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CRAB EDR PURPOSE AND NEED

October 12, 2010

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.

The Council requests staff to prepare a discussion paper developing the following alternatives for Council consideration:

- 1) critical operational components by individual crab fishery,
- 2) critical operational components from all crab fisheries (aggregated across all crab fisheries),
- 3) critical operational components from all fisheries (aggregated across all fisheries), and
- 4) all operational components by individual crab fishery (similar to current data collection program).