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JUSTIFICATION FOR CHANGE
AMENDMENT 80 ECONOMIC DATA REPORT FOR THE CATCHER/PROCESSOR
NON-AFA TRAWL SECTOR
OMB CONTROL NO. 0648-0564

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The revised Amendment 80 economic data report (EDR) must be sent out to fisherman on March 27, 2009, to allow sufficient time for completion and return by June 1, 2009. Therefore we are requesting completion of review no later than March 15, 2009.

Amendment 80 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area primarily allocates several Bering Sea and Aleutian Islands Management Area non-pollock trawl groundfish fisheries among fishing sectors, and facilitates the formation of harvesting cooperatives in the catcher/processor sector of the non-American Fisheries Act (non-AFA) Trawl Catcher/processor Cooperative Program (Program). The Program established a limited access privilege program for the non-AFA trawl catcher/processor sector.

The EDR collects cost, revenue, ownership, and employment data on an annual basis and provides information unavailable through other means to review the Program. The purpose of the EDR is to understand the economic effects of the Amendment 80 program on vessels or entities regulated by the Program, and to inform future management actions. Data collected through the EDR is mandatory for all Amendment 80 quota share (QS) holders.

The year 2008 is the first full year of data required for the Amendment 80 EDR. The data (EDR and responses to questions) for 2008 are required by June 1, 2009, or if sent by U.S. mail, postmarked by that time to be considered timely. This timing provides the Amendment 80 QS holder adequate time to gather and review records.

This change request would modify the Amendment 80 EDR to increase quality and accuracy of the data and efficiency of the EDR submission process. After conducting workshops with the affected fishing owners in June 2008 and January-February 2009, National Marine Fisheries Service (NMFS) determined that it is necessary to include additional instructions in the EDR form and make minor modifications to some of the EDR questions. The former block format was changed to table format. These changes will ensure consistent interpretation, align data entry with industry recordkeeping practices, and obtain better quality data. The details of all changes to the EDR are provided in the Attachment.

The questions regarding Vessel Characteristics: Processing Capacity (formerly Block H) was reformatted and renamed as Table 2.4. A question requesting the "total number of processing lines on vessel" is added for clarification. When reviewing this table (Vessel Characteristics: Processing Capacity), industry participants indicated that the information would be more useful if the form contained a field for the total number of processing lines on a vessel. This is because use of processing lines varies for different products. A vessel may produce 5 different products and use a different combination of its 5 processing lines for each product. As an example, if the respondents filled out the form as originally drafted, the response would be:

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Product processed	Number of processing lines	Maximum throughput (lbs/hr)
Product A	2	500
Product B	1	1000
Product C	4	750
Product D	5	1250
Product E	3	1000

Industry participants were concerned that analysts might simply add the number of processing lines (for a total of 15), when in fact, the vessel only has 5 processing lines in total. Any further analysis based on this incorrect addition of processing lines from the table could misrepresent processing capacity.

One term in the first question regarding Vessel Characteristics: Survey Value (formerly Block F) was changed to clarify that the response should provide the vessel's replacement value rather than the fair market value. Industry participants indicated that a surveyor actually estimates the vessel's replacement value in a survey, not the fair market value. If a vessel (including all equipment) was lost and had to be replaced, this replacement value may not be the same as the fair market value if the vessel was sold on the open market.

The question "product processed" was confusing and participants could not determine what information was requested, because some species can be processed into different types of products. To clarify this confusion, the "processed product" field was split up into species code -- to identify the species of fish involved, and product code – to describe the end product. A table was added to provide the appropriate codes for use with this question.

Overall, these revisions do not increase the 7.5 hour burden to complete the EDR or increase costs to obtain the data. The Amendment 80 EDR is available through the Internet on the NMFS Alaska Region Web site at http://www.alaskafisheries.noaa.gov.

ATTACHMENT—PROPOSED CHANGES TO AMENDMENT 80 EDR

Front page and introduction
    added heading "Introduction"
    made consistent format for word "catcher/processor"
    revised name and address for submittal twice

Certification page
    added after "Amendment 80 QS holder" "(If your name and address are the same name and address provided in the QS Holder Information block above, the information does not need to be repeated here)."

Vessel characteristics--survey value
    revised question 1 by removing [which means "survey value"] in two places and by **adding** "indicate if this is approximate replacement value" YES or NO

Vessel characteristics--fuel consumption
    moved this question from a different location
    added "gal/hr" into each row under column 2
    added "gal" into each row under column 3
    1st row, 1st column *revised* to read "and/or processing"
    added "(not fishing or processing)" after "steaming" in 2nd row and 3rd row, 1st column

Vessel characteristics--freezer space
    added to question 1 "Include only product storage capacity. Do not include plate freezer, galley freezer, or other non-product storage capacity."
    added to question 2 "Report the maximum capacity of all plate freezers in pounds, divided by the average number of hours required to
      freeze product (note: this is not throughput under realistic operating conditions)."

Vessel characteristics--processing capacity
    Revised to read: Report the total number of processing lines on the vessel in the first line. For each type of product processed on the line in the BSAI Amendment 80 fishery, record the number of processing lines of similar type (equipment and/or product mix), and the vessel's maximum average throughput in pounds (round weight) per hour, totaled over all processing lines for this product type. Assume optimal operating conditions and that quantity of raw fish and other inputs are not limiting. Use species and product codes to describe product types produced (see Table A below). Report only Amendment 80 species, including halibut and crab if targeted using Amendment 80 prohibited species catch (PSC) quota.
    added "Total number of processing lines on vessel"
    added "Species code" and "Product code" to column 1, making two columns under old heading "Product processed"
    added "lbs/hr" to each row in new column 4

Vessel characteristics--vessel activity
    Revised to read: Record the number of days the vessel was engaged in each of the following activities. Report days fishing and days processing in the Amendment 80 fisheries and all other fisheries separately. Count days fishing and/or processing this or another Amendment 80 vessel's quota of Amendment 80 species, including Amendment 80 halibut and crab PSC, as Amendment 80 fishery activity (includes fishing of Amendment 80 catch delivered to other processors and processing of Amendment 80 catch received from other vessels). Report days traveling or offloading over all vessel activity (including tendering, charters, cargo transport, etc.) and inactive in the calendar year. If not applicable, please write "NA". Count any portion of a calendar day that the vessel was engaged in the activity as one day (this may result in a total greater than 365 days).
    added new column to replace existing 2 columns for rows 3 and 4
    added "(not fishing or processing)" after "offloading" in row 3

<u>2008 Revenues</u>
revised row 3 to read: Income from sale of LLP licenses associated with this vessel during the calendar year.

revised row 4 to read: Quantity and royalty revenue from QS shares leased by other vessels. Only report quantity and revenue are for formal leases. Do not include quantity or value of in-kind or other informal quota transfers.
    added "(in metric tons)" to heading "Quantity of QS"
    added "$US" to all rows for column 3

<u>Capital expenditures and materials usage</u>
    revised instructions to read: Please give the calendar year 2008 capital expenditures associated with each of the following categories for this vessel. Only report costs for purchases of fully capitalized investments. Report costs fully expensed during the year in Table 5. Do not report cost for purchases of onshore equipment or facilities. Round all answers to the   nearest 100 dollars.
    corrected numbering of questions ("d" was missing)
    added "$US" to all rows in column 2 and row e column 3

<u>Expenses</u>
    revised instructions to read
    In the table below, please provide the total calendar year 2008 expenses (before income tax) associated with the following categories.
    Do not include expenditures that were capitalized and reported in Table 4. Round all answers to the nearest 100 dollars.
    added "(deck crew)" after "Fishing" in row 1
    added "(officers, engineers, cooks, etc.)" after "employees" in row 3
    added "wharf age and offload costs" to row 10
    added "associated with vessel operation" to row 15
    added "do not include employee health insurance reported in line 5)" to row 16
    added "including shared Fisheries Business Tax and Fishery Resource Landing Tax" to row 17
    added "(all fisheries and species)" to row 18
    revised row 19   to read: Quantity and royalty costs paid for QS shares leased from other vessels. Only report quantity and cost for formal leases. Do not include quantity or value of in-kind or other informal quota transfers.
    added "$US" to all rows in column 2

<u>Calendar year 2008 labor</u>
    added "(deck crew)" after "Fishing" in row 1a
    added "(including officers, engineers, cooks, etc.)" after "vessel" in row 1c