

**JUSTIFICATION FOR CHANGE  
NORTHEAST REGION PERMIT FAMILY OF FORMS  
OMB CONTROL NO. 0648-0212**

In conjunction with Final Rule RIN: 0648-BA79, National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Services (NMFS) proposes to revise catch reporting requirements in the Atlantic herring fishery through the following three changes:

1. Eliminate weekly catch reporting by limited access herring vessels through the interactive voice response system (IVR).
2. Increase catch reporting through the IVR system for all open access herring vessels.
3. Increase frequency of catch reporting through vessel trip reports (VTRs) from monthly to weekly for all permitted herring vessels.

**Background:**

The MSA (402(a)(2)), in conjunction with regulations at 50 CFR Part 648.7, provide NMFS with the authority to revise fishery reporting requirements as necessary to monitor a fisheries management plan (FMP). Recognizing the importance of timely catch information to better monitor herring catch against the stock-wide herring annual catch limits (ACL) and management areas sub-ACLs, as well as helping prevent sub-ACL overages, NMFS proposes revising catch reporting requirements in the herring fishery.

**VTR Changes:**

NMFS proposes that all permitted herring vessels be required to submit VTRs on a weekly basis. This requirement would not increase the amount of information to be reported, it would only increase the frequency of reporting. The submission of weekly VTRs is currently required for owner/operators of vessels issued Northeast multispecies permits.

With the implementation of Amendment 16 to the Northeast Multispecies FMP, all vessel owners/operators issued a multispecies permit were required to submit VTRs weekly in lieu of monthly. The proposed VTR catch reporting changes will therefore, only affect those herring vessel owners that do not already have a multispecies permit.

Although there are 2,342 herring permit holders, only 152 do not also have a multispecies permit. Therefore, changes proposed here will only affect **152** vessel owner/operators.

**Each vessel owner will be required to submit an additional 40 VTRs annually (52 weeks/year minus 12 monthly VTRs that are already submitted) for a total of 6,080 additional VTRs.**

**The additional annual burden for each vessel owner will be 40 x 5 minutes/60 minutes or 3.34 hours. The total additional annual burden for all 152 vessels will be 507 hours.**

**The additional cost for each vessel owner from this change will be (40 \* \$0.44 (the price of a stamp)) for a total of \$17.60/year. The additional cost for all vessels being impacted by this change is \$2,675 (\$0.44 x 6,080).**

The VTR catch reporting burden for all permitted vessels in the Northeast region has been adjusted to include the addition of weekly VTR submission by herring vessels. These changes will adjust responses from 178,916 to 184,996, the hourly burden from 14,909 to **15,416** and adjust the total public cost burden for vessel trip report submissions from \$78,723.04 to **\$81,398.24**.

#### **IVR Changes:**

Currently, owners/operators issued herring *limited access* herring vessels are also required to report herring catch (retained and discarded) weekly through the IVR system (regardless of whether any fish were caught). As a part of the new catch reporting requirements, NMFS is proposing that limited access vessels (Categories A-C) report catch daily through their vessel monitoring system (VMS) (OMB Control No. 0648-0202). *Therefore, to prevent redundancy in reporting, NMFS is proposing the elimination of weekly catch reporting through the IVR system for all limited access vessels.*

Owner/operators issued *open access* herring permits are currently required to report herring catch through the IVR system only if catch is greater than 2,000 lb. If herring catch is less than 2,000 lb, the catch is only reported through a VTR. The 2,000 lb threshold has often been confusing for fishermen and makes monitoring difficult, as herring management areas are not reported on VTRs. Therefore, NMFS is also proposing that owner/operators of vessels issued open access herring permits be required to report catch weekly via the IVR system. If no herring was caught during a week, no IVR report would be required.

The changes to IVR associated with this rulemaking consist of the following steps:

- Eliminate 52 4-minute responses for each of 101 limited access vessels (number of active limited access vessels).
- This leaves five open access vessels that land over 2,000 lb of herring and submit 52 catch reports each, for a total of 260 responses and a burden of 1040 hours (4 minutes per response).
- Add four 4-minute responses each for 86 open access vessels that land less than 2,000 lb of herring, and will now be required to report all catch via IVR.
- This leaves a net decrease of 15 vessels (91 from 106), 48 responses per vessel, 5,148 total responses and a net decrease in burden of 327.20 hours.
- With these changes, the new total is 91 open access vessels with 4 responses each for a total of 364 responses and 24.27 hours.
- Since calling into the IVR system is free, there is still no cost burden associated with this information collection.

Final burden table for proposed catch reporting:

Information Collection	Vessel Permit Categories	# of Entities	Items Per Entity	Total # of Items	Response Time (Min)	Total Burden Hours	Public Labor Cost (\$)	Public Cost Burden Per Item	Total Public Cost Burden
New Herring IVR Burden	A, B, C, D	91	4	364	4	24.27	\$458.15	\$0	\$0
New Herring VTR Burden	A, B, C, D	152	40	6,080	5	507	\$9,566	\$0.44	\$2,675
Total Burden	A, B, C, D	243	44	6,444	9	530.93	\$10,024.02	\$0.44	\$2,675

**For the entire information collection (IVR and VTR), there will be a net: increase of 932 responses, increase of 163 hours, and increase of \$2,675 in reporting costs.**