

# Amendment 80 Non-AFA Trawl Gear Catcher/Processor

Report Prepared for Pacific States Marine Fisheries Commission  
2017 Calendar Year Data



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## INDEPENDENT ACCOUNTANTS' REPORT ON APPLICATION OF AGREED-UPON PROCEDURES

To Pacific States Marine Fisheries Commission  
Portland, Oregon

We have performed the procedures described in the following report, which were agreed to by Pacific States Marine Fisheries Commission and National Marine Fisheries Service solely to assist you in evaluating the accuracy of the information submitted through Economic Data Reports for the 2017 calendar year. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described in the following pages either for the purpose for which this report has been requested or for any other purpose.

As part of our testing we will use sampling. Whenever sampling is involved there is the possibility that the findings might not be representative of the population from which it was drawn.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Economic Data Reports or the submitters of those reports. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

In the contract between Pacific States Marine Fisheries and Aldrich CPAs + Advisors LLP, the terminology "audit" was used and is used in the following pages to align with the contract terms. As mentioned above, the procedures performed do not constitute an audit in accordance with generally accepted auditing standards.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than those specified parties.

*Aldrich CPAs + Advisors LLP*

Lake Oswego, Oregon  
February 20, 2019

## BACKGROUND

Under regulations promulgated by the United States Secretary of Commerce, fishing and seafood processing businesses and associated participants in the Bering Sea and Aleutian Islands Crab Rationalization (CR), American Fisheries Act (AFA), and Amendment 80 (A80) fishery management programs, and groundfish trawl fisheries in the Gulf of Alaska (GOA Trawl), are subject to mandatory annual economic data collection censuses, referred to as Economic Data Reports (EDR). As developed by the North Pacific Fishery Management Council (Council) and implemented by National Marine Fisheries Service (NMFS), EDR requirements for regulated participants in these fisheries are specified under 50 CFR 680.6, 679.65, 679.94, and 679.110, respectively. EDRs are intended to provide employment, cost, sales and other business data to inform the Council's oversight of fishery management through improved analyses of economic performance of affected harvesters and processors participating in these Alaska fisheries, and social and economic effects on associated communities. The Council placed a high priority on data quality assurance (QA) in the design of EDR programs.

Compliance with EDR submission requirements is mandatory for all subject entities as a condition of federal fishery permit issuance and renewal, and failure to submit required EDR forms in a timely manner is grounds for enforcement action by NMFS Office of Law Enforcement. In addition to these and other data QA elements, the Council specified EDR regulations to include data verification audits of EDR records, to be performed by a qualified financial auditor contracted and authorized to solicit and review financial and other supporting company records from EDR submitters, assess reported data values against supporting records, and verify accurate values.

Data collection and management of EDR programs for Alaska fisheries is administered by the Pacific State Marine Fisheries Commission (PSMFC), under a grant from National Marine Fisheries Service (NMFS) and in collaboration with NMFS Alaska Fisheries Science Center (AFSC). For each distinct category of participant in the respective fisheries, EDR questionnaire forms have been designed to collect quantitative financial and administrative information about business operations with respect to the previous calendar year. Submission due dates are June 1 for all EDR forms. Primary data validation is conducted by PSMFC during the course of data collection and employs automated database processes to identify gross and/or logical reporting errors and obtain submitter corrections where possible. Following completion of primary validation and error correction, the EDR database is further analyzed to identify a subset of records from the most recent years of EDR submissions for verification audit.

## KEY PARTICIPANTS AND ROLES

The key participants in the project include:

- ▶ **National Marine Fisheries Service (NMFS)** – initiator of the audit process and end-user of the information contained in the EDRs.
- ▶ **Pacific States Marine Fisheries Commission (PSMFC)** – collector and manager of the data collected through the EDRs.
- ▶ **Aldrich CPAs + Advisors LLP (Aldrich/Auditor)** – independent accountants and consultants selected to audit and validate the information collected in the EDRs.
- ▶ Participants in the Amendment 80 rationalization program.

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## SCOPE OF WORK

### *Selection of audits and data preparation:*

- ▶ NMFS selected the EDR data items from each respective EDR form to be audited for all audits.
- ▶ NMFS analyzed the EDR data submitted for anomalies and selected records as appropriate for non-random audits.
- ▶ PSMFC compiled the data from selected EDRs into a tabular data report from which the Auditor validated as agreed to with PSMFC.
- ▶ PSMFC supplied the contact information and assisted with making arrangements between the Auditor and the EDR submitter.

### *Data verification and analysis:*

- ▶ The Auditor contacted and solicited supporting information from the selected EDR submitters for data items specified by NMFS.
- ▶ The Auditor reviewed and verified reported values based upon supporting information provided. For each reported data value audited, verification includes:
  - Evaluate and classify the quality of supporting documentation supplied as the basis for verification of reported EDR values
  - Evaluate methods and calculations used to derive or approximate the reported value
  - Identify and classify reporting errors
  - Where possible, identify an appropriate correction to the reported value and quantify the amount of reporting error
  - Criteria and codes for classification of qualitative results are provided below
- ▶ The Auditor followed up on missing or inaccurate data to validate and correct the data.
- ▶ The Auditor identified and confirmed with the submitter appropriate changes to data when missing or inaccurate.
- ▶ The Auditor identified general problems with the data and the data collection process (e.g., the EDR forms and instructions, submission deadlines, submitter compliance) and made recommendations for future reporting as appropriate.

## TESTING METHODOLOGY

For each EDR variable and data entry selected for audit verification, Aldrich critically evaluates the support provided by the selected vessel or processor. Information is evaluated against third party support, such as invoices or fish tickets; internally-generated information, such as crew settlement sheets, general ledger details, invoices, detailed internal reports, or financial statements; and estimates made, including an assessment of the reasonableness of assumptions. Where a selected EDR data value as originally reported is based solely on the submitter's internally-generated records, auditors may request additional supporting documentation as needed to substantiate the internal records and/or verify the reported value. Aldrich also notes when no support is available to evaluate the selected data entry.

Many of the records provided to Aldrich by vessel owners reflect the broad variation in accounting and record-keeping systems among this segment of EDR submitters. The processor reporting tends to be more formal and standardized, reflecting the large company nature of those operations. Because the material provided is so unique, the audit process begins with a detailed review of each information packet received while comparing totals for each variable to the original EDR entry. Each supporting document is assessed for accuracy and depth of support. Estimates are accepted as long as a reasonable explanation and/or calculations are also provided. If there were no source documents available to support the value reported it was noted in the database that is submitted to PSMFC. If nothing was provided initially or upon further inquiry it was recorded as a non-response and noted in the database report. If the initially provided documentation is determined to be incomplete or insufficient, then Aldrich contacts the vessel or processor to request further documentation. Once this additional documentation is received, it is assessed and validated via the process described above.

If discrepancies are found between the original EDR submission and the supporting documentation provided, Aldrich contacts the vessel owner and/or preparer to validate the corrected value. Many times this discussion leads to the receipt of additional documentation and/or further explanation as to the methodology used to report the associated EDR values. Once all supporting documentation has been provided by EDR submitters and evaluated by auditors, the Validated Value is determined (as equal to, or a correction to, the original value) and entered into the database report.

For each audited value, Aldrich also records a qualitative assessment of the audit results as a pair of Audit Codes in the database report, based on criteria described below (see TABLE: SUPPORT ANALYSIS CODES). A distinct Audit Code is assigned to each of the Original Value and Verified Value, based on auditors assessment of the quality and/or deficiencies in supporting documentation provided, the nature of any reporting error identified for the Original Value, and the resolution of any deficiencies and/or errors as represented in the Validated Value. Audit codes 0, 1, 1T, 5, 7, 9, or 10 (denoted by " \* " in the table) are used to characterize the accuracy and quality of support for either Original Value or Validated Value entries. Audit codes that represent a category of reporting error and/or support deficiency identified with respect to the Original Value (2, 2T, 3, 4, 7, or 8) are coupled with a code value of 1, 1T, 5, 6, 7, 9, or 10 assigned to the Validated Value.

**TABLE: SUPPORT ANALYSIS CODES**

| Audit codes | Documented support for Original Value | Documented support for Verified Value | Validation result  |
|-------------|---------------------------------------|---------------------------------------|--|
| 0           | No                                    | No                                    | Respondent did not respond to audit request for supporting records; represents noncompliance.  |
| 1*          | Yes                                   | Yes (same as original)                | No error; reported value is clearly substantiated by complete records. [Zero handling: Original value is "0": Correct value= 0 (no correction). Original and corrected code= 1.]         |
| 1T*         | Yes                                   | Yes (same as original)                | Original value is blank or 'N/A': Correct value= 0 (not counted as error for fail letters)   |
| 2           | Yes                                   | Yes (same as original)                | Calculation error  |
| 2T          | Yes                                   | Yes (same as original)                | Observable typographic error on the respondent's part  |
| 3           | Yes                                   | Yes (same as original)                | Misinterpretation of question  |
| 4           | Yes                                   | Yes (same as original)                | Estimate is based on original documentation but flawed assumptions/logic   |
| 5*          | Yes                                   | Yes (same as original)                | Data cannot be reported precisely as specified in EDR form and must be estimated; estimate is based on appropriate documentation and sound assumptions/logic and is considered validated |
| 6           | Yes                                   | Yes (updated)                         | Original value was reported correctly based on original documentation, but corrected based on updated documentation  |
| 7*          | No                                    | No                                    | Reported value is "best guess", not derived from records; no valid value is available  |
| 8           | No                                    | Yes (new)                             | Original value is unsubstantiated; correction based on new documentation   |
| 9*          | No                                    | No                                    | No data reported   |
| 10*         | No                                    | No                                    | Item "Not Applicable" to vessel  |

\*Code can be used as the validation support code

## OUTLIER AUDIT – GOA SHORESHIDE PROCESSOR EDR RECORDS

A total of 18 individual Shoreside Processor EDR data entries were selected for verification, representing 8 distinct EDR variables, and 5 distinct EDR submitters, from which one or more EDR entries were selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support and the validated support. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

### Variable 1: Table 1 - Processing Labor Payment (housed)

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Support Analysis  |                 |             | As Corrected # of Processors | As Corrected % of Total |
| Code              | # of Processors | % of Total  |                              |                         |
| 1                 | 2               | 67%         | 2                            | 67%                     |
| 5                 | 0               | 0%          | 1                            | 33%                     |
| 7                 | 1               | 33%         | 0                            | 0%                      |
| <b>Total</b>      | <b>3</b>        | <b>100%</b> | <b>3</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 All items submitted were correct as reported and were validated to payroll reports.
- 7 One processor reported an initial value that was an estimate. This estimate was agreed to supporting records and therefore coded a 5.

### Variable 2: Table 1 - Processing Labor Man-Hours (housed)

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Support Analysis  |                 |             | As Corrected # of Processors | As Corrected % of Total |
| Code              | # of Processors | % of Total  |                              |                         |
| 1                 | 2               | 67%         | 2                            | 67%                     |
| 5                 | 0               | 0%          | 1                            | 33%                     |
| 7                 | 1               | 33%         | 0                            | 0%                      |
| <b>Total</b>      | <b>3</b>        | <b>100%</b> | <b>3</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 All items submitted were correct as reported and were validated to payroll reports.
- 7 One processor reported an initial value that was an estimate. This estimate was agreed to supporting records and therefore coded a 5.



**Variable 3: Table 2 - Number of Non-processing Employees**

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Code              | # of Processors | % of Total  | As Corrected # of Processors | As Corrected % of Total |
| 5                 | 0               | 0%          | 2                            | 67%                     |
| 7                 | 2               | 67%         | 0                            | 0%                      |
| 0                 | 1               | 33%         | 1                            | 33%                     |
| <b>Total</b>      | <b>3</b>        | <b>100%</b> | <b>3</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

7 Two processors reported an initial value that was an estimate. This estimate was agreed to supporting records and therefore coded a 5.

0 No information was provided for this data entry from one processor.

**Variable 4: Table 2 - Total Wages and Salaries**

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Code              | # of Processors | % of Total  | As Corrected # of Processors | As Corrected % of Total |
| 5                 | 0               | 0%          | 2                            | 67%                     |
| 7                 | 2               | 67%         | 0                            | 0%                      |
| 0                 | 1               | 33%         | 1                            | 33%                     |
| <b>Total</b>      | <b>3</b>        | <b>100%</b> | <b>3</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

7 Two processors reported an initial value that was an estimate. This estimate was agreed to supporting records and therefore coded a 5.

0 No information was provided for this data entry from one processor.

**Variable 5: Table 3 - Electricity Cost**

| Initial Reporting |                 |            | Corrected Reporting          |                         |
|-------------------|-----------------|------------|------------------------------|-------------------------|
| Code              | # of Processors | % of Total | As Corrected # of Processors | As Corrected % of Total |
| 1                 | 2               | 100%       | 2                            | 100%                    |

Support analysis code and description of support provided:

1 All of the data entries selected were validated to expense account detail or invoices.

**Variable 6: Table 3 - Electricity Hours**

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Support Analysis  |                 |             | As Corrected # of Processors | As Corrected % of Total |
| Code              | # of Processors | % of Total  |                              |                         |
| 1                 | 0               | 0%          | 2                            | 100%                    |
| 2                 | 1               | 50%         | 0                            | 0%                      |
| 2T                | 1               | 50%         | 0                            | 0%                      |
| <b>Total</b>      | <b>2</b>        | <b>100%</b> | <b>2</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

- 2 One processor reported an initial value that included a calculation error, but corrected based on information provided.
- 2T This error appears to be a typographical error in the data entry. Supporting documentation was reviewed and the value was validated.

**Variable 7: Table 3 - Water Cost**

| Initial Reporting |                 |            | Corrected Reporting          |                         |
|-------------------|-----------------|------------|------------------------------|-------------------------|
| Support Analysis  |                 |            | As Corrected # of Processors | As Corrected % of Total |
| Code              | # of Processors | % of Total |                              |                         |
| 1                 | 1               | 100%       | 1                            | 100%                    |

Support analysis code and description of support provided:

- 1 All of the data entries selected were validated to expense account detail or invoices.

**Variable 8: Table 3 - Water Gallons**

| Initial Reporting |                 |             | Corrected Reporting          |                         |
|-------------------|-----------------|-------------|------------------------------|-------------------------|
| Support Analysis  |                 |             | As Corrected # of Processors | As Corrected % of Total |
| Code              | # of Processors | % of Total  |                              |                         |
| 1                 | 0               | 0%          | 1                            | 100%                    |
| 2                 | 1               | 100%        | 0                            | 0%                      |
| <b>Total</b>      | <b>1</b>        | <b>100%</b> | <b>1</b>                     | <b>100%</b>             |

Support analysis code and description of support provided:

- 2 One processor reported an initial value that included a calculation error, but corrected based on information provided.

## OUTLIER AUDIT – CATCHER PROCESSOR EDR RECORDS

A total of 24 individual Trawl Catcher Processor EDR data entries were selected for verification, representing 16 distinct EDR variables, and 8 distinct EDR submitters, from which one or more EDR entry was selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support and the validated support. 2 additional variables were added from one of the Catcher Processors as those amounts had been submitted incorrectly. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

### Variable 1: Table 2.2 - Fuel Usage Cost

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 5                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided. The updated value is an estimate that was validated.

### Variable 2: Table 2.2 - Fuel Usage Gallons

| Initial Reporting     |                         |            | Corrected Reporting                  |                         |
|-----------------------|-------------------------|------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total | As Corrected # of Catcher Processors | As Corrected % of Total |
| 5                     | 1                       | 100%       | 1                                    | 100%                    |

Support analysis code and description of support provided:

- 5 For one catcher processor the annual fuel use was calculated based on an estimate of fuel used per hour.

**Variable 3: Table 2.3 - Freezer Space**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 5                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided. The new amount reported was an estimate that was validated.

**Variable 4: Table 2.5 - Processing Capacity**

| Initial Reporting     |                         |            | Corrected Reporting                  |                         |
|-----------------------|-------------------------|------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total | As Corrected # of Catcher Processors | As Corrected % of Total |
| 5                     | 1                       | 100%       | 1                                    | 100%                    |

Support analysis code and description of support provided:

- 5 For one catcher processor the maximum throughput was calculated based on maximum cases per hour multiplied by pounds per case.

**Variable 5: Table 3 - Total Fishery Sales Revenue**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 6: Table 3 - Total Fishery Sales Units**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 7: Table 4 - Expense Fish Gear**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 8: Table 4 - Expenditures on Vessel and Onboard Equipment**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 2                                    | 100%                    |
| 8                     | 2                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>2</b>                | <b>100%</b> | <b>2</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 9: Table 4 - Capital Expenditures Related to Vessel Operations**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 3                                    | 100%                    |
| 8                     | 3                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>3</b>                | <b>100%</b> | <b>3</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 Three catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 10: Table 5 - Fishing Labor**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 11: Table 5 - Processing Labor**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 2                                    | 67%                     |
| 8                     | 2                       | 67%         | 0                                    | 0%                      |
| 0                     | 1                       | 33%         | 1                                    | 33%                     |
| <b>Total</b>          | <b>3</b>                | <b>100%</b> | <b>3</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.
- 0 No information was provided for this data entry from one catcher processor.

**Variable 12: Table 5 - Labor Other**

| Initial Reporting     |                         |             |  | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  |  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          |  | 2                                    | 67%                     |
| 5                     | 0                       | 0%          |  | 1                                    | 33%                     |
| 6                     | 1                       | 33%         |  | 0                                    | 0%                      |
| 8                     | 2                       | 67%         |  | 0                                    | 0%                      |
| <b>Total</b>          | <b>3</b>                | <b>100%</b> |  | <b>3</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 6 One catcher processor's original value was reported correctly based on original documentation but corrected based on updated documentation.
- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 13: Table 5 - Food and Provisions**

| Initial Reporting     |                         |             |  | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  |  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          |  | 1                                    | 100%                    |
| 2T                    | 1                       | 100%        |  | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> |  | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 2T One catcher processor had a typographical error that was corrected through the validation process.

**Variable 14: Table 5 - Freight and Storage**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 1                       | 33%         | 3                                    | 100%                    |
| 8                     | 2                       | 67%         | 0                                    | 0%                      |
| <b>Total</b>          | <b>3</b>                | <b>100%</b> | <b>3</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.
- 8 Two catcher processors reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 15: Table 5 - Product and Packaging Materials**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 0                       | 0%          | 1                                    | 100%                    |
| 8                     | 1                       | 100%        | 0                                    | 0%                      |
| <b>Total</b>          | <b>1</b>                | <b>100%</b> | <b>1</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 16: Table 5 - Quantity and Royalty Costs**

| Initial Reporting     |                         |             | Corrected Reporting                  |                         |
|-----------------------|-------------------------|-------------|--------------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Processors | % of Total  | As Corrected # of Catcher Processors | As Corrected % of Total |
| 1                     | 1                       | 50%         | 2                                    | 100%                    |
| 8                     | 1                       | 50%         | 0                                    | 0%                      |
| <b>Total</b>          | <b>2</b>                | <b>100%</b> | <b>2</b>                             | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 One catcher processor provided support for the initial value, which was substantiated by agreeing the amount to expense account detail.
- 8 One catcher processor reported an initial value that was unsubstantiated but corrected based on information provided.



## OUTLIER AUDIT – GOA TRAWL CATCHER VESSEL EDR RECORDS

A total of 21 individual GOA Trawl Catcher Vessel EDR data entries were selected for verification, representing 9 distinct EDR variables, and 10 distinct EDR submitters, from which one or more EDR entry was selected. Upon completion of the verification review, each selected data entry was assigned a code for the quality of the original support, and the validated support. The tables below provide a summary of audit results for each EDR variable selected, listing the number and percentage (%) of selected entries assigned each audit code for the original and verified value, respectively, with the associated codes defined below.

### Variable 1: Certification Page - Vessel Equip Market Value

| Initial Reporting |              |             |  | Corrected Reporting |                   |  |
|-------------------|--------------|-------------|--|---------------------|-------------------|--|
| Support Analysis  | # of Catcher |             |  | As Corrected # of   | As Corrected % of |  |
| Code              | Vessels      | % of Total  |  | Catcher Vessels     | Total             |  |
| 1                 | 1            | 25%         |  | 3                   | 75%               |  |
| 2T                | 2            | 50%         |  | 0                   | 0%                |  |
| 0                 | 1            | 25%         |  | 1                   | 25%               |  |
| <b>Total</b>      | <b>4</b>     | <b>100%</b> |  | <b>4</b>            | <b>100%</b>       |  |

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which were substantiated with survey reports.
- 2T Two catcher vessels had a typographical error that was corrected through the validation process.
- 0 No information was provided for this data entry from one catcher vessel.

### Variable 2: Certification Page - Vessel Equip Replacement Value

| Initial Reporting |              |             |  | Corrected Reporting |                   |  |
|-------------------|--------------|-------------|--|---------------------|-------------------|--|
| Support Analysis  | # of Catcher |             |  | As Corrected # of   | As Corrected % of |  |
| Code              | Vessels      | % of Total  |  | Catcher Vessels     | Total             |  |
| 1                 | 1            | 33%         |  | 2                   | 67%               |  |
| 2T                | 1            | 33%         |  | 0                   | 0%                |  |
| 0                 | 1            | 33%         |  | 1                   | 33%               |  |
| <b>Total</b>      | <b>3</b>     | <b>100%</b> |  | <b>3</b>            | <b>100%</b>       |  |

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated with survey reports.
- 2T One catcher vessel had a typographical error that was corrected through the validation process.
- 0 No information was provided for this data entry from one catcher vessel.

**Variable 3: Table 1 - Excluder Gear Cost**

| Initial Reporting     |                      |            | Corrected Reporting               |                         |
|-----------------------|----------------------|------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 0                     | 2                    | 100%       | 2                                 | 100%                    |

Support analysis code and description of support provided:

- 0 No information was provided for this data entry from two catcher vessels.

**Variable 4: Table 1 - Fuel Cost**

| Initial Reporting     |                      |             | Corrected Reporting               |                         |
|-----------------------|----------------------|-------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total  | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 1                     | 1                    | 50%         | 2                                 | 100%                    |
| 2T                    | 1                    | 50%         | 0                                 | 0%                      |
| <b>Total</b>          | <b>2</b>             | <b>100%</b> | <b>2</b>                          | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the detail summary.
- 2T One catcher vessel had a typographical error that was corrected through the validation process.

**Variable 5: Table 1 - Fuel Gallons**

| Initial Reporting     |                      |             | Corrected Reporting               |                         |
|-----------------------|----------------------|-------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total  | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 1                     | 1                    | 50%         | 2                                 | 100%                    |
| 8                     | 1                    | 50%         | 0                                 | 0%                      |
| <b>Total</b>          | <b>2</b>             | <b>100%</b> | <b>2</b>                          | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to the detail summary.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.

**Variable 6: Table 2 - Captain Labor Payment**

| Initial Reporting     |                      |             | Corrected Reporting               |                         |
|-----------------------|----------------------|-------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total  | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 1                     | 1                    | 33%         | 1                                 | 33%                     |
| 2                     | 1                    | 33%         | 0                                 |                         |
| 6                     | 0                    | 0%          | 1                                 | 33%                     |
| 0                     | 1                    | 33%         | 1                                 | 33%                     |
| <b>Total</b>          | <b>3</b>             | <b>100%</b> | <b>3</b>                          | <b>100%</b>             |

Support analysis code and description of support provided:

- 1 One catcher vessel provided support for the initial value, which was substantiated by agreeing the amount to accounting report.
- 2 One catcher vessel reported an initial value that included a calculation error, but corrected based on information provided.
- 0 No information was provided for this data entry from one catcher vessel.

**Variable 7: Table 2 - Total Crew Labor Payment**

| Initial Reporting     |                      |             | Corrected Reporting               |                         |
|-----------------------|----------------------|-------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total  | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 1                     | 0                    | 0%          | 1                                 | 25%                     |
| 2                     | 1                    | 25%         | 0                                 | 0%                      |
| 6                     | 0                    | 0%          | 1                                 | 25%                     |
| 8                     | 1                    | 25%         | 0                                 | 0%                      |
| 0                     | 2                    | 50%         | 2                                 | 50%                     |
| <b>Total</b>          | <b>4</b>             | <b>100%</b> | <b>4</b>                          | <b>100%</b>             |

Support analysis code and description of support provided:

- 2 One catcher vessel reported an initial value that included a calculation error, but corrected based on information provided.
- 8 One catcher vessel reported an initial value that was unsubstantiated but corrected based on information provided.
- 0 No information was provided for this data entry from two catcher vessels.

**Variable 8: Table 2 Total Crew Members**

| Initial Reporting     |                      |            | Corrected Reporting               |                         |
|-----------------------|----------------------|------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 0                     | 1                    | 100%       | 1                                 | 100%                    |

Support analysis code and description of support provided:

0 No information was provided for this data entry from one catcher vessel.

**Variable 9: Table 3 - Crew License Count**

| Initial Reporting     |                      |            | Corrected Reporting               |                         |
|-----------------------|----------------------|------------|-----------------------------------|-------------------------|
| Support Analysis Code | # of Catcher Vessels | % of Total | As Corrected # of Catcher Vessels | As Corrected % of Total |
| 0                     | 1                    | 100%       | 1                                 | 100%                    |

Support analysis code and description of support provided:

0 No information was provided for this data entry from one catcher vessel.

The quality of the information submitted in the EDRs is important, as the information will be used to analyze effect of current and future fishery management decisions associated with the Amendment 80 program and groundfish trawl fisheries in the Gulf of Alaska, on the owners of vessels and processing plants submitting EDR data as well as other stakeholders. Overall, the data verification procedures found that for the processors out of 5 submissions, 4 were well-supported and 1 failed. For the catcher processors out of 8 submissions, 7 were well-supported and 1 failed. For the catcher vessels out of 10 submissions, 7 were well-supported and 3 failed. It was also noted that some of the variables selected were not applicable to all of the vessels or processors.

The results of the data verification procedures performed, detailed in the findings section, discuss the basis for the initial values and the support provided if the initial values were corrected based on updated documentation. Based on key objectives listed earlier in the report, several other observations noted through the data verification procedures performed are as follows:

1. The majority of support provided was consistent with the types of support provided during the EDR data verification audits conducted in previous years.
2. Most EDR respondents were in compliance with the testing procedures, and support was provided in a timely fashion and follow-up questions were addressed as requested. For the Processor submissions there were 2 selected EDR entries for which there was no response to the audit request. For the Catcher Processors there was 1 selected EDR entry for which we did not receive a response to our audit request and 2 entries that were not selected for which submitters volunteered corrected values. For the Catcher Vessels there were 8 selected EDR entries for which we did not receive a response to our information request letter and 1 entry that was not selected for which submitters volunteered corrected values.
3. Errors in submitted information did not appear to indicate a directional bias in the data. The corrected information was made as a result of new information received subsequent to the preparation of the original EDR or based on updated estimates or guidance on how to derive the variable.