

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Gulf of Alaska Catcher Vessel and Processor Trawl (CVPT) Economic Data Report (EDR)**  
**OMB Control No. 0648-0700**

**B. Collections of Information Employing Statistical Methods**

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

In determining the scope or “universe” of the entities to be considered, NMFS generally includes only those entities that can reasonably be expected to be directly regulated by the action. Based on the most recent economic data report (EDR) submissions, there were fewer than 120 entities impacted by this EDR collection. The number of participants fluctuates annually.

Entity Type	Sample Size
8 shoreside processors	100%
2 stationary floating processors	100%
1 fish meal processor	100%
106 catcher vessels	100%

Groundfish harvest includes both the Gulf of Alaska (GOA) and Bering Sea and Aleutian Islands management area; therefore, groundfish activity from both areas is included. The owner or leaseholder of a catcher vessel with a License Limitation Program license endorsed for catcher vessel operation type, and for trawl gear in the Western or Central GOA reporting area during a calendar year must submit an Annual Trawl Catcher Vessel EDR for that calendar year.

The owner or leaseholder of a shoreside processor or stationary floating processor with a Federal Processor Permit that processes groundfish caught by vessels fishing with trawl gear in the Western and Central GOA reporting area must submit an Annual Shoreside Processor EDR for that calendar year.

**2. Describe the procedures for the collection of information including:**

- Statistical methodology for stratification and sample selection,
- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

This ICR uses an annual census of all respondents, as any other sampling methodology would produce too few observations to estimate representative levels of cost, earnings, and other outputs required for

this collection. As this program is a mandatory collection, and valuable fishing and processing privileges could be withheld if an EDR is not submitted, we anticipate a 100 percent response rate from the respondents.

In 2018, a discussion paper reviewing the EDR Program information collections was prepared to inform the North Pacific Fisheries Management Council in its process to potentially revise the collections. The Council is presently reviewing the program with its Social Sciences Planning Team assigned the task. The discussion paper contains an extensive history of the development of the EDR Program as well as a literature review regarding data collection methods and data quality. That document is incorporated for reference here. (<https://meetings.npfmc.org/CommentReview/DownloadFile?p=1f542e61-0dfc-465e-92eb-f7f00ab70edc.pdf&fileName=D5%20EDR%20Discussion%20Paper.pdf>)

Given that approximately 100 to 120 respondents each year will be participating in this fishery, it is not feasible to generate enough observations on any one of the variables without applying this collection annually. And, random sampling from this population is not a viable option for statistical reasons. Based on the degrees of freedom and number of observations required for estimating the statistical relationship among the variables in this collection, data may be separately pooled to create a time-series of cross-sectional data in order to generate sufficient observations for economic and statistical analyses. The strata used in preparing analyses (either deterministic or statistical) of management actions for this group will depend on the specific questions of interest.

**3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

Each of the owners and leaseholders in the catcher vessel, shoreside processor, and stationary floating processor sectors is required to submit an annual EDR. Therefore, the response to mandatory data requirements should be very high. Those individuals who do not submit their EDR by the submission date will receive a follow-up phone call from Pacific States. If a solution cannot be reached at that point, their information will be referred to the NOAA Office of Law Enforcement. Therefore, we anticipate a response rate of 100 percent.

NMFS has established different enforcement procedures for the GOA Trawl EDR Program than those used to ensure that accurate fisheries landings are reported. The economic data are not used for in-season management as landings data are, therefore persons submitting EDR data are given an opportunity to correct omissions and errors before any enforcement action is taken.

This approach is important to ensure that accurate EDR data are collected without being overly burdensome on industry for unintended errors. Only if the agency and the person submitting the data cannot reach a solution will the enforcement agency be contacted.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

There have not been tests of procedures or methods undertaken recently. The collection has only been in place since 2015, and will be undergoing a comprehensive review by the North Pacific Fisheries Management Council's Social Sciences planning team in 2020 and 2021. The statistical design team will

consider tests of procedure when deemed appropriate.

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

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SMiller 7/29/2020, 8/4/2020, 8/11/2020, 8/12/2020, 8/24/2020, 9/24/2020, 9/28/2020, 10/28/2020  
GAberle 8/20/2020, 11/1/2020  
JWATSON 8/21/2020