefits arising from the various alternatives two factors in particular must be considered, data accuracy and redundancy. To the extent that inaccuracy limits the utility of data, analytical benefits cannot be derived from the data. Similarly, to the extent that data collected is redundant with data from other sources, no benefit would be derived from those data. These factors are considered in the analysis of alternatives.

The status quo alternative (for all sectors) is structured to collect all crab fishery revenues and variable costs (i.e., those that may be changed in the short term) and non-variable costs to the extent needed to understand variable costs. Data of this scope may be intended to support a variety of analyses, including the analyses of profits and quasi-rents and their distribution, valuation of harvest privileges, regional and community economic impacts, and harvesting and processing employment and payments to labor.

Despite efforts of staff and industry, the current data collection includes several elements that are of limited accuracy. In most cases, this accuracy cannot be quantified, as the true value of the element is not known. This analysis describes the known sources of inaccuracies and, to the extent possible, provides a discussion of the severity of inaccuracies. In large part, the conclusions of the analysis are consistent with those of prior review of the data. In some cases, the analysis has updated conclusions based on new insights into the data element from ongoing reviews and preparation of this analysis.

In general, reviews of the current collection suggest that approximately one-third of the reported elements are not usable. While revisions to some of the elements may overcome some of these shortcomings, it is likely that a substantial percentage of the data will continue to suffer from data quality limitations that

[31] If a processor realizes revenues through other activities and those revenues are reported, this reporting would be different from COAR. As structured, the reporting requirement suggests that revenues are from sales of processed products only.

prevent their use. In addition, one-third of the data are subject to "significant data quality limitations that require careful understanding of the data quality documentation to ensure their appropriate use and interpretation." These data are considered reliable, provided "analytical adjustments" are made to overcome data quality concerns. The remaining third of the data are considered to be of high quality and may be used generally in a manner consistent with their description. As a result of the limitations on use arising from data quality, these data cannot support the range of analyses initially anticipated. In considering the effects of the status quo, this analysis of alternatives considers these data shortcomings. In other words, to the extent that inaccuracies make those data unreliable, those data are not considered to be unusable for analyses and without value. In addition, data that are usable in a qualified or limited manner are assessed in this analysis subject to those limitations. Where accuracy problems can be addressed through modification of the collection, possible modifications are suggested and the potential utility of the resulting data is discussed. Similarly, some accuracy issues are likely to arise under the action alternatives. The benefits of those elements of the action alternatives are qualified based on their potential inaccuracies.

In addition to data quality limitations, several elements of the data collected under the status quo also are duplicative of other data collection programs. In some cases, redundancies are partial, with collected data providing some additional information. The analysis of alternatives also considers these redundancies, with only new information (unavailable from other sources) providing an information benefit.

Administrative costs

Although the collection of data is adapted for each of the applicable sectors, the data collection program is administered by NOAA Fisheries as a single program. Consequently, the analysis of administrative costs of the catcher vessel alternatives applies equally to shore-based and floating processors, and catcher processors in most respects. To avoid redundancies, the analysis of shore-based and floating processor alternatives and catcher processor alternatives does not repeat the catcher vessel discussion, but references it. Any differences across sectors are identified under the applicable alternatives.

2.5.7 Catcher vessel alternatives

This section examines the alternatives applicable to catcher vessels. The status quo collects a broad range of elements that are intended to support a wide range of economic and social analyses. The action alternatives are less ambitious in their scope, scaling back the data collection to include substantially fewer variables.

2.5.7.1 Catcher vessel alternative 1 (status quo)

The status quo collects a wide array of data from vessel operators in the crab fisheries.

Data utility and benefits

The first section of the status quo collects data on fishing activity, including fish ticket numbers, days fishing, and days transiting and offloading by crab fishery. These elements are useful for examining operational efficiencies; however, although not exactly duplicative, each of these elements is redundant with data from other sources. Given that analysts can estimate these elements through other sources, which likely carry a similar degree of inaccuracy, their collection in the status quo provides little or no benefit.

The second section of the status quo collects data on revenues and deliveries. Although other sources of data exist for revenues, none distinguish revenues by share type (i.e., Class A IFQ, Class B IFQ, and C share IFQ). As an important and novel component of the rationalization program, information concerning the differences in landings prices arising under the different share types is important to understanding the program's effects. Class A IFQ landings are subject to IPQ and regional landing requirements. Terms of

these landings may also be decided by the arbitration system. Prices for these landings are one factor reflecting on whether this unique structure is working as intended. Class B IFQ landings may be marketed freely. Prices for these landings are another indicator of market function for landings. C share IFQ are subject to limitations intended to ensure that they are held exclusively by active participants in the fisheries. These shares are only 3 percent of the IFQ pool. Price information concerning landings with these shares provides important information for assessing whether their holders (who may not own vessels) are able to effectively integrate their use into the fisheries.

The status quo also collects information concerning the use of "vessel owner's" shares by the reporting vessel and other vessels along with any lease payments from these other vessels. In addition, all shares "leased" to the vessel and payments for those leases are reported. Shares of crew leased to the vessel and the payments for those shares are also reported. The intention of this reporting is to gain insights into the leasing of shares and the market for those leases. As noted in the discussion of elements, the instructions fail to define the terms "vessel owner" and "lease" for purposes of determining the information to be reported. Given the complexity of ownership structures and cooperative arrangements, these data are of very little value.[32] This alternative also collects the leases of shares to the vessel by crew. As with other lease information, this reporting does not distinguish market rate leases from other arrangements under which crew compensation is affected by the crewmember's compensation. In addition, under many cooperative arrangements C share IFQ are pooled in the cooperative with their use integrated with other cooperative shares (often without specifically considering the vessel on which crew are employed). These arrangements are not consistent with the current reporting that examines only the direct leasing of shares by a crewmember to the vessel on which that crewmember works.

Crew data collected under this alternative allows analysts to understand gross payments to crew and captains. Information concerning deductions and charges, crew share percentages, and number of crew by fishery provides some general information, but lacks the detail needed to improve the understanding of these factors over existing information sources (including other quantitative sources of data and anecdotal information).

At the most basic level, data collected concerning crab fishing costs in the current reporting are intended to provide analysts with information concerning operating costs and changes in those costs in the fisheries. In addition, analysts intended to combine these cost data with other data to perform more sophisticated analyses (such as analyses of quasi-rents and profits). Although the specific data requested are largely unavailable from other sources, the data quality limitations greatly complicate use of the data. Some of elements intended to collect fundamental operational information (such as bait costs and pot costs) are both difficult to accurately collect and may not accurately represent firm level costs because of the operational practices (such as pooling of pots and harvesting of bait). Vessels that participate in other

[32] While attempts could be made to define "vessel owner" and "lease", those efforts are likely to be futile. Overlapping ownership of vessels and share holdings, together with the increasing prevalence of cooperative arrangements that pool shares for harvest, at times without compensation for overharvests and clean up harvests, prevent a comprehensive collection of data concerning the distribution of share harvests and prices for transfers without contemporaneously collection all agreements and ownership information. If the Council wished to pursue that course, it could revise this alternative to include such an element. The burden associated with the collection, use, and interpretation of these data is likely to be very substantial. Whether the collection would yield useful information is uncertain. Attempts to characterize the distribution of share holdings based on current information used to administer caps on share holdings have found the complexity of overlapping ownership structures a substantial barrier. Integrating those data with vessel ownership data and attempting to discern the degree to which transfers are among independent parties (as would be needed to use this means of understanding the lease market and arm's length prices) is likely to be even more challenging.

activities cannot isolate crab specific costs (such as insurance premiums and wharfage costs) and proration methods differ across the fleet. These complexities have been a barrier to consistent reporting, leaving analysts unable to accurately interpret the data.[33] Due to these shortcomings, little accurate and consistent data are provided to analysts by this section of the status quo.

Vessel cost data collection under the status quo is intended to improve analysts' ability to understand the causes of changes in crab fishing operations. For example, a substantial vessel investment could improve vessel efficiency. In the absence of information concerning vessel investments, a change in operational costs could be attributed to other factors. This section also collects repair and maintenance costs, insurance premiums, fuel purchases, and other vessel costs. Each of these elements suffers from some data quality issue. Reporting of a cost as either an investment cost or a repair and maintenance cost is somewhat discretionary and may depend on the vessel owner's position with respect to tax deductions. Insurance premiums could include several different types of insurance, some of which may not be carried by all vessels. In addition, the coverage may vary substantially from vessel to vessel and company to company. Analysts' interpretations of these data are not likely to be consistent or accurate. Overall fuel purchases can be accurately reported, but interpreting these costs may be difficult, as year end inventories are not reported and information concerning activities other than fishing (such as transiting and tendering) is not available.[34] Since "other vessel costs" are an open ended item that is not consistently reported, it cannot be used by analysts for any purpose other than examining the types of expenses incurred by vessels.

The last section of the status quo includes elements that apply to all activities of a vessel, including days at sea, gross revenues, total pounds landed, and labor costs. These data are believed to be accurately reported. Analysts, however, must consider that reported days at sea, gross revenues, and labor costs may arise, in part, from non-fishing activities. Gross pounds landed do not include non-fishing activities. These data when used with crab specific costs previously reported may provide some indication of the importance of crab fishery operations to a vessel. In some cases, such as days at sea, interpreting these data may be difficult, since non-fishing activities could include transiting (which may be related to crab fisheries or other fisheries) and tendering and research charters (which are unrelated to crab fishing).

A few sections of the status quo data collection stand out as providing useful, accurate information that is not available from other sources. Revenues from landings by share type and crew compensation amounts provide information relevant to fishery managers and policy makers that are unavailable from other sources. Yet, within this section, the reporting of crab size and quality has little utility, given current pricing practices, which has not distinguished size or quality. Whether pricing these practices will continue into the future is not known.

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[33] In some cases, other existing data sources may be available that provide reasonable information concerning these elements; however, those data most often do not include cost amounts. For example, information on pot usage is available through pot registration and pot pull data. This pot usage data also provides some information concerning bait usage by analysts who have a general understanding of baiting practices. These simpler methods of discerning information concerning operational aspects of the fishery are clearly not comparable to direct cost data; however, without accurate cost information, these alternative data sources provide analysts with a reasonable understanding of certain operational components of the fishery and changes in those components over time.

[34] It should be noted that these fuel data cannot necessarily be used with fuel costs by crab fishery for a few reasons. First, current data on fuel use by fishery are not considered accurate. Second, those data do not show date of purchase or vessel inventories. As a result, analysts may not be able to identify the percentage of a vessel's fuel use in the crab fishery on an annual basis. Crab fishery use might be identified as a percentage of annual purchases, noting that inventories may be carried over at the beginning or end of the year.

In addition, captain and crew compensation reported in the crew section are informative for examining differences in pay across the fleet and over time. In addition, permit holder and crew license information give some perspective to analysts on the number of crew employed in the fisheries and the geographic distribution of crewmembers. Other information in this crew section has some limited utility. Net revenue shares and deductions and charges that are reported provide incomplete information on the structure of crew contracts, but cannot be fully (and reliably) interpreted in the absence of more complete information from crew contracts and settlement sheets. Likewise, crew license numbers and CFEC permits may provide some information concerning the demographics of crew, but demographic data associated with license and permit numbers may not be reliable. If those demographic data are improved in the future, these data could become more useful. In addition, since license and permit data collected under this alternative do not show the amount of participation by any crewmember, apportioning crew compensation among reporting crews will not be possible.

Information in the last section of the reports concerning days at sea, revenues, and labor costs also provide some general perspective on a vessel's relative dependence on and involvement in crab fisheries in comparison to other activities. These data also provide only general information concerning the scale of basic vessel operations. Given the difference in types of operations a vessel may undertake (such as tendering and fishing) and the lack of information concerning some of these operations, these annual data will only reflect general levels of activity for comparison with levels in the crab fisheries.

While this collection provides analysts with data to examine a few important aspects of crab vessel operations, the alternative fails to achieve its broader objective of providing analysts with information to perform broad scope analyses of vessel costs, quasi rents, and profits. Each of these analyses requires relatively comprehensive cost data. Although the current program attempts to collect those data, much of the information reported considered inaccurate preventing its use altogether or of limited accuracy, requiring analysts to qualify its use. These limitations leave analysts without the data needed for the broad scope analyses of production originally intended to be supported by this collection.[35]

Administrative costs

NOAA Fisheries is responsible for analytical, budgetary, and regulatory functions associated with the data collection program. The program is, largely, administered by NOAA Fisheries through contracts with Pacific States Marine Fisheries Commission, (PSMFC) which serves as an independent third party data collection agent.

Administrative costs associated with the status quo alternative arise from the production and distribution of data collection forms, processing of completed forms, data entry, data verification, and data management. The majority of these costs were either initial startup costs incurred when the program was initiated, or are annual fixed costs that vary little from one year to the next. Technology infrastructure costs to support the data collection and database administration are largely fixed cost investments, and do not vary significantly with the number of variables collected or the number of submitters. It is expected that these fixed costs will be distributed over additional data collection projects, pending action by the Council.

Electronic data submission is supported and encouraged, to minimize data entry costs and associated errors. Participants are notified annually by certified mail of the requirement to complete the data report, with instructions for using electronic formats of the form (available on the PSMFC crab data collection

[35] It should be noted that, to the extent that the Council could elect to make revisions to the current data collection as a part of this action under a revised status quo alternative, revisions to the conclusions of this section may be needed.

webpage) or for requesting delivery of a paper booklet. Electronic formats available include pdf files for download, which can be filled out and submitted electronically, or printed and submitted on paper. The catcher vessel data collection form is currently available as an online web form, which is accessed by the submitter via secure login credentials supplied in the certified mail notification. The web form version provides access to a crew license number lookup and incorporates a variety of error detection functions to minimize data entry error and the need to call back the submitter for clarification or correction. Approximately 65 percent of catcher vessel data forms are submitted electronically. NOAA Fisheries plans to adapt the catcher vessel forms into a form that supports electronic spreadsheet format to support partial automation of data export directly from the submitter's computerized record systems into the form after Council final action. This adaptation should improve support for data quality control by streamlining submissions and reviews of forms. Until electronic signatures are accepted, all submitters must provide a hard copy of the signed Certification Pages found at the beginning of every form. Each of these distribution methods have ongoing costs associated with updating data forms and web interfaces as well as materials and postage. Administrative costs associated with production and distribution of data forms under the status quo alternative are likely to decrease once all of the data forms are available online.

Processing of data forms includes tasks associated with tracking responses for each field or variable in the data form and maintaining and populating the database. Under the status quo alternative, data processing and entry costs are largely fixed, but will vary annually with quality of responses and the number of data forms received.

Administrative costs associated with data verification arise largely from audits conducted under a contract administered by PSMFC. Two types of data audits are conducted under the program: 1) random audits to review and verify a subset of the data values reported in randomly selected, and 2) outlier audits to review and verify a subset of the data values reported in data forms in which NOAA Fisheries identifies multiple outliers. Under the status quo alternative, the number of data audits conducted and total cost of data audits has decreased as NOAA Fisheries has eliminated audits of variables that are of unreliable quality and as industry has adapted record keeping to the accommodate the reporting requirement and associated audits. Validation of some of the most severely quality-limited variables has been suspended pending Council action to revise the data collection. Validation costs are expected to decrease further under the status quo as electronic submissions are developed reducing data entry errors.

Total agency administrative cost for the data collection program was estimated to be $293,258 for 2009-2010, representing 12.3 percent of total expenditures by NOAA Fisheries in managing the crab rationalization program in that year. This cost is considered to be an estimate, and a high estimate at that, because the portion of these monies allocated to Pacific States Marine Fisheries Commission ($128,955) includes both administration costs of the data collection program and costs of the Joint Electronic Reporting program (which are not for the data collection program). As expected, total annual cost of administering the data collection program has decreased since 2005-2006 when program costs exceed $500,000. As a percentage of total annual agency costs associated with the rationalization program, data collection costs have ranged from a low of 10.9 percent (in 2006-2007) to a high of 18.7 percent (in 2007-2008).

Industry reporting costs

The Paperwork Reduction Act (PRA) filing states that the time for completing a single vessel report under the status quo is estimated to be 37 hours; however, since vessel operations and recordkeeping practices vary greatly, the actual reporting time for any vessel report may vary substantially from this estimate. Time creating records by vessel operators and managers and consolidating records by managers and accountants can either reduce or add to this estimate. For example, as respondents have developed more familiarity with the reporting requirements, many have adapted their recordkeeping to streamline the

reporting process. As a result, some respondents have successfully reduced reporting time well below the PRA estimated time. Others remain at or near the PRA estimated time.

Reporting of fishing elements (such as fish ticket numbers, days fishing, and days traveling and offloading) requires vessel operators to record these data, which are passed on to vessel managers and accountants for later completion of the report.

Delivery and revenue elements are tabulated by vessel managers. Landing poundage and deadloss are relatively straightforward to report (as those data appear on fish tickets and landing reports). Reporting of revenues by share type can be substantially more complicated. At times, common prices are paid for all pounds in a landing, regardless of the share type, in which case, the payment can be prorated based on pounds landed. Even in this circumstance, post landing adjustments can be paid months after a landing, requiring tracking of the payments over time. In more complicated instances, post delivery payments may be made for several landings from multiple vessels in a cooperative including landings using several different share types at a single time. Unbundling these payments and distributing portions of those payments across the different share types and vessels, as required by this reporting, can be complicated. This section also requires reporting on the use of vessel owner's shares on the reporting vessel and other vessels, as well as the use of other persons' shares by the reporting vessel (i.e., leased shares) and payments for those shares. These sections require the reporting vessel owner to make some determination concerning which shares belong to the vessel owner and which belong to others. With all shares allocated to cooperatives and increasing cooperative fishing (i.e., cooperative members pooling shares rather than transacting through two party leases) separation of shares in the manner sought by the collection may not always be possible. In addition, some transactions include post-landings adjustments and cost sharing arrangements (under which the lessor shares in vessel operating costs), which further complicate calculation of lease payment amounts. These bookkeeping exercises require additional reporting time for vessel owners, who must make consistent judgments concerning the designation of transactions as leases when reporting. In a simple system with individual share holdings and individual vessel ownership reporting in the form display would be straight forward; however, because of complex ownership structures and the cooperative structure of the fisheries, the reporting burden associated with this reporting system is substantial.

Crew elements currently require a vessel owner to report payments to captains and crew by fishery, general charges and deductions, shares applied to net revenues for payments to captains and crew by fishery, and crew license numbers and CFEC permit numbers. These items are generally straight forward to provide as most items are part of a crew contract and settlement sheet. The reporting of deductions and charges requests only standard practices (since practices may differ across fisheries).

Vessel cost elements reported are intended to capture all variable cost information for crab fishery operations. In addition, most of these data require reporting of the location of purchase to allow for their use to evaluate community and regional impacts. The greatest burden arising from this section of the data collection comes from the need to separate costs by location. This requirement demands that vessel managers and accountants sort invoices for most purchases to identify the location of purchase (if possible). In multiple vessel operations this requirement can be complicated as vessel owners must identify both the vessel incurring a cost and the location of purchase. Costs reported at the fishery level (such as bait and fuel) often require vessel owners to apply some method of estimating or prorating expenses. On vessels that deduct these items from crew compensation, the estimation is typically well established, but on other vessels, prorating costs by fishery can increase the burden, if done accurately. For vessels that operate in multiple fisheries or in multiple vessel operations, many of the other elements require some discretion for separating costs among vessels. For example, wharfage costs may not be charged on a vessel basis on invoices. An owner of multiple vessels must then disaggregate costs across

its vessels for reporting. Depending on the vessel owner and degree of comprehensiveness that the owner intends to exercise in reporting, open ended items (such as other crew expenses and other crab specific costs) could add to the burden of reporting elements in this category.

Vessel costs elements create a similar burden to crab fishery costs, but remove any requirement that these costs be prorated across the various crab fisheries or that crab fisheries costs be separated from costs in other activities. Location of purchase is required to be reported for some costs, which may increase the burden associated with that reporting for costs are incurred in multiple locations. The open ended element - other vessel costs – can impose a differential burden depending on whether the vessel owner chooses to attempt to report other types of costs.

The reporting of general vessel information imposes some burden. Days at sea reporting requires that logs of all activities be reviewed to ensure that all days are accurately included in the count. Gross revenues reporting requires that the vessel owner consult receipts of payments. Pounds landed requires that the vessel owner consult fish tickets (or other landings records). Labor costs require that the vessel owner consult all employee payment accounts.

The reporting burden associated with this alternative is substantial. The reports require the vessel owner to consult both annual fishing and financial records. Although the estimated time for completing each form is currently estimated to be 37 hours per vessel, in some cases, vessels with relatively simple operations (which fish independently and lease little quota) the reporting burden may be substantially lower.[36] Compiling records for the year-end report may take as little as 10 hours; provided in-season recordkeeping is adapted in anticipation of the reporting requirement. Audits of reports also impose a time burden on those vessels that are subject to the audit. The time spent on the audit is dependent on the recordkeeping of the vessel owner. In recent years, audits have been scaled back, as the agency no longer includes data of poor or unknown quality in audits. As a result, vessel operators with well-prepared supporting records have spent as little as 8 hours on an audit. In other cases, audits have taken substantially more time, as the vessel owner has needed to arrange records for review by auditors.

2.5.7.2 Catcher vessel alternative 2

The first action alternative would scale back the data collection substantially from the status quo. This reduction in the scope of the collection would cause the effects of the data collection to differ from the status quo in several respects.

Data utility and benefits

Fishing data would be revised to collect only port and transiting days during which crew were employed on the vessel. Although these data are intended to aid analysts attempting to calculate crew daily pay rates, it is unlikely that these data will be reported in a manner that allows analysts to improve their understanding of daily crew compensation, since many vessels employ only a portion of their crews during these periods. Since data concerning fishing days are available from other sources and port and transiting days can be approximated based on anecdotal information, the fishing data available under this alternative and the status quo are comparable.

Delivery and revenue data would include revenues by fishery and share type, allowing analysts to examine how landings prices vary across share types, vessels, and time, as under the status quo. Quota

[36] The time to complete the form was initially estimated to be 7.5 hours per vessel. This amount was adjusted up to 37 hours in the most recent form.

leased to the vessel would be collected, as under the status quo. These data are likely to continue to suffer from the lack of a good definition of leasing and any distinction of arm's length transactions from other transactions that are not at market prices. These shortcomings will limit reliability of these data for examining share prices and lease rates. Given the absence of sound definitions of leases and failure to distinguish market price transactions, it is unlikely that this alternative will provide improved leasing data, in comparison to the status quo. This section will also require vessel owners to report the number of crew on the vessel that hold C shares. This information could be useful for examining the degree to which vessels employ C share holders and variations in that employment across the fleet. Although of limited use and information value, these data provide a very minor improvement over the status quo.

Crew and captain compensation by fishery will be collected under this alternative. These data have proven useful for assessing changes in compensation over time and across the fleet, as described in the analysis of the status quo. This alternative also would collect all unique crew contracts and settlement sheets. These documents would provide analysts with comprehensive information concerning all changes in crew compensation. Discerning the effects will require substantial efforts on the part of analysts and data managers, as processing individual contracts and settlement sheets will require interpretation. The collection of crew license numbers and CFEC permit numbers provides very limited information, since demographic information associated with license and permit numbers is limited to mailing addresses (which may not be a person's residence) and the level of participation for these license and permit holders is not reported.

Much of the crab fishing cost data will be eliminated under this alternative. The elements that are proposed to be eliminated, however, have quality problems that limit their utility. Location of purchase information, intended to provide information concerning the distribution of economic impacts arising from purchases, are believed to unreliable under the existing data collection; the removal of that reporting requirement in this alternative is not expected to affect the utility of the data. New pot purchases will be reported, but not used pots. These data can be used to understand prices for and quantity of new pots in the fisheries. In the near term, the data are unlikely to represent all of the gear acquired by vessels in the fisheries, given the abundance of used gear available from vessels that have been removed from the fishery; however, over time the new pot purchases are likely to provide a reasonable estimate of the number of pots introduced to the fishery annually and the cost of those pots. These data are likely to be less misleading than comprehensive pot purchase data, which cannot account for the serviceability and condition of those used pots. In addition, analysts can currently use pot registration and pot pull data collected by the State of Alaska to develop a better understanding of the number of pots and their use in the fisheries. These data together with assumptions concerning bait usage, may allow analysts to gain some insights into total bait usage in the fisheries. Such a calculation would suffer from inaccuracies to the extent that variation in bait usage across vessels and over time are not reflected in the assumptions. Fuel purchases will also be collected aggregated across all fisheries (including non-crab fisheries). These data will provide some insight into total fuel purchases by each vessel, but will not provide detail concerning use in any fishery and will not account for inventories carried over from year to year. These shortcomings will prevent fuel data reported under this alternative from being very useful for examining fuel use in the crab fisheries. In addition, without more complete information concerning the scale of a vessel's operations (such as whether the vessel participates in tendering) it may not be possible to come to any conclusions concerning changes in fuel efficiency from analysis of these fuel data.

Similarly, much of the vessel cost data collected under the status quo alternative will be eliminated under this alternative. Aggregated vessel and equipment investments, repairs, and maintenance costs will be collected. These data should provide analysts with similar information concerning these costs to the current collection under which investments are separated from repairs and maintenance, as the distinction may be a result of the vessel owner's tax position (rather than a difference in the type of expenditure).

Insurance premium costs will also be collected under this alternative. While these costs can be accurately reported, analysts' understanding of these costs is likely to be limited as types of insurance and coverage and deductible amounts will not be reported. Analysts will only be able to draw general conclusions concerning insurance costs, without understanding the degree of risk taken on by the vessel, which would arise from choices of coverage.

Annual gross revenues from all activities would be collected under this alternative, as would annual labor costs. The annual revenues would differ from those currently available to analysts since revenues from tendering would be included. In addition, annual labor costs are not available from any other source. These two elements would provide analysts and managers with general information concerning the relative importance of the crab fisheries in comparison to overall operations of the vessel and its crew (but without any detail concerning those operations, particularly tendering). The omission of days at sea in all activities under this alternative will prevent analysts from examining the amount of time crab fishing relative to other activities; however, total days at sea as reported in the status quo would include not only other revenue generating activities, but also transiting in support of crab fishing operations.

Administrative costs

Although this alternative proposes a substantial scaling back of the data collection program the data collection and management structure under the alternative would be very similar to the structure under the status quo. Previously collected data elements removed from the program by this action would remain in historic databases administered by PSMFC, but those data would no longer be collected. There would be some agency cost savings associated with reduced data entry and processing requirements resulting from fewer data entry fields, but because the majority of respondents provide their submissions via an online interface, data collection cost savings associated with removing certain program elements would largely be realized by industry rather than NMFS.

Removal of redundant elements (i.e., those elements that are available from other initiatives such as vessel pot gear usage recorded in the ADF&G vessel registration database and certain quota management elements that may be obtained from RAM records) and inaccurate data elements, would provide some administrative cost savings through a reduction in the amount of time needed to process those submissions.

Elimination or restructuring of data elements as described in this alternative is likely to provide the greatest benefit in terms of administrative cost savings. Approximately one fourth of the variables currently being collected in the program are subject to significant data quality limitations and have not been used in analyses for the Council. Elimination or restructuring of those data elements would provide some administrative cost savings, although as previously described, cost savings associated with elimination of individual data elements are likely to be minimal. Removal of data elements could provide substantial costs savings by reducing the amount of time expended in data verification and during the data audit process, although as previously noted, validation of several of the variables considered for elimination or restructuring has been suspended pending Council action to revise the data collection.

Industry reporting costs

In comparison to the status quo, the costs of data reporting to industry should be reduced substantially under this alternative. The total time for reporting under the alternative is estimated to be approximately 15 hours.

Fishing data reporting will be somewhat reduced from the status quo. Reporting of transiting days and port days will require minor recordkeeping by vessel owners.

The burden of reporting landings and revenues by share type and fishery will be similar to that described under the status quo. Post landing adjustments and pooling of payments to several landings and possibly multiple vessels complicates this reporting. Use of leased shares and lease costs reported under this alternative will be a substantial burden for some vessel owners, similar to the burden under the status quo. This reporting will require vessel owners to make an assumption concerning which transfers will be defined as leases. Once that assumption is made, reporting transfers meeting the definition would be complicated by the variety of fishing, share pooling, and compensation and cost sharing arrangements in the fisheries. Crew license and permit information, along with counts of crew leasing C shares, should be relatively straightforward, provided vessel owners collect that information during the season.

Reporting of crew and captain compensation by fishery is relatively straightforward, since those data are maintain in standard bookkeeping. Reporting of deductions and charges by fishery should also be straightforward to report since those elements are maintained in settlement sheets. Some burden is associated with those elements as several charges and deductions would be reported in each fishery in which the vessel participates. Crew license and CFEC permit numbers should also be relatively simple to report, without a substantial burden.

The burden associated with reporting of both crab fishery costs and vessel costs will be substantially reduced relative to the status quo. Eliminating collection of location of purchase will substantially reduce the burden associated with reporting of these elements. In addition, several elements reported under the status quo are removed from reporting in this alternative, leaving only new crab pot purchases, annual fuel use, annual investments, repairs and maintenance, and insurance premiums. In addition, location of purchase is not required to be reported. Although these elements could require vessel owners to sum costs incurred over the course of the year, the limited number of elements reported will substantially reduce the associated reporting burden.

The burden associated with reporting gross revenues from all activities and labor costs for all activities will also require vessel owners to sum revenues and expenses, respectively, over the course of the year. The overall burden of this reporting is expected to be substantially less than the burden under the status quo.

2.5.7.3 Catcher Vessel Alternative 3

Alternative 3 further scales back further the scope of the data collection program from the second alternative, eliminating data collected altogether from some categories.

Data utility and benefits

As under the first catcher vessel action alternative, crew port and transiting days would be collected with the intention of providing information concerning crew days to allow for the calculation of crew daily compensation. Yet, since not all crew participate in all of these activities these data are unlikely to improve on available information.

This alternative would also collect landings and revenues by share type and fishery. As noted in the discussion of other alternatives, these data are useful for examining performance of the share structure of the rationalization program. Lease data would be limited to revenues and pounds by share type for only arm's length leases. This limited collection is intended to allow analysts to examine lease share prices in the different fisheries. The amount of data that might be collected through limiting data arm's length leases is uncertain. The reliability of share lease market prices produced from these will depend on the number of arm's length transactions reported.

Payments to captains and crew would be reported by fishery, as under the previous two alternatives. These data can be used to examine differences in compensation across time and vessels, as discussed under the previous alternatives. This alternative would also collect all unique crew contracts and settlement sheets. These data are likely would provide analysts with comprehensive information concerning all changes in crew compensation. Discerning the effects will require substantial efforts on the part of analysts and data managers, as processing individual contracts and settlement sheets will require interpretation.

This alternative eliminates all other fishery and vessel operating cost data. While these data are eliminated, analysts will have access to existing data that provide some information concerning changes in operations. Pot registration and pot pull data are available for examining pot use in the fisheries. These data could also provide a proxy for assessing bait usage, using reasonable analytical assumptions concerning bait usage per pot. This alternative will lack costs associated with new pots purchased for use in the fisheries, which would be reported under alternative 2. While that alternative is far from any comprehensive reporting of fishery costs, reporting of new pot purchases would be useful for understanding the introduction of new gear to the fishery. This alternative omits any vessel investment and repair and maintenance costs (collected under both the status quo and the other action alternative), limiting the ability of analysts to examine expenses on vessel upkeep and improvement. Those data could be useful for examining trends in vessel upkeep over time, which some stakeholders and commentators contend should increase in a rationalized fishery. The omission of insurance costs under this alternative will leave analysts without information concerning insurance costs, the loss of information is unlikely to be substantial since no alternative collects information on the amounts by type of coverage. Annual fuel costs are also omitted from this collection. Although those data do not provide information concerning crab fishery operations specifically, they provide information concerning an important overall vessel operating cost. While it is unlikely that cost data can be collected to fully understand the effects of operational and management changes on operational costs, the elimination of all cost data in this alternative leaves analysts without any cost information. As a result, analysts can only surmise how different operational changes may affect operating costs.

This alternative also omits any collection of information concerning overall vessel activities. Analysts will be able to examine vessel fishing catches and revenues using existing landings data, but will not have information concerning revenues from other activities or labor costs, which are collected under the both the status quo and alternative 2. In addition, total days at sea (collected under the status quo) will not be collected under this alternative; however, that element may include transiting to support crab fishing operations preventing any clear separation of days at sea for crab fishing operations from days at sea for other activities.

Administrative costs

The administrative costs of the third catcher vessel alternative are very similar to the costs of the second catcher vessel alternative. As under that alternative, the elimination of elements will provide some savings, but much of the infrastructure supporting the data collection program must remain in place. As a consequence, the reduction in administrative costs will be limited.

Industry reporting costs

The costs of data reporting to industry should be reduced substantially under this alternative from the status quo and slightly from the second alternative. The reporting is expected to be reduced to approximately 8 hours per vessel owner.

Fishing data under this alternative is the same as under the second alternative. Reporting of transiting days and port days will require minor recordkeeping by vessel owners.

The burden of reporting landings and revenues by share type and fishery will be similar to that described under the status quo. Post landing adjustments and pooling of payments to several landings and possibly multiple vessels complicates this reporting. Reporting of leases will be limited to arm's length transactions. This will greatly simplify reporting (in comparison to the first and second alternative), as vessel owners will not be compelled to make assumptions concerning pooling arrangements for purposes of reporting transactions as leases. Counts of crew leasing C shares should be relatively straightforward, provided vessel owners collect that information during the season.

Reporting of crew and captain compensation by fishery is relatively straightforward, since those data are maintain in standard bookkeeping. Reporting of deductions and charges by fishery should also be straightforward to report since those elements are maintained in settlement sheets. Some burden is associated with those elements as several charges and deductions would be reported in each fishery in which the vessel participates. Crew license and CFEC permit numbers should also be relatively simple to report, without a substantial burden.

The burden associated with reporting of both crab fishery costs and vessel costs will be substantially reduced relative to the status quo. Eliminating collection of location of purchase will substantially reduce the burden associated with reporting of these elements. In addition, several elements reported under the status quo are removed from reporting in this alternative, leaving only new crab pot purchases, annual fuel use, annual investments, repairs and maintenance, and insurance premiums. In addition, location of purchase is not required to be reported. Although these elements could require vessel owners to sum costs incurred over the course of the year, the limited number of elements reported will substantially reduce the associated reporting burden.

The burden associated with reporting gross revenues from all activities and labor costs for all activities will also require vessel owners to sum revenues and expenses, respectively, over the course of the year.

2.5.8 Shore plant and floating processor alternatives

This section examines the alternatives applicable to shore plants and floating processors. As under the catcher vessel alternatives, the status quo collects a broad range of elements that are intended to support a wide range of economic and social analyses. The scope of the action alternatives is much narrower than the status quo.

2.5.8.1 Processor alternative 1 (status quo)

Data utility and benefits

The first section of the status quo collects data on production activity, including first and last production dates by fishery, processing days by fishery, raw pounds by fishery, and products and processed pounds by grade, crab size, and box size by fishery, as well as an identifier of custom processing. These elements are useful for examining production; however, they are largely redundant with data collected through other initiatives. The distinction of production by grade, crab size, and box size under this data collection is unique. Currently, many processors report a large share of their catches as mix size and mixed grade (as defined in the collection instructions). Whether this grade and size distinctions reflect operational differences or inconsistent reporting practices is uncertain. Box size reported information shows a large variety of reporting.

The second section of the collection includes revenue information from crab sales similar to COAR reports but identifying crab grade and size and box size. As noted above, this reporting differs from

COAR data, in that only actual sales are reported, whereas COAR data includes estimated values for all production from the year. In addition, the data collected in this reporting also distinguishes sales to affiliated companies from sales to unaffiliated companies. Custom processing revenues are also included in the revenue section of the reports. These revenues are unavailable from other sources. Revenue reporting is incomplete, since crab buyers that do not actively process (but contract for custom process all crab production are not required to report). This results in some crab sales being omitted from the reporting.[37]

In considering the differences between collected production data and collected sales data in this reporting, it should be noted that inventories may be retained at year end (resulting in some sales of the preceding year's production and some inventorying of the reporting year's production). In addition, it is possible that some production is repackaged prior to sale. This repackaging is not reported on a fishery basis but only as an aggregated cost. Consequently, it is unlikely that production can be matched to sales. Analysts instead will need to make some assumptions concerning inventories and repackaging. Over time, some insights may be gained into the amount of reprocessing and repackaging occurs prior to sales based on inferences drawn from comparing production and sales (with reasonable uncertainties arising from possible inventories).

The labor section of the processor reports include, for each crab fishery, average processing positions, man-hours, total payments to processing labor, and counts of processing employees by residence. Average processing positions is not believed to provide an accurate estimate of the number of workers used, as staffing may change with needs. In some cases, a plant may switch from one line to two lines, with large changes in the number of workers. Since instructions provide no reporting directions for these circumstances, it is possible that reporting is very inconsistent across processors. Separation of data by crab fishery in this section appears to result in poor estimates, as processors in multispecies fisheries are reported to move personnel among processing lines based on immediate labor needs. Consequently, man-hours and payments to labor suggest variations in annual average hourly wage rates of over 100 percent in each fishery during the first five years of the program. Given the poor quality of reporting of those data, it is questionable whether any of the elements in this section can be accurately reported at a crab fishery level.

Custom processing services purchased is also reported in the status quo, including raw crab inputs, product and process, crab size and grade, box size, finished pounds, and processing fee. Although the data requested is clear, a reporting entity must decide whether the entity contracting for the custom processing is the same as the plant owner (in which case reporting is required) or a different entity (in which case, reporting would not be required).[38] Potential inconsistencies in this determination could complicate interpretation of these data. These data are not available from other sources. These elements, however, are largely duplicated by the reporting of custom processing revenues by processors contracted to perform that processing. Since these data cannot be directly associated with sales, because of inventory carryovers from year-to-year and repackaging prior to sales, it is not clear that additional information is gained by collecting these data from both the processor of the crab and the person contracting for those processing services.

[37] If the Council elects to maintain the status quo, it could consider requiring persons that purchase crab and sell crab products (but not actively process crab) to report their purchases and sales.

[38] If the company contracting for custom processing is different from the vessel owner, reporting may be required as a part of a separate submission.

Raw crab purchases are collected in the next section of the reports. These data are similar to COAR, but distinguish purchases by share type, grade, and crab size. Price distinctions by share price in collected data follow a predictable pattern with slightly higher prices for purchases of crab that are not constrained by regional and IPQ landing requirements. The data collected to date suggest that size and grade distinctions either are of little importance or are not applied in the manner directed by the data collection, as price information shows no consistent pattern.[39] These data are also incomplete, as persons who purchase raw crab exclusively to have that crab custom processed are not required to report.[40]

A broad array of crab processing costs is collected under the status quo. Most costs are aggregated across crab fishery operations, with the exception of fishery taxes, broker fees, and leased pounds of IPQ. Data quality issues limit the usefulness of these data, which are not available from other sources. In most instances, processors are required to prorate costs between crab fisheries and other fisheries to report these data. In any multispecies plant, processing and packing materials, food and provisions, broker fees and promotions, freight for supplies and for crab products, product storage, water, sewer, and waste disposal costs are to some degree incurred in an integrated manner to support all operations. No proration method is specified in instructions for reporting these elements. Given the absence of instructions and the difficulty in separating costs among different operations, it is very unlikely that these costs are consistently reported across processors.[41] In addition, for some variables (such as promotions and broker costs) any consistent method of proration is unlikely to accurately apportion costs, as apportionments may vary with circumstances. The difficulty in determining whether these data are accurately and consistently collected and how to address any inaccuracies and inconsistencies poses a substantial challenge to any analyst using these data and may bring into question any results.[42] Location of purchase is reported for most of these elements, however, that information is not believed to be reliable.

General plant costs collected under the status quo are intended to provide analysts with plant level costs, which when used together with crab processing costs, provide an indication of total costs for processing crab products, and when used with crab revenues can be used for analyses of profits and quasi-rents. These data include annual fuel and fluid costs, plant and equipment investments, repairs and maintenance costs, salaries, and other plant costs. As with other cost elements, reporting of these elements requires some discretion on the part of the processor, as some expenses related to ancillary facilities (such as housing) may (or may not) be reported. These uncertainties could lead to inconsistencies both across processors and over time. As a result, the reported amounts may reflect either differences in processing operations (and associated facilities) and their costs or choices in reporting. Location of purchase is reported for investments and repair and maintenance costs; however, those data are not believed to be accurate.

General processing information collected under the status quo is intended to provide analysts with information concerning the overall operations that can be used to assess the dependence of the plant on

[39] The inconsistency likely arises from current practices which allow a certain percentage of a delivery to be low quality, without price adjustment. Processors may either report a mixed crab with a single price or part of the crab as standard and part as substandard, with both parts receiving the same price.

[40] These data could be included in the collection in the future, should the Council elect to continue the status quo collection; however, these price information is available from catcher vessel reports.

[41] Whether a proration method is available to accurately apportion costs among different operations is not known. Proration methods may vary across the different elements. For example, an accurate apportionment for water, sewer, and waste disposal may not be applicable to food and provisions.

[42] An alternative to collecting these elements on a crab fishery basis or aggregated across all crab fisheries would be to collect the elements in an aggregate form. Although the data would be less useful for examining specific aspects of crab fishery operations, the data could likely be reported more accurately and consistently.

crab fishing relative to other operations. Of the elements reported in this section, only total labor costs provide data that are not available (directly or through reasonable estimates) from other sources. That factor, however, cannot be compared with crab labor costs, as that element is not accurately reported.

Administrative costs

The administrative costs of the status quo processor alternative are largely as described for the catcher vessel status quo alternative. One difference is that the processor versions of the current form are available in electronic spreadsheet format to support partial automation of data export directly from the submitter's computerized record systems into the data collection form. This format simplifies submission of forms and reduces the data entry burden. The number of entry errors should also be reduced, resulting in a further reduction in administrative burden associated with correcting identified errors.

Industry reporting costs

The broad scope of the status quo data collection results in a relatively large reporting burden for processors, in comparison to the other alternatives. The time for completing each form is currently estimated to be 48 hours per plant.[43] The burden associated with the different elements will often depend on the scale of operations. For example, a plant that receives many deliveries from many cooperatives and vessels will have an increased reporting burden relative to a small plant that takes deliveries from only a few vessels. Similarly, plants that do little custom processing will have a relatively small burden associated with reporting custom processing.

Production data reported in the first section of the report is largely parallel with the reporting of production in COAR reports. The requirement that production be reported by crab size and grade and box size (which is not included in COAR reports) adds a layer of complexity to this reporting requirement, increasing the burden relative to COAR data.

Similarly, revenue reporting closely parallels COAR reports with a few added elements. Revenues are limited to actual sales, with sales distinguished by crab size and grade and box size. In addition, sales to affiliates are distinguished from sales to unaffiliated buyers. These distinctions add slightly to the burden associated with this reporting.

For most processors, labor reporting requires the processor to develop a means of separating crab processing man-hours and payments from man-hours and payments in other processing activities. In addition, processors are required to identify personnel that worked in crab processing and report their residence. Requiring processors to isolate crab processing activities increases the burden associated with this reporting substantially. In addition, worker residence information imposes a substantial burden, as it requires reviewing the personnel file of each employee.

Under the custom processing services purchased section, each processor reports crab production in each fishery from custom processed crab and its costs for purchasing those services. Reports distinguish purchased production by product, process, crab size and grade and box size. These data impose a slight burden on reporting processors.

Crab purchases are reported by fishery with purchase distinguished by share type and crab size and grade. These data are similar to COAR data, but distinguish landings by share type and crab size and grade. The

[43] The time to complete the form was initially estimated to be 10 hours per plant. This amount was later adjusted up to 48 hours.

burden associated with this section is minor, but it is not clear that grading and sizing are consistently reported. If consistent methodology is developed, the burden associated with the reporting could change.

Crab processing costs reported include a broad range of cost data, including taxes and fees, processing and packaging materials, supplies and equipment, food and provisions, freight, repackaging, brokerage services and promotions, product storage, water, sewer, and waste disposal. The burden associated with reporting these costs is substantial, as they cover a wide range of costs incurred in a variety of locations. Most elements must be prorated further complicating reporting. Some elements are reported by location of purchase, which increases the burden significantly, as tracking (or attempting to track location of purchase often requires reviews of individual invoices.

General plant costs include fuel and fluid costs, plant and equipment investments, repairs and maintenance, salaries, and other plant costs. These elements also create a substantial reporting burden, as investments and repairs and maintenance are required to be reported by location of purchase.

General processing information includes processing days, gross revenues from all fisheries, finished pounds of all fisheries products, and total processing labor costs. These elements impose a minor burden. Processing days is generally estimated based on processing and landings data from the plant, Revenues and production are available by summing data from other data reports. Labor costs are unique to this data collection.

2.5.8.2 Processor alternative 2

The second processor alternative removes several of elements from the current data collection. Most notably, most elements of the production data (which are similar to COAR data) and processing and plant costs (much of which suffer from data quality limitations) are not collected.

Data utility and benefits

Production data are omitted from the second alternative, with the exception of the first and last day of processing in each fishery and the number of days of processing. Although these data are intended to inform analysts concerning the degree of capacity utilization by a plant, the reported data in this section could be estimated based on landings data from fish tickets. Consequently, these data provide no information that is not available from other sources.

Revenue data collected under this alternative are the same as those collected under the status quo. These data allow analysts to distinguish sales to affiliated entities from sales to unaffiliated entities, which cannot be done with other data sources. Reporting also distinguishes sales by crab size and grade and box size. Size and grade distinctions incorporated into the reporting do not appear to correlate with sale price differences to date. If market (or reporting) practices change in the future to make the distinctions identified in the reporting more consistent with price differences, it is possible that these reports could be useful. Custom processing revenues are also reported in this section. Those data are unavailable from other sources and may provide some insights into the costs of processing and markets for custom processing services in the fisheries.[44]

[44] If the Council selects this alternative, it should consider broadening the collection to require reporting by persons who purchase raw crab and sell processed products, but who do not actively process crab. Including non-processing raw crab buyers in the collection will ensure that comprehensive data are collected for those purchases and product sales.

Labor data is similar to the status quo, but excludes the reporting of average processing workers per fishery. As under the status quo, the data collected under this alternative are likely to be inaccurate, due to the movement of workers between lines and processing activities as demands changes. This reporting provides little additional information concerning processing employment to analysts, as data are of unknown accuracy.

Custom processing services purchased are also reported. These data elements parallel the reporting in the COAR, but include custom processing costs. The reporting in this alternative differs from the status quo by excluding crab size and grade and box size. Currently, crab grade and size do not appear to be consistently reported, as pricing seems to bear no consistent relationship to those variables. Box size reporting shows a variety of sizing, but primarily bulk production. Changes in the amount of custom processing production of various box size categories can be examined, as well as differences in processing prices for different size packs using these data.

Crab purchases by share type are collected under this alternative. These data allow analysts to examine price variations with the different share types, as under the status quo. Unlike the status quo, crab size and grade distinctions are not reported. Currently, those elements are not reported consistently across processor, so no information is obtained through those data under the status quo at present. If pricing and changes were to occur, it is possible that the status quo would provide information concerning price variation with size and grade of crab, which would not be available under this alternative; however, given the inconsistencies in reporting, it is also possible that the changes in pricing would not be revealed by under the status quo.

Most processing and plant cost information are omitted from this alternative. Only IPQ lease costs by fishery and salaries are reported. Lease cost data are important to analysts attempting to understand the value of those shares. Cost information collected under the status quo is generally known to suffer from quality limitations that severely limit their reliability. These shortcomings limit the difference in information under this alternative in comparison to the status quo.

General processing information collected under this alternative is the same as that collected under the status quo. As noted under that alternative, total processing labor costs are the only information that are not available from other sources.

Administrative costs

Administrative costs should decrease slightly under the second processor alternative. By reducing the number of elements for which data are collected, some minor reduction in administrative costs should be realized. This cost reduction is unlikely to be very substantial, as much of the administrative costs arise through the data collection structure in general, rather than on an element by element basis.

Some administrative costs savings should also be realized through the elimination of inaccurate elements that disproportionately require more in-depth review in the audit process. Audit costs savings arising from the elimination of these elements is likely to be the most significant administrative difference between this alternative and the status quo.

Industry reporting costs

The second processor alternative reduces the industry burden of the data collection substantially, primarily by almost eliminating the collection of production data and plant and operating costs.

Production data are limited to the collection of the first and last day of processing and the number of active processing days in each fishery. A process can easily generate estimates for this reporting from fish ticket or processing records.

The crab sales data collected under this alternative are the same as the sales data collected under the mare reported by crab size and grade and box size. In addition, custom processing revenues are reported by product and process. The burden associated with reporting these elements is the same as the burden associated with these data under the status quo.

Labor data reported under this alternative is the same as under the status quo, except that the average number of crab processing workers per fishery is omitted. Since that number is typically estimated based on the recollection of the plant operator, the burden associated with this section is very similar to the status quo.

The reporting of custom processing services purchased under this alternative are similar to the status quo, but crab size and grade and box size are omitted. These data are very similar to those reported in the COAR, which omits the collection of custom processing fees. As a result, the burden associated with this reporting is not substantial.

Crab purchases are reported by share type in a manner similar to the status quo. Unlike the status quo, this alternative does not distinguish these purchases by crab grade and size, decreasing the burden associated with this reporting slightly.

Crab processing costs are largely omitted from this collection, as processors are only required to report IPQ leases. This reduces the burden substantially from the status quo, which requires fairly comprehensive reporting of costs, along with location of purchase in some instances. Likewise, most plant costs are removed from this alternative, with only payments to foremen, managers, and salaried employees remaining. This substantially reduces the burden associated with reporting under the status quo.

General processing information reported under this alternative is the same as that reported under the status quo, so the burden associated with that reporting is also the same.

The burden associated with this alternative is substantially less than under the status quo, as a result of the removal of crab processing costs, which may take considerable effort to attempt to isolate from processing costs in other fisheries. The overall burden associated with this collection is likely to be approximately 18 hours, with most of that time required for the estimate of sales and custom processing data that are more detailed than required for COAR, generating labor estimates, and reporting crab purchases after price adjustments.

2.5.8.3 Processor alternative 3

The third processor alternative is similar to the second processor alternative, with changes in the reporting of labor data.

Data utility and benefits

The utility of data collected under this alternative is the same as that collected under alternative 2 (described above) except for the utility of labor data. This alternative collects man-hours and total payments for processing labor aggregated across all fisheries. These data are likely more accurate than data reported on a crab fishery basis, which must be prorated based on estimated time that employees spend in different processing activities. Most processors report that line assignments change with

demands, preventing accurate reporting of this element on a crab fishery basis. Reporting of crew residencies would also be on an aggregate plant basis (rather than for crab fisheries processing workers). Although the data are likely to suffer from inaccuracies in residency information gathered by processors, the data will not require processors to attempt to determine which workers processed crab for purposes of reporting. These data will not be useful for examining crab fishery specific impacts, but will likely be more accurate and useful for examining overall impacts of plant operations through income of their employees.

Administrative costs

The administrative costs of the third processor alternative are likely to be the same as those of the second processor alternative. The differences in the alternatives are minor, with only a few elements eliminated by this alternative. These elements could result in very minor cost savings, to the extent that they save on audit costs arising from identified inconsistencies across submissions.

Industry reporting costs

The burden associated with reporting under the third processor alternative is very similar to the burden of the second processor alternative, as the two alternatives are very similar. The burden is reduced slightly by the aggregation of labor data, which is reported for the plant generally, rather than on a crab fishery basis or for all crab fisheries aggregated. The overall burden associated with this alternative is estimated to be 15 hours.

2.5.9 Catcher processor alternatives

The catcher processors participate in both harvesting and processing. Consequently, the alternatives for the catcher processor sector include elements for the collection of both harvesting and processing information. In general, the alternatives are structured similarly to the alternatives that apply to catcher vessels and processors. The status quo collects a broad range of elements intended to support a variety economic and social analyses. The second and third alternatives are less comprehensive, including on fewer elements.

In considering catcher processor data collected, it should be kept in mind that any public reporting of catcher processor data will need to be consolidated with data from either catcher vessels or shore plants and floating processors, as too few catcher processors are active to meet confidentiality requirements to report catcher processor activity separately.

2.5.9.1 Catcher processor alternative 1

The status quo alternative collects a comprehensive harvesting and processing production, revenue and cost data, intended to support analyses of quasi-rents and profits.

Data utility and benefits

The first section of the catcher processor report collects information concerning fishing and processing activities. These data include dates covered by the fishery (i.e., first and last day of operations), days fishing, days travelling to and from port to grounds and offloading, and days processing. Each of these items can be estimated by fish tickets and log books (which are the most likely sources of estimates of these elements by responding catcher processors. The estimates generated by catcher processors using those sources may be inconsistent as a result of different methods of generating the estimates. Operationally, catcher processors may differ from catcher vessels, in that some product may be offloaded in Seattle, without delivery to a local Alaska port. Instructions could be interpreted to either include or exclude this travel time. In addition, the instructions suggest that days traveling include only travel time after fishing and processing. Catcher processors, at times, will complete a substantial portion of the trip to port while processing. These offloads could lead to inconsistent reporting of this element, since a catcher

processor may (or may not) include steaming time to Seattle in their estimates of travel time between fishing grounds and port. The current survey is unlikely to reveal whether this practice (operationally and in reporting) is adopted and may be overlooked by analysts who do not compare fish ticket data with data from this collection. More consistent estimates of time fishing are likely to be generated through fish ticket reports and log books.[45] Since these data may not be consistently reported, but ample information is available through other sources to consistently estimate these time, these data provide little or no additional information to analysts (in comparison to other data sources available to analysts).

The second section of the catcher processor report contains production elements by fishery, including raw pounds processed, product, process, crab size and grade, and box size. Fish ticket and COAR data include crab catch (and deliveries to the processor, if any were made) and crab production. Production data, however, do not include crab size or grade or box size. As with processors, crab size and grade are likely inconsistently reported across catcher processors (some of which report all production as mixed, while others report distinguishing large from small and standard quality from low quality). Changes in management, crab quality, or operational practices could lead to a change this reporting at some time in the future. Box size distinctions could show changes in production should they arise. To confidently use these data, the data must be merged with fish ticket data to determine whether catcher processors received deliveries from catcher vessels. If so, the raw crab inputs and production outputs reported will include both catcher processor production and production from deliveries, which may be relevant when considering production performance and operational costs. To the extent that the use of these data requires an analyst to use fish ticket data to determine raw crab input sources, it is questionable whether the collection of raw crab data has any analytical effect other than potentially confusing analysts (who may not compare inputs to fish ticket data).

The third section of the data collection includes revenues from both product sales and custom processing. As with the processing sector, product revenues are from actual sales only (compared to COAR, which includes estimated values for production that is not sold) with sales to affiliated entities distinguished from sales to unaffiliated entities. In addition, the collection distinguishes sale by crab size and grade and box size. As noted, the distinction of crab size and grade is inconsistently applied across processors. Box size distinctions are problematic to the extent that differences in production and sales may arise from either repackaging or inventories carried over from the previous year. As noted in analysis of processor alternatives, over time some methodologies may be developed for matching production to sales that addresses this mismatch with an acceptable degree of uncertainty. As noted in the analysis of processor alternatives, the collection of custom processing revenues could also present some challenges, as crab size and grade and box size are omitted from the custom processing report (but are included in the production reports). To the extent that sorting or different box sizes lead to different processing costs, those factors are overlooked by this section of the collection. In addition, for catcher processors, it could be unclear whether custom processing is integrated with a harvesting contract. This reporting could be inadequate and misinterpreted, if a catcher processor IFQ holder contracted with another catcher processor to harvest and process its allocation. In such a circumstance, it is unclear whether all charges can (or should) be reported as custom processing revenues.

The next section of the form collects data concerning crab quota. The first portion collects information concerning the use of the "vessel owner's" quota by the reporting vessel and other vessels. As noted in the analysis of catcher vessel alternatives, without a clear definition of "vessel owner", it is possible that respondents may interpret the reporting requirement inconsistently, with some persons assuming only

[45] It should be noted that logbook data are not currently entered into an electronic database. To make use of logbook data, agency staff would need to input those data into such a database.

quota held by the named vessel owner should be reported, while others may report any quota held by entities with ownership overlapping with the vessel owner. The potential for inconsistent interpretations make these data particularly problematic for analysts. In addition, to the extent that the vessel owner's quota that is used by other vessels may be subject to either a market rate lease or an internal lease to an affiliated entity, these data may not provide reliable information concerning market lease rates. The second portion of this section collects information concerning quota leased for harvest by the vessel. These entries also fail to distinguish arm's length transactions and transactions with affiliates, which could mislead analysts concerning both lease rates and the extent to which the vessel harvests leased quota. The absence of clear instructions for reporting creates ambiguities that prevent these data from being consistently reported and accurately interpreted by analysts. This section includes the use of all forms of shares, including catcher processor owner IFQ, Class A IFQ, Class B IFQ, and C share IFQ (but catcher processor C shares are not distinguished from catcher vessel C shares).

The fourth section of the catcher processor report collects data concerning employment and payments to labor. The first section reports captains pay. The second portion is for payments to persons whose pay is "primarily" based on their harvesting work. The third portion is for persons whose pay is "primarily" based on their processing work. Since crews may move between harvesting and processing, this report allows the vessel owner some judgment for determining whether to report a person as a harvest employee or processing employee. Inconsistencies in applying this division may occur over time and across vessels. Consequently, annual compensation data for a vessel, as a whole, may be comparable with data from other seasons and vessels, harvesting compensation or processing compensation data may not be comparable with harvesting and processing compensation data, respectively, from other years or vessels. **The Council could consider combining all catcher processor employees (other than the captain) into a single entry to avoid inconsistencies in assign crews to different work.** The information collected concerning deductions and charges provide only general information concerning those practices, but do not add substantial information over anecdotal information sources. Crew license and CFEC permit information, as well as processing crew residence information, provide analysts with some ability to examine the distribution of employee benefits geographically, but these data do not provide amounts of compensation received by specific employees, requiring analysts to make assumptions concerning the distribution of total employee compensation.

The fifth section collects information concerning custom processing services purchased by the vessel owner, including raw crab inputs, product and process, crab size and grade, box size, finished pounds, and processing fee. As with other sections, the submitter must make a judgment concerning whether the custom processing is being done for the submitter (in which case reporting is required) or some related, but different entity (in which case reporting is not required). Although not available from other sources, these data are largely duplicated reports of custom processing done for others. As noted in the processing alternatives analysis, these data cannot be directly associated with sales, because of inventory carryovers from year-to-year and repackaging prior to sales, limiting their utility.

Raw crab purchases are collected in the next section of the reports. These data are similar to COAR, but distinguish purchases by share type, grade, and crab size. Since catcher processors cannot receive crab harvested with Class B IFQ, the reporting makes no distinction of prices by landing. It should, however, be noted that catcher processors can receive crab harvested with C share IFQ. Prices for these landings could be distinguished from Class A IFQ deliveries. As noted in the discussion of processor alternatives,

to date, size and grade distinctions either are of little importance or are not applied in the manner directed by the data collection.[46]

The variety of harvesting, production, and delivery sections of the current form could confuse submitters and analysts. For example, it is unclear whether a person who contracts for harvesting and processing of crab (but maintains ownership of the product) should report custom processing of that crab in the same manner as a person who contracts custom processing of delivered crab. This alternative omits collection of deliveries and revenues, if a catcher processor also operates as a catcher vessel. This omission could leave analysts with incomplete data concerning fleet price information and coud result in some analysts failing to have complete operational information, if they do not acquire that information from other data sources.

A variety of crab fishery operating costs are collected under the status quo. Many of these costs have little information value because of data quality limitations, preventing analysts from undertaking the broad analyses of quasi-rents and profits intended to be supported by the collection. As discussed in the analysis of elements and the analyses of the status quo alternatives for catcher vessels and processors, the data quality shortcomings limit the information value of these data.

Annual vessel costs are also intended to improve analysts ability to understand the causes of changes in crab fishing operations. Information value of these elements is also limited by data quality issues. If combined, investment costs and repair and maintenance costs together provide an estimate of total expenditures on vessel improvements and maintenance during the year. Annual fuel purchases are believed to be accurately reported, but interpreting these costs may be difficult, as year end inventories are not available.

Annual information is collected in the last section of the status quo. These data are intended to allow analysts to examine the role of crab fishing in the overall operations of the vessel. Revenues, finished pounds, harvested pounds, and processing days may be estimated from other sources.[47] Days at sea (which includes transiting) and annual labor costs, are unavailable from other sources.

Administrative costs

The administrative costs of the catcher processor status quo alternative are largely as described for the catcher vessel status quo alternative. As with the processor versions of the form, catcher processor forms are available in electronic spreadsheet format to support partial automation of data export directly from the submitter's computerized record systems into the data collection form. This structure reduces administrative costs of data entry and reduces data entry errors. This reduction in data errors has a follow on benefit of reducing audit costs arising from identified inconsistencies across submitters.

[46] The inconsistency likely arises from current practices which allow a certain percentage of a delivery to be low quality, without price adjustment. Processors may either report a mixed crab with a single price or part of the crab as standard and part as substandard, with both parts receiving the same price.

[47] It should be noted that total revenues may differ in estimates from that reported depending on how the vessel owner interprets the data request. Some vessel owners may interpret this element as actual sales; some may interpret it as estimate values (in the manner requested by COAR), while others may interpret it as requesting all income (including lease and custom processing revenues). These ambiguities suggest that other sources may provide better information to analysts.

Industry reporting costs

Since the status quo catcher processor alternative is a combination of the catcher vessel status quo alternative and processor status quo alternative, the burden associated with reporting is similar to the burdens of those two reports.

Reporting on vessel activities requires the vessel owner to examine in season records, typically estimating the beginning and end of the season, time spent fishing, processing and traveling and offloading based on fish tickets or internal records. Production of these data is a minor burden.

The second section of the form requires production in each fishery by product, process, crab size and grade, and box size with a custom processing indicator. Most of these data are taken directly from COAR reports, however, the added detail on crab size and grade and box size increases the burden slightly.

The third section of the report contains sales information for each species by product, process, crab size and grade, and box size and custom processing information by fishery, product, and process. This section also closely parallels COAR reports with the addition of crab size and grade and box size for sales and revenues for custom processing. This additional information increases the burden slightly from COAR.

The fourth section of the form collects information on the use of the vessel owner's quota. Depending on the operation of the vessel, this section can create notable burden, since it requires vessel owners to report on the source and cost of all quota used on the vessel. The owner must determine which shares are leased and then report use of the vessel owner's own share, the shares of others by category and lease costs associated with those shares.

The fifth section includes labor information concerning harvesting and processing crews. Harvesting crew elements currently require a vessel owner to report payments to captains and crew by fishery, general charges and deductions, and crew license numbers and CFEC permit numbers. These items are generally straight forward to provide as most items are part of a crew contract and settlement sheet. Distinguishing harvesting from processing employees may not be consistent across vessels or time, as some workers typically move between both parts of production depending on labor demands on the vessel. Payments to processing employees, average processing employees, and residence information are also reported. These data are typically retained in ordinary operations, but require some effort to extract from records and consolidate for reporting.

Custom processing services purchased are reported in the next section. This reporting imposes a slight burden, as described in the processing status quo alternative, which varies depending on the extent to which a party contracts for those services.

Crab purchases from delivering vessels are collected in the next section. The burden from this reporting is similar to that described in the processor status quo alternative. The burden for catcher processors is likely minor, since most catcher processors take few deliveries from catcher vessels.

The burden associated with crab fishing costs is similar to that described for catcher vessels and processors. In general reporting of the location of purchase greatly increases the reporting burden, as vessel owners must sort invoices to determine the location of purchase. The broad range of harvesting and processing costs creates a substantial burden, which is further increased when reporting is required at the fishery level. These elements often require vessel owners to either pro rate costs or attempt to estimate costs (either of which can increase the burden significantly, if attention is given to accuracy).

General annual vessel costs include fuel and fluid costs, vessel and equipment investments, repairs and maintenance, salaries, and other vessel costs create a substantial reporting burden, particularly investments and repairs and maintenance, which are reported by location of purchase.

Annual activities reported in the last section of the report (such as days at sea and f.o.b. revenues) also create a slight additional burden. The information is typically kept in company records (or may be estimated based on company records), but may require some effort to extract and compile.

2.5.9.2 Catcher processor alternative 2

The first action alternative for catcher processors scales back the data collection considerably from the status quo.

Data utility and benefits

Under this alternative, the first section of the catcher processor report on fishing data would be eliminated, as that information can be estimated from other sources. A new section is added for deliveries and revenues by share type when operating as a catcher vessel. Most catcher processors are unlikely to operate as a catcher vessel, but in instances when a catcher processor operates as a catcher vessel, these data could be important to understanding the vessel's revenues.

The collection of production information would be eliminated under this alternative. Analysts would continue to have access to production information through COAR data, but would not have information concerning crab size and grade and box size, which is available under the status quo. If grading, sizing, or box sizing practices change, quantitative data showing production those changes would not be available.

This alternative would continue the collection of sales by species by crab size and grade and box size to affiliated entities and unaffiliated entities. As currently structured, these data would reveal changes in sales by crab size and grade and box size. Sales to affiliates would be distinguished, providing analysts with information to examine market prices.

Information concerning leasing of IFQ would be collected, although no definition of a lease is current specified. In the absence of a definition of leasing and a means of distinguishing arm's length transactions, these data are of little value for determining market prices for shares. In addition, a count of crew providing shares to the vessel for harvest is also collected. This count provides some information concerning the distribution of C share use across the fleet.

Payments to captains, harvesting crews, and processing crews would be collected by fishery. A check bos to indicate whether a captain also owns an interest in the vessel would be added, as that ownership interest could affect the terms of a contract for operating the vessel. The distinction of harvesting crews from processing crews is unlikely to be consistent across time and processors, as workers move between the deck and processing lines with changes in demand. Consequently, these data should likely be combined for analyses. Crew license and CFEC permit numbers and residence information provides general information concerning the distribution of the benefits of employment, but does not identify the distribution of payment amounts geographically. All crew contracts and settlement sheets would be collected under this alternative. These documents could provide very detailed information concerning crew compensation and the factors that affect compensation. Gaining insights from the contracts and settlement sheets would require substantial data management and analytical efforts.

Custom processing services purchased are reported, which parallel the reporting in the COAR, but include custom processing costs. Under this alternative, crab size and grade and box size are not reported. The effects of changes in box size on pricing of services could not be examined using these data.

Crab purchases by share type are collected under this alternative. These data allow analysts to examine price variations with the different share types, as under the status quo. Unlike the status quo, crab size and grade distinctions are not reported, although those elements do not appear to be consistently reported currently. If changes in operational and reporting practices could reveal the effects of those factors, this alternative would not capture data showing those effects.

Most vessel costs are omitted from this alternative. Only new pot purchases and fuel use and cost (aggregated across all fisheries) are collected. As noted in the discussion of catcher vessel alternatives, much of the currently collected data suffers from quality limitations that limit their utility. New pot purchases would be informative concerning the amount and cost of new pots introduce to the fishery. These data together with pot registration information can provide information concerning gear turnover in the fishery. Together with pot pull information, these data can provide analysts with some insights into changes not only in pot usage but also bait usage in the fisheries. Annual fuel cost data collected under the alternative would provide information concerning changes in those costs annually and across the fleet, but would not be useful for examining changes in the different fisheries, which may be important to certain management decisions. Processing data (such as broker fees, repackaging costs, storage costs, and processing and packing materials) also are eliminated from this section of the collection. As noted in the discussion of the processing sector, most of these data also suffer from quality limitations. In most cases, these data are not available on a fishery basis or require submitters to pro rate and/or estimate the costs associated with crab fishing or specific crab fisheries.

Vessel cost data collected under this alternative will be limited to aggregated vessel equipment investments, repairs, and maintenance costs, insurance premiums, and payments to other employees. The elements eliminated by this alternative, however, suffer from data quality limitations that limit their utility. Aggregating investments with repairs and maintenance should not affect use of the data, as the distinction is believed to be inconsistently applied. Insurance premium costs can be accurately reported, but interpretation of these data is problematic since coverage amounts and types and deductibles will not be known to analysts. Employment information is not likely to be consistently reported under the current instructions, since some vessels may report salaries of onshore staff. It may be possible to modify the instructions to ensure that reporting is consistent, but it may not be possible to collect vessel specific information from multiple vessel operations, if shore-based staff is included in the collection.

Annual gross f.o.b. revenues from all activities would be collected under this alternative, as would annual labor costs. The annual revenues would differ from those currently available to analysts, since revenues may include non-fishing activities. Interpretation of these data could be problematic, particularly if some vessels include lease revenues in their reported revenues. In addition, annual labor costs are not available from any other source. These data may provide relevant information concerning the employment compensation effects of the vessels operations. The omission of days at sea in all activities under this alternative will prevent analysts from examining the amount of time crab fishing relative to all other activities combined; however, total days at sea as reported in the status quo would include not only other revenue generating activities, but also transiting in support of crab fishing operations. Estimates of fishing days can be generated using fish ticket data for these vessels, which may be consistently produced by analysts for assessing the time spent in crab fishing in comparison to other fishing. Similarly, the elimination of processing days may limit the ability of analysts from comparing reported processing days in crab fisheries to reported processing in other fisheries. Consistent estimates of processing activities, however, can be generated from fish tickets, which may be used by analysts to compare crab processing to processing in other fisheries.

Administrative costs

Administrative costs should decrease slightly under the second catcher processor alternative, as the number of data elements is reduced. This decrease will be offset by the collection of crew contracts and settlement sheets. The need to enter data from a large number of contracts and settlement sheets and the need to interpret those contracts as a part of that process will add substantially to the administration and management costs of this alternative. Given the move toward online electronic data submissions, it is very likely that the administration of submission of contracts and settlement sheets will be greater than the all other administrative costs of the status quo. This cost reduction is unlikely to be very substantial, as much of the administrative costs arise through the data collection structure in general, rather than on an element by element basis.

As under the second processor alternative, administrative costs savings should also arise from the elimination of inaccurate elements which are more likely to be subject to the outlier audit process.

Industry reporting costs

Industry reporting costs associated with this alternative decline substantially from the status quo, as the substantial portions of the data collected under the status quo are excluded from this collection.

Landings as a catcher vessel will be reported, as well as revenues from those landings. This reporting is unlikely to be substantial for catcher processors.

Revenue data will be reported, as described in the status quo. The burden associated with that reporting will minor, since similar data are reported in COAR data. These data differ in that only actual sales are reported and additional aspects of those sales are reported (including crab size and grade and box size along with distinguishing sales to affiliated entities from sales to unaffiliated entities).

Leased IFQ are reported under this alternative. This reporting is similar to that under the status quo, and will be complicated since no definition of a lease is provided. In addition, a count of crew leasing C shares to the vessel must be reported. This reporting should create a minor burden.

Crew and processing labor costs are reported similar to the status quo. The numbers of harvesting crew and processing crew in each fishery are omitted. The submission of contracts and settlement sheets will require vessel owners to keep track of those records, but will not require processing of information, only submission of the documents. Crew license and CFEC permit numbers and worker residences are reported as under the status quo. In general, all data are maintained in company records, but reporting of the amounts of deductions and charges will increase the reporting burden of this section over the burden under the status quo.

Crab purchase data are similar to that collected under the status quo, but exclude crab size and grade. The burden associated with this reporting is similar to (but slightly less that) the burden under the status quo.

The removal of many elements from the crab fishery vessel costs reduces the burden of reporting under this alternative substantially from the burden under the status quo. Under this alternative, only new pot purchases are included and fuel costs (aggregated across all fisheries). Reporting these elements is a minor burden, particularly in comparison to the status quo. Similarly, the annual vessel costs are reduced to the aggregated investments and repairs and maintenance and insurance premiums. These data are a minor burden to report, particularly in comparison to the status quo.

The burden associated with reporting of annual activities is also reduced slightly from the status quo, by eliminating days at sea, finished pounds, and raw pounds. These items are typically reported based on records, but may take substantial time to consolidate, depending on the vessel's operations.

2.5.9.3 Catcher processor alternative 3

The second action alternative for catcher processors is very similar to the first action alternative, except that a few additional data elements are eliminated from the collection.

Data utility and benefits

The effects of this alternative are the same as the effects of preceding alternative with a few exceptions. First, only arm's length lease information is collected under this alternative. Although this will lead to the collection of information concerning fewer lease transactions, it could improve the quality and utility of the data by providing information concerning market lease rates. The number of crew providing shares to a vessel will not be collected. Since C share use by vessels is available through other sources, some information concerning C share use will be available, but not information on the number of crew providing shares to each vessel. Crew license and CFEC permit numbers and processing crew residence information would not be collected under this alternative, preventing analysts from understanding the geographic distribution of employment compensation effects. In considering this effect, it should be kept in mind that the amount paid to employees from different geographic locations is not available under either of the other alternatives.

The only cost information collected under this alternative is compensation to foreman, managers, and other employees. The loss of new pot purchase information, annual fuel usage, and vessel investment and repair and maintenance costs will result in some loss of understanding of the effects of those costs on participants, in comparison to the preceding alternative. Except for these differences, the data utility and benefits of this alternative are the same as those of the second catcher processor alternative.

Administrative costs

The administrative costs of the third catcher processor alternative are likely to be very similar to the administrative costs of the second catcher processor alternative. The elimination of a few inaccurate elements under this alternative could result in some very modest savings in audit costs, to the extent that inaccuracies are identified as outlier that should be subject to audit.

Industry reporting costs

Industry reporting burden associated with this alternative is very similar to the burden of the second catcher processor alternative. Reducing reporting of leases to arm's length leases will simplify reporting, particularly by avoiding reporting on cooperative movements of shares that are for harvest coordination purposes that might otherwise be reported as leases. Also, the removal of reporting of employee license and permit numbers and addresses reduces the reporting burden further, but these data are generally available in company records. The removal of other elements (such as crew contributing C shares, and fuel use) have a minimal effect on the reporting burden. Overall, this action reduces the reporting burden slightly from the preceding alternative.

2.5.10 Summary of possible analyses

In its original consideration of this action, the Council suggested the data collected by the program should be used to support several types of economic and social analyses (such as estimates of profits, quasi rents, and the distribution of revenues from the fisheries). The Council's purpose and need for this action suggests that the data collection program may not be providing the benefit anticipated due to data inaccuracies. Implicit in that statement is the suggestion that the data may not support the anticipated

analyses. The following table (see Table 1) is a brief summary of analyses identified by in the analysis of the Council's initial action and an assessment of the potential for the various alternatives considered here to support those analyses.

In general, none of the data collection alternatives under consideration (including the status quo) provide adequate data to support most of the economic measures of concern to the Council in the initial analysis. The inadequacy of the status quo arises largely from the inaccuracies of the data collected.[48] Specifically, estimates such as profits, quasi rents, and efficiency require accurate and comprehensive cost information. Much of the cost data collected under the status quo, however, are not accurate and, consequently, cannot be relied on for these analyses. As a result, the alternatives are largely indistinguishable with respect to the measures addressed in the initial analysis. It may be possible to develop some understanding of certain fleet level costs, if data reliability can be established for those uses. It also should be noted, that some important analyses may be supported by each of the alternatives. Specifically, harvesting crew and plant compensation can be analysed, along with the distribution of revenues. Although not reflected in the initial council action, differences in the distribution of revenues by harvest share type are also revealed by the all of the alternatives.

Table 1. Analyses that may be supported by each alternative.

Measure	Alternative 1	Alternative 2	Alternative 3
Capacity and capacity utilization	Estimates will be biased by inadequate cost data		
Profits	Standard estimates cannot be made		
Quasi-rents	Standard estimates cannot be made		
Productivity	Estimates will be biased by inadequate cost data		
Efficiency	Estimates will be biased by inadequate cost data		
Distribution of ex vessel revenue	Estimates can be made		
Distribution of product revenue	Estimates can be made		
Distribution of profits and quasi rents within and between harvesters and processor	Standard estimates cannot be made		
Distribution of privileges within the harvesting and processing sectors	Estimates can be made, but some uncertainty will exist because of complex ownership structures		
Seasonality of catch and revenues by location	Estimates can be made		
Vertical integration	Estimates can be made, but some uncertainty will exist because of complex ownership structures		
Domestic and foreign ownership	Estimates can be made, but some uncertainty may exist because of complex ownership structures		
Harvesting employment and payments to harvesting crews	Estimates can be made		
Processing employment and payments to processing crews	Estimates for total plant compensation can be made		
Involvement of crab fishery participants in other fisheries	Estimates can be made		
Value of privileges	Estimates cannot be made		Estimates can be made, with some uncertainty depending on the structure of transactions
Regional economic impacts	Some simple estimates can be made		

[48] The data are also compromised by fishing at the cooperative level, which includes pot sharing, which results in data that are not at the firm level, as needed for most estimates.

2.5.11 Net benefits to the Nation

Net benefits to the Nation from the various data collection alternatives are difficult to assess, as the benefits of data collection are derived indirectly. Specifically, the benefits are derived through more informed management decision making. Contrasting alternatives requires a comparison of net benefits, which are the added information from data collected less the costs of collection, processing, and analyzing of those data, across the alternatives. As in preceding sections of the analysis, this section separates the alternatives by sector for simplicity.

Catcher vessel alternatives

Under the **status quo alternative**, analysts are provided data to understand whether different share types bring different landings prices in the fisheries. In addition, captain and crew compensation levels are available, which can be examined relative to vessel revenues, vessel harvests, and fishing time. By combining vessel investment costs and repairs and maintenance costs, analysts can gain a perspective on the relative spending for vessel upkeep and improvements. These can be examined across the fleet and over time to understand spending patterns relative to effort in the fisheries. The last section of the data collection provides data concerning overall activities of a vessel. These data are the only source of data concerning total days at sea, total vessel revenues, and total labor costs. Through these elements, analysts can compare operations in crab fisheries with a vessel's total operations to develop a basic understanding of the role crab operations relative to a vessel's total operations for these factors. While the status quo alternative provides these benefits, a substantial portion of the submitted data are of poor or unknown quality, and thereby, provide limited benefit. The burden associated with reporting under the status quo alternative data is high (relative to the other alternatives). In the case of vessels that pool shares for fishing in a cooperative, developing lease data often requires several simplifying assumptions and substantial effort to unbundle cooperative fishing records. Location of purchase information requires respondents to sift through records to attempt to separate purchases by location. These data are also problematic, as matching acquisitions to location of purchase may not be possible through some invoices. Processing these data also is a substantial burden on agency staff and contractors. Yet, these data cannot be used in analyses due to their quality concerns. Although some elements of the status quo alternative provide data that are useful for examining some factors in the fisheries, a large share of the data elements collected provide no additional information, at a substantial cost to submitters and the agency.

The **second catcher vessel alternative** would reduce the reporting and management burdens substantially from the status quo. Analysts would be able to examine landings revenues by share type, crew compensation, and certain cost elements. Although fuel costs by fishery would be eliminated,[49] pot purchase information would be improved, by removing the purchase of used pots (which are not very informative of vessel level operations due to pot sharing arrangements). The differences in information between the second alternative and the first alternative are believed to be outweighed by the substantial difference in vessel owner reporting burden and the agency burden for processing the data. As a consequence, the second alternative is expected to have a greater net benefit to the Nation.

The net benefits to the Nation associated with the **third catcher vessel alternative** are similar to those of the second alternative, with a few specific differences. Lease data reporting is limited to arm's length leases, which should improve the informativeness of data reported, as well as reduce the burden associated with reporting. On the other hand, the omission of all collection of cost data leaves analysts to draw inferences from other data to assess cost changes in the fishery. While it may not be feasible to collect reliable comprehensive cost information, certain reliable elements (including those collected under

[49] It is likely that revision of the current reporting of fuel costs by fishery with improved instructions would make that variable reliable for analyses.

the second alternative) may provide some direct information concerning operational cost changes in the fishery. The net benefits of this alternative are similar to the net benefits associated with the second alternative. The costs of this alternative are reduced, by elimination of comprehensive lease information and all cost elements; however, the elimination of all cost information from this alternative reduces the information available to analysts under this alternative.

Shore based and floating processor alternatives

Under the **status quo alternative**, production and sales data are collected by crab grade and size and box size. Although these data appear to provide little information under current processing and grading practices, should those practices change in the future, it is possible that these data could be informative. Revenue data also distinguish sales to affiliated companies, which reveal differences in pricing practices for internal sales. Custom processing revenues, which are not collected elsewhere, provide some information concerning the price of processing services and their value in the fisheries. Crab purchase data provide information concerning landing prices by share type, which are unavailable from other sources. In addition, total plant labor cost provide data concerning payments to labor that cannot be obtained otherwise. The status quo also collects substantial data that are not reliable, including processing costs and labor data. In many cases, these data reporting requirements impose a substantial burden, as efforts must be undertaken to apportion costs to different fishery operations. These require processors to review not only crab operational data, but also data from those other fisheries. These data also impose a substantial burden on the agency, which must process those data for use by analysts. These costs substantially (together with the limited information value of much of the data) severely detract from the net benefits of the status quo alternative.

The **second shore-based and floating processor alternative** maintains the collection of most revenue data and custom processing services purchased, but eliminates the collection of production and most labor data. Scaling back from the status quo would prevent analysts from examining changes in production by box size or crab size or grade. Crab purchase information would continue to be collected allowing analysts to examine purchases by share type. Almost all crab processing and plant costs would be eliminated. The collection of those data under the status quo is of limited informative value, as elements are typically pro rated and not reported consistently or accurately. Labor data would continue to be collected under this alternative, but (as noted) these data are not accurately reported, limiting their value. The omission of labor and cost data from this alternative results in an improvement in net benefits, as the costs of reporting and processing these data are substantial to industry and agency staff, respectively. This alternative provides greater net benefits than the status quo, as a result of the removal of many inaccurate elements and the costs associated with their collection.

The **third shore-based and floating processor alternative** provides net benefits very similar to the second processor alternative. The third alternative differs in that it collects aggregate labor data, which are likely to be more accurate and informative (although these data will not be informative concerning crab fishery operations specifically). These data will also be less burdensome to report and process, in comparison to the second alternative, since they will not require proration or division by fishery. These improvements result in an increase in net benefits under the third alternative.

Catcher processor alternatives

Under the **status quo**, catcher processors report fishing data and production data that are largely duplicative of (or which may be estimated by through data available from) other reporting requirements.

Revenue data are reported with the only current distinguishing characteristic being sales to affiliates.[50] Data concerning IFQ (both held by a vessel owner and used by a vessel) are reported, but not accurately enough for those data to be reliable. Crew compensation under the status quo is believed to be accurate, but distinctions between harvesting and processing crews are unlikely to be accurate. Custom processing services purchased and crab purchase data are not applicable to catcher processors in most cases, but a burden arises only when they are applicable and these data are believed to be accurately reported. The extensive crab fishery and vessel cost information collected under the status quo is largely inconsistently and inaccurately reported, providing little information to analysts for fishery analysis. These data also are time consuming to report for respondents and require costly administrative processing by the agency. These factors substantially limit the benefits derived from the status quo.

The **second catcher processor alternative** (in a manner similar to the second catcher vessel alternative and second processor alternative) eliminates several data elements collected under the status quo. The elimination of most fishing and cost data will not only reduce industry and administrative burdens, but is also unlikely to substantially reduce the information value of the data collection program, as a whole. IFQ data are scaled back, but some of the data included in the collection are unlikely to provide useful information. Removal of some labor data from the collection could reduce the information concerning that important aspect of the fishery. Despite these shortcomings, the cost savings arising from the elimination of several uninformative variables likely will result in this alternative yielding greater net benefits than the status quo catcher processor alternative.

The third **catcher processor alternative** is very similar to the second alternative and provides similar net benefits. The third alternative removes some elements that may be useful for analyses, such as information concerning the number of crew working on a vessel (both fishing and processing).[51] At the same time, this alternative also improves on some elements, such as lease reporting, which is limited to arm's length leases only. As a result of these competing effects (which are limited in number), the net benefits of the second and third alternatives are very similar.

3 REGULATORY FLEXIBILITY ANALYSIS

3.1 Introduction

The Regulatory Flexibility Act (RFA), first enacted in 1980, and codified at 5 U.S.C. 600-611, was designed to place the burden on the government to review all regulations to ensure that, while accomplishing their intended purposes, they do not unduly inhibit the ability of small entities to compete. The RFA recognizes that the size of a business, unit of government, or nonprofit organization frequently has a bearing on its ability to comply with a Federal regulation. Major goals of the RFA are: 1) to increase agency awareness and understanding of the impact of their regulations on small business; 2) to require that agencies communicate and explain their findings to the public; and 3) to encourage agencies to use flexibility and to provide regulatory relief to small entities.

The RFA emphasizes predicting significant adverse impacts on small entities as a group distinct from other entities and on the consideration of alternatives that may minimize the impacts, while still achieving the stated objective of the action. When an agency publishes a proposed rule, it must either, (1)"certify"

[50] As under the processor alternatives, production and sales are reported distinguishing box size and crab size and grade. Under current processing and reporting practices, these distinctions provide limited or no information. It is possible that changes in processing and reporting could yield benefits from these data.

[51] Although these elements may not accurately distinguish fishing from processing labor, they do provide a count of total workers on a vessel.

that the action will not have a significant adverse effect on a substantial number of small entities, and support such a certification declaration with a "factual basis", demonstrating this outcome, or, (2) if such a certification cannot be supported by a factual basis, prepare and make available for public review an Initial Regulatory Flexibility Analysis (IRFA) that describes the impact of the proposed rule on small entities.

Based upon a preliminary evaluation of the proposed pilot program alternatives, it appears that "certification" would not be appropriate. Therefore, this IRFA has been prepared. Analytical requirements for the IRFA are described below in more detail.

The IRFA must contain:

1. A description of the reasons why action by the agency is being considered;
2. A succinct statement of the objectives of, and the legal basis for, the proposed rule;
3. A description of, and where feasible, an estimate of the number of small entities to which the proposed rule will apply (including a profile of the industry divided into industry segments, if appropriate);
4. A description of the projected reporting, record keeping, and other compliance requirements of the proposed rule, including an estimate of the classes of small entities that will be subject to the requirement and the type of professional skills necessary for preparation of the report or record;
5. An identification, to the extent practicable, of all relevant Federal rules that may duplicate, overlap, or conflict with the proposed rule;
6. A description of any significant alternatives to the proposed rule that accomplish the stated objectives of the Magnuson-Stevens Act and any other applicable statutes, and that would minimize any significant adverse economic impact of the proposed rule on small entities. Consistent with the stated objectives of applicable statutes, the analysis shall discuss significant alternatives, such as:

    a. The establishment of differing compliance or reporting requirements or timetables that take into account the resources available to small entities;
    b. The clarification, consolidation or simplification of compliance and reporting requirements under the rule for such small entities;
    c. The use of performance rather than design standards;
    d. An exemption from coverage of the rule, or any part thereof, for such small entities.

The "universe" of entities to be considered in an IRFA generally includes only those small entities that can reasonably be expected to be directly regulated by the proposed action. If the effects of the rule fall primarily on a distinct segment of the industry, or portion thereof (e.g., user group, gear type, geographic area), that segment would be considered the universe for purposes of this analysis.

In preparing an IRFA, an agency may provide either a quantifiable or numerical description of the effects of a proposed rule (and alternatives to the proposed rule), or more general descriptive statements if quantification is not practicable or reliable.

3.1.1 Definition of a Small Entity

The RFA recognizes and defines three kinds of small entities: (1) small businesses; (2) small non-profit organizations; and (3) and small government jurisdictions.

Small businesses: Section 601(3) of the RFA defines a "small business" as having the same meaning as a "small business concern," which is defined under Section 3 of the Small Business Act. A "small

business" or "small business concern" includes any firm that is independently owned and operated and not dominate in its field of operation. The U.S. Small Business Administration (SBA) has further defined a "small business concern" as one "organized for profit, with a place of business located in the United States, and which operates primarily within the United States, or which makes a significant contribution to the U.S. economy through payment of taxes or use of American products, materials, or labor. A small business concern may be in the legal form of an individual proprietorship, partnership, limited liability company, corporation, joint venture, association, trust, or cooperative, except that where the form is a joint venture there can be no more than 49 percent participation by foreign business entities in the joint venture."

The SBA has established size criteria for all major industry sectors in the U.S., including fish harvesting and fish processing businesses. A business "involved in fish harvesting" is a small business if it is independently owned and operated and not dominant in its field of operation (including its affiliates), and if it has combined annual receipts not in excess of $4.0 million for all its affiliated operations worldwide. A seafood processor is a small business if it is independently owned and operated, not dominant in its field of operation (including its affiliates) and employs 500 or fewer persons, on a full-time, part-time, temporary, or other basis, at all its affiliated operations worldwide. A business involved in both the harvesting and processing of seafood products is a small business if it meets the $4.0 million criterion for fish harvesting operations. A wholesale business servicing the fishing industry is a small business if it employs 100 or fewer persons on a full-time, part-time, temporary, or other basis, at all its affiliated operations worldwide.

The SBA has established "principles of affiliation" to determine whether a business concern is "independently owned and operated." In general, business concerns are affiliates of each other when one concern controls or has the power to control the other or a third party controls or has the power to control both. The SBA considers factors such as ownership, management, previous relationships with or ties to another concern, and contractual relationships, in determining whether affiliation exists. Individuals or firms that have identical or substantially identical business or economic interests, such as family members, persons with common investments, or firms that are economically dependent through contractual or other relationships, are treated as one party, with such interests aggregated when measuring the size of the concern in question. The SBA counts the receipts or employees of the concern whose size is at issue and those of all its domestic and foreign affiliates, regardless of whether the affiliates are organized for profit, in determining the concern's size. However, business concerns owned and controlled by Indian Tribes, Alaska Regional or Village Corporations organized pursuant to the Alaska Native Claims Settlement Act (43 U.S.C. 1601), Native Hawaiian Organizations, or Community Development Corporations authorized by 42 U.S.C. 9805 are not considered affiliates of such entities, or with other concerns owned by these entities, solely because of their common ownership.

Affiliation may be based on stock ownership when: (1) A person is an affiliate of a concern if the person owns or controls, or has the power to control 50% or more of its voting stock, or a block of stock which affords control because it is large compared to other outstanding blocks of stock, or (2) If two or more persons each owns, controls or have the power to control less than 50% of the voting stock of a concern, with minority holdings that are equal or approximately equal in size, but the aggregate of these minority holdings is large as compared with any other stock holding, each such person is presumed to be an affiliate of the concern.

Affiliation may be based on common management or joint venture arrangements. Affiliation arises where one or more officers, directors, or general partners control the board of directors and/or the management of another concern. Parties to a joint venture also may be affiliates. A contractor and subcontractor are treated as joint venturers if the ostensible subcontractor will perform primary and vital requirements of a

contract or if the prime contractor is unusually reliant upon the ostensible subcontractor. All requirements of the contract are considered in reviewing such relationship, including contract management, technical responsibilities, and the percentage of subcontracted work.

Small organizations: The RFA defines "small organizations" as any nonprofit enterprise that is independently owned and operated and is not dominant in its field.

Small governmental jurisdictions: The RFA defines small governmental jurisdictions as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of fewer than 50,000.

3.2 A description of the reasons why action by the agency is being considered

The Council developed the following purpose and need statement defining its rationale for considering this action:

> *As a part of its Bering Sea and Aleutian Island crab rationalization (CR) program, the Council developed a comprehensive economic data collection ("EDR") program to provide information to analysts to assess the effects of the CR program and identify problems that may require future amendments to the EDR program.*
>
> *Council review of the EDR program, development of the EDR metadata through PNCIAC and testimony from the industry has resulted in the identification of substantial portions of the EDR data that are inaccurate. In addition, several elements are wholly or partially redundant with other existing data collection requirements, and some components may not further the Council's objectives. The cost to industry, both directly through data submission, and indirectly through cost recovery funding of program administration, outweigh the benefits of the resultant data and greatly exceed estimates provided in the initial analysis of the EDR program and in the accompanying regulatory analyses.*
>
> *To address these problems, the Council intends to amend the EDR process so that the data collected is accurate, informative to the Council, not redundant with existing reporting requirements, and can be reported by industry and administered at a reasonable cost.*
>
> *The Council expressly wants to limit the EDR to the collection of data that have been demonstrated, through the development of the EDR metadata, and other reviews of the data, to be sufficiently accurate. Data collection should be structured and specific elements identified, to minimize costs while maintaining accuracy and providing the greatest information value to the management decision making process.*
>
> *As analysts develop, refine, and verify methods for accurately collecting additional informative data elements the Council will consider expansion of the data collection program to include those elements. This process can also inform the future Council action regarding other existing and future EDR programs.*

3.3 The objectives of, and the legal basis for, the proposed rule

Under the current regulatory structure, Bering Sea/Aleutian Islands crab resources are managed by NOAA Fisheries and the State of Alaska, under an FMP. The objective of this action is to provide a cost

effective data collection program to inform analyses of fishery management actions. The authority for this action and the FMP are contained in the Magnuson-Stevens Act.

3.4 A description of, and where feasible, an estimate of the number of small entities to which the proposed rule will apply

To be completed

3.5 A description of the projected reporting, record keeping, and other compliance requirements of the proposed rule

To be completed

3.6 An identification, to the extent practicable, of all relevant Federal rules that may duplicate, overlap, or conflict with the proposed rule

To be completed

3.7 A description of any significant alternatives to the proposed rule that accomplish the stated objectives of the Magnuson-Stevens Act and any other applicable statutes, and that would minimize any significant adverse economic impact of the proposed rule on small entities

To be completed

4 NATIONAL STANDARDS & FISHERY IMPACT STATEMENT

4.1 National Standards

Below are the ten National Standards as contained in the Magnuson-Stevens Act, and a brief discussion of the consistency of the proposed alternatives with each of those National Standards, as applicable.

National Standard 1

Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery.

The action may help achieve optimum yield and prevent overfishing by improving economic information available to managers considering management actions.

National Standard 2

Conservation and management measures shall be based upon the best scientific information available.

The analysis draws on the best scientific information that is available, concerning the Bering Sea and Aleutian Island crab fisheries. The most up-to-date information that is available has been provided by the managers of these fisheries, as well as by members of the fishing industry.

National Standard 3

To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

The proposed action is consistent with the management of individual stocks as a unit or interrelated stocks as a unit or in close coordination.

National Standard 4

Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various U.S. fishermen, such allocation shall be (A) fair and equitable to all such fishermen, (B) reasonably calculated to promote conservation, and (C) carried out in such a manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

The proposed alternatives would treat all participants the same, regardless of their state of residence. The proposed change would be implemented without discrimination among participants and is intended to contribute to the fairness and equity of the program by ensuring that managers have more complete information to assess the effects of potential management actions. This action will have no effect on the limitations on excessive shares contained in the current management program.

National Standard 5

Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources, except that no such measure shall have economic allocation as its sole purpose.

This action considers efficiency in utilization of the resource by providing better information to managers concerning the fishery.

National Standard 6

Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

None of the alternatives would be expected to affect changes in the availability of Bering Sea and Aleutian Island crab resources each year. Any such changes would be addressed through the annual allocation process, which is not affected by the alternatives.

National Standard 7

Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

The explicit objective of this action is to eliminate redundant reporting requirements and to remove unnecessary duplication of reporting.

National Standard 8

Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

This action is intended to improve information available to managers when making management decisions. As such, the action is intended to ensure that managers have accurate information concerning community effects of future management actions.

National Standard 9

Conservation and management measures shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

This action has no effect on bycatch or discard mortality.

National Standard 10

Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

The alternatives considered under this action do not affect safety of human life at sea.

4.2 Section 303(a)(9) – Fisheries Impact Statement

Section 303(a)(9) of the Magnuson-Stevens Act requires that any management measure submitted by the Council take into account potential impacts on the participants in the fisheries, as well as participants in adjacent fisheries. The impacts of the alternatives on participants in the fisheries have been discussed in previous sections of this document. This action will have no effect on participants in other fisheries.

5 REFERENCES

North Pacific Fishery Management Council (June 2004) Motion of the Council for BSAI Crab Rationalization, June 10, 2002, updated through June 9, 2004.

North Pacific Fishery Management Council/AECOM (November 2010) Five-Year Review of the Crab Rationalization Management Program for Bering Sea and Aleutian Islands Crab Fisheries.

North Pacific Fishery Management Council/National Marine Fisheries Service (August 2004a) Environmental Impact Statement, Voluntary Three-Pie Cooperative Program for the Bering Sea and Aleutian Islands Crab Fisheries.

North Pacific Fishery Management Council/National Marine Fisheries Service (August 2004b) Regulatory Impact Review/Initial Regulatory Flexibility Analysis, Voluntary Three-Pie Cooperative Program for the Bering Sea and Aleutian Islands Crab Fisheries.

Alaska Fisheries Science Center, BSAI Crab EDR Database: Data Quality Summary (Updated: January 30, 2008).

Alaska Fisheries Science Center, BSAI Crab Economic Data Report Database: Metadata, January 30, 2009.

AKT, LLP, Alaska Crab Economic Data Report Data Validation: Report, 2009 Calendar Year Data, Portland, OR. November 2010.

AKT, LLP, Alaska Crab Economic Data Report Data Validation: Report, 2008 Calendar Year Data, Portland, OR. November 2009.

AKT, LLP, Alaska Crab Economic Data Report Data Validation: Report, 2007 Calendar Year Data, Portland, OR. November 2008.

AKT, LLP, Alaska Crab Economic Data Report Data Validation: Report, 2006 Calendar Year Data, Portland, OR, January 2008.

AKT, LLP, Pacific States Marine Fisheries Commission, Alaska Crab Economic Data Report Data Validation, 1998, 2001, 2004, & 2005 Calendar Year Data, Portland, OR, May 2007.

AKT, LLP, Alaska Crab Economic Data Report Data Validation Extension, 1998, 2001, 2004, & 2005 Calendar Year Data, Portland, OR, April 2008.

Tyler, Geana, Historic Economic Data Report (EDR) Data Collection Difficulties, Pacific States Marine Fisheries Commission, November 29, 2005.

Tyler, Geana, 2005 Economic Data Report (EDR) Data Collection Difficulties, Pacific States Marine Fisheries Commission, July 30, 2006.

Tyler, Geana, 2006 Economic Data Report (EDR) Data Collection Difficulties, Pacific States Marine Fisheries Commission, July 2007.

Heglund, Eric, Memo to 2008 Alaskan Crab Study Project Team, Common EDR Submission Errors, November 13, 2009.

Ciardiello,Sara, Memo to 2009 Alaskan Crab Study Project Team, Common EDR Submission Errors, January 24, 2010.

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APPENDIX A

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Fishing data	Fish ticket number	all crab fisheries	-	-
	Days fishing	by crab fishery	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery		
Deliveries and revenues	Landings by share type - pounds	by crab fishery	by crab fishery	by crab fishery
	Deadloss by share type - pounds	by crab fishery		-
	Landings by share type - revenues	by crab fishery	by crab fishery	by crab fishery
	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-
	Vessel owner's IFQ used on other vessels by share type			
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost			
	Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing	
Crew	Number of crew by fishery	by crab fishery	-	-
	Payments to crew	by crab fishery	by crab fishery	by crab fishery
	Payments to captain	by crab fishery	by crab fishery, check box for skipper/owners	by crab fishery
	Labor payment details - charges and deductions	in all crab fisheries		
	All unique captain and crew contracts and settlement sheets		by crab fisheries	by crab fisheries
	Revenue shares - owner/crew/captain	by crab fishery	-	-
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-
	Insurance premium - crab only	aggregated across all crab fisheries and aggregated across all fisheries	-	-
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only	
	Pot purchases - cost			
	Pot purchases - location	aggregated for all crab fisheries	-	-
	Line and other gear purchases - costs	aggregated for all crab fisheries		
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-
	Bait used - species/pounds by fishery	by crab fishery	-	-
	Bait used - species/cost by fishery			

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Crab costs	Bait used - purchase location by fishery	by crab fishery	-	-
	Fuel used - gallons by fishery	by crab fishery		by crab fishery (gallons only)
	Fuel used - cost by fishery			-
	Fuel used - purchase location by fishery	by crab fishery	-	-
	Food and provisions - costs	aggregated across all crab fisheries	-	
	Other crew expenses	aggregated for all crab fisheries	-	
	Freight costs for landed crab	aggregated for all crab fisheries	-	
	Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries	-	
	Observer costs - by fishery	by crab fishery	-	-
	Landing taxes and fees	aggregated across all crab fisheries	-	-
	Cooperative fees	aggregated across all crab fisheries	-	-
	Other expenses	aggregated across all crab fisheries	-	-
Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	
	Vessel and equipment investment - location	aggregated across all fisheries	-	-
	Repair and maintenance - costs	aggregated across all fisheries	-	-
	Repair and maintenance - location	aggregated across all fisheries	-	-
	Insurance premium	aggregated across all fisheries	Aggregated All Fisheries	-
	Fuel - gallons and cost			aggregated all fisheries
	Fuel, lubrication, fluids - annual - cost	aggregated across all fisheries	Aggregated All Fisheries	-
	Fuel, lubrication, fluids - annual - location	aggregated across all fisheries	-	-
	Other vessel specific costs	aggregated across all fisheries	-	-
All activities	Days at sea - all activities	aggregated across all activities	-	-
	Gross revenues - all activities	aggregated across all activities	aggregated across all activities	-
	Pounds - all fisheries	aggregated across all fisheries	-	-
	Tendering			check box
	Labor cost - all activities	aggregated across all activities	aggregated across all activities	aggregated across all activities

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Production	Production - dates covered by fishery	by crab fishery		
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days	
	Raw crab processed by fishery	by crab fishery		
	Product and processed pounds by fishery	by crab fishery		
	Production - crab size and grade	by crab fishery		
	Production - box size	by crab fishery		
	Production - finished pounds	by crab fishery		
	Production - custom processing identifier	by crab fishery		
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery	
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery		
	Man-hours	by crab fishery	by crab fishery	aggregated across all fisheries
	Total processing labor payments	by crab fishery	by crab fishery	aggregated across all fisheries
	Crab processing employees by residence	by crab fishery	by crab fishery	aggregated across all fisheries
Custom processing services purchased	**Reporting requirement**			All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery		
	Custom processing services purchased - box size	by crab fishery		
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery		
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Crab processing costs	Fisheries taxes and fees - crab only	by crab fisheries		
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries		
	Food and provisions - crab only	aggregated across crab fisheries		
	Other direct crab labor costs	aggregated across crab fisheries		
	Insurance deductibles - crab only	aggregated across crab fisheries		
	Repackaging costs	aggregated across crab fisheries		
	Broker fees and promotions by fishery	by crab fishery		
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments)
	Observer costs	by crab fishery		
	Freight cost for plant supplies	aggregated across crab fisheries		
	Freight costs for products	aggregated across crab fisheries		
	Product storage	aggregated across crab fisheries		
	Water, sewer, and waste disposal	aggregated across crab fisheries		
	Other crab-specific costs	aggregated across crab fisheries		
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries		
	Plant and equipment investments	aggregated across all fisheries		
	Repair and maintenance	aggregated across all fisheries		
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other plant specific costs	aggregated across all fisheries		
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Processing labor costs - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
Production	Production - dates covered by fishery	by crab fishery		
	Production - processing days by fishery	by crab fishery	Providing first and last day and number of active days	
	Raw crab processed by fishery	by crab fishery		
	Product and processed pounds by fishery	by crab fishery		
	Production - crab size and grade	by crab fishery		
	Production - box size	by crab fishery		
	Production - finished pounds	by crab fishery		
	Production - custom processing identifier	by crab fishery		
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery	
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery FOB Alaska only
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include raw pounds and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery
Labor	Average processing positions	by crab fishery		
	Man-hours	by crab fishery	by crab fishery	aggregated across all fisheries
	Total processing labor payments	by crab fishery	by crab fishery	aggregated across all fisheries
	Crab processing employees by residence	by crab fishery	by crab fishery	aggregated across all fisheries
Custom processing services purchased	**Reporting requirement**			All companies contracting custom processing must report
	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery		
	Custom processing services purchased - box size	by crab fishery		
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery		
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt. 2	Alt. 3
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery
Crab processing costs	Fisheries taxes and fees - crab only	by crab fisheries		
	Processing and packing materials, equipment, and supplies - crab only	aggregated across crab fisheries		
	Food and provisions - crab only	aggregated across crab fisheries		
	Other direct crab labor costs	aggregated across crab fisheries		
	Insurance deductibles - crab only	aggregated across crab fisheries		
	Repackaging costs	aggregated across crab fisheries		
	Broker fees and promotions by fishery	by crab fishery		
	Lease (IPQ) costs	by crab fishery	by crab fishery	by crab fishery - arm's length (monetary payments)
	Observer costs	by crab fishery		
	Freight cost for plant supplies	aggregated across crab fisheries		
	Freight costs for products	aggregated across crab fisheries		
	Product storage	aggregated across crab fisheries		
	Water, sewer, and waste disposal	aggregated across crab fisheries		
	Other crab-specific costs	aggregated across crab fisheries		
General plant costs	Annual fuel, electricity, lubrication, hydraulic fluids	aggregated across all fisheries		
	Vessel and equipment investments	aggregated across all fisheries		
	Repair and maintenance	aggregated across all fisheries		
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Other vessel specific costs	aggregated across all fisheries		
General processing information	Processing days - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Gross FOB revenues - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Finished processed pounds - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	
	Processing labor costs - annual total - all fisheries	aggregated across all fisheries	aggregated across all fisheries	

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Fishing Data	Dates covered (days in the fishery)	by crab fishery		
	Days fishing	by crab fishery	-	-
	Days traveling (from port to grounds) and offloading	by crab fishery		
	Days processing	by crab fishery		
Deliveries and revenues - for operations as a catcher vessel	Landings by share type - pounds	-	by crab fishery	by crab fishery
	Landings by share type - revenues	-	by crab fishery	by crab fishery
Production	Raw crab processed by fishery	by crab fishery		
	Product and processed pounds by fishery	by crab fishery		
	Production - crab size and grade	by crab fishery		
	Production - box size	by crab fishery		
	Production - finished pounds	by crab fishery		
	Production - custom processing identifier	by crab fishery		
Revenues	Sales to affiliates/non-affiliates by species - product/process	by crab fishery	by crab fishery	by crab fishery
	Sales to affiliates/non-affiliates by species - crab size and grade	by crab fishery	by crab fishery	
	Sales to affiliates/non-affiliates by species - box size and finished pounds	by crab fishery	by crab fishery	by crab fishery (use box size categories)
	Sales to affiliates/non-affiliates by species - revenues (fob)	by crab fishery	by crab fishery	by crab fishery - FOB Alaska
	Custom processing by species/product/process	by crab fishery	by crab fishery	by crab fishery (include pounds raw and pounds of product)
	Custom processing revenues	by crab fishery	by crab fishery	by crab fishery
IFQ	Vessel owner's IFQ used on the vessel by share type	by crab fishery	-	-
	Vessel owner's IFQ used on other vessels by share type			
	Leased quota by share type - pounds	by crab fishery	by crab fishery	by crab fishery- arms length monetary payments only
	Leased quota by share type - cost			
	Leased quota by share type - crew contributing shares	by crab fishery	aggregated all crab fisheries- count of crew leasing	-

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Crew	Number of harvest crew by fishery	by crab fishery	-	-
	Payments to captain	by crab fishery	by crab fishery -check box for skipper/owners	by crab fishery
	Payments to harvest crew	by crab fishery	by crab fishery	by crab fishery
	Harvest labor payment details - charges and deductions	in all crab fisheries		
	Number of crew paid based on processing work	by crab fishery		
	Average processing positions by fishery	by crab fishery		
	Total processing labor payments	by crab fishery	by crab fishery	by crab fishery
	All unique captain and crew contracts and settlement sheets		by crab fisheries	by crab fisheries
	Crew license number/CFEC permit number	aggregated across all crab fisheries	aggregated across all crab fisheries	-
	Crab processing employees by residence	aggregated across all crab fisheries	aggregated across all crab fisheries	-
Custom processing services purchased	Custom processing services purchased - raw pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - product and process	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - size and grade	by crab fishery		
	Custom processing services purchased - box size	by crab fishery		
	Custom processing services purchased - finished pounds	by crab fishery	by crab fishery	by crab fishery
	Custom processing services purchased - processing fee	by crab fishery	by crab fishery	by crab fishery
Crab purchases	Raw crab purchases by fishery - ifq type	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - size and grade	by crab fishery		
	Raw crab purchases by fishery - pounds	by crab fishery	by crab fishery	by crab fishery
	Raw crab purchases by fishery - gross payments	by crab fishery	by crab fishery	by crab fishery

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Crab costs	Insurance premium - crab only	aggregated across all crab fisheries	-	-
	Paid deductibles - crab only	aggregated across all crab fisheries	-	-
	Pot purchases - number	aggregated for all crab fisheries	aggregated all fisheries new pots only	-
	Pot purchases - cost			
	Pot purchases - location	aggregated for all crab fisheries	-	-
	Line and other gear purchases - costs	aggregated for all crab fisheries	-	-
	Line and other gear purchases - location	aggregated for all crab fisheries	-	-
	Bait used - species/pounds by fishery	by crab fishery	-	-
	Bait used - species/cost by fishery			
	Bait used - purchase location by fishery	by crab fishery	-	-
	Fuel used - gallons by fishery	by crab fishery	-	by crab fishery (gallons only)
	Fuel used - cost by fishery			-
	Fuel used - purchase location by fishery	by crab fishery	-	-
	Food and provisions - costs	aggregated across all crab fisheries	-	-
	Other crew expenses	aggregated for all crab fisheries	-	-
	Processing and packing materials, equipment, and supplies - crab	aggregated across crab fisheries	-	-
	Repackaging costs	aggregated across crab fisheries		
	Broker fees and promotions by fishery	by crab fishery		
	Lease (IPQ) costs		by crab fishery	by crab fishery - arm's length (monetary payments)
	Landing and sales taxes and fees - crab only	by crab fisheries		
	Storage, wharfage, delivery costs for gear	aggregated for all crab fisheries		
	Observer costs - by fishery	by crab fishery	-	-
	Freight costs for products	aggregated across crab fisheries		
	Product storage	aggregated across crab fisheries		
	Cooperative fees	aggregated across all crab fisheries	-	-
	Other expenses	aggregated across all crab fisheries	-	-

Data type	Data element	Alt 1. (status quo)	Alt 2.	Alt 3.
Vessel costs	Vessel and equipment investment - cost	aggregated across all fisheries (excluding exclusively non-crab costs)	aggregated all fisheries, including R&M	-
	Vessel and equipment investment - location	aggregated across all fisheries	-	-
	Repair and maintenance - costs	aggregated across all fisheries	-	-
	Repair and maintenance - location	aggregated across all fisheries	-	-
	Foremen, managers, other employees and salaries	aggregated across all fisheries	aggregated across all fisheries	aggregated across all fisheries
	Insurance premium	aggregated across all fisheries	Aggregated All Fisheries	-
	Fuel - gallons and cost			aggregated all fisheries
	Fuel, lubrication, fluids - annual - cost	aggregated across all fisheries	Aggregated All Fisheries	-
	Fuel, lubrication, fluids - annual - location	aggregated across all fisheries	-	-
	Other vessel specific costs	aggregated across all fisheries	-	-
All activities	Processing days - all activities	aggregated all fisheries	aggregated all fisheries	
	Days at sea - all activities	aggregated across all activities	aggregated all fisheries	
	FOB revenues - all activities	aggregated across all activities	aggregated all fisheries	
	Finished pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries	
	Round/raw pounds - all fisheries	aggregated across all fisheries	aggregated all fisheries	
	Labor cost - all activities	aggregated across all activities	aggregated all fisheries	

APPENDIX B

Reset Form Save Form Print Form

Revised: 02/09/2010

OMB control No. 0648-0518
Expiration Date: 05/30/2011

ANNUAL
CATCHER VESSEL
CRAB ECONOMIC DATA REPORT (EDR)

CALENDAR YEAR 2010

This form can be downloaded from
http://www.fakr.noaa.gov

PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 37 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*.); 3) Responses to this information request are confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq*.). They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

ANNUAL CATCHER VESSEL EDR

Introduction

This report collects information on Bering Sea and Aleutian Islands Management Area (BSAI) crab operations, including Western Alaska Community Development Quota Program (CDQ) crab fisheries. These fisheries are referred to as crab rationalization fisheries (CR fisheries). Pursuant to the legislation, the data and identifiers will also be used for program enforcement and determination of qualification for quota shares. Consequently, identifiers and data will be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

You have received this form because our records show that you are either the owner of a catcher vessel that participated in the BSAI crab fisheries in the past or were leased a catcher vessel that participated in the BSAI crab fisheries in the past. **You are required to submit the Certification Pages (pages 3 and 4) and any additional information requested in the Economic Data Report (EDR). Failure to submit an EDR form when required will result in delay in and/or denial of any and all crab permit applications**.

To make sure that each company is consistently and accurately completing the EDR, random audits will be performed by a qualified accountant on some of the EDRs for a subset of the crab fishery participants. This step will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska crab fisheries.

Auditors will verify records by comparing specific elements of the report with your accounting records. To make this activity as efficient and non-intrusive as possible, we suggest that you:

1. Keep a copy of the completed EDR or certification pages you submit to the Data Collection Agent (DCA). Copy and attach extra sheets as needed.

2. Keep a file that has all of the supporting information used in the preparation of the EDR.

3. Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:

    a. Audited financial statements
    b. Reviewed financial statements
    c. Compiled financial statements
    d. Tax returns.

Record only whole numbers. Round up dollar figures to the next highest dollar.

If YOUR label address is incorrect or missing, please correct the error on the label or print your permanent name and address here.

Vessel Name
Company Name
Street address or P.O. Box Number
City, State, and Zip Code

NOTE:

Any owner or leaseholder of a catcher vessel during any period in the calendar year identified on the EDR in which the catcher vessel was used to harvest crab in a Crab Rationalization (CR) fishery must submit to the DCA, at the address provided on the form, an EDR for a catcher vessel.

Definition of "Leaseholder": For the purpose of defining the persons responsible for submitting the EDR, a Leaseholder is a person, other than the owner of the catcher vessel for which the EDR is required, who: was identified as the leaseholder, in a written lease, of the catcher vessel, **OR** paid expenses of the catcher vessel, **OR** claimed expenses for the catcher vessel as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

Mail or FAX Certification Pages or Entire EDR by June 28, 2011 to:

Pacific States Marine Fisheries Commission
205 SE Spokane, Suite 100
Portland, OR 97202

FAX Number: 503-595-3450

For more information or if you have questions, please call toll free 1-877-741-8913

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CERTIFICATION PAGE – 1 of 2

This is a **required form**. Provide all information requested below.

Catcher Vessel Information	
Vessel Name	ADF&G Vessel Registration Number
	Crab License Limitation Permit Number(s)
	USCG Documentation Number
Current Estimated Market Value of Vessel and Equipment ($)	Replacement Value of Vessel and Equipment ($)
Name of Crab Harvesting Cooperative (if applicable)	

Vessel Owner Information	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

Vessel Leaseholder Information (if applicable)	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

NOTE: Any owner or leaseholder may appoint a designated representative to respond to questions in the EDR. The designated representative is the primary contact person for the DCA on issues relating to data required in the EDR.

Person Completing this Report (check one)

- ○ Owner (If your name and address are the same name and address provided in the Owner Information block above, the information does not need to be repeated here)
- ○ Leaseholder (If your name and address are the same name and address provided in the Leaseholder Information block above, the information does not need to be repeated here)
- ○ Designated Representative (complete information below)

Name	Title
Business Number Telephone	Business FAX Number
Business E-mail address (if available)	

CERTIFICATION PAGE – 2 of 2

Select one of the following statements and provide any requested information. Check one box below. Note: The descriptions below refer to leasing of the vessel. Do not provide information regarding any quota leasing here – questions will be asked about quota leases in the EDR form.

◯ 1. You are the catcher vessel **owner**, and you harvested BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
◯ 2. You are the catcher vessel **leaseholder**, you harvested BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
◯ 3. You are the catcher vessel **owner**, and you leased or sold the above described vessel for a portion of the year to another party, and **harvested some BSAI crab** in the above described catcher vessel during the 2010 calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the 2010 calendar year below). **OR** You are the catcher vessel owner and vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year.**
◯ 4. You are the catcher vessel **owner**, you leased or sold the above described **vessel** to another party, and **harvested no BSAI crab** in the above described vessel during the 2010 calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the 2010 calendar year below). **OR** You are the catcher vessel **owner** and vessel was lost or rendered permanently inoperable due to accident, and **harvested no BSAI crab** in the above described vessel during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**
◯ 5. You are the catcher vessel **owner**, and no one harvested BSAI crab in the above described catcher vessel during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**

Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name	
Business address	
Telephone No (include area code)	Date of Sale or Lease (day/month/2010)

Read the following statement, and sign and date the box below:

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	Date signed

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The table below contains information you will need when completing the EDR forms.

Table: Crab CR Fisheries

Fishery Code	CR Fishery	Geographic Area
EAG	Eastern Aleutian Islands golden king crab (*Lithodes aequispinus)*	in waters of the EEZ with **an eastern boundary** the longitude of Scotch Cap Light (164° 44' W. long.) to 53E 30' N. lat., then West to 165E W. long. **a western boundary** of 174° W. long., and **a northern boundary** of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab (*Lithodes aequispinus*)	in waters of the EEZ with **an eastern boundary** the longitude 174° W. long., **a western boundary** the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and **a northern boundary** of a line from the latitude of 55E30' N. lat., then west to the U.S.-Russian Convention line of 1867.
BST	Bering Sea Tanner crab (*Chionoecetes bairdi)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54E30'N. lat. with **a southern boundary** of 54° 36' N. lat.
BSS	Bering Sea Snow crab (*Chionoecetes opilio)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54° 30' N. lat. with **a southern boundary** of 54° 36' N.
BBR	Bristol Bay red king crab (*Paralithodes camtschaticus*)	in waters of the EEZ with **a northern boundary** of 58° 30' N. lat., **a southern boundary** of 54° 36' N. lat., and **a western boundary** of 168° W. long. and including all waters of Bristol Bay.

Table: Crab CR Fisheries		
Fishery Code	CR Fishery	Geographic Area
SMB	St. Matthew blue king crab (*Paralithodes platypus)*	in waters of the EEZ with **a northern boundary** of 62° N. lat., **a southern boundary** of 58°30' N. lat., and **a western boundary** of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

Instructions for completing this EDR Form: Provide all information requested in each section. Please record only whole numbers, and round all dollar values to the next highest dollar.

1. BSAI Crab Activity Chart

CR Fishery Code

Record the following data items for each CR fishery in which this vessel participated. Leave the row blank for any fisheries in which the vessel did not participate.

ADF&G Fish Ticket Number

Record the ADF&G Fish Ticket numbers corresponding to the landings that occurred during each CR fishery. Include fish tickets landed for the harvest cooperative, if applicable.

Number of Days Crab Fishing

Record the total number of days during each crab fishery that the vessel was operating in the fishing grounds. Do not include time spent waiting at processors or traveling to and from the fishing grounds.

Number of Days Traveling and Offloading

Record the total number of days during each fishery that the vessel spent traveling to and from fishing grounds and waiting to offload at processors. Do not include days traveling to and from home port before and after crab harvesting for the year (this will be collected in Table 6).

Table 1.0: BSAI Crab Fishery Activity

CR FISHERY CODE	ADF&G FISH TICKET NUMBER(S)		NUMBER OF DAYS CRAB FISHING	NUMBER OF DAYS TRAVELING & OFFLOADING
EAG				
WAG				
BST				
BSS				
BBR				
SMB				

2. Crab Sales, Gross Revenue

Record pounds sold to processors, deadloss, and gross ex-vessel revenue information on all BSAI Crab harvested, by fishery.

Report pounds and revenue separately by the category of harvest quota or permit used:

IFQ Type
Report pounds sold, deadloss, and gross ex-vessel revenues for each category of IFQ:

A Type: CVO-IFQ A Class shares
B Type: CVO-IFQ B Class shares, CPO-IFQ, CDQ, and Adak
C Type: CVC-IFQ, CPC-IFQ

Live Pounds Sold
For each of the listed fisheries and IFQ categories, record the total pounds of BSAI crab landed during the calendar year by this vessel.

Deadloss
For each of the listed fisheries and IFQ categories, record the total deadloss for all crab landed by this vessel.

Gross Revenue
For each of the listed fisheries and IFQ categories, record the gross revenue from crab delivered to processors during the calendar year. Include the value of any deductions from your payment for bait, taxes, IFQ or other deductions withheld from your payment by processors (we will ask you to report IFQ, taxes, and bait costs in Sections 3.2 and 5.1 of the EDR). Include any post-season adjustments received by the time of submitting this EDR, but do not report any payments not yet received as of this date.

Table 2: Crab Sales, Gross Revenue

CRAB LANDINGS BY FISHERY AND IFQ TYPE				
QUOTA TYPE: CVO IFQ – A				
		Live Pounds	Deadloss	Gross Revenue
FISHERY CODE	EAG	lbs	lbs	$
	WAG	lbs	lbs	$
	BST	lbs	lbs	$
	BSS	lbs	lbs	$
	BBR	lbs	lbs	$
	SMB	lbs	lbs	$
QUOTA TYPE: CVO IFQ – B, CPO-IFQ, CDQ				
		Live Pounds	Deadloss	Gross Revenue
FISHERY CODE	EAG	lbs	lbs	$
	WAG	lbs	lbs	$
	BST	lbs	lbs	$
	BSS	lbs	lbs	$
	BBR	lbs	lbs	$
	SMB	lbs	lbs	$
QUOTA TYPE: CVC-IFQ, CPC-IFQ				
		Live Pounds	Deadloss	Gross Revenue
FISHERY CODE	EAG	lbs	lbs	$
	WAG	lbs	lbs	$
	BST	lbs	lbs	$
	BSS	lbs	lbs	$
	BBR	lbs	lbs	$
	SMB	lbs	lbs	$

3. BSAI Crab Quota

3.1 Catcher Vessel Owner Annual Harvest Quota Allocation

Record information only for the annual allocation of BSAI Crab harvest quota to the vessel owner or leaseholder submitting this EDR. Information on harvest quota leased from other quota holders will be collected in Table 3.2. Record the data for each CR fishery in which this vessel participated. Include harvest quota owned by the vessel owner/leaseholder that was assigned to a harvest cooperative. Leave the cells blank for any fisheries in which the catcher/processor did not participate or for any quota type that the owner does not hold.

Owner Quota Harvested by this Catcher Vessel

Report all harvest quota held by the vessel owner/leaseholder and harvested by this vessel (include deadloss pounds). If some or all of the owner/leaseholders' IFQ was assigned to a harvest cooperative, report the amount of the owners' assigned quota that was harvested on the vessel.

CPO – IFQ Harvested: record the amount of this catcher vessel owner/leaseholder's allocation of Catcher/Processor Owner (CPO) IFQ pounds harvested in the listed fishery.

IFQ A Harvested: record the amount of this catcher vessel owner/leaseholder's allocation of IFQ A-class pounds harvested in the listed fishery.

IFQ B Harvested: record the amount of this catcher vessel owner/leaseholder's allocation of IFQ B-class pounds harvested in the listed fishery.

Owner Quota Transferred to Other Vessels

Report pounds and lease revenue for all harvest quota held by the vessel owner/leaseholder that was transferred to other entities (either through formal lease, coop assignment, or other agreement). If some or all of the IFQ was assigned to a harvest cooperative, report the pounds of the assigned quota that was harvested by other cooperative members and report the quota royalties received from other members of the cooperative.

If you had an arrangement under which you transferred your IFQ to another owner to harvest and paid them a percentage (for example, 30%) of the revenues from the harvested quota, record the total pounds transferred and the total dollar amount of the revenue share (for example, 70%) you received, for each class of quota (CDQ, CPO-IFQ, IFQ-A, IFQ-B, IFQ- C).

NOTE: If you (the vessel owner/leaseholder) are submitting EDRs for more than one vessel, select one EDR to report all quota leased to other entities. Do not report quota used on your other vessel(s) unless royalties were exchanged, and do not report the same quota transfers on more than one EDR.

CPO – IFQ Transferred

Pounds: Record the number of pounds of this vessel owner/leaseholder's allocation of CPO-IFQ transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred CPO-IFQ pounds in the listed fishery

IFQ A Transferred

Pounds: Record the number of pounds of this vessel owner/leaseholder's allocation of IFQ-A transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred IFQ-A pounds in the listed fishery.

IFQ B Transferred

Pounds: Record the number of pounds of this vessel owner/leaseholder's allocation of IFQ-B transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred IFQ-B pounds in the listed fishery.

Table 3.1: Vessel Owner/Leaseholder's IFQ Allocation

VESSEL OWNER/LEASEHOLDER'S ANNUAL HARVEST QUOTA PERMITS LANDED BY THIS VESSEL			
Fishery Code	CPO-IFQ Harvested (pounds)	IFQ A Harvested (pounds)	IFQ B Harvested (pounds)
EAG	lbs	lbs	lbs
WAG	lbs	lbs	lbs
BST	lbs	lbs	lbs
BSS	lbs	lbs	lbs
BBR	lbs	lbs	lbs
SMB	lbs	lbs	lbs

VESSEL OWNER/LEASEHOLDER'S ANNUAL HARVEST QUOTA PERMITS TRANSFERRED TO OTHER VESSELS						
Fishery Code	CPO- IFQ Transferred		IFQ A Transferred		IFQ B Transferred	
	Pounds	Revenue	Pounds	Revenue	Pounds	Revenue
EAG	lbs	$	lbs	$	lbs	$
WAG	lbs	$	lbs	$	lbs	$
BST	lbs	$	lbs	$	lbs	$
BSS	lbs	$	lbs	$	lbs	$
BBR	lbs	$	lbs	$	lbs	$
SMB	lbs	$	lbs	$	lbs	$

3. BSAI Crab Quota

3.2 BSAI Crab Harvest Quota Lease Costs

In the table below, please record the total pounds and costs for annual harvest quota permits *owned by other entities* that were landed by this vessel in the listed BSAI Crab fisheries. Please include all such quota landed by this vessel, through either a formal lease or informal agreement (such as stacking or pooling within harvest cooperatives or harvest of IFQ held by crew).

If you had an arrangement under which you harvested another holder's quota and paid them a percentage (for example, 70%) of the revenues from the landed quota, record the total pounds landed and the total dollar amount of the landing revenues paid to the quota holders(s), for each type of quota (e.g., CDQ, IFQ-A, IFQ-B, IFQ-C). Include all post-season adjustments to date.

Report only the direct costs for leasing CDQ or IFQ, including all post-season adjustments. Indirect costs (e.g., harvest cooperative fees) will be recorded in Section 5.1m. If you did not acquire additional CDQ or IFQ for one or more fishery, indicate N/A on that line.

Adak Community Allocation WAG (ACA-WAG) and Community Development Quota (CDQ):
Pounds : If you acquired the right to land a given amount of ACA-WAG (in the Western Aleutian Islands golden king crab fishery) or CDQ crab for 2010, enter the number of pounds.
Total Cost: Record the total cost of the **ACA-WAG or CDQ** quota you acquired in each CR fishery for each species, including all post-season adjustments to date.

CPO-IFQ
Pounds: If you acquired the right to land additional **CPO-IFQ** crab for 2010 (beyond your original allocation), enter the number of pounds.

Total Cost: Record the total cost of the additional **CPO-IFQ** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ A
Pounds: If you acquired the right to land additional **IFQ A-class** crab for 2010 (beyond your original allocation), enter the number of pounds.
Total Cost: Record the total cost of the additional **IFQ A-class** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ B
Pounds: If you acquired the right to land additional **IFQ B-class** crab for 2010 (beyond your original allocation), enter the number of pounds.
Total Cost: Record the total cost of the additional **IFQ B-class** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ C
Number of Crew: Record the number of crew members (including captain) contributing IFQ to the harvest.
Pounds: Record the number of pounds of **Crew IFQ (CVC, CPC, or "C-class")** crab quota harvested by the vessel. Include C-shares leased from IFQ owners that did not work on the vessel.
Total Cost: Enter the total amount in dollars paid for the IFQ C-shares, including all post-season adjustments to date. Do not include payments made to the captain or crew for labor - these will be reported in Section 4.

Table 3.2 BSAI Crab Harvest Quota Lease Costs

Quota Type	Fishery Code	Pounds Leased	Total Cost
CDQ/ACA-WAG	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$
CPO-IFQ	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$

(Table continues on next page)

Table 3.2 (Continued) BSAI Crab Harvest Quota Lease Costs

Quota Type	Fishery Code	Pounds Leased	Total Cost
IFQ A	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$
IFQ B	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$

		Number of Crew Contributing C Shares	Pounds	Total Cost
IFQ C	EAG		lbs	$
	WAG		lbs	$
	BST		lbs	$
	BSS		lbs	$
	BBR		lbs	$
	SMB		lbs	$

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4. Labor Information

4.1 Crab Harvesting Labor Costs

Record the following information for crew who harvest crab. Record the data for each CR fishery in which this vessel participated. Leave the row blank for any fisheries in which the vessel did not participate.

Number of Paid Harvest Crew Members (exclude the captain): Record the number of crew aboard the vessel (exclude captain) who provided crab harvesting labor during each listed fishery.

Total Labor Payment to Harvest Crew (exclude the captain)
Record the total payment made to crew (exclude the captain) for their crab harvesting labor. List the amount actually paid to crew in their settlement, *not* their earnings before crew-related expenses (such as fuel, bait, or food and provisions) were deducted. Include all post-season adjustments to date. Exclude any payments to crew for their IFQ (enter this in Table 3.2).

Captain Labor Payment
Record the total payment made to the captain for his services. List the amount actually paid to the captain, *not* the earnings before shared expenses (such as fuel, bait, or food and provisions) were deducted. Include all post-season adjustments to date. Exclude any payments to captain for his/her IFQ (enter this in Table 3.2).

Table 4.1: Labor Payments to Captain and Crew

CR FISHERY CODE	CREW		CAPTAIN
	Number of Paid Harvest Crew Members	Total Labor Payment to Harvest Crew	Total Labor Payment to Captain
EAG		$	$
WAG		$	$
BST		$	$
BSS		$	$
BBR		$	$
SMB		$	$

4. Labor Information

4.2 Labor Payment Details

In Table 4.2 below, indicate by checking the appropriate column whether the following expenses were deducted (shared expenses taken off the top of gross revenues), directly charged (charged to an individual after the crew share is calculated), or not charged to crew when calculating the harvest crew payments in BSAI crab fisheries. If expenses were treated differently in different fisheries, report how they were treated on average or most often.

Table 4.2 Labor Payment Details

EXPENSES	CHECK ONE			
	DEDUCTED	DIRECTLY CHARGED	NOT CHARGED TO CREW	NOT APPLICABLE
Fuel and lubrication	○	○	○	○
Food and provisions	○	○	○	○
Bait	○	○	○	○
Fish tax (see Section 7.1.l)	○	○	○	○
Observer costs	○	○	○	○
CDQ costs (from Table 3.2)	○	○	○	○
IFQ costs (from Table 3.2)	○	○	○	○
Travel and airfare costs	○	○	○	○
Gear loss	○	○	○	○
Other (describe):	○	○	○	○
	○	○	○	○
	○	○	○	○

4. Labor Information

4.3 Revenue Shares

In Table 4.3, indicate what percentage of the net share (total revenues minus the expenses listed in Table 4.2) was paid to the owner, crew, and captain for each of the listed CR fisheries. If you did not participate in a fishery, leave that row blank. If crew was paid wages in one or more fishery, and not by a share of net revenue, indicate N/A in the crew share column for that fishery. For each fishery that you did participate in, the shares you report for that fishery code in the owner, crew and captain column must sum to 100%.

Table 4.3 Revenue Shares

CR FISHERY CODE	OWNER SHARE %	CREW SHARE % (excluding Captain)	CAPTAIN SHARE %
EAG	%	%	%
WAG	%	%	%
BST	%	%	%
BSS	%	%	%
BBR	%	%	%
SMB	%	%	%

4. Labor Information

4.4 BSAI Crab Crew Licenses and Permits

Crew Licenses/Permit Numbers
In Table 4.4, record the Alaska Commercial Crew license number **or** a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number for each individual who worked as a captain or harvest crewmember during the calendar year. For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g. M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license **or** permit number per crewmember. Do not count any crewmember more than once.

Table 4.4: Harvest Crew Licenses/Permits

Crewmember	LICENSE/PERMIT NUMBER	CHECK ONE: ADF&G Crew License	CHECK ONE: CFEC Gear Operator Permit	Crewmember	LICENSE/PERMIT NUMBER	CHECK ONE: ADF&G Crew License	CHECK ONE: CFEC Gear Operator Permit
1		○	○	15		○	○
2		○	○	16		○	○
3		○	○	17		○	○
4		○	○	18		○	○
5		○	○	19		○	○
6		○	○	20		○	○
7		○	○	21		○	○
8		○	○	22		○	○
9		○	○	23		○	○
10		○	○	24		○	○
11		○	○	25		○	○
12		○	○	26		○	○
13		○	○	27		○	○
14		○	○	28		○	○

Note: Commercial fishing license and permit information is public record. A vessel master has the right to record the crew member's license number or permit ID and no release is necessary to report the information here. EDR submitters can contact PSMFC, ADF&G or CFEC to request license or permit numbers by crewmember name at the contacts below:

ADF&G – Commercial Crew License Licensing Questions (907) 465-2376 Licensing FAX (907) 465-2440 Licensing Email licensehelp@fishgame.state.ak.us	CFEC - Gear Operator Permit Phone: (907) 790-6921 Email: dfg.cfec.questions@alaska.gov Website: http://www.cfec.state.ak.us/publook/publook.jsp

5. Vessel Costs

5.1 Costs for BSAI Crab Fishing Only

In Table 5.1, record the BSAI crab fishery operating costs for this vessel. These are costs that are incurred by this vessel solely in the BSAI Crab fisheries. Section 5.2 will ask for information on costs that cannot be tied exclusively to the BSAI crab fisheries. Include any taxes paid on the listed items (e.g. fuel tax, sales tax) in the totals.

a. Insurance Premiums (Hull, Property and Indemnity, and Pollution): if you paid a specific premium for operating in the BSAI Crab fishery, record the cost here. Record insurance premiums that cannot be attributed just to crab fishing in Section 5.2.c (page 22-23). If you belonged to an insurance pool for the BSAI crab fishery, record the net costs of being in the pool (deposits into the pool minus any dividends received).

b. Insurance Deductibles: include any insurance deductibles paid for accidents that occurred on the vessel during 2010. Exclude any repair or medical costs paid by the insurance claim (i.e., only list your out-of-pocket expense).

c. Crab Pots Purchased for Use in BSAI Crab Fishery, by Location: the total quantity and cost of crab pots purchased during 2010. Identify the location of the seller you purchased the pots from using the location codes listed below. Report costs of repair and maintenance of crab pots (including rebuilding in 5.1n. Report costs of pots used for commercial harvest of cod or other non-crab species in Section 5.2 b.

d. Line and Other Crab Gear Purchases, by location: the total expense on line, floats, and other fishing gear other than pots used in BSAI crab fishing. Identify the locations where you purchased these items using the location codes listed below.

e. Bait used in BSAI crab fishery, by type and location: the total quantity (**in pounds)** and cost of bait (by species) used in each listed CR fishery during the calendar year. Identify the locations where you purchased the bait using the location codes listed below. Do not include bait you caught or purchased prior to 2010.

f. Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery: record fuel purchases made for each of the BSAI CR fisheries. Identify the locations where you purchased fuel using the location codes listed below. Record the total quantity (**in gallons**) of fuel and the purchase cost including fuel taxes. Indicate in the check box if fuel purchase cost includes lubrication and fluids. Record fuel purchases in each fishery for the entire period in which you were fishing in, traveling to and from, and offloading during each CR fishery. Record fuel cost for transiting to and from your home port before and after the crab fishery in Table 5.2d.

g. Food and Provisions for Crew: the total cost of these items consumed and used by the crew. Do not include any items that were paid for by crewmembers, either directly or withheld from their earnings.

h. Other Crew Costs: list additional expenses for crew and the associated costs (for example, transportation costs, medical costs, payroll taxes, unemployment insurance, etc.) Do not include any items that were paid for by crewmembers, either directly or withheld from their earnings.

i. Freight Costs for Landed Crab: total expenses for shipping crab caught aboard this vessel for sale or processing elsewhere.

j. Storage, Wharfage, and Delivery: the total storage, wharfage, trucking, and delivery costs for pots and other equipment used aboard this vessel in the crab fisheries.

k. Observer Costs: record the sum of all observer fees paid in each CR fishery for the year.

l. Crab Landing Taxes and Fees: record the sum of all state and local fish taxes (e.g., Alaska fisheries business tax, local landing tax, cost recovery and buyback tax, arbitration assessment, and others) you paid for landing BSAI crab. These taxes and fees were included in the Gross Revenue recorded in Section 2.

m. Fishing Cooperative Costs: record the total cost to you for this vessel's participation in a BSAI crab fishing cooperative, including intercooperative exchange fees. Exclude any monies paid to purchase or lease crab ITQ. List only the costs associated with membership or operating costs of the cooperative.

n. Other Crab-specific Costs: list additional expenses incurred for BSAI Crab fishing and the associated costs (for example, pot and gear repairs, association/marketing fees, vessel communication costs, vessel leasing costs, pot truck fees, accounting fees, vessel moorage during the crab fishery, overage fines, etc.).

Location Codes for Table 5.1

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 5.1 Costs for BSAI Crab Fishing Only

COST CATEGORY		TOTAL COST
a. Insurance Premiums (Hull, Property and Indemnity, and Pollution)		$
b. Insurance Deductibles		$
c. Crab Pots Purchased for Use in BSAI Crab Fishery		
Location Code:	Quantity:	$
Location Code:	Quantity:	$
Location Code:	Quantity:	$
d. Line and Other Crab Gear Purchases		
Location Code:		$
Location Code:		$
Location Code:		$
e. Bait Used in BSAI Crab Fishery		
CR Fishery Code: **EAG**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **WAG**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BST**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BSS**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BBR**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:-	$
Bait Species	Pounds:	$
CR Fishery Code: **SMB**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:-	$
Bait Species	Pounds:	$

COST CATEGORY			TOTAL COST
f. Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery		Cost includes lube/fluids? ◯ Yes ◯ No	
CR Fishery Code	Location Code(s)	Fuel Quantity (gallons)	Total Cost
EAG			$
WAG			$
BST			$
BSS			$
BBR			$
SMB			$
g. Food and Provisions for Crew			$
h. Other Crew Costs (describe below)			
			$
			$
			$
i. Freight Costs for Landed Crab			$
j. Storage, Wharfage, and Delivery			$
k. Observer Costs			
		CR Fishery Code: **EAG**	$
		CR Fishery Code: **WAG**	$
		CR Fishery Code: **BST**	$
		CR Fishery Code: **BSS**	$
		CR Fishery Code: **BBR**	$
		CR Fishery Code: **SMB**	$
l. Crab Landing Taxes and Fees			$
m. Crab Harvest Cooperative Fees			$
n. Other Crab-specific Costs (describe below)			
			$
			$
			$
			$
			$
			$
			$

5.0 Vessel Costs

5.2 Annual Vessel Costs

In Table 5.2, please record all of the following costs that were incurred for your vessel during the 2010 calendar year.. Indicate if these costs were incurred for the BSAI crab fishery only by checking "Yes" under "Crab-only Cost". Otherwise, check "No" and these costs will be averaged out over *all* your crab and non-crab activities during the year.

a. Investments in Vessel and Equipment: record the total cost of improvements or investments in vessel, gear and equipment for the year. This includes the costs of all assets that were financed or purchased using Capital Construction Fund monies during 2010 and will be depreciated for tax purposes. Do not include standard repairs and purchases that were paid for completely from 2010 income (record these in item 7.2b), and exclude investments made solely for non-crab fisheries. Identify the location of the seller you purchased the improvements from using the location codes listed below.

b. Repair and Maintenance for Vessel and Equipment: record the repair and maintenance expenses for maintaining this vessel and repairing mechanical and physical problems with the vessel or equipment (exclude investment expenditures included in item 5.2a). Exclude expenses or repairs that result solely from non-crab fisheries. Include salaries of employees whose job is to perform R&M only if their wages are *not* already included in Section 4.1. Identify the location of the seller you purchased the R&M goods and services from using the location codes listed below.

c. Insurance Premiums (Hull, Property and Indemnity, and Pollution): record the total costs of your annual insurance premiums for this vessel.

d. Fuel, Lubrication, and Fluids: record fuel purchases that were not incurred for fishing or processing during the BSAI crab season (for example, for transiting to and from home port to reach the Bering Sea before and after the crab fishing season). Identify the locations where you purchased the fuel using the location codes listed below., Record the total quantity (**in gallons**) of fuel; and the purchase cost including fuel taxes. Indicate in the check box if fuel purchase cost includes lubrication and fluids.

e. Other Vessel-specific Costs: record any other significant cost(s) that were incurred in order to fish for crab in calendar year 2010 that were not included in the categories above, and not reported in the crab season-specific table (Section 5.1). Please describe the nature of the expense(s) and do not list costs of permits or licenses.

Location Codes for Table 5.2

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO

Location	Code
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 5.2: Annual Vessel Costs

COST CATEGORY	TOTAL	CRAB ONLY COST?
a. Investments in Vessel and Equipment		
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
b. Repair and Maintenance for Vessel and Equipment		
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
c. Insurance Premiums (Hull, Property and Indemnity, and Pollution)	$	◯ Yes ◯ No
d. Fuel, Lubrication, and Fluids		
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
Location code:	$	◯ Yes ◯ No
Fuel Cost includes lube/fluids? ◯ Yes ◯ No		
e. Other Vessel-specific Costs. Describe below.		
	$	◯ Yes ◯ No
	$	◯ Yes ◯ No
	$	◯ Yes ◯ No

6. Annual Totals for All Fisheries

Please record the total sum for the calendar year for days at sea, gross revenue, pounds landed, and labor costs for this vessel. Be sure to include all fishery participation for the calendar year, **including vessel activities other than BSAI Crab fishing (i.e., include groundfish, chartering, tendering, etc**) and days spent transiting from/to home port. Do not include revenues from sale or lease of quota or permits.

	TOTAL
Days at Sea	
Gross Revenue	$
Total Pounds Landed	
Labor Costs*	$

*Include only the direct compensation made to the crew and captain, as in Section 4.

Revised: 02/09/2010

OMB control No. 0648-0518
Expiration Date: 05/30/2011

ANNUAL
SHORESIDE PROCESSOR
CRAB ECONOMIC DATA REPORT (EDR)

CALENDAR YEAR 2010

This form can be downloaded from
http://www.fakr.noaa.gov

PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 48 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 (16 U.S.C. 1801, *et seq*.). They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

ANNUAL SHORESIDE PROCESSOR EDR

Introduction

This report collects information on Bering Sea and Aleutian Islands Management Area (BSAI) crab operations, including Western Alaska Community Development Quota Program (CDQ) crab fisheries. These fisheries are referred to as Crab Rationalization fisheries (CR fisheries). Pursuant to the legislation, the data and identifiers will also be used for program enforcement and determination of qualification for quota shares. Consequently, identifiers and data will be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

You have received this form because our records show that you are either the owner of a shoreside processor that participated in the BSAI crab fisheries in the past or were leased a shoreside processor that participated in the BSAI crab fisheries in the past. **You are required to submit the Certification Pages (pages 3 and 4) and any additional information requested in the Economic Data Report (EDR). Failure to submit an EDR form when required will result in delay in and/or denial of any and all crab permit applications**.

To make sure that each company is consistently and accurately completing the EDR, random audits will be performed by a qualified accountant on some of the EDRs for a subset of the crab fishery participants. This step will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska crab fisheries.

Auditors will verify records by comparing specific elements of the report with your accounting records. To make this activity as efficient and non-intrusive as possible, we suggest that you:

1. Keep a copy of the completed EDR or certification pages you submit to the Data Collection Agent (DCA). Copy and attach extra sheets as needed.

2. Keep a file that has all of the supporting information used in the preparation of the EDR.

3. Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:

    a. Audited financial statements
    b. Reviewed financial statements
    c. Compiled financial statements
    d. Tax returns.

Record only whole numbers. Round up dollar figures to the next highest dollar.

If YOUR label address is incorrect or missing, please correct the error on the label or print your permanent name and address here.

Shoreside Processor Name
Company Name
Street address or P.O. Box Number
City, State, and Zip Code

NOTE:

Any owner or leaseholder of a shoreside processor during any period in the calendar year identified on the EDR in which the processing facility was used to process crab in a Crab Rationalization (CR) fishery must submit to the DCA, at the address provided on the form, an EDR for a shoreside processor.

Definition of "Leaseholder": For the purpose of defining the persons responsible for submitting the EDR, a Leaseholder is a person, other than the owner of the processing facility for which the EDR is required, who: was identified as the leaseholder, in a written lease, of the processing facility, **OR** paid expenses of the processing facility, **OR** claimed expenses for the processing facility as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

Mail or FAX Certification Pages or Entire EDR by June 28, 2011 to:

Pacific States Marine Fisheries Commission
205 SE Spokane, Suite 100
Portland, OR 97202

Email: alaska_crab@psmfc.org
FAX Number: 503-595-3450

For more information or if you have questions, please call toll free 1-877-741-8913

This page intentionally blank.

CERTIFICATION PAGE – 1 of 2

This is a **required form**. Provide all information requested below.

Shoreside Processor Information	
Shoreside Processor Name	
Registered Crab Receiver Permit Number	ADF&G Processor Code (F Code)
Physical Location of Land-based Plant (street address, city, state, zip code)	
Borough Assessed Value of Plant and Equipment ($)Year Assessed:	Current Estimated Value of Plant and Equipment ($)

Owner Information	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

Leaseholder Information (if applicable)	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

NOTE: Any owner or leaseholder may appoint a designated representative to respond to questions in the EDR. The designated representative is the primary contact person for the DCA on issues relating to data required in the EDR.

Person Completing this Report (check one)

- ◯ Owner (If your name and address are the same name and address provided in the Owner Information block above, the information does not need to be repeated here)
- ◯ Leaseholder (If your name and address are the same name and address provided in the Leaseholder Information block above, the information does not need to be repeated here)
- ◯ Designated Representative (complete information below)

Name	Title
Business Number Telephone	Business FAX Number
Business E-mail address (if available)	

CERTIFICATION PAGE – 2 of 2

Select one of the following statements and provide any requested information. Check one box below.

☐ 1. You are the Shoreside Processor owner, and you processed BSAI crab in the above described plant during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
☐ 2. You were the Shoreside Processor leaseholder, and you operated the above described Shoreside Processor, and you processed BSAI crab during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
☐ 3. You are the Shoreside Processor owner, and you leased a portion of your IPQ to another party, and processed BSAI crab in the above described Shoreside Processor during the 2010 calendar year. Provide the name, address, and telephone number of the person to whom you leased the IPQ during the 2010 calendar year below. **Complete and submit <u>entire EDR</u> for the 2010 calendar year.**
☐ 4. You are the Shoreside Processor owner, and you leased all of your IPQ to another party, and you processed no BSAI crab in the above described Shoreside Processor. Provide the name, address, and telephone number of the person to whom you leased the IPQ during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**
☐ 5. You are the Shoreside Processor owner, and no one processed BSAI crab in the above described Shoreside Processor during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**

Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name	
Business address	
Telephone No (include area code)	Date of Sale or Lease (day/month/2010)

Read the following statement, and sign and date the box below:

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	Date signed

Tables A through F contain information you will need when completing the EDR forms.

Table A. Crab CR Fisheries

Fishery Code	CR Fishery	Geographic Area
EAG	Eastern Aleutian Islands golden king crab (*Lithodes aequispinus)*	in waters of the EEZ with **an eastern boundary** the longitude of Scotch Cap Light (164° 44' W. long.) to 53E 30' N. lat., then West to 165E W. long. **a western boundary** of 174° W. long., and **a northern boundary** of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab (*Lithodes aequispinus*)	in waters of the EEZ with **an eastern boundary** the longitude 174° W. long., **a western boundary** the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and **a northern boundary** of a line from the latitude of 55E30' N. lat., then west to the U.S.-Russian Convention line of 1867.
BST	Bering Sea Tanner crab (*Chionoecetes bairdi)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54E30'N. lat. with **a southern boundary** of 54° 36' N. lat.
BSS	Bering Sea Snow crab (*Chionoecetes opilio)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54° 30' N. lat. with **a southern boundary** of 54° 36' N.
BBR	Bristol Bay red king crab (*Paralithodes camtschaticus*)	in waters of the EEZ with **a northern boundary** of 58° 30' N. lat., **a southern boundary** of 54° 36' N. lat., and **a western boundary** of 168° W. long. and including all waters of Bristol Bay.
SMB	St. Matthew blue king crab (*Paralithodes platypus)*	in waters of the EEZ with **a northern boundary** of 62° N. lat., **a southern boundary** of 58°30' N. lat., and **a western boundary** of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

Table B. Crab Species Codes		
Species Code	Common Name	Scientific Name
900	Box	*Lopholithodes mandtii*
910	Dungeness	*Cancer magister*
921	Red king crab	*Paralithodes camtschaticus*
922	Blue king crab	*Paralithodes platypus*
923	Golden (brown) king crab	*Lithodes aequispinus*
924	Scarlet king crab	*Lithodes couesi*
931	Tanner crab	*Chionoecetes bairdi*
932	Snow crab	*Chionoecetes opilio*
933	Grooved Tanner crab	*Chionoecetes tanneri*
934	Triangle Tanner crab	*Chionoecetes angulatus*
940	Korean horsehair crab	*Erimacrus isenbeckii*
951	Multispinus crab	*Paralomis multispinus*
953	Verrilli crab	*Paralomis verrilli*

Table C. Crab Product Codes Used for EDRs	
Code	Description
01	Whole crab
80	Crab sections
81	Crab meats
82	Crab claws
83	Crab tails
84	Crab legs
97	Other crab product (specify):

Table D. Crab Process Codes.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Process Code	Description
00	Other (specify):
01	Fresh
02	Frozen
03	Salted/brined
06	Cooked
07	Live
18	Fresh/vacuum pack
21	Frozen/block
22	Frozen/shatter pack
28	Frozen/vacuum pack

Table E. Crab Size Codes.
If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Size Code	Description
1	Standard or large sized crab or crab sections
2	Smaller size crab or crab sections, e.g., *opilio* crab less than 4 inches.
3	Mixed crab size or “ocean run”

Table F. Crab Grade Codes
If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Grade Code	Description
1	Standard or premium quality crab or crab sections
2	Lower quality product, e.g., dirty shelled crab or a pack that is of lower quality than No. 1 crab.
3	Mixed crab grade or “ocean run”

Instructions: Provide all information requested in each section. Enter the calendar year for which this report is submitted on all pages requesting it. Please record only whole numbers, and round all dollar values to the next highest dollar.

1. BSAI Crab Processing Activity

Record the following information on finished crab production in the tables 1.a-e below for each CR fishery in which this plant participated. Leave the table blank for any fisheries in which the plant did not participate.

Number of Crab Processing Days
Record the total number of days on which you processed crab in each CR fishery.

Dates Covered
Record the beginning and ending day, month and year for the time period in which you participated in each of your defined CR fisheries. Provide separate beginning/ending dates for Spring and Fall fisheries if you participated in both.

Raw Crab Pounds Purchased
Record the number of raw crab pounds used in processing.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on separate lines.

Finished Pounds
Record the number of finished pounds produced for each product.

Custom Processed (Yes or No)
Record custom and non-custom processing activities on separate lines. Check “Yes” or “No” to indicate if the recorded production was custom processing done by this plant for another party.

Table 1.a: Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: **EAG**		Dates Covered: ______ to ______ (mm/dd/yy) (mm/dd/yy) ______ to ______ (mm/dd/yy) (mm/dd/yy)	
Number of Crab Processing Days:		Raw Crab Pounds Processed:	

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.b: Western Aleutian Islands Golden CR Fishery

CR Fishery Code: **WAG**	Dates Covered: ______________ to ______________ (mm/dd/yy) (mm/dd/yy) ______________ to ______________ (mm/dd/yy) (mm/dd/yy)

Number of Crab Processing Days:		Raw Crab Pounds Processed:	

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.c: Bering Sea Tanner CR Fishery

CR Fishery Code: **BST**	Dates Covered: ____________ to ____________ (mm/dd/yy) (mm/dd/yy) ____________ to ____________ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No
				lb kg	lbs	Yes No

Table 1.d: Bering Sea Snow CR Fishery

CR Fishery Code: **BSS**	Dates Covered: ______ to ______ (mm/dd/yy) (mm/dd/yy) ______ to ______ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.e: Bristol Bay Red CR Fishery

CR Fishery Code: **BBR**	Dates Covered: ______ to ______ (mm/dd/yy) (mm/dd/yy) ______ to ______ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No

Table 1f : Saint Mathew Blue CR Fishery

CR Fishery Code: **SMB**	Dates Covered: ______ to ______ (mm/dd/yy) (mm/dd/yy) ______ to ______ (mm/dd/yy) (mm/dd/yy)

Number of Crab Processing Days:		Raw Crab Pounds Processed:	

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

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2. BSAI Crab Sales and Processing

2.1 Annual BSAI Crab Sales

Record the following information on crab sales to **affiliated** entities (Table 2.1a) and to **unaffiliated** entities (Table 2.1b). For further details on the definition of "Affiliation" please refer to the federal regulations at 50 CFR part 680.2. Sales for 2010 would include sales of products produced and sold in 2010 or sales from inventory (products that were harvested and processed in a prior year). Do not include product processed in 2010, but not sold during the calendar year (i.e. held in storage).

Species Code
Record the species code from Table B for each product sold in calendar year 2010. If multiple species were sold, record the information on a separate line.

Product Code
Record the product code from Table C for each product. If multiple products were sold, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate "Bulk" if production was in random weight units. If different box sizes were sold, record the total amount for each box size on separate lines.

Finished Pounds
Record the total pounds of each product sold.

FOB Alaska/Seattle Revenues
Record the amount you received for each product sold. Do not include any additional payment you received to cover any shipping, handling, or storage costs associated with the sale beyond the FOB port. Do not deduct any broker fees or taxes paid or royalties for IPQ (we will ask you to report taxes, bait and IPQ costs in Section 6.1 of the EDR). Include any post-season adjustments received by the time of submitting this EDR, but do not report any payments not yet received as of this date. Indicate in the checkbox the shipping point for FOB revenues.

Table 2.1a: BSAI Crab Sales to Affiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle
					◯lb ◯kg		$	◯Alaska ◯Seattle

Table 2.1b: BSAI Crab Sales to Unaffiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle
					◯ lb ◯ kg		$	◯ Alaska ◯ Seattle

2. BSAI Crab Sales and Processing

2.2 Custom Processing Services Provided

CR Fishery Code
Record the code from Table A for each CR fishery in which you provided custom processing services. If you produced multiple custom products within a CR fishery, record information for each on separate lines.

Product Code
Record the product code from Table C for each product. If multiple products were processed, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Custom Processing Revenue
Record the revenue received for custom processing the specified products.

Table 2.2: Custom Processing Services Provided

CR FISHERY CODE	PRODUCT CODE	PROCESS CODE	CUSTOM PROCESSING REVENUE
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$

3. Labor Information

3.1 Crab Processing Labor Costs

Record processing labor cost information for each of the listed CR fisheries that the plant participated in during the 2010 calendar year in Table 3.1 below. Leave the row blank for any fisheries in which the plant did not process any crab.

Average Number of Crab Processing Positions: estimate the average number of crab processing positions on your crab line(s) on days that you processed crab, for each crab CR fishery. Do not count any salaried employees (these will be recorded in Section 6.2).

Total Man-Hours: record the sum of all hours worked by crab processing workers for each CR fishery.

Total Processing Labor Payment: record the total payment made to crab processing workers in each CR fishery. List the amount actually paid to labor; exclude benefits and indirect expenses made on their behalf. Include wages and bonuses only for the processing workers included above. Do not count any payments to salaried employees (these will be recorded in Section 6.2).

Table 3.1: Crab Processing Labor Costs

CR FISHERY CODE	AVERAGE NUMBER OF CRAB PROCESSING POSITIONS	TOTAL MAN-HOURS	TOTAL PROCESSING LABOR PAYMENT
EAG			$
WAG			$
BST			$
BSS			$
BBR			$
SMB			$

3. Labor Information

3.2 BSAI Crab Employee Residence

Record the cities of residence of the employees that participated in BSAI crab processing, and the number of employees that are from each residential location. For employees with Alaska residence, list individual Alaska cities that employees identified on employment records (i.e. W-4 forms). For employees without Alaska residence, list individual states for US residents, or individual counties for nonresident workers. Record the number of employees residing in the each of listed residence locations. **Do not count any employee more than once.**

Table 3.2: BSAI Crab Employee Residence

US RESIDENTS		IF COUNTRY OTHER THAN UNITED STATES, ENTER PRIMARY COUNTRY OF RESIDENCE	NUMBER OF EMPLOYEES
IF ALASKA, ENTER PRIMARY CITY OF RESIDENCE	IF OTHER THAN ALASKA, ENTER PRIMARY STATE OF RESIDENCE		

4. BSAI Crab Custom Processing Done for You

Record the following information on custom crab processing provided for you by processors other than this plant. Record information for each CR fishery in which custom processing was obtained. Leave the table blank for any fisheries in which no custom processing was done.

Raw Pounds Supplied to Custom Processors
For each species, record the number of raw crab pounds you supplied to the custom processor for processing on your behalf.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on a separate line.

Finished Pounds
Record the number of finished pounds produced for each product.

Processing Fee
Record the payment made to custom processors for each crab product.

Table 4.a: Custom Processing - Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: EAG						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 4.b: Custom Processing - Western Aleutian Islands Golden CR Fishery

CR Fishery Code: WAG						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 4.c: Custom Processing - Bering Sea Tanner CR Fishery

CR Fishery Code: BST						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$

Table 4.d: Custom Processing - Bering Sea Snow CR Fishery

CR Fishery Code: BSS						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$
				☐ lb ☐ kg	lbs	$

Table 4.e: Custom Processing - Bristol Bay Red CR Fishery

CR Fishery Code: BBR						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 4.f: Custom Processing – St. Mathew Blue CR Fishery

CR Fishery Code: SMB						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

5. Raw Crab Purchases from Delivering Vessels

Record the following information on raw crab purchases from delivering vessels in tables below. Record information for each CR fishery in which raw crab was purchased. Leave the table blank for any fisheries in which no raw crab purchases were made.

IFQ Type
Report raw crab purchases from each CR fishery by harvest quota type using the following type codes:

IFQ Type Code	Harvest Quota
A	A Class shares - CVO-IFQ and CPO-IFQ
B	B Class shares - CVO-IFQ and CPO-IFQ; CPO-IFQ; CDQ; and Adak WAG IFQ
C	C Class Shares - CVC-IFQ and CPC-IFQ

Crab Size
Record the crab size from Table E for each species. If different sizes of crab were purchased in a CR fishery, record the amounts on separate lines.

Crab Grade
Record the crab grade from Table F for each species. If different grades of crab were purchased, record the totals for each grade on separate lines.

Raw Pounds Purchased
Record the total pounds of raw crab purchased, by size and grade for each crab species.

Gross Payment
Record amount paid to fishers for raw crab purchased from each each crab IFQ type/size/grade combination. Gross payment includes the value of any taxes paid on behalf of delivering vessels. Include any post-season adjustments in the gross payment totals.

Table 5.a: Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.b: Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.c: Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.d: Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.e: Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.f: Raw Crab Purchases, St. Mathew Blue (SMB) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

6. Plant Costs

6.1 Costs for BSAI Crab Production Only

In Table 6.1, record the BSAI crab fishery operating costs for this plant. These are costs that are incurred by this plant solely in the BSAI Crab fisheries. Section 6.2 will ask for information on costs that cannot be tied exclusively to the BSAI crab fisheries. Include any taxes paid on the listed items (e.g. fuel tax, sales tax) in the totals.

a. Fisheries Taxes: total of all the Alaska fisheries business tax, SMAA taxes, and other local sales tax on raw crab. Includes all direct tax payments you made to a city, borough or the State of Alaska as a result of processing BSAI crab at this plant for the year, excluding property taxes and landing taxes paid on behalf of fishermen.

b. Processing and Packaging Materials, Equipment, and Supplies, by Location: the total cost of all processing supplies (gear, knives, gloves, boots, etc.) and packaging materials (such as banding or strapping material, shrink-wrap, pallets, etc.) purchased for processing BSAI crab products at this plant in calendar year 2010. Record total cost these goods purchased in the following locations: Atka, Akutan, Dutch Harbor/Unalaska, King Cove, Kodiak, St. Paul, All other Alaska Cities, All Out-of-State locations.

c. Food and Provisions: record the total cost of these items if they are provided to processing workers free of charge (i.e., as part of their contract). Do not include the wages paid to employees responsible for food preparation, cooking, and clean up.

d. Other Direct Costs for Crab Labor: record the total costs to the plant owner for transportation and housing, payroll taxes, unemployment insurance, workmen's compensation, medical expenses, social security and insurance benefits, recruitment, training, and education. Do not include costs paid by employees.

e. Insurance Deductibles: include any insurance deductibles paid for accidents that occurred on the vessel during 2010. Exclude any repair or medical costs paid by the insurance claim (i.e., only list your out-of-pocket expense).

f. Re-packing Costs: record the total amount you spent to re-pack any of the BSAI crab products you processed in this plant during the year.

g. Broker Fees and Promotions for BSAI Crab Sales, by Fishery: record the sum of all fees paid to brokers for sales and promotion of BSAI crab for each CR fishery for the 2010 calendar year.

h. Individual Processor Quota (IPQ) Lease Costs: record the pounds leased and cost paid to quota holders for use of IPQ for each CR fishery for the 2010 calendar year.

i. Observer Costs, by Fishery: record the sum of all observer fees paid in each CR fishery for the year.

j. Freight Costs for Supplies to the Plant: total expenses for having equipment/items used in this plant (for BSAI crab only) shipped to you.

k. Freight and Handling Costs for Processed Crab Products From the Plant: record the freight and handling costs you incurred during the sale and delivery of processed products during the year. If storage costs were incurred while shipping these products, include the costs here and *do not* include them in "k. PRODUCT STORAGE."

l. Product Storage: record the total cost of storing processed BSAI crab products during the year.

m. Water, Sewer, and Waste Disposal: record your annual crab-specific costs for these items for this plant.

n. Other Crab-specific Costs: list the total cost of other significant expenditures incurred in 2010 that were specific to BSAI crab processing not included in any of the other categories (e.g., IPQ lease or purchase costs, association or accounting fees). Please describe the nature of the expense(s) and do not list costs to be recorded in Sections 6.2 or the costs of permits or licenses.

Table 6.1: Costs for BSAI Crab Production Only

COST CATEGORY			TOTAL COST
a. Fisheries taxes			$
b. Processing and Packaging Materials, Equipment, and Supplies			
LOCATION OF PURCHASE:	ATKA, AK		$
	AKUTAN, AK		$
	DUTCH HARBOR/UNALASKA, AK		$
	KING COVE, AK		$
	KODIAK, AK		$
	ST. PAUL, AK		$
	ALL OTHER ALASKA		$
	ALL OUT-OF-STATE		$
c. Food and Provisions			$
d. Other Direct Costs for Crab Labor			$
e. Insurance Deductibles			$
f. Re-packing Costs			$
g. Broker Fees and Promotions for BSAI Crab Sales			
FISHERY CODE:	EAG		$
	WAG		$
	BST		$
	BSS		$
	BBR		$
	SMB		$
h. Processor Quota (IPQ) Lease Costs			
FISHERY CODE:	EAG	**lbs**	$
	WAG	**lbs**	$
	BST	**lbs**	$
	BSS	**lbs**	$
	BBR	**lbs**	$
	SMB	**lbs**	$

Table 6.1: Costs for BSAI Crab Production Only (Continued)

i. Observer Costs		
FISHERY CODE:	EAG	$
	WAG	$
	BST	$
	BSS	$
	BBR	$
	SMB	$
j. Freight Costs for Supplies to the Plant		$
k. Freight and Handling Costs for Processed Crab Products from the Plant		$
l. Product Storage		$
m. Water, Sewer and Waste Disposal		$
n. Other Crab-specific Costs (describe below)		
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$

This page intentionally blank.

6. Plant Costs

6.2 Annual Plant Costs

In Table 6.2, please record all of the following costs that were incurred for **this plant only** during the 2010 calendar year. Indicate if these costs were incurred for the BSAI crab fishery only by checking "Yes" under "Crab-only Cost". Otherwise, check "No" and these costs will be averaged out over *all* your crab and non-crab activities during the year.

a. Fuel, Electricity, Lubrication and Hydraulic Fluids: total annual cost of fuel, electricity, lubrication & hydraulic fluids used in BSAI crab processing.

b. Investments in Plant and Equipment, by Location: total cost of improvements to plant and equipment for the year. This includes the costs of all assets that were financed or purchased using Capital Construction Fund monies during 2010 and will be depreciated for tax purposes. Do not include standard repairs and purchases that were paid for completely from 2010 income. Identify the location of the seller you purchased the improvements from using the location codes listed below.

c. Repair and Maintenance (R&M) for Plant and Equipment, by location: expenses for maintaining this plant and repairing mechanical and physical problems with the plant or equipment (exclude investment expenditures reported for item 6.2a). Exclude expenses or repairs that result solely from non-crab processing. Do not include salaries of employees whose job is to perform R&M (include these costs in Section 6.2.d). Identify the location of the seller you purchased the R&M goods and services from using the location codes listed below.

d. Number of Employees and Salaries for Foremen, Managers and other Employees: the number of any additional plant employees and the total payment for wages and salaries not included in direct labor costs reported in Section 3.1.

e. Other Plant-specific Costs: list the total cost of all other significant plant-specific expenditures incurred in calendar year 2010 that were not included in any of the other categories. Please specify the nature of the expense(s) and do not list costs recorded in Section 6.1.

Location Codes for Table 6.2

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 6.2: Annual Plant Costs

COST CATEGORY			TOTAL	CRAB ONLY COST
a. Fuel, Electricity, Lubrication and Hydraulic Fluids			$	◯ Yes ◯ No
b. Investments in Plant and Equipment:				
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
c. Repair and Maintenance for Plant and Equipment				
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
Location Code:			$	◯ Yes ◯ No
d. Number of Employees and Salaries for Foremen, Managers and other Employees			$	◯ Yes ◯ No
	Number of Employees:			
e. Other Plant-Specific Costs (describe below)				
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No
			$	◯ Yes ◯ No

7. Annual Totals for All Fisheries

Please record the total sum for the calendar year for processing days, gross FOB Alaska/Seattle revenues, finished pounds processed, and processing labor costs. Be sure to include all of your relevant fishery participation (crab, groundfish, etc). in the totals. Indicate Alaska or Seattle (check one) as your FOB port.

		TOTAL
Processing Days		
Gross FOB Revenues	◯ Alaska ◯ Seattle	$
Finished Pounds Processed		
Processing Labor Costs*		$

*(include only the direct compensation made to processing labor, as in Section 3., and exclude salaried employees).

Print Form Submit via E-mail

Revised: 03/25/2009

OMB control No. 0648-0518
Expiration Date: 05/30/2011

ANNUAL
STATIONARY FLOATING CRAB PROCESSOR (SFCP)

CRAB ECONOMIC DATA REPORT (EDR)

CALENDAR YEAR 2010

This form can be downloaded from
http://www.fakr.noaa.gov

PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 48 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 (16 U.S.C. 1801, *et seq*.). They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

ANNUAL STATIONARY FLOATING CRAB PROCESSOR EDR

Introduction

This report collects information on Bering Sea and Aleutian Islands Management Area (BSAI) crab operations, including Western Alaska Community Development Quota Program (CDQ) crab fisheries. These fisheries are referred to as Crab Rationalization fisheries (CR fisheries). Pursuant to the legislation, the data and identifiers will also be used for program enforcement and determination of qualification for quota shares. Consequently, identifiers and data will be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

You have received this form because our records show that you are either the owner of a SFCP that participated in the BSAI crab fisheries in the past or were leased a SFCP that participated in the BSAI crab fisheries in the past. **You are required to submit the Certification Pages (pages 3 and 4) and any additional information requested in the Economic Data Report (EDR). Failure to submit an EDR form when required will result in delay in and/or denial of any and all crab permit applications**.

To make sure that each company is consistently and accurately completing the EDR, random audits will be performed by a qualified accountant on some of the EDRs for a subset of the crab fishery participants. This step will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska crab fisheries.

Auditors will verify records by comparing specific elements of the report with your accounting records. To make this activity as efficient and non-intrusive as possible, we suggest that you:

1. Keep a copy of the completed EDR or certification pages you submit to the Data Collection Agent (DCA). Copy and attach extra sheets as needed.

2. Keep a file that has all of the supporting information used in the preparation of the EDR.
3. Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:

    a. Audited financial statements
    b. Reviewed financial statements
    c. Compiled financial statements
    d. Tax returns.

Record only whole numbers. Round up dollar figures to the next highest dollar.

If YOUR label address is incorrect or missing, please correct the error on the label or print your permanent name and address here.

SFCP Name
Company Name
Street address or P.O. Box Number
City, State, and Zip Code

NOTE:

Any owner or leaseholder of a SFCP during any period in the calendar year identified on the EDR in which the processing facility was used to process crab in a Crab Rationalization (CR) fishery must submit to the DCA, at the address provided on the form, an EDR for a SFCP.

Definition of "Leaseholder": For the purpose of defining the persons responsible for submitting the EDR, a Leaseholder is a person, other than the owner of the SFCP for which the EDR is required, who: was identified as the leaseholder, in a written lease, of the SFCP, **OR** paid expenses of the SFCP, **OR** claimed expenses for the SFCP as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

Mail or FAX Certification Pages or Entire EDR by June 28, 2011 to:

Pacific States Marine Fisheries Commission
205 SE Spokane, Suite 100
Portland, OR 97202

Email: alaska_crab@psmfc.org
FAX Number: 503-595-3450

For more information or if you have questions, please call toll free 1-877-741-8913

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CERTIFICATION PAGE – 1 of 2

This is a **required form**. Provide all information requested below.

SFCP Information	
SFCP Name	Registered Crab Receiver Permit Number
	USCG Documentation Number
	ADF&G Processor Code (F Code)
Current Estimated Market Value of SFCP and Equipment ($)	Replacement Value of SFCP and Equipment ($)

Owner Information	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

Leaseholder Information (if applicable)	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

NOTE: Any owner or leaseholder may appoint a designated representative to respond to questions in the EDR. The designated representative is the primary contact person for the DCA on issues relating to data required in the EDR.

Person Completing this Report (check one)

❒ Owner (If your name and address are the same name and address provided in the Owner Information block above, the information does not need to be repeated here)

❒ Leaseholder (If your name and address are the same name and address provided in the Leaseholder Information block above, the information does not need to be repeated here)

❒ Designated Representative (complete information below)

Name	Title
Business Number Telephone	Business FAX Number
Business E-mail address (if available)	

CERTIFICATION PAGE – 2 of 2

Select one of the following statements and provide any requested information. Check one box below.

❒ 1. You are the Stationary Floating Processor owner, and you processed BSAI crab in the above described plant during the 2010 calendar year. **Complete and submit entire EDR for the 2010 calendar year.**
❒ 2. You were the Stationary Floating Processor leaseholder, and you operated the above described Stationary Floating Processor, and you processed BSAI crab during the 2010 calendar year. **Complete and submit entire EDR for the 2010 calendar year.**
❒ 3. You are the Stationary Floating Processor owner, and you leased a portion of your IPQ to another party, and processed BSAI crab in the above described Stationary Floating Processor during the 2010 calendar year. Provide the name, address, and telephone number of the person to whom you leased the IPQ during the 2010 calendar year below. **Complete and submit entire EDR for the 2010 calendar year.**
❒ 4. You are the Stationary Floating Processor owner, and you leased all of your IPQ to another party, and you processed no BSAI crab in the above described Stationary Floating Processor. Provide the name, address, and telephone number of the person to whom you leased the IPQ during the 2010 calendar year. **Complete and submit the EDR Certification Pages only.**
❒ 5. You are the Stationary Floating Processor owner, and no one processed BSAI crab in the above described Stationary Floating Processor during the 2010 calendar year. **Complete and submit the EDR Certification Pages only.**

Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name	
Business address	
Telephone No (include area code)	Date of Sale or Lease (day/month/2010)

Read the following statement, and sign and date the box below:

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	Date signed

Tables A through F contain information you will need when completing the EDR forms.

Table A. Crab CR Fisheries

Fishery Code	CR Fishery	Geographic Area
EAG	Eastern Aleutian Islands golden king crab (*Lithodes aequispinus)*	in waters of the EEZ with **an eastern boundary** the longitude of Scotch Cap Light (164° 44' W. long.) to 53E 30' N. lat., then West to 165E W. long. **a western boundary** of 174° W. long., and **a northern boundary** of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab (*Lithodes aequispinus*)	in waters of the EEZ with **an eastern boundary** the longitude 174° W. long., **a western boundary** the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and **a northern boundary** of a line from the latitude of 55E30' N. lat., then west to the U.S.-Russian Convention line of 1867.
BST	Bering Sea Tanner crab (*Chionoecetes bairdi)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54E30'N. lat. with **a southern boundary** of 54° 36' N. lat.
BSS	Bering Sea Snow crab (*Chionoecetes opilio)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54° 30' N. lat. with **a southern boundary** of 54° 36' N.
BBR	Bristol Bay red king crab (*Paralithodes camtschaticus*)	in waters of the EEZ with **a northern boundary** of 58° 30' N. lat., **a southern boundary** of 54° 36' N. lat., and **a western boundary** of 168° W. long. and including all waters of Bristol Bay.
SMB	St. Matthew blue king crab (*Paralithodes platypus)*	in waters of the EEZ with **a northern boundary** of 62° N. lat., **a southern boundary** of 58°30' N. lat., and **a western boundary** of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

Table B. Crab Species Codes		
Species Code	Common Name	Scientific Name
900	Box	*Lopholithodes mandtii*
910	Dungeness	*Cancer magister*
921	Red king crab	*Paralithodes camtschaticus*
922	Blue king crab	*Paralithodes platypus*
923	Golden (brown) king crab	*Lithodes aequispinus*
924	Scarlet king crab	*Lithodes couesi*
931	Tanner crab	*Chionoecetes bairdi*
932	Snow crab	*Chionoecetes opilio*
933	Grooved Tanner crab	*Chionoecetes tanneri*
934	Triangle Tanner crab	*Chionoecetes angulatus*
940	Korean horsehair crab	*Erimacrus isenbeckii*
951	Multispinus crab	*Paralomis multispinus*
953	Verrilli crab	*Paralomis verrilli*

Table C. Crab Product Codes Used for EDRs	
Code	Description
01	Whole crab
80	Crab sections
81	Crab meats
82	Crab claws
83	Crab tails
84	Crab legs
97	Other crab product (specify):

Table D. Crab Process Codes.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Process Code	Description
00	Other (specify):
01	Fresh
02	Frozen
03	Salted/brined
06	Cooked
07	Live
18	Fresh/vacuum pack
21	Frozen/block
22	Frozen/shatter pack
28	Frozen/vacuum pack

Table E. Crab Size Codes.
If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Size Code	Description
1	Standard or large sized crab or crab sections
2	Smaller size crab or crab sections, e.g., *opilio* crab less than 4 inches.
3	Mixed crab size or “ocean run”

Table F. Crab Grade Codes
If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Grade Code	Description
1	Standard or premium quality crab or crab sections
2	Lower quality product, e.g., dirty shelled crab or a pack that is of lower quality than No. 1 crab.
3	Mixed crab grade or “ocean run”

Instructions: Provide all information requested in each section. Enter the calendar year for which this report is submitted on all pages requesting it. Please record only whole numbers, and round all dollar values to the next highest dollar.

1. BSAI Crab Processing Activity

Record the following information on finished crab production in the tables 1.a-e below for each CR fishery in which this SFCP participated. Leave the table blank for any fisheries in which the SFCP did not participate.

Number of Crab Processing Days
Record the total number of days on which you processed crab in each CR fishery.

Dates Covered
Record the beginning and ending day, month and year for the time period in which you participated in each of your defined CR fisheries. Provide separate beginning/ending dates for Spring and Fall fisheries if you participated in both.

Raw Crab Pounds Purchased
Record the number of raw crab pounds used in processing.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1)If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on separate lines.

Finished Pounds
Record the number of finished pounds produced for each product.

Custom Processed (Yes or No)
Record custom and non-custom processing activities on separate lines. Check “Yes” or “No” to indicate if the recorded production was custom processing done by this FSCP for another party.

Table 1.a: Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: **EAG**	Dates Covered: _____ to _____ (mm/dd/yy) (mm/dd/yy); _____ to _____ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No

Table 1.b: Western Aleutian Islands Golden CR Fishery

CR Fishery Code: **WAG**	Dates Covered: ______________ to ______________ (mm/dd/yy) (mm/dd/yy) ______________ to ______________ (mm/dd/yy) (mm/dd/yy)

Number of Crab Processing Days:		Raw Crab Pounds Processed:	

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No

Table 1.c: Bering Sea Tanner CR Fishery

CR Fishery Code: **BST**	Dates Covered: ______________ to ______________ (mm/dd/yy) (mm/dd/yy) ______________ to ______________ (mm/dd/yy) (mm/dd/yy)

Number of Crab Processing Days:		Raw Crab Pounds Processed:	

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No

Table 1.d: Bering Sea Snow CR Fishery

CR Fishery Code: **BSS**	Dates Covered: ______________ to ______________ (mm/dd/yy) (mm/dd/yy) ______________ to ______________ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No

Table 1.e: Bristol Bay Red CR Fishery

CR Fishery Code: **BBR**	Dates Covered: ______________ to ______________ (mm/dd/yy) (mm/dd/yy) ______________ to ______________ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No
				❒ lb ❒ kg	lbs	❒ Yes ❒ No

Table 1f : Saint Mathew Blue CR Fishery

CR Fishery Code: **SMB**	Dates Covered: ______ to ______ (mm/dd/yy) (mm/dd/yy) ______ to ______ (mm/dd/yy) (mm/dd/yy)
Number of Crab Processing Days:	Raw Crab Pounds Processed:

PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No
				❐ lb ❐ kg	lbs	❐ Yes ❐ No

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2. BSAI Crab Sales and Processing

2.1 Annual BSAI Crab Sales

Record the following information on crab sales to **affiliated** entities (Table 2.1a) and to **unaffiliated** entities (Table 2.1b). For further details on the definition of "Affiliation" please refer to the federal regulations at 50 CFR part 680.2. Sales for 2010 would include sales of products produced and sold in 2010 or sales from inventory (products that were harvested and processed in a prior year). Do not include product processed in 2010, but not sold during the calendar year (i.e. held in storage).

Species Code
Record the species code from Table B for each product sold in 2010. If multiple species were sold, record the information on a separate line.

Product Code
Record the product code from Table C for each product. If multiple products were sold, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate "Bulk" if production was in random weight units. If different box sizes were sold, record the total amount for each box size on separate lines.

Finished Pounds
Record the total pounds of each product sold.

FOB Alaska/Seattle Revenues
Record the amount you received for each product sold. Do not include any additional payment you received to cover any shipping, handling, or storage costs associated with the sale beyond the FOB port. Do not deduct any broker fees or taxes paid or royalties for IPQ (we will ask you to report taxes, bait and IPQ costs in Section 6.1 of the EDR). Include any post-season adjustments received by the time of submitting this EDR, but do not report any payments not yet received as of this date. Indicate in the checkbox the shipping point for FOB revenues.

Table 2.1a: BSAI Crab Sales to Affiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle
					❒ lb ❒ kg		$	❒ Alaska ❒ Seattle

Table 2.1b: BSAI Crab Sales to Unaffiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle
					❐ lb ❐ kg		$	❐ Alaska ❐ Seattle

2. BSAI Crab Sales and Processing

2.2 Custom Processing Services Provided

CR Fishery Code
Record the code from Table A for each CR fishery in which you provided custom processing services. If you produced multiple custom products within a CR fishery, record information for each on separate lines.

Product Code
Record the product code from Table C for each product. If multiple products were processed, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Custom Processing Revenue
Record the revenue received for custom processing the specified products.

Table 2.2: Custom Processing Services Provided

CR FISHERY CODE	PRODUCT CODE	PROCESS CODE	CUSTOM PROCESSING REVENUE
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$

3. Labor Information

3.1 Crab Processing Labor Costs

Record processing labor cost information for each of the listed CR fisheries that the vessel/plant participated in during the 2010 calendar year in Table 3.1 below. Leave the row blank for any fisheries in which the vessel/plant did not process any crab.

Average Number of Crab Processing Positions: estimate the average number of crab processing positions on your crab line(s) on days that you processed crab, for each crab CR fishery. Do not count any salaried employees (these will be recorded in Section 6.2).

Total Man-Hours: record the sum of all hours worked by crab processing workers for each CR fishery.

Total Processing Labor Payment: record the total payment made to crab processing workers in each CR fishery. List the amount actually paid to labor; exclude benefits and indirect expenses made on their behalf. Include wages and bonuses only for the processing workers included above. Do not count any payments to salaried employees (these will be recorded in Section 6.2).

Table 3.1: Crab Processing Labor Costs

CR FISHERY CODE	AVERAGE NUMBER OF CRAB PROCESSING POSITIONS	TOTAL MAN-HOURS	TOTAL PROCESSING LABOR PAYMENT
EAG			$
WAG			$
BST			$
BSS			$
BBR			$
SMB			$

3. Labor Information

3.2 BSAI Crab Employee Residence

Record the cities of residence of the employees that participated in BSAI crab processing, and the number of employees that are from each residential location. For employees with Alaska residence, list individual Alaska cities that employees identified on employment records (i.e. W-4 forms). For employees without Alaska residence, list individual states for US residents, or individual counties for nonresident workers. Record the number of employees residing in the each of listed residence locations. **Do not count any employee more than once.**

Table 3.2: BSAI Crab Employee Residence

US RESIDENTS		IF COUNTRY OTHER THAN UNITED STATES, ENTER PRIMARY COUNTRY OF RESIDENCE	NUMBER OF EMPLOYEES
IF ALASKA, ENTER PRIMARY CITY OF RESIDENCE	IF OTHER THAN ALASKA, ENTER PRIMARY STATE OF RESIDENCE		

4. BSAI Crab Custom Processing Done for You

Record the following information on custom crab processing provided for you by processors other than this SFCP. Record information for each CR fishery in which custom processing was obtained. Leave the table blank for any fisheries in which no custom processing was done.

Raw Pounds Supplied to Custom Processors
For each species, record the number of raw crab pounds you supplied to the custom processor for processing on your behalf.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on a separate line.

Finished Pounds
Record the number of finished pounds produced for each product.

Processing Fee
Record the payment made to custom processors for each crab product.

Table 4.a: Custom Processing - Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: EAG						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

Table 4.b: Custom Processing - Western Aleutian Islands Golden CR Fishery

CR Fishery Code: WAG						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

Table 4.c: Custom Processing - Bering Sea Tanner CR Fishery

CR Fishery Code: BST						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

Table 4.d: Custom Processing - Bering Sea Snow CR Fishery

CR Fishery Code: BSS						
Raw Pounds Supplied to Custom Processors:					lbs	
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

Table 4.e: Custom Processing - Bristol Bay Red CR Fishery

CR Fishery Code: BBR						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

Table 4.f: Custom Processing – St. Mathew Blue (SMB) CR Fishery

CR Fishery Code: SMB						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒lb ❒kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$
				❒ lb ❒ kg	lbs	$

5. Raw Crab Purchases from Delivering Vessels

Record the following information on raw crab purchases from delivering vessels in the tables below. Record information for each CR fishery in which raw crab was purchased. Leave the table blank for any fisheries in which no raw crab purchases were made.

IFQ Type
Report raw crab purchases from each CR fishery by harvest quota type using the following type codes:

IFQ Type Code	Harvest Quota
A	A Class shares - CVO-IFQ and CPO-IFQ
B	B Class shares - CVO-IFQ and CPO-IFQ; CPO-IFQ; CDQ; and Adak WAG IFQ
C	C Class Shares - CVC-IFQ and CPC-IFQ

Crab Size
Record the crab size from Table E for each species. If different sizes of crab were purchased in a CR fishery, record the amounts on separate lines.

Crab Grade
Record the crab grade from Table F for each species. If different grades of crab were purchased, record the totals for each grade on separate lines.

Raw Pounds Purchased
Record the total pounds of raw crab purchased, by IFQ type, size, and grade for each crab species.

Gross Payment
Record amount paid to fishers for raw crab purchased for each crab IFQ type/size/grade combination. Gross payment includes the value of any taxes paid on behalf of delivering vessels. Include any post-season adjustments in the gross payment totals.

Table 5.a: Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.b: Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.c: Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.d: Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.e: Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

Table 5.f: Raw Crab Purchases, St. Mathew Blue (SMB) CR Fishery

IFQ TYPE	CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$
			lbs	$

6. Vessel/Plant Costs

6.1 Costs for BSAI Crab Production Only

In Table 6.1, record the BSAI crab fishery operating costs for this vessel/plant. These are costs that are incurred by this vessel/plant solely in the BSAI Crab fisheries. Section 6.2 will ask for information on costs that cannot be tied exclusively to the BSAI crab fisheries. Include any taxes paid on the listed items (e.g. fuel tax, sales tax) in the totals.

a. Fisheries Taxes: total of all the Alaska fisheries business tax, SMAA taxes, and other local sales tax on raw crab. Includes all direct tax payments you made to a city, borough or the State of Alaska as a result of processing BSAI crab at this vessel/plant for the year, excluding property taxes and landing taxes paid on behalf of fishermen.

b. Processing and Packaging Materials, Equipment, and Supplies: the total cost of all processing supplies (gear, knives, gloves, boots, etc.) and packaging materials (such as banding or strapping material, shrink-wrap, pallets, etc.) purchased for processing BSAI crab products at this vessel/plant in calendar year 2010. Record total cost these goods purchased in the following locations: Atka, Akutan, Dutch Harbor/Unalaska, King Cove, Kodiak, St. Paul, All other Alaska Cities, All Out-of-State locations.

c. Food and Provisions: record the total cost of these items if they are provided to processing workers free of charge (i.e., as part of their contract). Do not include the wages paid to employees responsible for food preparation, cooking, and clean up.

d. Other Direct Costs for Crab Labor: record the total costs to the vessel/plant owner for transportation and housing, payroll taxes, unemployment insurance, workmen's compensation, medical expenses, social security and insurance benefits, recruitment, training, and education. Do not include costs paid by employees.

e. Insurance Deductibles: include any insurance deductibles paid for accidents that occurred on the vessel during 2010. Exclude any repair or medical costs paid by the insurance claim (i.e., only list your out-of-pocket expense).

f. Re-packing Costs: record the total amount you spent to re-pack any of the BSAI crab products you processed in this vessel/plant during the year.

g. Broker Fees and Promotions for BSAI Crab Sales: record the sum of all fees paid to brokers for sales and promotion of BSAI crab for each CR fishery for the 2010 calendar year.

h. Individual Processor Quota (IPQ) Lease Costs: record the pounds leased and cost paid to quota holders for use of IPQ for each CR fishery for the 2010 calendar year.

i. Observer Costs: record the sum of all observer fees paid in each CR fishery for the year.

j. Freight Costs for Supplies to the Vessel/plant: total expenses for having equipment/items used in this vessel/plant (for BSAI crab only) shipped to you.

k. Freight and Handling Costs for Processed Crab Products From the Vessel/plant: record the freight and handling costs you incurred during the sale and delivery of processed products during the year. If storage costs were incurred while shipping these products, include the costs here and *do not* include them in "k. PRODUCT STORAGE."

l. Product Storage: record the total cost of storing processed BSAI crab products during the year.

m. Water, Sewer, and Waste Disposal: record your annual crab-specific costs for these items for this vessel/plant.

n. Other Crab-specific Costs: list the total cost of other significant expenditures incurred in 2010 that were specific to BSAI crab processing not included in any of the other categories (e.g., IPQ lease or purchase costs, association or accounting fees). Please describe the nature of the expense(s) and do not list costs to be recorded in Sections 6.2 or the costs of permits or licenses.

Table 6.1: Costs for BSAI Crab Production Only

COST CATEGORY				TOTAL COST
a. Fisheries Taxes				$
b. Processing and Packaging Materials, Equipment, and Supplies				
LOCATION OF PURCHASE:	ATKA, AK			$
	AKUTAN, AK			$
	DUTCH HARBOR/UNALASKA, AK			$
	KING COVE, AK			$
	KODIAK, AK			$
	ST. PAUL, AK			$
	ALL OTHER ALASKA			$
	ALL OUT-OF-STATE			$
c. Food and Provisions				$
d. Other Costs Direct for Crab Labor				$
e. Insurance Deductibles				$
f. Re-packing Costs				$
g. Broker Fees and Promotions for BSAI Crab Sales				
FISHERY CODE:	EAG			$
	WAG			$
	BST			$
	BSS			$
	BBR			$
	SMB			$
h. Processor Quota (IPQ) Lease Costs				
FISHERY CODE:	EAG	**lbs**		$
	WAG	**lbs**		$
	BST	**lbs**		$
	BBS	**lbs**		$
	BBR	**lbs**		$
	SMB	**lbs**		$

Table 6.1: Costs for BSAI Crab Production Only (Continued)

COST CATEGORY		TOTAL COST
i. Observer Costs		
FISHERY CODE:	EAG	$
	WAG	$
	BST	$
	BSS	$
	BBR	$
	SMB	$
j. Freight Costs for Supplies to the Plant		$
k. Freight and Handling Costs for Processed Crab Products from the Plant		$
l. Product Storage		$
m. Water, Sewer and Waste Disposal		$
n. Other Crab-specific Costs (describe below)		
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$
		$

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6. Vessel Costs

6.2 Annual Vessel/Plant Costs

In Table 6.2, please record all of the following costs that were incurred for **this SFCP only** during the 2010 calendar year. Indicate if these costs were incurred for the BSAI crab fishery only by checking "Yes" under "Crab-only Cost". Otherwise, check "No" and these costs will be averaged out over *all* your crab and non-crab activities during the year.

a. Fuel, Electricity, Lubrication and Hydraulic Fluids: the total annual cost of fuel, electricity, lubrication & hydraulic fluids used in BSAI crab processing.

b. Investments in Plant and Equipment, by Location: total cost of improvements to plant and equipment for the year. This includes the costs of all assets that were financed or purchased using Capital Construction Fund monies during 2010 and will be depreciated for tax purposes. Do not include standard repairs and purchases that were paid for completely from 2010 income. Identify the location of the seller you purchased the improvements from using the location codes listed below.

c. Repair and Maintenance (R&M) for Plant and Equipment, by Location: expenses for maintaining this plant and repairing mechanical and physical problems with the plant or equipment (exclude investment expenditures reported for item 6.2a). Exclude expenses or repairs that result solely from non-crab processing. Do not include salaries of employees whose job is to perform R&M (include these costs in Section 6.2.d). Identify the location of the seller you purchased the R&M goods and services from using the location codes listed below.

d. Number of Employees and Salaries for Foremen, Managers and other Employees: the number of any additional SFCP employees and the total payment for wages and salaries not included in direct labor costs reported in Section 3.1.

e. Other Vessel-specific Costs: list the total cost of all other significant vessel-specific expenditures incurred in calendar 2010 that were not included in any of the other categories. Please specify the nature of the expense(s) and do not list costs recorded in Table 6.1 or elsewhere in Table 6.2.

Location Codes for Table 6.2

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 6.2: Annual Vessel/Plant Costs

COST CATEGORY	TOTAL	CRAB ONLY COST
a. Fuel, Electricity, Lubrication and Hydraulic Fluids	$	❒ Yes ❒ No
b. Investments in Vessel and Equipment:		
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
c. Repair and Maintenance for Vessel and Equipment		
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
Location Code:	$	❒ Yes ❒ No
d. Number of Employees and Salaries for Foremen, Managers and other Employees	$	❒ Yes ❒ No
Number of Employees:		
e. Other Vessel-Specific Costs (describe below)		
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No
	$	☐ Yes ☐ No

7. Annual Totals for All Fisheries

Please record the total sum for the calendar year for processing days, gross FOB Alaska/Seattle revenues, finished pounds processed, and processing labor costs. Be sure to include all of your relevant fishery participation (crab, groundfish, etc.) in the totals. Indicate Alaska or Seattle (check one) as your FOB port.

		TOTAL
Processing Days		
Gross FOB Revenues	❒ Alaska ❒ Seattle	$
Finished Pounds Processed		
Processing Labor Costs*		$

*(include only the direct compensation made to processing labor, as in Section 3, and exclude salaried employees).

Print Form Submit via E-mail

Revised: 02/09/2010

OMB control No. 0648-0518
Expiration Date: 05/30/2011

ANNUAL
CATCHER/PROCESSOR
CRAB ECONOMIC DATA REPORT (EDR)

CALENDAR YEAR 2010

This form can be downloaded from
http://www.fakr.noaa.gov

PUBLIC REPORTING BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 37 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 (16 U.S.C. 1801, *et seq*.). They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

ANNUAL CATCHER/PROCESSOR EDR

Introduction

This report collects information on Bering Sea and Aleutian Islands Management Area (BSAI) crab operations, including Western Alaska Community Development Quota Program (CDQ) crab fisheries. The fisheries are referred to as Crab Rationalization fisheries (CR fisheries). Pursuant to the legislation, the data and identifiers will also be used for program enforcement and determination of qualification for quota shares. Consequently, identifiers and data will be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

You have received this form because our records show that you are either the owner of a catcher/processor that participated in the BSAI crab fisheries in the past or were leased a catcher/processor that participated in the BSAI crab fisheries in the past. **You are required to submit the Certification Pages (pages 3 and 4) and any additional information requested in the Economic Data Report (EDR). Failure to submit an EDR form when required will result in delay in and/or denial of any and all crab permit applications**.

To make sure that each company is consistently and accurately completing the EDR, random audits will be performed by a qualified accountant on some of the EDRs for a subset of the crab fishery participants. This step will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska crab fisheries.

Auditors will verify records by comparing specific elements of the report with your accounting records. To make this activity as efficient and non-intrusive as possible, we suggest that you:

1. Keep a copy of the completed EDR or certification pages you submit to the Data Collection Agent (DCA). Copy and attach extra sheets as needed.

2. Keep a file that has all of the supporting information used in the preparation of the EDR.

3. Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:

    a. Audited financial statements
    b. Reviewed financial statements
    c. Compiled financial statements
    d. Tax returns.

Record only whole numbers. Round up dollar figures to the next highest dollar.

If YOUR label address is incorrect or missing, please correct the error on the label or print your permanent name and address here.

Catcher/processor Name
Company Name
Street address or P.O. Box Number
City, State, and Zip Code

NOTE:

Any owner or leaseholder of a catcher/processor during any period in the calendar year identified on the EDR in which the catcher/processor was used to process crab in a Crab Rationalization (CR) fishery must submit to the DCA, at the address provided on the form, an EDR for a catcher/processor. **If the owner or leaseholder of this vessel harvested but did not process any crab, a Catcher Vessel EDR may be submitted instead of this form.** A Catcher Vessel EDR form may be requested from Pacific States Marine Fisheries Commission at the address or phone number listed below.

Definition of "Leaseholder": For the purpose of defining the persons responsible for submitting the EDR, a Leaseholder is a person, other than the owner of the catcher/processor for which the EDR is required, who: was identified as the leaseholder, in a written lease, of the catcher/processor, **OR** paid expenses of the catcher/processor, **OR** claimed expenses for the catcher/processor as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

Mail or FAX Certification Pages or Entire EDR by June 28, 2011 to:

Pacific States Marine Fisheries Commission
205 SE Spokane, Suite 100
Portland, OR 97202

Email: **alaska_crab@psmfc.org**
FAX Number: 503-595-3450

For more information or if you have questions, please call toll free 1-877-741-8913

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CERTIFICATION PAGE – 1 of 2

This is a **required form**. Provide all information requested below.

Catcher/Processor Information	
Catcher/Processor Name	ADF&G Processor Code (F Code)
	Registered Crab Receiver Permit Number
USCG Documentation Number	Crab License Limitation Permit Number(s)
Current Estimated Market Value of Vessel and Equipment ($)	Replacement Value of Vessel and Equipment ($)
Name of Crab Harvesting Cooperative (if applicable)	

Vessel Owner Information	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

Vessel Leaseholder Information (if applicable)	
Name of company, partnership, or sole proprietorship	
Business Telephone Number	Business FAX Number
Business E-mail address, if available	

NOTE: Any owner or leaseholder may appoint a designated representative to respond to questions in the EDR. The designated representative is the primary contact person for the DCA on issues relating to data required in the EDR.

Person Completing this Report (check one)

- ◯ Owner (If your name and address are the same name and address provided in the Owner Information block above, the information does not need to be repeated here)
- ◯ Leaseholder (If your name and address are the same name and address provided in the Leaseholder Information block above, the information does not need to be repeated here)
- ◯ Designated Representative (complete information below)

Name	Title
Business Number Telephone	Business FAX Number
Business E-mail address (if available)	

CERTIFICATION PAGE – 2 of 2

Select one of the following statements and provide any requested information. Check one box below. Note: The descriptions below refer to leasing of the vessel. Do not provide information regarding any quota leasing here – questions will be asked about quota leases in the EDR form.

◯ 1. You are the catcher/processor **owner**, and you harvested or processed BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
◯ 2. You are the catcher/processor **leaseholder**, you harvested or processed BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year**.
◯ 3. You are the catcher/processor **owner**, and you leased or sold the above described vessel for a portion of the year to another party, and **harvested or processed some BSAI crab** in the above described catcher/processor during the 2010 calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the 2010 calendar year below). **OR** You are the catcher/processor **owner** and the vessel was lost or rendered permanently inoperable due to accident, and harvested or processed no BSAI crab in the above described vessel during the 2010 calendar year. **Complete and submit <u>entire EDR</u> for the 2010 calendar year.**
◯ 4. You are the catcher/processor **owner**, you leased or sold the above described **vessel** to another party, and **harvested or processed no BSAI crab** in the above described vessel during the 2010 calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the 2010 calendar year below). **OR** You are the catcher/processor **owner** and the vessel was lost or rendered permanently inoperable due to accident, and **harvested or processed no BSAI crab** in the above described vessel during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**
◯ 5. You are the catcher/processor **owner**, and no one harvested or processed BSAI crab in the above described catcher/processor during the 2010 calendar year. **Complete and submit the <u>EDR Certification Pages only.</u>**

Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name	
Business address	
Telephone No (include area code)	Date of Sale or Lease (day/month/2010)

Read the following statement, and sign and date the box below:

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	Date signed

Tables A through F contain information you will need when completing the EDR forms.

Table A: Crab CR Fisheries

Fishery Code	CR Fishery	Geographic Area
EAG	Eastern Aleutian Islands golden king crab (*Lithodes aequispinus)*	in waters of the EEZ with **an eastern boundary** the longitude of Scotch Cap Light (164° 44' W. long.) to 53E 30' N. lat., then West to 165E W. long. **a western boundary** of 174° W. long., and **a northern boundary** of a line from the latitude of Cape Sarichef (54° 36' N. lat.) westward to 171° W. long., then north to 55° 30' N. lat., then west to 174° W. long.
WAG	Western Aleutian Islands golden king crab (*Lithodes aequispinus*)	in waters of the EEZ with **an eastern boundary** the longitude 174° W. long., **a western boundary** the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991), and **a northern boundary** of a line from the latitude of 55E30' N. lat., then west to the U.S.-Russian Convention line of 1867.
BST	Bering Sea Tanner crab (*Chionoecetes bairdi)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54E30'N. lat. with **a southern boundary** of 54° 36' N. lat.
BSS	Bering Sea Snow crab (*Chionoecetes opilio)*	in waters of the EEZ east of the Maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991) to 171E W. long., and then south to 54° 30' N. lat. with **a southern boundary** of 54° 36' N.
BBR	Bristol Bay red king crab (*Paralithodes camtschaticus*)	in waters of the EEZ with **a northern boundary** of 58° 30' N. lat., **a southern boundary** of 54° 36' N. lat., and **a western boundary** of 168° W. long. and including all waters of Bristol Bay.

Table A (Continued): Crab CR Fisheries		
Fishery Code	CR Fishery	Geographic Area
SMB	St. Matthew blue king crab (*Paralithodes platypus)*	in waters of the EEZ with **a northern boundary** of 62° N. lat., **a southern boundary** of 58°30' N. lat., and **a western boundary** of the maritime Boundary Agreement Line as that line is described in the text of and depicted in the annex to the Maritime Boundary Agreement between the United States and the Union of Soviet Socialist Republics signed in Washington, June 1, 1990, and as the Maritime Boundary Agreement Line as depicted on NOAA Chart No. 513 (6th edition, February 23, 1991) and NOAA Chart No. 514 (6th edition, February 16, 1991).

Table B. Crab Species Codes		
Species Code	Common Name	Scientific Name
900	Box	*Lopholithodes mandtii*
910	Dungeness	*Cancer magister*
921	Red king crab	*Paralithodes camtschaticus*
922	Blue king crab	*Paralithodes platypus*
923	Golden (brown) king crab	*Lithodes aequispinus*
924	Scarlet king crab	*Lithodes couesi*
931	Tanner crab	*Chionoecetes bairdi*
932	Snow crab	*Chionoecetes opilio*
933	Grooved Tanner crab	*Chionoecetes tanneri*
934	Triangle Tanner crab	*Chionoecetes angulatus*
940	Korean horsehair crab	*Erimacrus isenbeckii*
951	Multispinus crab	*Paralomis multispinus*
953	Verrilli crab	*Paralomis verrilli*

Table C. Crab Product Codes Used for EDRs	
Code	Description
01	Whole crab
80	Crab sections
81	Crab meats
82	Crab claws
83	Crab tails
84	Crab legs
97	Other crab product (specify):

Table D. Crab Process Codes.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Process Code	Description
00	Other (specify):
01	Fresh
02	Frozen
03	Salted/brined
06	Cooked
07	Live
18	Fresh/vacuum pack
21	Frozen/block
22	Frozen/shatter pack
28	Frozen/vacuum pack

Table E. Crab Size Codes.
If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Size Code	Description
1	Standard or large sized crab or crab sections
2	Smaller size crab or crab sections, e.g., *opilio* crab less than 4 inches.
3	Mixed crab size or “ocean run”

Table F. Crab Grade Codes
If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Grade Code	Description
1	Standard or premium quality crab or crab sections
2	Lower quality product, e.g., dirty shelled crab or a pack that is of lower quality than No. 1 crab.
3	Mixed crab grade or “ocean run”

Instructions for completing this EDR Form: Provide all information requested in each section.. Please record only whole numbers, and round all dollar values to the next highest dollar.

1. Harvesting and Processing Information

1.1 BSAI Crab Activity Chart

Record the following data for each CR fishery in which this vessel participated (harvesting or processing). Leave the row blank for any fisheries in which the vessel did not participate.

Dates Covered
Record the beginning and ending date (MM/DD/YY) for the period in which you participated in the listed fishery. Provide separate beginning/ending dates for spring and fall fisheries if you participated in both.

Number of Days Crab Fishing
Record the total number of days during each fishery that the vessel was harvesting crab in the fishing grounds. Do not include time spent waiting at processors or traveling to and from the fishing grounds.

Number of Days Traveling and Offloading
Record the number of days during each fishery that the vessel spent traveling to and from fishing grounds or waiting to offload at processors. Do not include days traveling to and from home port before and after crab harvesting and processing for the year (this will be collected in Table 8).

Number of Days Crab Processing
Record the total number of days on which you processed crab in each CR fishery.

Table 1.1: BSAI Crab Fishery Activity

CR FISHERY CODE	DATES COVERED		NUMBER OF DAYS CRAB FISHING	NUMBER OF DAYS TRAVELING & OFFLOADING	NUMBER OF DAYS CRAB PROCESSING
	BEGIN DATE MM/DD/YY	END DATE MM/DD/YY			
EAG					
WAG					
BST					
BSS					
BBR					
SMB					

1. Harvesting and Processing Information

1.2 BSAI Crab Production

Record the following information on finished crab production in the tables 1.2 a-e below for each CR fishery in which this vessel participated. Leave the table blank for any fisheries in which the vessel did not participate.

Raw Crab Pounds
Record the number of raw crab pounds used in processing each species in each CR fishery.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on a separate line.

Finished Pounds
Record the number of finished pounds produced for each product.

Custom Processed (Yes or No)
Record custom and non-custom processing activities on separate lines. Check “Yes” or “No” to indicate if the recorded production was custom processing done by you for another party.

Table 1.2a: Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: **EAG**			Raw Crab Pounds Processed:			
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.2b: Western Aleutian Islands Golden CR Fishery

CR Fishery Code: **WAG**			Raw Crab Pounds Processed:			
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.2c: Bering Sea Tanner CR Fishery

CR Fishery Code: **BST**			Raw Crab Pounds Processed:			
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No

Table 1.2d: Bering Sea Snow CR Fishery

CR Fishery Code: **BSS**			Raw Crab Pounds Processed:			
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No
				◯ lb ◯ kg	lbs	◯ Yes ◯ No

Table 1.2e: Bristol Bay Red CR Fishery

CR Fishery Code: **BBR**				Raw Crab Pounds Processed:		
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

Table 1.2e: St. Matthew Blue CR Fishery

CR Fishery Code: **SMB**				Raw Crab Pounds Processed:		
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	CUSTOM PROCESSED (check one)
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No
				○ lb ○ kg	lbs	○ Yes ○ No

2. BSAI Crab Sales and Processing

2.1 Annual BSAI Crab Sales

Record the following information on crab sales to **affiliated** entities (Table 2.1a) and to **unaffiliated** entities (Table 2.1b). For further details on the definition of "Affiliation" please refer to the federal regulations at 50 CFR part 680.2. Sales for 2010 would include sales of products produced and sold in 2010 or sales from inventory (products that were harvested and processed in a prior year). Do not include product processed in 2010, but not sold during the calendar year (i.e. held in storage).

Species Code
Record the species code from Table B for each product sold in 2010. If multiple species were sold, record the information on a separate line.

Product Code
Record the product code from Table C for each product. If multiple products were sold, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined and frozen crab, or cooked and frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate "Bulk" if production was in random weight units. If different box sizes were sold, record the total amount for each box size on separate lines.

Finished Pounds
Record the total pounds of each product sold.

FOB Alaska/Seattle Revenues
Record the amount you received for each product sold. Do not include any additional payment you received to cover any shipping, handling, or storage costs associated with the sale beyond the FOB port. Do not deduct any broker fees or taxes paid or royalties for IFQ/IPQ (we will ask you to report IFQ, taxes, and bait costs in other sections 3.2 and 7.1 of the EDR). Include any post-season adjustments received by the time of submitting this EDR, but do not report any payments not yet received as of this date. Indicate in the checkbox the shipping point for FOB revenues.

Table 2.1a: BSAI Crab Sales to Affiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle

Table 2.1b: BSAI Crab Sales to Unaffiliated Entities

SPECIES CODE	PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE (check lb or kg)	FINISHED POUNDS	FOB REVENUES (check FOB Port Alaska or Seattle)	
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle
					○ lb ○ kg		$	○ Alaska ○ Seattle

2. BSAI Crab Sales and Processing
2.2 Custom Processing Services Provided

CR Fishery Code
Record the code from Table A for each CR fishery in which you participated. If you participated in multiple crab fisheries, record information for each on separate lines.

Product Code
Record the product code from Table C for each product. If multiple products were processed, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during the year, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Custom Processing Revenue
Record the revenue received for custom processing the specified products.

Table 2.2: Custom Processing Services Provided

CR FISHERY CODE	PRODUCT CODE	PROCESS CODE	CUSTOM PROCESSING REVENUE
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$
			$

3. BSAI Crab Quota

3.1 Catcher/Processor Owner Annual Crab Harvest and Processor Quota Allocation

Owner Quota Harvested or Processed by this Catcher/Processor

Report all IFQ held by the vessel owner or leaseholder and harvested or processed by this vessel. If some or all of the owner/leaseholder's IFQ was assigned to a harvest cooperative, report only the amount of the owners' assigned quota that was harvested on the vessel. Information about quota leased from other quota holders will be collected in Table 3.2.

CPO – IFQ Harvested: record the amount of this vessel owner/leaseholder's allocation of Catcher/Processor Owner (CPO) IFQ pounds harvested in the listed fishery.

IFQ A Harvested: record the amount of this vessel owner/leaseholder's allocation of IFQ A-class pounds harvested in the listed fishery.

IFQ B Harvested: record the amount of this vessel owner/leaseholder's allocation of IFQ B-class pounds harvested in the listed fishery.

IPQ Processed: record the amount of this vessel owner/leaseholder's allocation of IPQ pounds processed in the listed fishery

Owner Quota Transferred to other Vessels

Report pounds and lease revenue for all harvest and processor quota held by the vessel owner/leaseholder that was transferred to other entities (either through formal lease, coop assignment, or other agreement). If some or all of the IFQ was assigned to a harvest cooperative, report the pounds of the assigned quota that was harvested or processed by other cooperative members and report the quota royalties received from the coop.

If you had an arrangement under which you transferred your IFQ to another owner to harvest or process and paid them a percentage (for example, 30%) of the revenues from the quota, record the total pounds transferred and the total dollar amount of the revenue share (for example 70%) you received, for each class of quota (CDQ, CPO-IFQ, IFQ-A, IFQ-B).

NOTE: If you (the vessel owner/leaseholder) are submitting EDRs for more than one vessel, select one EDR to report all quota leased to other entities. Do not report quota used on your other vessel(s) unless royalties were exchanged, and do not report the same quota transfers on more than one EDR.

CPO – IFQ Transferred

Pounds: Record the number of pounds of this vessel owner's (or leaseholder's) allocation of CPO-IFQ transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred CPO-IFQ pounds in the listed fishery.

IFQ A Transferred

Pounds: Record the number of pounds of this vessel owner's (or leaseholder's) allocation of IFQ-A transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred IFQ-A pounds in the listed fishery.

IFQ B Transferred

Pounds: Record the number of pounds of this vessel owner's (or leaseholder's) allocation of IFQ-B transferred to other vessels in the listed fishery.
Revenue: Record total payment received from other vessels for use of the transferred IFQ-B pounds in the listed fishery.

IPQ Transferred

Pounds: Record the number of pounds of this vessel owner's (or leaseholder's) allocation of IPQ transferred to other processors in the listed fishery.
Revenue: Record total payment received from other processors for use of the transferred IPQ pounds in the listed fishery.

Table 3.1 Catcher/Processor Owner/Leaseholder's IFQ and IPQ Allocation

VESSEL OWNER/LEASEHOLDER'S ANNUAL QUOTA PERMITS HARVESTED BY THIS VESSEL				
Fishery	CPO-IFQ Harvested (pounds)	IFQ A Harvested (pounds)	IFQ B Harvested (pounds)	IPQ Processed
EAG	lbs	lbs	lbs	lbs
WAG	lbs	lbs	lbs	lbs
BST	lbs	lbs	lbs	lbs
BSS	lbs	lbs	lbs	lbs
BBR	lbs	lbs	lbs	lbs
SMB	lbs	lbs	lbs	lbs

VESSEL OWNER/LEASEHOLDER'S ANNUAL QUOTA PERMITS TRANSFERRED TO OTHER VESSELS								
Fishery	CPO- IFQ Transferred		IFQ A Transferred		IFQ B Transferred		IPQ Transferred	
	Pounds	Revenue	Pounds	Revenue	Pounds	Revenue	Pounds	Revenue
EAG	lbs	$	lbs	$	lbs	$	lbs	$
WAG	lbs	$	lbs	$	lbs	$	lbs	$
BST	lbs	$	lbs	$	lbs	$	lbs	$
BSS	lbs	$	lbs	$	lbs	$	lbs	$
BBR	lbs	$	lbs	$	lbs	$	lbs	$
SMB	lbs	$	lbs	$	lbs	$	lbs	$

3. BSAI Crab Quota

3.2 BSAI Crab Quota Lease Costs

In the table below, please record the total pounds and costs for annual harvest and processor quota permits *owned by other entities* that were harvested or processed by this catcher/processor in the listed BSAI Crab fisheries. Please include all such quota landed or processed by this vessel, through either a formal lease or informal agreement (such as stacking or pooling within harvest cooperatives or harvest of IFQ held by crew).

If you had an arrangement under which you harvested or processed another holder's quota and paid them a percentage (for example, 70%) of the revenues from the harvested or processed quota, record the total pounds and the total dollar amount of the revenues paid to the quota holders(s), for each class of quota (e.g., CDQ, CPO-IFQ, IFQ-A, IFQ-B, IFQ-C, IPQ). Include all post-season adjustments to date.

Report only the direct costs of acquiring harvest or processor quota permits, including all post-season adjustments. Indirect costs (e.g., harvest cooperative fees) will be recorded in Section 7.1. If you did not participate in or did not acquire additional quota for one or more fishery, leave those lines blank.

IPQ

Pounds: If you acquired the right to process additional **crab IPQ** for 2010 (beyond your original allocation), enter the number of pounds

Total Cost: Record the total cost of the additional **crab IPQ** you acquired in each CR fishery for each species, including all post-season adjustments to date.

Adak Community Allocation WAG (ACA-WAG) and Community Development Quota (CDQ):

Pounds : If you acquired the right to land a given amount of Adak WAG (in the Western Aleutian Islands golden king crab fishery) or CDQ, for 2010, enter the number of pounds.

Total Cost: Record the total cost of the **Adak IFQ or CDQ** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

CPO-IFQ

Pounds: If you acquired the right to land additional **CPO-IFQ** crab for 2010 (beyond your original allocation), enter the number of pounds.

Total Cost: Record the total cost of the additional **CPO-IFQ** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ A

Pounds: If you acquired the right to land additional **IFQ A-class** crab for 2010 (beyond your original allocation), enter the number of pounds.

Total Cost: Record the total cost of the additional **IFQ A-class** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ B

Pounds: If you acquired the right to land additional **IFQ B-class** crab for 2010 (beyond your original allocation), enter the number of pounds.

Total Cost: Record the total cost of the additional **IFQ B-class** crab you acquired in each CR fishery for each species, including all post-season adjustments to date.

IFQ C

Number of Crew: Record the number of crew members (including captain) contributing IFQ to the harvest.

Pounds: Record the number of pounds of **Crew IFQ (CVC, CPC, or "C-class")** crab quota harvested by the vessel. Include C-shares leased from IFQ owners that did not work on the vessel.

Total Cost: Enter the total amount in dollars paid for the IFQ C-shares, including all post-season adjustments to date. Do not include payments made to the captain or crew for labor - these will be reported in Section 4.

Table 3.2 BSAI Crab CDQ and IFQ Lease Costs

Quota Type	Fishery Code	Pounds Leased	Total Cost
IPQ	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$
CDQ/ACA-WAG	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$
CPO-IFQ	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$

Table 3.2 (Continued) BSAI Crab CDQ and IFQ Lease Costs

Quota Type	Fishery Code	Pounds Leased	Total Cost
IFQ A	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$
IFQ B	EAG	lbs	$
	WAG	lbs	$
	BST	lbs	$
	BSS	lbs	$
	BBR	lbs	$
	SMB	lbs	$

		Number of Crew Contributing C Shares	Pounds	Total Cost
IFQ C	EAG		lbs	$
	WAG		lbs	$
	BST		lbs	$
	BSS		lbs	$
	BBR		lbs	$
	SMB		lbs	$

4. Labor Information

4.1 Crab Harvesting Labor Costs

Record the following information for crew who harvest crab and whose pay is based **primarily** on their harvesting work. Do not count any individual as both harvest crew and processing employee in the same fishery. Record the data for each CR fishery in which this catcher/processor participated. Leave the row blank for any fisheries in which the catcher/processor did not participate.

Number of Paid Harvest Crew Members (exclude the captain): Record the number of crew aboard the vessel (exclude captain) who provided primarily crab harvesting labor during each listed fishery. Do not count individuals whose primary job was processing during that fishery. Do not count any salaried employees (these will be recorded in Table 7.2).

Total Labor Payment to Harvest Crew (exclude the captain)
Record the total payment made to crew (exclude the captain) for their crab harvesting labor. List the amount actually paid to crew in their settlement, *not* their earnings before crew-related expenses (such as fuel, bait, or food and provisions) were deducted. Include all post-season adjustments to date. Exclude any payments to crew for their IFQ (enter this in Table 3.2).

Captain Labor Payment
Record the total payment made to the captain for his services. List the amount actually paid to the captain, *not* the earnings before shared expenses (such as fuel, bait, or food and provisions) were deducted. Include all post-season adjustments to date. Exclude any payments to captain for his/her IFQ (enter this in Table 3.2).

Table 4.1: Crab Harvesting Labor Payments to Captain and Crew

CR FISHERY CODE	CREW		CAPTAIN
	Number of Paid Harvest Crew Members	Total Labor Payment to Harvest Crew	Total Labor Payment to Captain
EAG		$	$
WAG		$	$
BST		$	$
BSS		$	$
BBR		$	$
SMB		$	$

4. Labor Information

4.2 Crab Processing Labor Costs

Record the following information for crew who process crab and whose pay is based **primarily** on their processing work. Do not count any individual as both harvest crew and processing employee in the same fishery. Record the data for each CR fishery in which this catcher/processor participated. Leave the row blank for any fisheries in which the catcher/processor did not participate.

Number of Crew with Pay Determined by Processing Work
Record the total number of employees whose pay was determined primarily by their crab processing labor. Do not count any individual as both harvest crew and processing employee in the same fishery. Do not count any salaried employees (these will be recorded in Table 7.2).

Average Number of Crab Processing Positions
Enter the average number of employees engaged in crab processing on the days that you processed crab. This number may exceed the number of employees with pay determined by processing work if some of the harvesting crew assisted in the processing operations.

Total Processing Labor Payment
Record the total payment made to crab processing employees. List the amount actually paid to crew, not their earnings before crew-related expenses (such as food and provisions) were taken out. Include all post-season adjustments to date. Do not count payments to salaried employees (these will be recorded in Table 7.2).

Table 4.2: Crab Processing Labor Costs

CR FISHERY CODE	NUMBER OF CREW WITH PAY DETERMINED BY PROCESSING WORK	AVERAGE NUMBER OF CRAB PROCESSING POSITIONS	TOTAL PROCESSING LABOR PAYMENT
EAG			$
WAG			$
BST			$
BSS			$
BBR			$
SMB			$

4. Labor Information

4.3 Harvest Labor Payment Details

In Table 4.3 below, indicate by checking the appropriate column whether the following expenses were deducted (shared expenses taken off the top of gross revenues), directly charged (charged to an individual after the crew share is calculated), or not charged to crew when calculating the harvest crew payments in BSAI crab fisheries. If expenses were treated differently in different fisheries, report how they were treated on average or most often. Do not include processing employees.

Table 4.3: Harvest Labor Payment Details

EXPENSES	CHECK ONE			
	DEDUCTED	DIRECTLY CHARGED	NOT CHARGED TO CREW	NOT APPLICABLE
Fuel and lubrication	○	○	○	○
Food and provisions	○	○	○	○
Bait	○	○	○	○
Fish tax (see Section 7.1.l)	○	○	○	○
Observer costs	○	○	○	○
CDQ costs (from Table 3.2)	○	○	○	○
IFQ costs (from Table 3.2)	○	○	○	○
IPQ costs	○	○	○	○
Travel and airfare costs	○	○	○	○
Gear loss	○	○	○	○
Other (describe):	○	○	○	○
	○	○	○	○
	○	○	○	○

4. Labor Information

4.4 BSAI Harvest Crew Licenses and Permits

Crew Licenses/Permit Numbers

In Table 4.4, record the Alaska Commercial Crew license number **or** a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number for each individual who worked as a captain or harvest crewmember during the calendar year. For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g. M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license **or** permit number per crewmember. Do not count any crewmember more than once.

Table 4.4: Harvest Crew Licenses/Permits

Crewmember	LICENSE/PERMIT NUMBER	CHECK ONE: ADF&G Crew License	CHECK ONE: CFEC Gear Operator Permit	Crewmember	LICENSE/PERMIT NUMBER	CHECK ONE: ADF&G Crew License	CHECK ONE: CFEC Gear Operator Permit
1		○	○	15		○	○
2		○	○	16		○	○
3		○	○	17		○	○
4		○	○	18		○	○
5		○	○	19		○	○
6		○	○	20		○	○
7		○	○	21		○	○
8		○	○	22		○	○
9		○	○	23		○	○
10		○	○	24		○	○
11		○	○	25		○	○
12		○	○	26		○	○
13		○	○	27		○	○
14		○	○	28		○	○

Note: Commercial fishing license and permit information is public record. A vessel master has the right to record the crew member's license number or permit number and no release is necessary to report the information here. EDR submitters can contact ADF&G or CFEC to request license or permit numbers by crewmember name at the contacts below:

ADF&G – Commercial Crew License Licensing Questions (907) 465-2376 Licensing FAX (907) 465-2440 Licensing Email licensehelp@fishgame.state.ak.us	CFEC - Gear Operator Permit Phone: (907) 790-6921 Email: dfg.cfec.questions@alaska.gov Website: http://www.cfec.state.ak.us/publook/publook.jsp

4. Labor Information

4.5 BSAI Crab Processing Employee Residence

Record the cities of residence of the employees that participated in BSAI crab processing, and the number of employees that are from each residential location. For employees with Alaska residence, list individual Alaska cities that employees identified on employment records (i.e. W-4 forms). For employees without Alaska residence, list individual states for US residents, or individual counties for nonresident workers. Record the number of employees residing in the each of listed residence locations. **Do not count any employee more than once.**

Table 4.5: BSAI Crab Employee Residence

US RESIDENTS		IF COUNTRY OTHER THAN UNITED STATES, ENTER PRIMARY COUNTRY OF RESIDENCE	NUMBER OF EMPLOYEES
IF ALASKA, ENTER PRIMARY CITY OF RESIDENCE	IF OTHER THAN ALASKA, ENTER PRIMARY STATE OF RESIDENCE		

5. BSAI Crab Custom Processing Done for You

Record the following information on custom crab processing paid for by the catcher/processor owner (or leaseholder) submitting this EDR in tables below. Record information for each CR fishery in which custom processing was obtained. Leave the table blank for any fisheries in which no custom processing was performed for you.

Raw Pounds Supplied to Custom Processors
For each CR fishery, record the number of raw crab pounds you supplied to the custom processor for processing on your behalf. Include any raw crab you purchased from harvesting vessels that you had custom processed for you.

Product Code
Record the product code from Table C for each product. If multiple products were produced, record the information for each product on a separate line.

Process Code
Record the process code from Table D for each product.
(1) If multiple processes were used during a crab fishery, record the information for each process on a separate line.
(2) If more than one of the following processes was used to create a specific product (such as brined *and* frozen crab, or cooked *and* frozen crab) you may enter more than one process code in the process code box for that product.

Crab Size
Record the crab size from Table E for each product. If different sizes of crab were packed separately for a given product form, record the total amount produced, by size, on separate lines.

Crab Grade
Record the crab grade from Table F for each product. If different grades of crab were packed separately for a given product form, record the total amount produced, by grade, on separate lines.

Box Size
Record the box size associated with each product. Indicate whether the box is in pounds or kilograms by checking the appropriate box, or indicate “Bulk” if production was in random weight units. If different box sizes were produced, record the total amount for each box size on a separate line.

Finished Pounds
Record the number of finished pounds produced for each product.

Processing Fee
Record the payment made to custom processors for each crab product.

Table 5.a: Custom Processing - Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code: EAG						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 5.b: Custom Processing - Western Aleutian Islands Golden CR Fishery

CR Fishery Code: WAG						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 5.c: Custom Processing - Bering Sea Tanner CR Fishery

CR Fishery Code: BST						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 5.d: Custom Processing - Bering Sea Snow CR Fishery

CR Fishery Code: BSS						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 5.e: Custom Processing - Bristol Bay Red CR Fishery

CR Fishery Code: BBR						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

Table 5.f: Custom Processing – St. Matthew Blue CR Fishery

CR Fishery Code: SMB						
				Raw Pounds Supplied to Custom Processors:		lbs
PRODUCT CODE	PROCESS CODE	CRAB SIZE	CRAB GRADE	BOX SIZE check lb or kg	FINISHED POUNDS	PROCESSING FEE
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$
				○ lb ○ kg	lbs	$

6. Raw Crab Purchases from Delivering Vessels

Record the following information on raw crab purchases from delivering vessels in the tables below. Record information for each CR fishery in which raw crab was purchased. Leave the table blank for any fisheries in which no raw crab purchases were made. Do not record purchases of crab harvest quota in this section.

Crab Size
Record the crab size from Table E for each species. If different sizes of crab were purchased in a CR fishery, record the amounts on separate lines.

Crab Grade
Record the crab grade from Table F for each species. If different grades of crab were purchased, record the totals for each grade on separate lines.

Raw Pounds Purchased
Record the total pounds of raw crab purchased, by size and grade for each crab species.

Gross Payment
Record amount paid to fishers for raw crab purchased from each crab species. Gross revenue includes the value of any taxes paid on behalf of delivering vessels. Include any post-season adjustments in the gross payment totals.

Table 6.a: Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

Table 6.b: Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

Table 6.c: Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

Table 6.d: Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

Table 6.e: Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

Table 6.f: Raw Crab Purchases, St. Matthew Blue (SMB) CR Fishery

CRAB SIZE	CRAB GRADE	RAW POUNDS PURCHASED	GROSS PAYMENT
		lbs	$
		lbs	$
		lbs	$
		lbs	$
		lbs	$

7. Vessel Costs

7.1 Costs for BSAI Crab Production Only

In Table 7.1, record the BSAI crab fishery operating costs for this vessel. These are costs that are incurred by this vessel solely in the BSAI Crab fisheries. Section 7.2 will ask for information on costs that cannot be tied exclusively to the BSAI crab fisheries. Include any taxes paid on the listed items (e.g. fuel tax, sales tax) in the totals.

a. Insurance Premiums (Hull, Property and Indemnity, and Pollution): if you paid a specific premium for operating in the BSAI Crab fisheries, record the cost here. Record insurance premiums that cannot be attributed just to crab fishing in Section 7.2. If you belonged to an insurance pool for the BSAI crab fishery, record the net costs of being in the pool (deposits into the pool minus any dividends received).

b. Insurance Deductibles: include any insurance deductibles paid for accidents that occurred on the vessel during 2010. Exclude any repair or medical costs paid by the insurance claim (i.e., only list your out-of-pocket expense).

c. Crab Pots Purchased for Use in BSAI Crab Fishery, by Location: the total quantity and cost of crab pots purchased during 2010. Identify the location of the seller you purchased the pots from using the location codes listed below. Report costs of repair and maintenance of crab pots (including rebuilding in 7.1n. Report costs of pots used for commercial harvest of cod or other non-crab species in Section 7.2 b.

d. Line and Other Crab Gear Purchases, by location: the total expense on line, floats, and other fishing gear other than pots used in BSAI crab fishing. Identify the locations where you purchased these items using the location codes listed below.

e. Bait used in BSAI crab fishery, by type and location: the total quantity (in pounds) and cost of bait (by species) used in each listed CR fishery during the calendar year. Identify the locations where you purchased the bait using the location codes listed below. Do not include the cost of bait you caught or purchased prior to 2010.

f. Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery, by location: record fuel purchases made for each of the BSAI CR fisheries. Identify the locations where you purchased fuel using the location codes listed below. Record the total quantity (**in gallons**) of fuel and the purchase cost including fuel taxes. Indicate in the check box if fuel purchase cost includes lubrication and fluids. Record fuel purchases in each fishery for the entire period in which you were fishing in, traveling to and from, and offloading during each CR fishery. Record fuel cost for transiting to and from your home port before and after the crab fishery in Table 7.2.

g. Food and Provisions for Crew: the total cost of these items consumed and used by the crew. Do not include any items that were paid for by crewmembers, either directly or withheld from their earnings.

h. Other Crew Costs: list additional expenses for crew and the associated costs that were paid by the vessel (for example, transportation costs, medical costs, payroll taxes, unemployment insurance, etc.). Do not include any items that were paid for by crewmembers, either directly or withheld from their earnings.

i. Processing and Packaging Materials, Equipment, and Supplies: the total cost of processing supplies (gear, knives, gloves, boots, etc.) and packaging materials (such as banding or strapping material, shrink-wrap, pallets, etc.) purchased for processing BSAI crab products on this vessel in 2010. Identify the locations where you purchased these items using the location codes listed below.

j. Re-packing Costs: the total amount you spent to re-pack any of the BSAI crab products you processed on board this vessel during the year.

k. Broker Fees and Promotions for BSAI Crab Sales: the sum of all fees paid to brokers for sales

and promotion in each CR fishery for the 2010 calendar year.

l. Crab Landing and Sales Taxes and Fees: record the sum of all state and local fish taxes (e.g., Alaska fisheries business tax, local landing tax, cost recovery and buyback tax, arbitration assessment, and others) you paid for landing and sales of BSAI crab.

m. Storage, Wharfage, and Delivery: the total storage, wharfage, trucking, and delivery costs for pots and other equipment used aboard this vessel in the crab fisheries.

n. Observer Costs: record the sum of all observer fees paid in each CR fishery in 2010.

o. Freight and Handling Costs for Processed Crab Products from the Vessel: record the freight and handling costs you incurred during the sale and delivery of processed crab products during the year. If storage costs were incurred while shipping these products, include the costs here and do not include them in "p. Product Storage."

p. Product Storage: record the total cost of storing processed BSAI crab products during in 2010.

q. Fishing Cooperative Costs: record the total cost to you for this vessel's participation in a BSAI crab fishing cooperative, including intercooperative exchange fees. Exclude any monies paid to purchase or lease crab ITQ. List only the costs associated with membership or operating costs of the cooperative.

r. Other Crab-specific Costs: list additional expenses incurred for BSAI Crab fishing and the associated costs (for example, pot and gear repairs, association/marketing fees, IPQ Lease costs, vessel communication costs, vessel leasing costs, pot truck fees, accounting fees, vessel moorage during the crab fishery, overage fines, etc.)

Location Codes for Table 7.1

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 7.1: Costs for BSAI Crab Production Only

COST CATEGORY		TOTAL COST
a. Insurance Premiums (Hull, Property and Indemnity, and Pollution)		$
b. Insurance Deductibles		$
c. Crab Pots Purchased for Use in BSAI Crab Fishery		
Location Code:	Quantity	$
Location Code:	Quantity	$
Location Code:	Quantity	$
d. Line and Other Crab Gear Purchases		
Location Code:		$
Location Code:		$
Location Code:		$
e. Bait Used in BSAI Crab Fishery		
CR Fishery Code: **EAG**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **WAG**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BST**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BSS**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **BBR**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$
CR Fishery Code: **SMB**	Location Code(s):	
Bait Species	Pounds:	$
Bait Species	Pounds:	$
Bait Species	Pounds:	$

f. Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery		Cost includes lube/fluids? ◯ Yes ◯ No
CR Fishery Code	Location Code(s)	Fuel Quantity (gallons)	Total Cost
EAG			$
WAG			$
BST			$
BSS			$
BBR			$
SMB			$
g. Food and Provisions for Crew			$
h. Other Crew Costs (describe below)			
			$
			$
			$
i. Processing and Packaging Materials, Equipment, and Supplies			$
j. Re-packaging Costs			$
k. Broker Fees and Promotions for BSAI Crab Sales			$
l. Crab Landing and Sales Taxes and Fees			$
m. Storage, Wharfage, and Delivery			$
n. Observer Costs, by fishery			
CR Fishery Code: **EAG**			$
CR Fishery Code: **WAG**			$
CR Fishery Code: **BST**			$
CR Fishery Code: **BSS**			$
CR Fishery Code: **BBR**			$
CR Fishery Code: **SMB**			$
o. Freight and Handling Costs for Processed Crab Products from the Vessel			$
p. Product Storage			$
q. Fishing Cooperative Costs:			$
r. Other Crab-specific Costs (describe below)			
			$
			$
			$
			$

7. Vessel Costs

7.2 Annual Vessel Costs

In Table 7.2, please record all of the following costs that were incurred for your vessel during the 2010 calendar year. Indicate if these costs were incurred for the BSAI crab fishery only by checking "Yes" under "Crab-only Cost". Otherwise, check "No" and these costs will be averaged out over *all* your crab and non-crab activities during the year.

a. Investments in Vessel and Equipment: record total cost of improvements to plant and equipment for the year. This includes the costs of all assets that were financed or purchased using Capital Construction Fund monies during 2010 and will be depreciated for tax purposes. Do not include standard repairs and purchases that were paid for completely from 2010 income (record these in item 7.2b), and exclude investments made solely for non-crab fisheries. Identify the location of the seller you purchased the improvements from using the location codes listed below.

b. Repair and Maintenance (R&M) for Vessel and Equipment: record the repair and maintenance expenses for maintaining this vessel and repairing mechanical and physical problems with the vessel or equipment (exclude investment expenditures included in item 7.2a). Exclude expenses or repairs that result solely from non-crab fisheries. Do not include salaries of employees whose job is to perform R&M (include these costs in item 7.2.c). Identify the location of the seller you purchased the R&M goods and services from using the location codes listed below.

c. Number of Employees and Salaries for Foremen, Managers and other Employees: record the number of any additional vessel employees and the total payment for wages and salaries not included in direct labor costs reported in Section 4.

d. Insurance Premiums (Hull, Property and Indemnity, and Pollution): record the total costs of your annual insurance premiums for this vessel.

e. Fuel, Lubrication, and Fluids: record fuel purchases that were not incurred for fishing or processing during the BSAI crab season (for example, for transiting to and from home port to reach the Bering Sea before and after the crab fishing season). Identify the locations where you purchased the fuel using the location codes listed below. Record the total quantity (**in gallons**) of fuel; and the purchase cost including fuel taxes. Indicate in the check box if fuel purchase cost includes lubrication and fluids.

f. Other Vessel-specific Costs: record any other significant cost(s) that were incurred in order to harvest or process crab in the 2010 calendar year that were not included in Table 7.1 or elsewhere in Table 7.2). Please specify the nature of the expense(s). Do not list costs of permits or licenses.

Location Codes for Table 7.2

Location	Code
Akutan, AK	AKU
Atka, AK	ATK
Dutch Harbor/Unalaska, AK	DUT
King Cove, AK	KCO

Location	Code
Kodiak, AK	KOD
St. Paul, AK	STP
All Other Alaska Cities	OAC
All Out-Of-State Cities	OOS

Table 7.2 Annual Vessel Costs

COST CATEGORY	TOTAL	CRAB ONLY COST
a. Investments in Vessel and Equipment		
Location code:	$	Yes No
Location code:	$	Yes No
Location code:	$	Yes No
b. Repair and Maintenance for Vessel and Equipment		
Location code:	$	Yes No
Location code:	$	Yes No
Location code:	$	Yes No
c. Number of Employees and Salaries for Foremen, Managers and other Employees	$	Yes No
Number of Employees:		
d. Insurance Premiums (Hull, Property and Indemnity, and Pollution)	$	Yes No
e. Fuel, Lubrication, and Fluids		
Location code:	$	Yes No
Location code:	$	Yes No
Location code:	$	Yes No
Fuel Cost includes lube/fluids? Yes No		
f. Other Vessel-specific Costs (describe below)		

8.0 Annual Totals for All Fisheries

Please record the total sum for the calendar year for processing days, days at sea, gross FOB revenues, finished pounds processed, pounds retained and labor costs for all your fishing and processing activities during the calendar year. Be sure to include participation in all fisheries, **including activities other than BSAI Crab fishing (i.e., ground fish, chartering, tendering, etc**) and days spent transiting from/to home port. Indicate Alaska or Seattle (check one) as your FOB port. Do not include revenues from sale or lease of quota or permits.

		TOTAL
Processing Days		
Days at Sea		
Gross FOB Revenues	◯ Alaska ◯ Seattle	$
Finished Pounds Processed		
Round Pounds Caught (exclude discards)		
Labor Costs*		$

*Include only the direct compensation made to the crew, processing labor, and captain, as in Section 4. Exclude salaried employees.

NOTES

APPENDIX C

Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
1	Fish ticket number	A - High	Low	Used to verify consistency of records and link to other data sources	None	fish tickets - fully redundant with fish tickets	drop collection
1	Days fishing	B - Medium	Medium	Useful for analyzing operational and efficiency changes; unclear the extent of any improvement on existing fish ticket data	May lose some accuracy without partial days; includes days transiting on grounds (which is operationally different from fishing); no direction on treatment of partial days	1) fish tickets - days fishing as defined by date gear was first deployed and date of landing 2) logbooks, which collect date and time of setting and hauling for each string, catch in each string, and offload date	1) separate traveling and offloading; 2) clarify instructions 3) drop collection
1	Days traveling and offloading	B - Medium	Medium	Used for analyzing operational and efficiency changes; unclear the extent of any improvement on existing fish ticket data	No distinction between traveling and offloading time, which are operationally different; reports may or may not include time transiting between ports; may need to know base port to assess meaning of the data (e.g., King Cove, Kodiak, Dutch Harbor)		
2	Landings by share type - pounds	B - High	Medium	Useful for determining distribution of catch by share type	None	These data are redundant with IFQ data	1) Revise to ensure accuracy, may require some accommodation, if price distinctions are not clear; 2) add identifier for sales to affiliates; 3) drop collection
2	Deadloss by share type - pounds	B - High	Medium	Useful for determining distribution of catch by share type	None		
2	Landings by share type - revenues	B - Medium	Medium/High	Allows for comparison of prices by share type	Often difficult to separate payments by share type; requires tracking of bonuses, which may occur over an extended period; may involve some judgment concerning proportional distribution across different share types; unclear whether sales to affiliates should be identified (currently they are not)	None	
3.1	Vessel owner's IFQ used on the vessel by share type	C - Medium/Low	High - requires extensive spreadsheets	Used to show the distribution of activity and revenues in the fishery	Ignores pooling of quota by cooperatives - data may not reflect fishery operation; cannot be consistent, as vessel owner is not defined; Does not allow for entry of owner held C shares	None	1) Revise section on quota fishing/leasing - incorporate definitions of leasing and ownership; 2) supplement with data collection from inactive share holders; 3) add line for C shares; 4) simplify to collect only information on arm's length leases 5) drop collection
3.1	Vessel owner's IFQ used on other vessels by share type						
3.2	Leased quota by share type - pounds	C - Medium/Low	Medium	Used to show the distribution of activity and revenues in the fishery	May not be accurately reported due to complex ownership structures and owners of multiple vessels; cannot be consistent, as lease is not defined		
3.2	Leased quota by share type - cost						

* Letter scale (A/B/C)represents metadata accuracy finding; stated accuracy (high/medium/low) is based on metadata and industry review and input

Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
3.2	Leased quota by share type - crew contributing shares	C - Medium/Low	Medium	Used to show the number of crew on a vessel holding shares in the fishery	May not accurately reflect cooperative structure and share pooling, cannot be interpreted as active share holders	May be redundant with active participation reporting	1) revise collection to count/identify crew with share holdings; 2) drop collection
4.1	Number of crew by fishery	A - High/Medium	Low	Used to examine changes in fishery operations	Subject to inconsistency and misinterpretation - does not show number of crew on vessel at any time (reflects either the sum of crew employed in the season or the most on the vessel at any one time)	Elandings includes number of crew on vessel at time of landing	1) revise instruction to identify desired information; 2) drop collection
4.1	Payments to crew	A - High/Medium	Low	Used to examine payments to labor	Some uncertainty over non-crab fishery payments; some uncertainty of compensation, if crew pay certain expenses; captains payments may be non-market, when the captain also owns the vessel; data may be misleading for some purposes as boatyard and transiting work are not available	None	clarify reporting requirement and instructions, if captain is owner; clarify that amount reported is after all crab fishing related deductions and charges (excluding personal spending); expand collection to include boatyard time and transiting and identify any additional payment for that work
4.1	Payments to captain						
4.2	Labor payment details - charges and deductions	A - High/Medium	Low	Used to examine changes in labor payment structures	Data have very limited information since details for charges and deductions are not provided (i.e., amount charged/ deducted); no provision for identifying if crew are not subject to share system	None	1) expand to include deduction amounts and clarify instructions, if captain is owner; include option for payment on system other than share system; 2) drop element
4.3	Revenue shares - owner/crew/captain	A - High/Medium	Low	Used to examine the distribution of revenues (after deductions)	Details of deductions creates uncertainty in meaning - without detailed deductions and charges (which are not collected) this can be misleading and is uninformative; captain's share may be non-market, if captain is also vessel owner	None	drop element
4.4	Crew license number/CFEC permit number	A - High/Medium	Low/Medium	Used for analyzing distribution of crew and identifying unique crew	Crew license residence data may be unreliable; includes no demographic data; cannot necessarily be used to estimate distribution of benefits by location, since we don't know how much any crewmember was paid or how much any crewmember worked	None	Collect crew residence/ demographic information; supplement with crew member trips and/or payments

* Letter scale (A/B/C)represents metadata accuracy finding; stated accuracy (high/medium/low) is based on metadata and industry review and input

Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
5.1	Insurance premium - crab only	C - Low	Medium	Used for examining changes in cost structure	Variety of insurance contracts complicates any interpretation; usually prorated by the submitter to separate crab/non-crab - proration is somewhat arbitrary and may differ across submitters - is often confused with 5.2 c; too many types of insurance to decipher meaning (e.g., P&I, hull, liability, vehicles, commercial liability, cargo, longshoreman's, breach of warranty)	None	1) collect total premium amount (including all activities); 2) drop collection
5.1	Paid deductibles - crab only	C - Low	Medium	Used to examine changes in cost structure	Payments are often spread over several fiscal years - or are not incurred in year of incident; may overlap with repair and maintenance	None	1) Revise to ensure no overlap with repair and maintenance; 2) drop collection
5.1	Pot purchases - number	C - Medium/Low	Medium	Used to examine operational and cost structures	No distinction between new and used gear; for used gear may be difficult to get accurate count (as damaged gear may/may not be counted); may be difficult to separate crab costs from other fisheries; will not reflect actual operations; costs may or may not include refurbishment costs; omits exchanges and pooling of pots that is currently occurring	Substantial data are currently collected through Federal log books/State pot registration/State port sample interviews to show the number of pots used and effort levels in the fishery; no cost information is available	1) revise collection to more accurately record pot purchases by including detail on pot conditions and improved price information; 2) drop collection
5.1	Pot purchases - cost						
5.1	Pot purchases - location	C - Medium/Low	Medium	Used to examine distribution of economic activity	Difficult to track location from companies with multiple locations or purchases of pots from storage; economic effect of pots purchased from storage is very different from pots purchased new; value of data is compromised by its dependence on the pot number and cost information	None	drop collection
5.1 d	Line and other gear purchases - costs	C - Medium	Medium	Used to examine operational and cost structures	Typically cannot separate out crab costs; may be confused with repair and maintenance to the extent that purchases are for gear maintenance	None	1) broaden to include gear costs from all fisheries (and activities); 2) drop collection
5.1 d	Line and other gear purchases - location	C - Medium	Medium	Used to examine distribution of economic activity	Difficult to track location from companies with multiple locations	None	drop collection

* Letter scale (A/B/C)represents metadata accuracy finding; stated accuracy (high/medium/low) is based on metadata and industry review and input

Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
5.1 e	Bait used - species/pounds by fishery	B - Medium/Low	High/Medium	Used to examine operational and cost structures	May be difficult to separate by fishery and season and identify bait types ; inventories may be carried over to other crab fisheries or non-crab fisheries, but are excluded from collection; disregards bait caught by vessel	None	1) collect single bait purchase for all fisheries 2) clarify instructions 3) drop collection
5.1 e	Bait used - specied/cost by fishery						
5.1 e	Bait used - purchase location by fishery	B - Medium	High	Used to examine distribution of economic activity	May be compromised by problems with underlying data	None	drop collection
5.1 f	Fuel used - gallons by fishery	C - Medium/Low	High/Medium	Used to examine operational and cost structures	Difficult to separate by fishery, as a substantial number of operations are uncertain of estimates and a variety of methods are used to make estimates; difficult to separate fuel used transiting to Alaska; charges to crew on settlements may not match use by fishery (since transiting is excluded from reporting, but may be charged to crew)	None	1) develop uniform method for estimating use; 2) drop collection
5.1 f	Fuel used - cost by fishery						
5.1 f	Fuel used - purchase location by fishery	C - Medium/Low	High	Used to examine distribution of economic activity	Fuel is often carried over between fisheries and purchases complicating distribution of use by location of purchase (i.e., need clear methodology for assigning from multiple purchase locations - first in, first out); compromised by underlying data issues	None	drop collection
5.1 g	Food and provisions - costs	Medium	Medium	Used to examine cost structure	Inventories may be carried over from or to groundfish fisheries and year to year; some crews purchase own food; crew deductions are often per day estimates and are not actual cost	None	1) use crew charges; 2) drop collection
5.1 h	Other crew expenses	C - Medium	Medium	Used to examine cost structure; but these often are crew discretionary spending that is not relevant to operations	Open ended element creates uncertainty; amounts often change after preliminary settlements	None	1) develop instructions for specific information desired; 2) drop collection
5.1 i	Freight costs for landed crab	B - Unknown	Unknown	Used to examine costs associated with direct sales	This is a very small portion of sales - element just confuses most, as it is typically not relevant	None	1) clarify instructions; 2) drop collection
5.1 j	Storage, wharfage, delivery costs for gear	A - Medium/Low	Medium	Used to examine cost structure	May be difficult to separate costs from groundfish fishery and from costs of other boats, if multiple vessel operation (may just be apportioned by number of pots used); typically involves some judgment concerning which costs to include	None	1) develop consistent methodology for apportionment; 2) drop collection

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Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
5.1 k	Observer costs - by fishery	A - High/NA	Low/NA		observers cost are incurred only in the golden king crab and blue king crab fisheries		1) clarify instructions; 2) drop collection
5.1 l	Landing taxes and fees	B - Medium	Medium	Used to examine cost structure	Adjustments applied after year end, which may be necessary for both taxes and fees (such as buyback and arbitration assessment)		clarify instructions with respect to arbitration fees
5.1 m	Cooperative fees	A - Medium	Low	Used to examine cost structure	Does not clearly distinguish cooperative cost as a vessel from cooperative cost as a share holder (unclear, if and whether a distinction exists); unclear whether and why other costs are/are not included (i.e., FCMA cooperative negotiation costs seem to be included, but might not include arbitration costs and negotiation costs, if those are conducted independently, also may include research foundation costs)	None	1) clarify instructions; 2) consider collecting cooperative costs from share holders
5.1 n	Other expenses	C - Low	Medium	Used to examine cost structure	Limited direction on elements to include; may omit substantial expenses or include marginally relevant expenses; unclear whether independent arbitration/negotiation costs would be included		1) clarify instruction; 2) drop collection
5.2 a	Vessel and equipment investment - cost	B - Low/Medium	High	Used to examine cost structure	May be difficult to report whether it is a crab only expense; may be somewhat arbitrarily assigned between investment and repair/maintenance; collection excludes costs exclusively for non-crab fisheries (which is inconsistent with other entries in this section); unclear whether new vessel purchase would be included		1) clarify instruction; 2) combine with repair and maintenance costs; 3) drop collection
5.2 a	Vessel and equipment investment - location	C- Low	High	Used to examine distribution of economic activity	Locational information is difficult to separate as vendors have several locations		drop collection
5.2 b	Repair and maintenance - costs	B - Low/Medium	High	Used to examine cost structure	May be difficult to report whether it is a crab only expense; may be somewhat arbitrarily assigned between investment and repair/maintenance		1) clarify instruction; 2) combine with repair and maintenance costs; 3) drop collection

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Table number	Data element	Accuracy	Cost of collection	Utility	Possible shortcomings	Substitute sources	Alternatives
5.2 b	Repair and maintenance - location	C- Low	High	Used to examine distribution of economic activity	Locational information is difficult to separate as vendors have several locations; often several locations may be involved (up to 50 in one case); collection excludes costs exclusively for non-crab fisheries (which is inconsistent with some other entries in this section)		drop collection
5.2 c	Insurance premium	B - Medium/Low	Medium	Used to examine cost structure	Confusion between two insurance premium requests (see 5.1); may be prorated for crab on an unknown basis		1) clarify instructions; 2) drop collection
5.2 d	Fuel, lubrication, fluids - annual - cost	A - Medium	Medium	Used to examine cost structure	Difficult to separate crab/non-crab costs; purchases may be for fuel used in the following year; location information is thought to be a poor estimation		1) clarify instructions; 2) drop collection
5.2 d	Fuel, lubrication, fluids - annual - location	A - Medium	High	Used to examine distribution of economic activity			
5.2 e	Other vessel specific costs	C - Low/Medium	Medium	Used to examine cost structure	Element is too discretionary to be consistent		1) clarify instructions; 2) drop collection
6 e	Days at sea - all activities	B - Medium	High	Provides estimate of relative share of use of vessel in crab fisheries	By not distinguishing crab related from non-crab related activities other than fishing (such as transiting) this may misrepresent crab related activities; unclear to some whether transiting is included		1) clarify instructions; 2) drop collection
6 e	Gross revenues - all activities	A - High/medium	Medium	Used to examine crab dependence	Some payments are not made until after year's end; will not know source of non-crab revenues (i.e., tendering, chartering, fishing); clarify instructions that revenues from IFQ leases should not be included		1) clarify instructions; 2) drop collection
6 e	Pounds - all activities	A - High/medium	Medium	Used to examine crab dependence	Will not know whether pounds correlate with revenues because of non-fishing activities; unclear whether pounds in non-fishing activities should be included		1) clarify instructions; 2) drop collection
6 e	Labor cost - all activities	High	High	Used to examine crab dependence	May have different pay structures for fishing/tendering/ other activities; provide instruction to include payments in all activities		clarify instructions

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