

**JUSTIFICATION FOR CHANGE
REPORTING REQUIREMENTS FOR COMMERCIAL FISHERIES
AUTHORIZATION UNDER SECTION 118 OF THE MARINE MAMMAL
PROTECTION ACT
OMB CONTROL NO. 0648-0292**

In accordance with the Marine Mammal Protection Act (16 U.S.C. 1361 et seq.; MMPA or the Act) the owner or operator of a commercial fishing vessel is required to report all incidental mortality and injury of marine mammals in the course of commercial fishing operations, regardless of the classification of the fishery in which the vessel is operating. Section 118(e) of the MMPA requires that this information be reported to the National Marine Fisheries Service (NMFS) within 48-hours after the end of a fishing trip. Section 118(c) of the MMPA requires NMFS to reexamine the classification of fisheries based on information gathered under the MMPA, including these mortality and injury reports from fishermen. Therefore, NMFS needs this information to determine the correct category placement for fisheries.

Section 118(e) of the Act requires that all reports of incidental mortality and injury be submitted to the Secretary by mail on a postage paid form or "other means acceptable." The legislative history of the amendments indicates that Congress intended for the report forms to be machine-readable for use in a computerized data system. Since 1996, NMFS has collected the report information using paper forms submitted by mail or fax. Starting in 2015, NMFS would like to implement the "other means" by offering online submission by E-mail attachment with a fillable pdf form or on the Web page with an online Google form. NMFS will keep the paper form submission option available and add two more technology-based options to make mortality and injury reporting a simple and quick process. Offering mail, fax, E-mail, and online submission formats will encourage timely receipt of mortality and injury reports and allow fishermen to share information however is most convenient for them. There will be no change to burden or costs for this information collection as a result of these changes.