

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Groundfish Trawl Catcher/Processor Economic Data Report (EDR)**  
**OMB Control No. 0648-0564**

**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.**

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. Each catcher/processor is required to have one Amendment 80 quota share (QS) permit and one License Limitation Program (LLP) license, or an LLP groundfish license. Owners of multiple licenses and associated vessels are required annually to submit one Annual Trawl Catcher/Processor Economic Data Report (Annual Trawl Catcher/Processor EDR) for each licensed vessel. In 2023, 22 entities submitted an EDR for a 100 percent response rate.

| Entity Type           | Sample Size |
|-----------------------|-------------|
| 22 catcher/processers | 100%        |

**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 a mandatory annual census of all 22 catcher/processers. As the Annual Trawl Catcher/Processor EDR is a mandatory collection, and valuable fishing privileges will be withheld if an EDR is not submitted, we anticipate a 100 percent response rate from QS holders. QS and LLP licenses that designate participation in the trawl fisheries are issued to entities, rather than vessels, and specific provisions require that each participant is responsible for including data from any acquired vessel in this sector.

In February 2022 the Council received a Final Review Draft Regulatory Impact Review that was developed following a comprehensive review of the Annual Trawl Catcher/Processor EDR, along with the three other Alaska Region/North Pacific EDR Programs. One of the issues that was addressed in the review of the EDRs is whether annual submission of data by each respondent continues to be necessary to provide the data needed to monitor and evaluate the Alaska groundfish trawl fisheries. An option was

specifically considered changing the frequency of the information collection from annually to either every other or every third year. The Council chose to retain annual EDR submission in all remaining EDRs. This decision was influenced by the fact that the agency and contractor infrastructure would likely have to be maintained annually, as would industry bookkeeping practices, resulting in little reduction in either recoverable agency costs or industry compliance costs. Concerns about data quality were also raised in that if an anomalous event occurred in a year when data is not collected the resulting impact to the analyst's ability to evaluate economic impacts, to both fishery participants and fishery dependent communities, would be severely constrained.

Given the small population size of 22 vessels in the fleet, and relatively high inter-annual and cross-sectional heterogeneity in many key variables measured by the survey, the ICR is specified in regulation as a mandatory annual census, and does not permit alternative sample-based methods. Based upon the degrees of freedom and number of observations required for estimating the statistical relationship among the variables in this collection, data in the Annual Trawl Catcher/Processor EDR may be pooled to create a time-series of cross-sectional data in order to generate sufficient observations for economic and statistical analysis. Although the strata to be used in preparing analyses (either deterministic or statistical) of management actions for this fleet will depend on the specific questions of interest, vessels are commonly stratified by vessel length and the distribution and amount of catch by species.

**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/processor sector is required to annually submit the 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.

Enforcement of the Annual Trawl Catcher/Processor EDR with regard to non-compliance has been different from enforcement programs used to ensure that accurate landings are reported. The economic data are not being used for in-season management; persons submitting the data are given an opportunity to correct omissions and errors before any enforcement action is taken.

Giving the person submitting data a chance to correct problems is important because of the complexities associated with generating these data. Only if the agency and the person submitting the data cannot reach a solution will the enforcement agency be contacted. The intent of this program is to ensure that accurate data are collected without being overly burdensome on industry for unintended errors.

**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.**

Since the EDR program has been in place, informal testing has taken place by meeting with EDR submitters to discuss ways in which the forms used to request information could be improved. Pacific States (who administers the data collection as the Data Collection Agent) also conducts data verification

procedures, as described in Supporting Statement Part A, that are separate from data verification audits. In conducting data verification, Pacific States documents ways in which the EDRs could be clarified, and we have used this information to clarify instructions and variable definitions.

**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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