

JUSTIFICATION FOR CHANGE
NORTHEAST MULTISPECIES FRAMEWORK ADJUSTMENT 45 DATA
OMB CONTROL NO. 0648-0202

The National Marine Fisheries Service (NMFS) submitted a Paperwork Reduction Act (PRA) renewal package to the Chief Information Officer (CIO) for OMB Control No. 0648-0202 on August 25, 2009. At the time, the burden for a paper letter of authorization (LOA) declaring that a vessel intended to fish south of the Gulf of Maine (GOM) Regulated Mesh Area was inadvertently left out of that renewal package. The LOA had been approved under Framework Adjustment (FW) 20 to the Northeast (NE) Multispecies Fishery Management Plan (FMP) under OMB Control No. 0648-0202 for 498 vessels submitting up to 12 requests per year, and then was later approved with Amendment 13 to the NE Multispecies FMP for another 6 requests per year for a total public burden of up to 18 LOA requests per year. At this time, we would like to reinstate the PRA burden associated with the 498 vessels submitting up to 18 requests per year for this paper LOA to ensure that the burdens associated with FW 45 to the NE Multispecies FMP described below are approved pursuant to the PRA.

The GOM cod trip limit exemption requirements allow days-at-sea (DAS) vessels to land a higher trip limit of Georges Bank (GB) cod and transit through the GOM, provided they comply with all of the requirements of the exemption. Previously, this exemption was given only to vessels fishing under a NE multispecies Category A DAS because the trip limits for GB and GOM cod were different throughout the entire year; trip limits for GB cod and GOM cod were the same for Handgear A and Handgear B vessels. However, FW 44 to the NE multispecies FMP gave the Regional Administrator (RA) new authority to make inseason adjustments to daily and trip landing limits of all NE multispecies stocks allocated to the common pool fishery. In addition, FW 45 proposes to specify a different GOM and GB cod trip limit for handgear vessels. This change makes it possible for GOM cod to have a lower trip limit than GB cod for Handgear A and Handgear B vessels. Therefore, if FW 45 is approved, the LOA that was previously only applicable to DAS vessels would now need to be applied to Handgear A and Handgear B vessels to effectively enforce the different trip limits for these stocks.

Previously, the time burden for this requirement was estimated at 498 vessels submitting up to 18 requests per year, for a total burden of 8,964 responses and 747 hours per year (5 minutes per request). DAS vessels must declare where they fish on each trip via a vessel monitoring system (VMS), therefore, the paper LOA is requested infrequently. The paper LOA burden previously approved under OMB Control No. 0648-0202 and described above would be sufficient to also cover DAS vessels and for Handgear A and B vessels requesting a paper LOA as part of FW 45. Even though an additional number of vessels may be eligible to utilize the GOM cod trip limit exemption, the altered requirements are not expected to change this burden estimate. Therefore, we would like to reinstate the previous burden under OMB Control No. 0684-0202 that was previously left out of the 2009 renewal package.

This request will add 8,964 responses and 747 hours but no record/keeping reporting cost, as the LOAs are requested with a local telephone call.