

**SUPPORTING STATEMENT
ALASKA REGION BERING SEA & ALEUTIAN ISLANDS CRAB
ECONOMIC DATA REPORTS
OMB CONTROL NO. 0648-0518**

INTRODUCTION

In January 2004, the United States Congress amended Section 313(j) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to mandate the Secretary of Commerce (Secretary) to implement the Crab Rationalization Program for the Bering Sea and Aleutian Islands Management Area (BSAI) crab fisheries. The Program allocates BSAI crab resources among harvesters, processors, and coastal communities. The North Pacific Fishery Management Council (Council) prepared, and the National Marine Fisheries Service (NMFS) approved, the Fishery Management Plan for BSAI King and Tanner Crabs (FMP). The FMP establishes criteria for the management of certain aspects of the BSAI crab fisheries by the State of Alaska Department of Fish and Game (ADF&G). The FMP is implemented by regulations at 50 CFR Part 680.

NMFS, Alaska Region implemented the BSAI Crab Rationalization Program (CR Program) to both maintain rigorous safeguards on use of fishing privileges for a public resource and to provide safeguards for program constituents. The CR Program components include quota share (QS) allocation, processor quota share (PQS) allocation, individual fishing quota (IFQ) and individual processing quota (IPQ) issuance, quota transfers, use caps, crab harvesting cooperatives, protections for Gulf of Alaska groundfish fisheries, arbitration system, monitoring, economic data collection, and cost recovery fee collection. The economic data collection program details may be found at: <http://www.alaskafisheries.noaa.gov/regs/680/default.htm>.

This action is a request for renewal for this information collection.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

Section 313 (j) of the [Magnuson-Stevens Act](#) authorizes a mandatory economic data report (EDR) to be used “to study the impacts of the CR Program,” to insure that the program will achieve “equity between the harvesting and processing sectors,” and to monitor the “economic stability for harvesters, processors, and coastal communities.” The Magnuson-Stevens Act also provides specific guidance on the type of data to be collected, requirements for selecting a collection agent, verification of data, and treatment and distribution of confidential data that are included in this collection.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Congress required that an independent third-party data collection agent (DCA) administer the collection and dissemination of the crab EDR data. NMFS selected the Pacific States Marine Fisheries Commission (PSMFC) to be the DCA. The PSMFC is under contract (through a grant/cooperative agreement) with NMFS to collect, verify, and disseminate data to NMFS, ADF&G, and the Council.

The goal of the EDR design was to apply a format that closely matches the way in which records are kept by the affected fishing industry. NMFS conducted meetings with fishing industry accountants to define various cost and expenditure categories that match, with some variation, the general accounting structure present in much of the fleet. Four categories of crab EDR collect annual data pertaining to cost, revenue, ownership, and employment data from the harvesting and processing sectors.

NMFS uses the EDR data to evaluate the CR Program to

- ◆ Estimate effort, operating revenues and costs, and labor income
- ◆ Understand changes in the makeup of fishery participants
- ◆ Determine how fishing and processing are undertaken, and
- ◆ Determine how crew are compensated or employed

The Council uses the EDR data to evaluate the CR Program to analyze changes in

- ◆ Resource utilization
- ◆ Excess harvesting and processing capacity
- ◆ Economic returns
- ◆ Variable costs and revenues
- ◆ Economic efficiency, and
- ◆ Stability of harvesters, processors, and coastal communities

Section 313(j)(1) requires the Secretary to collaborate with the Federal Trade Commission (FTC) and Department of Justice (DOJ) to develop economic data for analysis by these agencies. Data from the EDR will directly contribute to this ongoing evaluation of potential anti-trust and anti-competitive practices in the crab industry.

NOAA Fisheries Office for Law Enforcement uses the individual and confidential EDR data to ensure industry compliance with the data reporting requirements of the CR Program. Compliance monitoring is an integral component of collecting reliable and accurate data. It would not be possible to ensure reporting compliance from the firms that are required to provide the data in a timely fashion without these enforcement tools.

The Alaska Commercial Fisheries Entry Commission (CFEC) issues permits and vessel licenses for Alaska's commercial fisheries to qualified individuals in both limited and unlimited fisheries and provides due process hearings and appeals. The monitoring and enforcement of this

Program are coordinated by NMFS and ADF&G. Harvesting and processing activity are monitored for compliance with the regulations. Methods for catch accounting and catch monitoring plans for cooperatives generate data to provide accurate and reliable estimates of the total catch and landings to manage quota share accounts, prevent overages of IFQ and IPQ, and determine regionalization requirements. Monitoring includes landed catch weight and species composition, bycatch, and deadloss to estimate total fishery removals.

An EDR is required annually for each of four categories of CR fisheries participants. These categories are:

- ◆ Catcher vessel
- ◆ Catcher/processor
- ◆ Stationary floating crab processor, and
- ◆ Shoreside crab processor

The following persons must submit an annual EDR:

- ◆ Persons who owned fishing vessels or processing plants that harvested crab or processed crab harvested in the CR fisheries at any time during the calendar year.
- ◆ Persons who were leaseholders of fishing vessels or processing plants that participated in the CR fisheries during the calendar year. A leaseholder is a person, other than the owner of the catcher vessel for which the EDR is required, who:
 - ◆ Was identified as the leaseholder, in a written lease, of the catcher vessel,
 - ◆ Paid expenses of the catcher vessel, OR
 - ◆ Claimed expenses for the catcher vessel or processing plants as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

PSMFC mails the annual crab EDR packages to vessel owners, stationary floating crab processor owners, and shoreside processor owners of record by May 1 each year. The respondent may request a crab EDR by telephone at 1-877-741-8913 or by email at alaska_crab@psmfc.org. A copy in fillable PDF format is available at http://www.psmfc.org/alaska_crab. In addition, an online version of the catcher vessel EDR is available at https://www.psmfc.org/alaska_crab/edr/edrlogin.php. NMFS provides an online version of the EDR only for catcher vessels, because this EDR is much simpler than the EDRs for processors.

Respondents are required to mail in Certification Pages (pages 3 and 4), because a signature is required to meet the submission requirements.

The annual EDR submission deadline is June 28. Failure to submit an EDR form when required will result in delay in and/or denial of any and all crab permit applications.

A designated representative, leaseholder, or owner may complete the EDR. The owner or leaseholder must submit the EDR certification pages either as part of the entire EDR or as a separate document.

- ◆ The owner or leaseholder must submit the completed EDR certification pages as part of the entire EDR and must attest to the accuracy and completion of the EDR by signing and dating the certification pages; or
- ◆ The owner or leaseholder must submit the completed EDR certification pages only and must attest that they meet the conditions exempting them from submitting the EDR, by signing and dating the certification pages.

For the purpose of defining the persons responsible for submitting the EDR, a Leaseholder is a person, other than the owner of the vessel for which the EDR is required, who:

- ◆ Was identified as the leaseholder, in a written lease, of the catcher/processor,
- ◆ Paid expenses of the vessel,
- ◆ Claimed expenses for the vessel as a business expense on schedule C of his/her Federal Income Tax Return, or on a State Income Tax Return.

a. Catcher Vessel Crab EDR

To qualify as a CR fisheries participant who may harvest crab in the CR fisheries, a catcher vessel owner or leaseholder must obtain QS allocation or IFQ, except that QS/IFQ is not needed to harvest CDQ or Adak community CR Program allocations. Any owner or leaseholder of a catcher vessel during any period in the calendar year identified on the EDR in which the catcher vessel was used to harvest crab in a CR fishery must submit to PSMFC, at the address provided on the form, an EDR for that catcher vessel.

The owner or leaseholder of a catcher vessel must submit the entire EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The catcher vessel owner	You harvested BSAI crab in the vessel during this calendar year.	Entire EDR
	You leased the vessel for a portion of the year to another party, but harvested some BSAI crab in the vessel during this calendar year (provide the name, address, and telephone number of the person to whom you leased the vessel during this calendar year).	Entire EDR
	You leased or sold the vessel for a portion of the year to another party and harvested some BSAI crab in the catcher vessel during the calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year). OR The vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during the calendar year.	Entire EDR
	Your vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during this calendar year.	Entire EDR
The leaseholder	You harvested BSAI crab in the vessel during this calendar year.	Entire EDR

The owner of a catcher vessel must submit only the Certification section of the EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The catcher vessel owner	No one harvested BSAI crab in the vessel during this year.	EDR certification pages
	You leased or sold the vessel to another party and harvested no BSAI crab in the vessel during the calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year). OR The catcher vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during the calendar year.	EDR certification pages
	You leased the vessel to another party, and harvested no BSAI crab in the vessel during this calendar year (provide the name, address, and telephone number of the person to whom you leased the vessel during the calendar year).	EDR certification pages

Catcher vessel crab EDR Certification Page

Catcher Vessel Information

- Vessel Name and ADF&G Vessel Registration Number
- Crab License Limitation Permit Number(s)
- USCG Documentation Number
- Current Estimated Market Value of Vessel and Equipment
- Replacement Value of Vessel and Equipment
- Name of Crab Harvesting Cooperative (if applicable)

Vessel Owner Information

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business FAX Number
- Business E-mail address, if available

Leaseholder Information (if applicable)

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business FAX Number
- Business E-mail address, if available

Person Completing this Report (check one)

- Owner
(If name and address are the same as provided in the Owner Information block, do not repeat)
- Leaseholder
(If name and address are the same as provided in the Leaseholder Information block, do not repeat)
- Designated Representative
Name and Title
Business Telephone Number and Business FAX Number
Business E-mail address (if available)

EDR filing Status

- Check appropriate statement to describe EDR filing status
- Buyer/Leaseholder Information (if applicable)
Buyer/Leaseholder Name
Telephone No (include area code)
Business Address
Date of Sale or Lease (day/month/year)

Certification Signature and date signed

Catcher vessel crab EDR

BSAI Crab Activity Chart

CR Fishery Code (provided)
ADF&G Fish Ticket Number
Number of Days Crab Fishing
Number of Days Traveling and Offloading.

Crab Sales, Gross Revenue

Crab landings by fishery and IFQ type
CR Fishery Code (provided)
Quota type: CVO IFQ-A
Live pounds
Deadloss
Gross Revenue
Quota type: CVO IFQ-B, CPO IFQ, CDQ
Live pounds
Deadloss
Gross Revenue
Quota type: CVC IFQ, CPC IFQ
Live pounds
Deadloss
Gross Revenue

Vessel Owner/Leaseholder's IFQ Allocation

Vessel owner/leaseholder's annual harvest quota permits landed by this vessel
CR Fishery Code (provided)
CPO-IFQ Harvested (pounds)
IFQ A Harvested (pounds)
IFQ B Harvested (pounds)
Vessel owner/leaseholder's annual harvest quota permits transferred to other vessels
CR Fishery Code (provided)
CPO- IFQ Transferred
Pounds
Revenue
IFQ A Transferred
Pounds
Revenue
IFQ B Transferred
Pounds
Revenue

BSAI Crab Harvest Quota Lease Costs

Quota Type (provided)
CR Fishery Code (provided)
Pounds leased
Total cost
Quota Type IFQ-C
CR Fishery Code (provided)
Number of Crew Contributing C Shares
Pounds
Total Cost

Labor Payments to Captain and Crew

CR Fishery Code (provided)
Crew
Number of Paid Harvest Crew Members
Total Labor Payment to Harvest Crew
Captain
Total Labor Payment to Captain

Labor Payment Details

Expense categories (provided)

Indicate how expenses were assigned (check one for each category)

Deducted

Directly charged

Not charged to crew

Not applicable

Revenue Shares (percentage of net share)

CR Fishery Code (provided)

Owner share percent

Crew share (excluding captain) percent

Captain share percent

BSAI Crab Crew Licenses and permits

License or permit number

Indicate (check one)

ADF&G Commercial Crew license number or

Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number

Costs for BSAI Crab Fishing Only

Cost category (provided)

Insurance Premiums (Hull, Property and Indemnity, and Pollution)

Total cost

Insurance Deductibles

Total cost

Crab Pots Purchased for Use in BSAI Crab Fishery

Location code

Quantity

Total cost

Line and Other Crab Gear Purchases

Location code

Total cost

Bait used in BSAI crab fishery

CR Fishery code (provided)

Location code

Bait species

Pounds

Total cost

Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery

Indicate if cost includes lubes and fluids

CR Fishery code (provided)

Location code

Fuel quantity (gallons)

Total cost

Food and Provisions for Crew

Total cost

Other Crew Costs

List type of costs

Total cost

Freight Costs for Landed Crab

Total cost

Storage, Wharfage, and Delivery

Total cost

Observer Costs

CR Fishery code (provided)

Total cost

Crab Landing Taxes and Fees

Total cost

- Crab Harvest Cooperative Fees
 - Total cost
- Other Crab-specific Costs
 - List type of costs
 - Total cost
- Annual Vessel Costs by Category
 - Investments in Vessel and Equipment
 - Location code
 - Total cost
 - Indicate if crab-only cost
 - Repair and Maintenance for Vessel and Equipment
 - Location code
 - Total cost
 - Indicate if crab-only cost
 - Insurance Premiums (Hull, Property and Indemnity, and Pollution)
 - Total cost
 - Indicate if crab-only cost
 - Fuel, Lubrication, and Fluids
 - Location code
 - Total cost
 - Indicate if crab-only cost
 - Other Vessel-specific Costs
 - Location code
 - Total cost
 - Indicate if crab-only cost
- Annual Totals for All Fisheries
 - Total days at sea
 - Total gross revenue
 - Total pounds landed
 - Total labor costs

The number of catcher vessels participating in the CR Program was 112 in 2006, 102 in 2007, 98 in 2008, and 90 in 2009. The number 90 is used in this analysis. The time-to-complete is given as 37 hours based on information provided by a submitter workgroup formed in 2009 to assess data quality and burden; however, this time may be changed after CR Program analysis is complete.

The crab EDR responses from respondents are submitted to PSMFC; however, one hour Federal Government burden is listed for staff comparison of participants who submitted EDRs with participants who requested permits.

Catcher vessel EDR, Respondent	
Number of respondents	90
Certification only – 6	
Full EDR - 84	
Total annual responses	90
Frequency of response = 1	
Total burden hours	
Time per certification = 1 hr (6 x 1 = 6)	3,114 hr
Time per full EDR = 37 hr (84 x 37 = 3,108)	
Total personnel cost	\$0
Total miscellaneous costs (\$311,463.60)	\$311,464
Certification (6 x 2pp x \$0.05 = \$0.60)	
Full EDR (84 x 15pp x \$0.05 = \$63.00)	
Postage for certification pages and other 84 EDRs paid by PSMFC	
Accountant completion of EDR (\$100 x 3,114 = \$311,400)	

Catcher vessel EDR, Federal Government	
Total annual responses	0
Total burden hours	1 hr
Time per response = 1 hr	
Total personnel costs (\$50 x 1)	\$50
Total miscellaneous costs	\$0

b. Catcher/processor crab EDR

To qualify as a CR fisheries participant who may process crab harvested in the CR fisheries, a vessel owner or leaseholder must obtain a PQS allocation, IPQ, or a Registered Crab Receiver permit, except that PQS/IPQ is not needed to process CDQ or Adak community CR Program allocations. Any owner or leaseholder of a catcher/processor during any period in the calendar year identified on the EDR in which the catcher/processor was used to process crab in a CR fishery must submit to PSMFC, at the address provided on the form, an EDR for that catcher/processor.

The owner or leaseholder of a catcher/processor must submit the entire EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The catcher/processor owner	You harvested BSAI crab in the vessel during this calendar year.	Entire EDR
	You leased the vessel for a portion of the year to another party, but harvested some BSAI crab in the vessel during this calendar year (provide the name, address, and telephone number of the person to whom you leased the vessel during this calendar year).	Entire EDR
	You leased or sold the vessel for a portion of the year to another party and harvested some BSAI crab in the catcher vessel during the calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year). OR The vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during the calendar year.	Entire EDR
	Your vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during this calendar year.	Entire EDR
The leaseholder	You harvested BSAI crab in the vessel during this calendar year.	Entire EDR

The owner of a catcher/processor must submit only the Certification section of the EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The catcher/processor owner	No one harvested BSAI crab in the vessel during this year.	EDR certification pages
	You leased or sold the vessel to another party and harvested no BSAI crab in the vessel during the calendar year (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year). OR The vessel was lost or rendered permanently inoperable due to accident, and harvested no BSAI crab in the vessel during the calendar year.	EDR certification pages
	You leased the vessel to another party, and harvested no BSAI crab in the vessel during this calendar year (provide the name, address, and telephone number of the person to whom you leased the vessel during the calendar year).	EDR certification pages

However, with the current catcher processor configuration, all must complete the entire EDR.

Catcher/processor crab EDR Certification page

Catcher/processor Information

- Catcher/processor Name and ADF&G Processor Code
- Registered Crab Receiver Permit Number
- Crab License Limitation Permit Number(s)
- USCG Documentation Number
- Current Estimated Market Value of Vessel and Equipment
- Replacement Value of Vessel and Equipment
- Name of Crab Harvesting Cooperative (if applicable)

Vessel Owner Information

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business FAX Number
- Business E-mail address, if available

Leaseholder Information (if applicable)

Name of company, partnership, or sole proprietorship
Business Telephone Number and Business FAX Number
Business E-mail address, if available

Person Completing this Report (check one)

Owner

(If name and address are the same as provided in the Owner Information block, do not repeat)

Leaseholder

(If name and address are the same as provided in the Leaseholder Information block, do not repeat)

Designated Representative

Name and Title

Business Telephone Number and Business FAX Number

Business E-mail address (if available)

EDR filing Status

Check appropriate statement to describe EDR filing status

Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name

Telephone No (include area code)

Business Address

Date of Sale or Lease (day/month/year)

Signature and date signed

Catcher/processor crab EDR

Harvesting and Processing Information

BSAI Crab Activity Chart

CR Fishery Code (provided)

Dates Covered

Begin date (xx/xx/xx)

End date (xx/xx/xx)

Number of Days Crab Fishing

Number of Days Traveling and Offloading

Number of Days Crab Processing

BSAI Crab Production

Eastern Aleutian Islands Golden CR Fishery

Raw Crab Pounds Processed

Product Code and Process Code

Crab Size and Crab Grade

Box Size (check lb or kg)

Finished Pounds

Custom Processed (Yes or No)

Western Aleutian Islands Golden CR Fishery

Raw Crab Pounds Processed

Product Code and Process Code

Crab Size and Crab Grade

Box Size (check lb or kg)

Finished Pounds

Custom Processed (Yes or No)

Bering Sea Tanner CR Fishery

Raw Crab Pounds Processed

Product Code and Process Code

Crab Size and Crab Grade

Box Size (check lb or kg)

Finished Pounds

Custom Processed (Yes or No)

Bering Sea Snow CR Fishery

Raw Crab Pounds Processed

Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)
Bristol Bay Red CR Fishery
Raw Crab Pounds Processed
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)

BSAI Crab Sales to Affiliated Entities

Species Code
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
FOB Revenues (check FOB Port Alaska or Seattle)

BSAI Crab Sales to Unaffiliated Entities

Species Code
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
FOB Revenues (check FOB Port Alaska or Seattle)

Custom Processing Services Provided

CR fishery code
Product Code and Process Code
Custom Processing Revenue

Catcher/Processor Owner/Leaseholder's IFQ and IPQ Allocation

Vessel Owner/Leaseholder's Annual Quota Permits Harvested by this Vessel
CR Fishery Code (provided)
CPO – IFQ Harvested (pounds)
IFQ A Harvested (pounds)
IFQ B Harvested (pounds)
IPQ Processed (pounds)

Vessel Owner/Leaseholder's Annual Quota Permits Transferred to other Vessels

CR Fishery Code (provided)
CPO – IFQ Transferred
Pounds
Revenue
IFQ A Transferred Pounds
Pounds
Revenue
IFQ B Transferred Pounds
Pounds
Revenue
IPQ Transferred
Pounds
Revenue

BSAI Crab CDQ and IFQ Lease Costs

Quota Type (provided)
CR Fishery Code (provided)
Pounds Leased
Total Cost

IFQ C Quota Type

CR Fishery Code (provided)
Number of Crew Contributing C Shares
Pounds
Total Cost

Crab Harvesting Labor Costs

Crab Harvesting Labor Payments to Captain and Crew

CR Fishery Code (provided)
Number of Paid Harvest Crew Members
Total Labor Payment to Harvest Crew
Total Labor Payment to Captain

Crab Processing Labor Costs

CR Fishery Code (provided)
Number of Crew with Pay Determined by Processing Work
Average Number of Crab Processing Positions
Total Processing Labor Payment

Harvest Labor Payment Details

Expense Categories (provided)
Indicate whether each expense was
Deducted (shared expenses taken off the top of gross revenues)
Directly charged (charged to an individual after the crew share is calculated), or
Not charged to crew
Not applicable

BSAI Harvest Crew Licenses and Permits

For each individual who worked as a captain or harvest crewmember during the calendar year, record
Alaska Commercial Crew license number or
Alaska CFEC gear operator permit number
Do not count any crewmember more than once.

BSAI Crab Processing Employee Residence

For U.S. residents
If Alaska, enter primary city of residence
If other than Alaska, enter primary state of residence
For country other than United States, enter primary country of residence
Number of employees residing in each of the listed residence locations

BSAI Crab Custom Processing Done for You

Custom Processing - Eastern Aleutian Islands Golden CR Fishery

CR Fishery Code (provided)
Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Western Aleutian Islands Golden CR Fishery

CR Fishery Code (provided)
Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Bering Sea Tanner CR Fishery

CR Fishery Code (provided)
Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade

- Box Size (check lb or kg)
- Finished Pounds
- Processing Fee
- Custom Processing - Bering Sea Snow CR Fishery
 - CR Fishery Code (provided)
 - Raw Pounds Supplied to Custom Processors
 - Product Code and Process Code
 - Crab Size and Crab Grade
 - Box Size (check lb or kg)
 - Finished Pounds
 - Processing Fee
- Custom Processing - Bristol Bay Red CR Fishery
 - CR Fishery Code (provided)
 - Raw Pounds Supplied to Custom Processors
 - Product Code and Process Code
 - Crab Size and Crab Grade
 - Box Size (check lb or kg)
 - Finished Pounds
 - Processing Fee

Raw Crab Purchases from Delivering Vessels

- Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
- Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
- Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
- Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
- Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment

Vessel Costs

- Costs for BSAI Crab Production Only
 - Total cost of Insurance Premiums (Hull, Property and Indemnity, and Pollution)
 - Total cost of Insurance Deductibles
 - Crab Pots Purchased for Use in BSAI Crab Fishery
 - Location Code
 - Quantity
 - Total cost
 - Line and Other Crab Gear Purchases
 - Location Code
 - Total cost
 - Bait used in BSAI crab fishery
 - CR Fishery Code (provided)
 - Location Code(s)
 - Bait species
 - Pounds

Total cost
 Fuel, Lubrication, and Fluids Used in BSAI Crab Fishery
 Indicate (YES or NO) if cost includes lube/fluids
 CR Fishery Code (provided)
 Location Code(s)
 Fuel Quantity (gallons)
 Total Cost
 Total cost of Food and Provisions for Crew
 Other Crew Costs
 Describe
 Total Cost
 Total cost of Processing and Packaging Materials, Equipment, and Supplies
 Total cost of Re-packing
 Total cost of Broker Fees and Promotions for BSAI Crab Sales
 Total cost of Crab Landing and Sales Taxes and Fees
 Total cost of Storage, Wharfage, and Delivery
 Observer Costs
 CR Fishery Code (provided)
 Total Cost
 Total cost of Freight and Handling for Processed Crab Products from the Vessel
 Total cost of Product Storage
 Total cost of Fishing Cooperative
 Other Crab-specific Costs
 Describe
 Total cost
 Annual Vessel Costs
 Investments in Vessel and Equipment
 Location code
 Total cost
 Indicate (YES or NO) if crab only cost
 Repair and Maintenance (R&M) for Vessel and Equipment
 Location code
 Total cost
 Indicate (YES or NO) if crab only cost
 Number of Employees and Salaries for Foremen, Managers, and other Employees
 Number of employees
 Total cost
 Indicate (YES or NO) if crab only cost
 Insurance Premiums (Hull, Property and Indemnity, and Pollution)
 Total cost
 Indicate (YES or NO) if crab only cost
 Fuel, Lubrication, and Fluids
 Location code
 Total cost
 Indicate (YES or NO) if crab only cost
 Indicate (YES or NO) if fuel costs include lube/fluids
 Other Vessel-specific Costs
 Describe
 Total cost
 Indicate (YES or NO) if crab only cost
Annual Totals for All Fisheries
 Total sum for the calendar year for all fishing and processing activities
 Total Processing days
 Total Days at sea
 Gross FOB revenues
 Indicate whether Alaska or Seattle

Total cost
 Total Finished pounds processed
 Total Round Pounds Caught (exclude discards)
 Total Labor costs

The number of catcher/processors participating in the CR Program was 7 in 2006, 6 in 2007, 5 in 2008, and 5 in 2009. The number 5 is used in this analysis. The time-to-complete is given as 37 hours based on information provided by a submitter workgroup formed in 2009 to assess data quality and burden; however, this time may be changed after CR Program analysis is complete.

The crab EDR responses go to PSMFC; however, one hour Federal Government burden is listed for staff comparison of participants who submitted EDRs with participants who requested permits.

Catcher/processor crab EDR, Respondent	
Number of respondents	5
Total annual responses	5
Frequency of response = 1	
Total burden hours	185 hr
Time per response = 37 hr	
Total personnel cost	0
Total miscellaneous costs (\$18,507.50)	\$18,508
Photocopy \$0.1 x 15 x 5 = \$7.50	
Postage paid by PSMFC	
Accountant fee to complete EDR (\$100 x 185 = \$18,500)	

Catcher/processor EDR, Federal Government	
Total annual responses	0
Total burden hours	1 hr
Time per response = 1 hr	
Total personnel cost (\$50 x 1)	\$50
Total miscellaneous costs	0

c. Stationary floating crab processor (SFCP) EDR

To qualify as a CR fisheries participant who may process crab harvested in the CR fisheries, a SFCP owner or leaseholder must obtain a PQS allocation, IPQ, or a Registered Crab Receiver permit, except that PQS/IPQ is not needed to process CDQ or Adak community CR Program allocations. Any owner or leaseholder of an SFCP during any period in the calendar year identified on the EDR in which the SFCP was used to process crab in a CR fishery must submit to PSMFC, at the address provided on the form, an EDR for that SFCP.

The owner or leaseholder of a stationary floating processor (SFCP) must submit the entire EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The SFCP owner	You processed BSAI crab in the SFCP during this calendar year.	Entire EDR
	You leased a portion of your IPQ to another party, and processed BSAI crab in the SFCP during the calendar year (provide the name, address, and telephone number of the person to whom you leased the IPQ during the calendar year).	Entire EDR
The SFCP leaseholder	You operated the SFCP, and you processed BSAI crab during the calendar year.	Entire EDR

The owner of an SFCP must submit only the Certification section of the EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The SFCP owner	No one processed BSAI crab in the SFCP during the calendar year.	EDR certification pages
	You leased all of your IPQ to another party, and you processed no BSAI crab in the SFCP (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year).	EDR certification pages

Stationary floating crab processor (SFCP) EDR Certification page

SFCP Information

- SFCP Name and ADF&G Processor Code
- Registered Crab Receiver Permit Number
- USCG Documentation Number
- Current Estimated Market Value of SFCP and Equipment
- Replacement Value of SFCP and Equipment

Owner Information

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business Fax Number
- Business E-mail address, if available

Leaseholder Information (if applicable)

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business Fax Number
- Business E-mail address, if available

Person Completing this Report

- Indicate if owner, leaseholder, or designated representative
- Designated Representative
 - Name and Title
 - Business Telephone Number and Business Fax Number
 - Business E-mail address (if available)

EDR Filing Status

- Select the appropriate statement to describe EDR filing status
- Buyer/leaseholder Information
 - Name
 - Business Telephone Number and Business Fax Number
 - Business E-mail address (if available)

Signature and date signed

SFCP EDR

BSAI Crab Processing Activity

- Eastern Aleutian Islands Golden CR Fishery
- Dates Covered

Number of Crab Processing Days
 Raw Crab Pounds Purchased
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Custom Processed (Yes or No)

Western Aleutian Islands Golden CR Fishery
 Dates Covered
 Number of Crab Processing Days
 Raw Crab Pounds Purchased
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Custom Processed (Yes or No)

Bering Sea Tanner CR Fishery
 Dates Covered
 Number of Crab Processing Days
 Raw Crab Pounds Purchased
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Custom Processed (Yes or No)

Bering Sea Snow CR Fishery
 Dates Covered
 Number of Crab Processing Days
 Raw Crab Pounds Purchased
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Custom Processed (Yes or No)

Bristol Bay Red CR Fishery
 Dates Covered
 Number of Crab Processing Days
 Raw Crab Pounds Purchased
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Custom Processed (Yes or No)

BSAI Crab Sales and Processing
BSAI Crab Sales to Affiliated Entities
 Species Code
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 FOB Revenues
 Total revenues
 check FOB Port Alaska or Seattle

BSAI Crab Sales to Unaffiliated Entities
 Species Code
 Product Code and Process Code

Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
FOB Revenues
 Total revenues
 check FOB Port Alaska or Seattle
Custom Processing Services Provided
 CR fishery code
 Product Code and Process Code
 Custom Processing Revenue

Labor Information

Crab Processing Labor Costs
 CR fishery code (provided)
 Average Number of Crab Processing Positions
 Total Man-Hours
 Total Processing Labor Payment
BSAI Crab Employee Residence
 For U.S. residents
 If Alaska, enter primary city of residence
 If other than Alaska, enter primary state of residence
 For country other than United States, enter primary country of residence
 Number of employees residing in each of the listed residence locations

BSAI Crab Custom Processing Done for You

Custom Processing - Eastern Aleutian Islands Golden CR Fishery
 Raw Pounds Supplied to Custom Processors
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Processing Fee
Custom Processing - Western Aleutian Islands Golden CR Fishery
 Raw Pounds Supplied to Custom Processors
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Processing Fee
Custom Processing - Bering Sea Tanner CR Fishery
 Raw Pounds Supplied to Custom Processors
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Processing Fee
Custom Processing - Bering Sea Snow CR Fishery
 Raw Pounds Supplied to Custom Processors
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)
 Finished Pounds
 Processing Fee
Custom Processing - Bristol Bay Red CR Fishery
 Raw Pounds Supplied to Custom Processors
 Product Code and Process Code
 Crab Size and Crab Grade
 Box Size (check lb or kg)

- Finished Pounds
- Processing Fee
- Raw Crab Purchases from Delivering Vessels
 - Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery
 - IFQ Type
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
 - Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery
 - IFQ Type
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
 - Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery
 - IFQ Type
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
 - Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery
 - IFQ Type
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
 - Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery
 - IFQ Type
 - Crab Size and Crab Grade
 - Raw Pounds Purchased
 - Gross Payment
- Vessel/Plant Costs
 - Costs for BSAI Crab Production Only
 - Total cost of Fisheries Taxes
 - Processing and Packaging Materials, Equipment, and Supplies
 - Location of purchase (provided)
 - Total cost
 - Total cost of Food and Provisions
 - Total Other Costs for Direct Crab Labor
 - Total cost of Insurance Deductibles
 - Total Re-packing Costs
 - Broker Fees and Promotions for BSAI Crab Sales
 - CR Fishery Code (provided)
 - Total cost
 - Processor Quota (IPQ) Lease Costs
 - CR Fishery Code (provided)
 - Total pounds
 - Total cost
 - Total Observer Costs
 - CR Fishery Code (provided)
 - Total cost
 - Total cost of Freight Costs for Supplies to the Plant
 - Total cost of Freight and Handling Costs for Processed Crab Products from the Plant
 - Total cost of Product Storage
 - Total cost of Water, Sewer, and Waste Disposal
 - Other Crab-specific Costs
 - Describe
 - Total cost
 - Annual Vessel/Plant Costs

Fuel, Electricity, Lubrication and Hydraulic Fluids
 Total cost
 Indicate (YES or NO) if crab only cost
 Investments in Plant and Equipment
 Location code
 Total cost
 Indicate (YES or NO) if crab only cost
 Repair and Maintenance for Vessel and Equipment
 Location code
 Total cost
 Indicate (YES or NO) if crab only cost
 Number of Employees and Salaries for Foremen, Managers, and other Employees
 Number of employees
 Total cost
 Indicate (YES or NO) if crab only cost
 Other Vessel-specific Costs
 Describe
 Total cost
 Indicate (YES or NO) if crab only cost

Annual Totals for All Fisheries

Total Processing days
 Total FOB revenues (indicate Alaska or Seattle)
 Total Finished pounds processed
 Total Processing Labor costs

The number of stationary floating crab processors participating in the CR Program was 10 in 2006, 4 in 2007, 5 in 2008, and 8 in 2009. The number 8 is used in this analysis. The time-to-complete is given as 48 hours based on information provided by a submitter workgroup formed in 2009 to assess data quality and burden; however, this time may be changed after CR Program analysis is complete.

The crab EDR responses go to PSMFC; however, one hour Federal Government burden is listed for staff comparison of participants who submitted EDRs with participants who requested permits.

Stationary floating crab processor EDR, Respondent	
Number of respondents	8
Certification only – 6	
Full EDR -- 2	
Total annual responses	8
Frequency of response = 1	
Total burden hours	102 hr
Time per certification = 1 hr (6x1=6)	
Time per full EDR = 48 hr (2x48=96)	
Total personnel cost	0
Total miscellaneous costs (\$10,202.10)	\$10,202
Photocopy	
Certification (6 x 2pp x 0.05 = 0.60)	
Full EDR (2 x 15pp x 0.05 = \$1.50)	
Postage paid by PSMFC	
Accountant fee to complete EDR	
(\$100 x 102= \$10,200)	

Stationary floating crab processor EDR, Federal Government	
Total annual responses	0
Total burden hours	1 hr
Time per response = 1 hr	
Total personnel costs (\$50 x 1)	\$50
Total miscellaneous costs	0

d. Shoreside processor EDR

To qualify as a CR fisheries participant who may process crab harvested in the CR fisheries, a shoreside processor owner or leaseholder must obtain a PQS allocation, IPQ, or a Registered Crab Receiver permit, except that PQS/IPQ is not needed to process CDQ or Adak community CR Program allocations. Any owner or leaseholder of a shoreside processor during any period in the calendar year identified on the EDR in which the shoreside processor was used to process crab in a CR fishery must submit to PSMFC, at the address provided on the form, an EDR for that shoreside processor.

The owner or leaseholder of a shoreside processor must submit the entire EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The shoreside processor owner	You processed BSAI crab in the Shoreside Processor during this calendar year.	Entire EDR
	You leased a portion of your IPQ to another party, and processed BSAI crab in the Shoreside Processor during the calendar year (provide the name, address, and telephone number of the person to whom you leased the IPQ during the calendar year).	Entire EDR
The shoreside processor leaseholder	You operated the Shoreside Processor, and you processed BSAI crab during the calendar year.	Entire EDR

The owner of an shoreside processor must submit only the Certification section of the EDR under the following conditions.

If you are ...	And ...	You must complete and submit ...
The shoreside processor owner	No one processed BSAI crab in the Shoreside Processor during the calendar year.	EDR certification pages
	You leased all of your IPQ to another party, and you processed no BSAI crab in the Shoreside Processor (provide the name, address, and telephone number of the person to whom you leased or sold the vessel during the calendar year).	EDR certification pages

Shoreside processor EDR Certification page

Shoreside processor Information

- Shoreside Processor Name and ADF&G Processor Code
- Registered Crab Receiver Permit Number
- Physical Location of Land-based Plant (street address, city, state, zip code)
- Borough Assessed Value of Plant and Equipment (\$) and Year Assessed
- Current Estimated Value of Plant and Equipment (\$)

Owner Information

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business FAX Number
- Business E-mail address, if available

Leaseholder Information (if applicable)

- Name of company, partnership, or sole proprietorship
- Business Telephone Number and Business FAX Number
- Business E-mail address, if available

Person Completing this Report (check one)

- Owner (If name and address are the same name and address provided in the Owner Information block above, do not repeat)
- Leaseholder (If name and address are the same name and address provided in the Leaseholder Information block above, do not repeat)
- Designated Representative
 - Name and Title
 - Business Telephone Number and Business FAX Number
 - Business E-mail address (if available)

EDR Filing Status

Select the appropriate statement to describe EDR filing status

Signature and date signed

Shoreside processor EDR

BSAI Crab Processing Activity

- Eastern Aleutian Islands Golden CR Fishery
 - Dates Covered
 - Number of Crab Processing Days
 - Raw Crab Pounds Purchased
 - Product Code and Process Code
 - Crab Size and Crab Grade
 - Box Size (check lb or kg)
 - Finished Pounds
 - Custom Processed (Yes or No)
- Western Aleutian Islands Golden CR Fishery
 - Dates Covered
 - Number of Crab Processing Days

Raw Crab Pounds Purchased
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)

Bering Sea Tanner CR Fishery

Dates Covered
Number of Crab Processing Days
Raw Crab Pounds Purchased
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)

Bering Sea Snow CR Fishery

Dates Covered
Number of Crab Processing Days
Raw Crab Pounds Purchased
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)

Bristol Bay Red CR Fishery

Dates Covered
Number of Crab Processing Days
Raw Crab Pounds Purchased
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Custom Processed (Yes or No)

BSAI Crab Sales and Processing

BSAI Crab Sales to Affiliated Entities

Species Code
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
FOB Revenues (check FOB Port Alaska or Seattle)

BSAI Crab Sales to Unaffiliated Entities

Species Code
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
FOB Revenues (check FOB Port Alaska or Seattle)

Custom Processing Services Provided

CR fishery code
Product Code and Process Code
Custom Processing Revenue

Labor Information

Crab Processing Labor Costs

CR fishery code (provided)
Average Number of Crab Processing Positions

Total Man-Hours
Total Processing Labor Payment
BSAI Crab Employee Residence
For U.S. residents
 If Alaska, enter primary city of residence
 If other than Alaska, enter primary state of residence
For country other than United States, enter primary country of residence
Number of employees residing in each of the listed residence locations

BSAI Crab Custom Processing Done for You

Custom Processing - Eastern Aleutian Islands Golden CR Fishery

Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Western Aleutian Islands Golden CR Fishery

Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Bering Sea Tanner CR Fishery

Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Bering Sea Snow CR Fishery

Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Custom Processing - Bristol Bay Red CR Fishery

Raw Pounds Supplied to Custom Processors
Product Code and Process Code
Crab Size and Crab Grade
Box Size (check lb or kg)
Finished Pounds
Processing Fee

Raw Crab Purchases from Delivering Vessels

Raw Crab Purchases, Eastern Aleutian Islands Golden (EAG) CR Fishery

IFQ Type
Crab Size and Crab Grade
Raw Pounds Purchased
Gross Payment

Raw Crab Purchases, Western Aleutian Islands Golden (WAG) CR Fishery

IFQ Type
Crab Size and Crab Grade
Raw Pounds Purchased
Gross Payment

Raw Crab Purchases, Bering Sea Tanner (BST) CR Fishery

IFQ Type
Crab Size and Crab Grade
Raw Pounds Purchased
Gross Payment
Raw Crab Purchases, Bering Sea Snow (BSS) CR Fishery
IFQ Type
Crab Size and Crab Grade
Raw Pounds Purchased
Gross Payment
Raw Crab Purchases, Bristol Bay Red (BBR) CR Fishery
IFQ Type
Crab Size and Crab Grade
Raw Pounds Purchased
Gross Payment

Plant Costs

Costs for BSAI Crab Production Only
Total cost of Fisheries Taxes
Processing and Packaging Materials, Equipment, and Supplies
Location of purchase (provided)
Total cost
Total cost of Food and Provisions
Total Other Direct Costs for Crab Labor
Total cost of Insurance Deductibles
Total Re-packing Costs
Broker Fees and Promotions for BSAI Crab Sales
CR Fishery Code (provided)
Total cost
Processor Quota (IPQ) Lease Costs
CR Fishery Code (provided)
Total pounds
Total cost
Observer Costs
CR Fishery Code (provided)
Total cost
Total cost of Freight Costs for Supplies to the Plant
Total cost of Freight and Handling Costs for Processed Crab Products from the Plant
Total cost of Product Storage
Total cost of Water, Sewer, and Waste Disposal
Other Crab-specific Costs
Describe
Total cost
Annual Plant Costs
Fuel, Electricity, Lubrication and Hydraulic Fluids
Total cost
Indicate (YES or NO) if crab only cost
Investments in Plant and Equipment
Location code
Total cost
Indicate (YES or NO) if crab only cost
Repair and Maintenance for Vessel and Equipment
Location code
Total cost
Indicate (YES or NO) if crab only cost
Number of Employees and Salaries for Foremen, Managers, and other Employees
Number of employees
Total cost

Indicate (YES or NO) if crab only cost
 Other Plant-specific Costs
 Describe
 Total cost
 Indicate (YES or NO) if crab only cost

Annual Totals for All Fisheries

Total Processing days
 Total FOB revenues (check Alaska or Seattle)
 Total Finished pounds processed
 Total Processing Labor costs

The number of shoreside processors participating in the CR Program was 21 in 2006, 15 in 2007, 19 in 2008, and 29 in 2009. The number 29 is used in this analysis. The time-to-complete is given as 48 hours based on information provided by a submitter workgroup formed in 2009 to assess data quality and burden; however, this time may be changed after CR Program analysis is complete.

The crab EDR responses go to PSMFC; however, one hour Federal Government burden is listed for staff comparison of participants who submitted EDRs with participants who requested permits.

Shoreside processor EDR, Respondent	
Number of respondents	29
Full EDR = 16	
Certification only = 13	
Total annual responses	29
Frequency of response = 1	
Total burden hours	781 hr
Time per certification = 1 hr (13x1=13)	
Time per full EDR = 48 hr (16x48=768)	
Total personnel cost	0
Total miscellaneous costs (78113.30)	\$78,113
Photocopy	
Certification (13 x 2pp x 0.05 = 1.30)	
Full EDR (16 x 15pp x 0.05 = \$12)	
Postage paid by PSMFC	
Accountant fee to complete EDR (100 x 781 = \$78,100)	

Shoreside processor EDR, Federal Government	
Total annual responses	0
Total burden hours	1
Time per response = 1 hr	
Total personnel costs (\$50 x 16)	\$50
Total miscellaneous costs	0

e. Verification of data.

NMFS authorizes PSMFC to obtain the services of an auditor to assist in verification of EDR data. At a minimum, the auditor shall be board certified and be selected based upon ability to perform the services in a timely manner within professional standards.

To ensure that each company consistently and accurately completes the EDR, a qualified PSMFC auditor conducts verification of EDR information with the owner or leaseholder. Auditing will ensure that the data produce accurate and reliable information for the Alaska crab fisheries. The PSMFC auditor may review and request copies of additional data provided by the owner or leaseholder, including but not limited to: previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data. It is estimated that approximately one-third of submitted EDR forms will need to be subject to verification audit in any given year due to questionable or omitted data.

The owner or leaseholder must provide copies of additional data to facilitate verification by PSMFC. Auditors will verify records by comparing specific elements of the report with participant accounting records. To make this activity as efficient and non-intrusive as possible, NMFS suggests that participants:

- ◆ Keep a copy of the completed EDR or certification pages submitted to PSMFC. Copy and attach extra sheets as needed.
- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Make sure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:
 - Audited financial statements
 - Reviewed financial statements
 - Compiled financial statements
 - Tax returns.
- ◆ Record only whole numbers. Round up dollar figures to the next highest dollar.

It is estimated that approximately one-third of submitted EDR forms will need to be audited in any given year due to questionable or omitted data. The owner or leaseholder must respond to data verification inquiries from PSMFC within 20 days of the date of issuance of the inquiry; there may be questions that are sequential based on previous questions. It would be difficult to reasonably complete verification, if a longer period were allowed. The verification questions are likely to be small in number, and occur through a telephone call or other short communication. The 20-day response period should not place a significant burden on submitters.

Verification of Data, Respondent	
Number of respondents [(90+4+8+29)]/3	44
Total annual responses	44
Frequency of response = 1	
Total burden hours	352
Time per response = 8 hr	
Total personnel cost	0
Total miscellaneous costs	\$36,080
Photocopy (\$.05 x 300 pp x 44 = 660)	
Telephone calls (\$5 x 44 = 220)	
Accountant fee to verify EDR (\$100 x 352 = 35,200)	

Verification of Data, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel costs	0
Total miscellaneous costs	0

It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about Crab Rationalization. As explained in the preceding paragraphs, the information gathered has utility. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The EDRs may be downloaded from the NMFS web site at www.alaskafisheries.noaa.gov, printed, and submitted by mail or FAX to PSMFC. Of these documents, only the catcher vessel EDR is set up for online submission. All other EDRs must be mailed or faxed.

NMFS in the future plans to coordinate efforts with PSMFC in the next year or so to create a data entry system that will allow additional applicants to enter EDR data online. The data will go directly into a database. It is anticipated that this type of system will be more efficient, timely, and accurate, though as stated above, some may choose to continue with the fillable pdf version.

4. Describe efforts to identify duplication.

None of the information collected as part of this information collection duplicates other collections. This information collection is part of a specialized and technical program that is not like any other.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Approximately 238 small entities own crab harvest vessels or crab catcher/processors. Eight small entities appear to qualify for processor allocations. This information collection does not impose a significant impact on small entities.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The intent of this collection is to study the impacts of the CR Program; to ensure that the program achieves equity between the harvesting and processing sectors; and to monitor the economic stability for harvesters, processors, and coastal communities. Without the specified reporting scheme described in this Supporting Statement, the program would be jeopardized. The consequences of not collecting this information would be that NMFS could not fulfill the intent of the law created under Pub. L. No. 108-199 and would be unable to provide data to the Council and the State of Alaska to evaluate the CR Program for each of the required review periods. Pub. L. No. 108-199 also requires that each component of the crab program enacted by Congress must be implemented or the whole program must be withdrawn. Thus, disapproval of this data collection program would threaten all components of Pub. L. No. 108-199.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Not applicable.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice, 75 FR 59687, published September 28, 2010, solicited public comment on this collection. One comment was received.

The commenter stated that it takes 35 hours to complete an EDR for an active fishing vessel, longer if the vessel is selected for audit. He goes on to say "The estimate of 7.5 hours is not accurate and understates an important industry contribution towards the joint management of the Bering Sea Fishery." This comment is similar to many comments received in the past year from the fishing industry. With this action, NMFS revised the burden hour estimates to respond to this comment and to input from an industry workgroup convened in 2009 to assess data quality and reporting burden.

The Council is also conducting a major review and revision of the CR Program EDRs. Alternatives for revising EDRs to improve data quality, simplify the reporting requirement, and reduce reporting burden and duplication with other reporting requirements are currently under development. A determination on a selected alternative for revisions to the EDR Program and survey instruments is expected during 2011, and implementation of revised reporting requirements is expected for 2012.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided under this program.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

As stated on the forms, the EDR data are confidential and are not disseminated to the public. PSMFC disseminates the EDR data to NMFS, ADF&G, and the Council staff after removing all personal identifiers such as Social Security Numbers, vessel identification numbers, names, addresses, and telephone numbers. PSMFC supplants the data with a randomized identification number that can be matched between datasets.

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801 *et seq.*) and under [NOAA Administrative Order \(AO\) 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. It was last revised in 1994.

NOAA also follows regulatory procedures for data confidentiality found at [50 CFR Sec. 600.405 et seq.](#) The Magnuson-Stevens Act generally prohibits collection of economic data, particularly from processing entities. In the legislation for the CR Program, an exception was created to the prohibition. NMFS was directed to implement a mandatory economic data program and feed the data to prescribed entities, with or without identifiers, depending on the entity.

NMFS will retain control over the information that is supplied, and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information.

System of Records: Routine Uses

The routine uses were described in the [COMMERCE/NOAA System-16; Crab Economic Data Report for Bering Sea/Aleutian Islands Management Area \(BSAI\) off the coast of Alaska](#), published on March 3, 2005 (70 FR 10360).

1. In the event that a system of records maintained by the Department to carry out its functions indicates or is relevant to a violation or potential violation of law or contract, whether civil, criminal or regulatory in nature and whether arising by general statute or particular program statute or contract, or rule, regulation or order issued pursuant thereto, or the necessity to protect an interest of the Department, the relevant records in the

system of records, including individual identifiers, may be referred to the appropriate agency, whether Federal, State, local or foreign, charged with the responsibility of investigation or prosecuting such violation or charged with enforcing or implementing the statute or contract, or rule, regulation or order issued pursuant thereto, or protecting the interest of the Department. That agency may disclose such records in the course of conducting its investigation.

2. A record from this system of records may be disclosed in the course of presenting evidence to a court, magistrate or administrative tribunal, including disclosures during the course of litigation, such as through discovery or to opposing counsel in the course of settlement negotiations.
3. A record in this system of records may be disclosed to a Member of Congress submitting a request involving an individual when the individual has requested assistance from the Member with respect to the subject matter of the record.
4. A record in this system of records may be disclosed without individual identifiers to a contractor of the Department having need for the information in the performance of the contract, but not operating a system of records within the meaning of 5 U.S.C. 552a(m).
5. A record in this system of records may be disclosed with individual identifiers to Department of Justice and the Federal Trade Commission when such records are requested by those agencies for anti-trust analyses or enforcement proceedings.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not involve information of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Estimated total respondents: 132, increased from 131. Estimated total responses: 176, down from 262. Estimated total burden: 4,534 hr, increased from 1,478 hr. Estimated total personnel costs: \$0.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Estimated total miscellaneous costs: \$454,367 increased from \$150,606.

14. Provide estimates of annualized cost to the Federal government.

Estimated total burden: 4 hr. Estimated total personnel costs: \$200. Estimated total miscellaneous costs: \$500,000 (see below).

A significant cost of administering the EDR is the cost of the contract with the independent third party. In P. L. No. 108-199, section 801, Congress required that the economic data collection be administered by an independent third party under contract to NMFS. The PSMFC is the independent agent selected by NMFS to disseminate EDR forms, to be the collection point for the EDR, and to verify the accuracy of the data collected from the BSAI crab fishing industry. The estimated cost of this contract is \$500,000 annually.

Total annual estimated costs: \$500,200.

15. Explain the reasons for any program changes or adjustments.

This action is a renewal without program change to EDRs or regulations.

Adjustments:

- There was a net increase of one respondent, based on the most recent records.
- NMFS increased the estimated burden hours for completion and submittal of the different types of EDR, which then increased the miscellaneous costs (for accountant fees) to complete and submit the EDRs.
- For the Verification of Data, it is estimated that approximately one-third of submitted EDR forms will need to be audited in any given year due to questionable or omitted data. In the 2008 renewal, which should have been shown as applying to only 1/3 of responses, burden and cost for verification of all responses was included. For this renewal, the adjustment is made to show auditing of only 1/3 of responses.

Total estimated changes are shown below:

- ◆ Catcher Vessel EDR
Respondents and responses changed from 100 to 90.
Burden hours changed from 750 hours to 3,114 hours.
Miscellaneous costs changed from \$ 75,139 to \$ 311,464.
- ◆ Catcher/processor EDR
Respondents and responses changed from 10 to 5
Burden hours changed from 125 hours to 185 hours
Miscellaneous costs changed from \$ 12,515 to \$ 18,508.
- ◆ Stationary floating crab processor EDR
Respondents and responses changed from 5 to 8
Burden hours changed from 50 hours to 102 hours
Miscellaneous costs changed from \$ 5,008 to \$ 10,202.
- ◆ Shoreside processor EDR

Respondents and responses changed from 16 to 29
Burden hours changed from 160 hours to 781 hours
Miscellaneous costs changed from \$ 16,024 to \$ 78,113.

- ◆ Verification of data
Respondents and responses changed from 131 to 44
Burden hours changed from 393 to 352
Miscellaneous costs changed from \$41,920 to \$36,080.

Net changes: increase of one respondent, decrease of 86 respondents, increase of 3,056 hours and increase of \$303,761 in miscellaneous costs.

16. For collections whose results will be published, outline the plans for tabulation and publication.

NMFS is required by the Council to provide 18-month, three-year, and five-year reviews of the economic effects of the CR Program. As part of these reviews, a number of data reports with aggregated and verified EDR data will be available to the Council and/or Congress. The analysis will include assessment of the change in the benefits and costs of the BSAI crab resource as well as distributional effects of the implementation of CR Program. Data regarding costs and revenues of harvesting and processing crab fisheries are displayed in aggregate to protect individual data.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.