

**SUPPORTING STATEMENT
GULF OF ALASKA CATCHER VESSEL & PROCESSOR
TRAWL ECONOMIC DATA REPORT
OMB CONTROL NO. 0648-0700**

This is a resubmission, with the Final Rule 0648-BE09, of a request is for a new information collection.

BACKGROUND

The Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through National Oceanic and Atmospheric Administration/National Marine Fisheries Service. National Marine Fisheries Service, Alaska Region (NMFS) manages the Gulf of Alaska groundfish trawl fisheries in the EEZ off Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska (FMP). The North Pacific Fishery Management Council (Council) prepared the FMPs under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act). Regulations implementing the FMP appear at [50 CFR part 679](#).

INTRODUCTION

NMFS would implement two new Economic Data Reports (EDRs) as part of a new Gulf of Alaska (GOA) Trawl Groundfish Economic Data Report Program which will evaluate the economic effects of current and future groundfish and prohibited species catch (PSC) management measures for the GOA trawl fisheries. The EDRs will provide the Council and other analysts with baseline information on affected harvesters, crew, processors, and communities in the GOA. The type of data collected would include labor information, revenues received, capital and operational expenses, and other operational or financial data. The information collected through the EDRs would be used to assess the impacts of major changes in the groundfish management regime, including catch share programs for PSC species and target species.

One of the EDRs in this new program would be submitted by owners or leaseholders of catcher vessels fishing with trawl gear for GOA groundfish. The second EDR would be submitted by owners or leaseholders of shoreside processors or stationary floating processors (SFPs) receiving deliveries from vessels using trawl gear fishing for groundfish in the GOA. A third EDR would be a revised Amendment 80 catcher/processor EDR (see revision to OMB Control No. 0648-0564).

A. JUSTIFICATION

The new GOA Trawl Gear EDRs will provide baseline information to better understand the economic impacts of NMFS-provided measures on industry to more effectively manage trawl PSC. This data will allow comparisons of the effects of a new GOA trawl catch share program before and after implementation, with primary focus on harvest crew employment.

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

NMFS would implement the Trawl Economic Data Report Program to evaluate the economic effects of current and future groundfish and PSC management measures for the GOA trawl fisheries. The new EDR information would be collected in order to understand employment and compensation changes in the GOA trawl fisheries and to better understand the current structure of the GOA trawl fishing industry.

Collection of these crew identifiers will allow NMFS to track the harvesting crew (captains, engineers, deck crew, and cook) over time and will provide baseline data for studies to understand how employment and compensation change in the GOA trawl fisheries. The new data will improve the scientific information that is available to make conservation and management decisions and to better understand the current structure of the GOA trawl fishing industry. Further, these data will allow analysts to better understand the impacts of the proposed trawl bycatch management program on participants in the fishery.

To better understand the potential economic and employment impacts resulting from the proposed actions, owners or leaseholders must submit an EDR:

- ◆ Catcher Vessel GOA Trawl EDR. All catcher vessels that harvest groundfish using trawl gear from the GOA or parallel fisheries.
- ◆ Processor GOA TRW EDR. All shoreside processors and stationary floating processors that take deliveries from vessels that harvest groundfish using trawl gear from the GOA or parallel fisheries.
- ◆ Catcher/processor GOA TRW EDR (see revision to OMB Control No. 0648-0564). All catcher/processors that harvest groundfish using trawl gear from the GOA or parallel fisheries as well as the BSAI fisheries. This existing collection would be revised to include the GOA.

Annual collection of these data will allow crew information to be linked to specific vessels or processors and would provide a better understanding of the:

- ◆ Crew members that participate in the GOA (and BSAI for catcher/processors) trawl fishery.

- ◆ Processing workers that work in plants processing trawl-caught groundfish from the GOA (and BSAI for catcher/processors) and their worker's compensation; and
- ◆ Harvesting costs from fuel and gear purchases by catcher vessels.

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.

a. Annual Trawl Catcher Vessel Economic Data Report (EDR)

The owner or leaseholder of a catcher vessel named on a Limited License Program (LLP) groundfish license with catcher vessel and trawl gear designations and endorsed for the GOA during a calendar year must submit an Annual Trawl Catcher Vessel EDR for that vessel.

The annual Trawl Catcher Vessel EDR will focus on vessel identifiers, employment data, and variable cost data (associated with fuel usage and gear purchases). Harvesting crew data includes annual payments to captains, annual payments to crew, and number of crew members that are engaged in commercial fishing. The crew identifiers would be collected and could be linked to the commercial crew data base to get more detailed information on the residence of crew members. Comparing total vessel revenue to crew payments should provide an estimate of crew shares relative to total vessel revenue from fish harvested.

Annual fuel use (both gallons and expenditures) would be collected from catcher vessels. These costs would not be apportioned among fisheries, because it would require too many assumptions by the person completing the survey. However, the fuel usage should be maintained and readily available by vessel for all GOA trawl fisheries in aggregate.

Trawl gear investment data will be collected. Reported costs will include aggregate trawl gear purchases and leases in a calendar year (e.g., nets, doors, rollers, cables). These costs should also include those incurred for PSC excluder devices that are obtained with the intent that they will be used with trawl gear in the GOA. Data will be based on costs that are fully expensed during the year (consistent with the structure used in the A80 EDR).

A complete EDR must be submitted for each calendar year on or before June 1 of the following year. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

Pacific States Marine Fisheries Commission (Pacific States) was designated by NMFS to be the Data Collection Agent for the GOA Trawl Program. Pacific States would mail EDR announcements and filing instructions to GOA trawl catcher vessels by April 1. To request a printed EDR may be requested by telephone at 1-877-741-8913 or email at am80edr@psmfc.org.

EDR submitters are encouraged to complete the form online. An EDR may be downloaded in fillable PDF format and then faxed or mailed. Submit the completed EDR:

By mail to: Pacific States Marine Fisheries Commission
NMFS Economic Data Reports
205 SE Spokane, Suite 100
Portland, OR 97202

By fax to: 503-595-3450

Online at: <https://survey.psmfc.org>

Trawl Catcher Vessel EDR

Certification Page

Vessel Information

Vessel Name
ADF&G Vessel Registration Number
GOA Groundfish LLP Number(s)
USCG Documentation Number
Current estimated market value of vessel and equipment (\$)
Replacement Value of Vessel and Equipment (\$)
Name of cooperative (*if applicable*)

Vessel Owner Information

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

Vessel Leaseholder Information (*if applicable*)

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

Person Completing this Report

Owner (If same name and address provided in the Owner block, do not repeat information)
Leaseholder (If same name and address provided in the Leaseholder block, do not repeat information)
Designated Representative

Name
Title
Business Number Telephone
Business FAX Number
Business E-mail address (*if available*)

Check one box to indicate whether EDR is required

If buyer/leaseholder
Buyer/leaseholder name
Business address
Telephone number
Date of sale or lease (day/month/year)

Certification statement

Signature and date signed

Vessel characteristics: fuel consumption

For each of the listed activities
Vessel's average gallons of fuel per hour
Annual fuel consumption

Vessel expenses, annual

Gallons: Record the total quantity of fuel purchased for the vessel during the previous calendar year, in gallons.

Cost: Record the total payment for fuel purchased for the vessel for all crab, non-crab, and non-fishing operations during the previous calendar year, including all sales taxes and surcharges. Do not include the cost of lubrication or other fluids.

Trawl Gear Cost: Record the total direct expenditures for lease, purchase and/or repair of trawl fishing gear (including nets, doors, rollers, cables, etc.) during the previous calendar year. Report only the amount that was fully expensed for the year.

Excluder Device Cost: Record the total direct expenditures for lease, purchase and/or repair of excluder devices during the previous calendar year. Report only the amount that was fully expensed for the year.

Crew labor costs

Number of Paid Harvest Crew Members (exclude the captain): Record the number of crew aboard the vessel (exclude captain) who provided harvesting labor during GOA groundfish trawl fisheries.

Total Labor Payment to Harvest Crew (exclude the captain)

Record the total payment made to crew (exclude the captain) for their labor. List the amount actually paid to crew in their settlement, not their earnings before crew-related expenses (such as fuel, bait, or food and provisions) were deducted.

Captain Labor Payment: Record the total payment made to the captain for his services during GOA trawl fisheries. List the amount actually paid to the captain, not the earnings before shared expenses (such as fuel, bait, or food and provisions) were deducted.

Crew licenses and CFEC permits

for each individual who worked as a captain or crewmember in GOA trawl fisheries during the previous calendar year, record either

the Alaska Commercial Crew license number or

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

Indicate if permit is ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number

record one license or permit number per crewmember.

For Commercial Crew Licenses, report the full 7-digit license number.

For Gear Operator Permits, include the fishery code and permit number (e.g., M71B25321N).

The number of catcher vessels using trawl gear to harvest GOA groundfish during the years 2008 through 2012 ranged from 67 to 73. During 2012, about 33 percent of these vessels were less than 60 feet length overall (LOA). That percentage has declined slightly from the earlier years considered when about 38 percent were less than 60 feet LOA. Based on this information, it assumed that about 70 catcher vessels will be subject to the data collection program and about one-third of those vessels will be less than 60 feet LOA.

GOA TRW CV EDR, Respondent	
Number of respondents	70
Total annual responses	70
Frequency of response = 1	
Total burden hours	1,050 hr
Time per response = 15 hr	
Total personnel cost (\$37/hr x 1050)	\$38,850
Total miscellaneous costs (184.55)	\$185
Photocopying (\$0.05 x 10pp x 70 = 35)	
Online (0.05 x 24 = 1.20)	
Mail (0.45 x 23 = 10.35)	
Fax (\$6 x 23= 138)	

To determine the agency cost of implementing the catcher vessel EDR, and assuming that the data elements in this analysis are imposed on 70 catcher vessels, the cost would be about \$40,000 for the first year when the survey instrument is developed and the program is implemented and

then about \$15,000 per year to maintain the program. These costs would include developing the infrastructure to collect, verify, store, maintain, and analyze the data.

GOA TRW CV EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Total Initial costs:	\$40,000
Develop instrument & implement = 40,000	
Total annual maintenance cost thereafter = \$15,000	\$15,000

b. GOA TRW Processor EDR

The owner or leaseholder of a shoreside processor or stationary floating processor with a Federal Processor Permit (FPP) that processes groundfish caught by vessels fishing with trawl gear in the Western and Central GOA reporting area must submit an Annual Groundfish Shoreside Processor Trawl Economic Data Report (EDR) for that calendar year.

Only processors that accept deliveries of groundfish harvested with trawl gear from the Central or Western GOA are required to submit the EDR. Most of the shorebased processors are located on Kodiak Island, and these are the primary shorebased processors of fish harvested from the Central GOA and West GOA trawl fisheries.

In addition, Kodiak has one processor that produces fish meal using by-products from other processors. Because this is a processor of groundfish harvested from the GOA with trawl gear, the Kodiak Fish Meal Company is considered a processor to be included under this program.

Other shoreside processors that are located in communities adjacent to the waters of the GOA and BSAI take deliveries of groundfish harvested in the Central and Western GOA trawl fisheries. These processors are located in Akutan, Dutch Harbor/Unalaska, King Cove, Kodiak, Sand Point, Seward, and Sitka.

There are also two stationary floating processors, operated by Icicle Seafoods and Trident, taking groundfish deliveries in recent years.

Monthly information on processing workers would be collected from shoreside processors and stationary floating processors. This information will help identify the impacts of regulations on employment throughout the year, but may be especially important for understanding how the numbers of employees and their aggregate monthly compensation changes.

In addition, electric and water usage by processors in Kodiak, Alaska, would be collected. This information is important to Kodiak because the suppliers must adjust production of those utilities based on the plant’s demand. This requires utility suppliers to have sufficient capacity to meet peak demand. Scheduling the fisheries out over a longer period of time could reduce the necessary peak capacity needs. The Council does not have the authority to require utility providers to supply the data under the Magnuson-Stevens Act. However, these entities could

supply an annual summary of usage by month to each processor. Processors could then pass those summaries on to NMFS at minimal or no cost. This information is proposed be collected from processors that utilize a community owned water and electric system. Applying the data requirement to community owned water and electric systems will focus the data collection on Kodiak. Residents of Kodiak highlighted this issue and requested the collection of these data.

The processors in Kodiak are requested to supply monthly data on water and electric utility purchases. This information will show monthly changes in utility usage that the local utility providers must accommodate. Given the quantity of water and electricity used by processing plants, fluctuations in demand from the plant require the utility providers to be able to plan and respond to usage. Stakeholders from Kodiak felt that this information was important to the community and requested that it be considered as part of the data collection program.

The primary use of these data will be to consider impacts on the community. The Kodiak Finance and Public Utilities staff oversee the information on water usage and billing. Electric services are supplied by the Kodiak Electric Association. Staff of those agencies indicated that it is a relatively easy matter to provide monthly summaries of utility usage to the plant managers to disseminate. The burden on both the utility provider and processing plants is anticipated to be small. The data will provide information on peak utility usage. If peak utility usage is reduced under prohibited species catch (PSC) management plan, then costs to Kodiak associated with gearing up for peak demand may be reduced. The proposed EDR elements are limited to monthly employment information that is readily available and utility usage that can be provided to the processor by the utility provider. Because this information is readily available the reporting burden should be about three hours per submission.

Pacific States Marine Fisheries Commission (Pacific States) was designated by NMFS to be the Data Collection Agent for the new GOA TRW Processor EDR. Pacific States mails EDR announcements and filing instructions to permit holders by April 1. To request a printed EDR by mailed , call 1-877-741-8913, or email a request to am80edr@psmfc.org.

An EDR may be submitted online or may be downloaded in fillable PDF format and then faxed or mailed. Submit the completed EDR:

By mail to: Pacific States Marine Fisheries Commission
NMFS Economic Data Reports
205 SE Spokane, Suite 100
Portland, OR 97202

By fax to: 503-595-3450

Online at: <https://survey.psmfc.org>

PROCESSOR GOA TRW EDR

GOA Groundfish Processing Labor Cost, by Month

Average Number of Groundfish Processing Positions, by month

Total Man-Hours, by month and housing status

Total Labor Payment, by month and housing status

General Non-processing Labor Expenses, Annual

For all non-processing personnel employed during the year, report the following:

Number of Employees

Salaries and wages

GOA Groundfish Processing Utilities Consumption and Cost, by Month

Water Purchased from Community Provider, Gallons and Cost, by Month

Electricity Purchased from Community Provider, Kilowatt Hours and Cost, by Month

Monthly employment data, not broken out by fishery

Labor, Processing crews

Average Number of processing employees (monthly)

Processing employee Man-hours, monthly by housing

Processing employee wages, annual (excluding managers, foremen, & other non-processing employees)

GOA TRW Processor EDR, Respondent	
Number of respondents	18
15 shoreside processors	
2 stationary floating processors	
1 fish meal processor	
Total annual responses	18
Frequency of response = 1	
Total burden hours	54 hr
Time per response = 3 hr	
Total personnel cost (\$37/hr x 54)	\$1,998
Total miscellaneous costs (12.15)	\$12
Photocopying (\$0.05 x 5pp x 18 = 4.50)	
Online (0.05 x 15 = 0.75)	
Mail (0.45 x 2 = 0.90)	
Fax (\$6 x 1 = 6)	

The agency cost of implementing the processor EDR is projected to be about \$20,000 during the first year of the program and \$10,000 per year after the development costs are realized. These costs would cover the collection, verification, storage, and maintenance of the data from about 18 processors.

GOA TRW Processor EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Total initial costs	\$20,000
Annual maintenance costs	\$10,000

Pacific States will conduct verification of information with the owner, leaseholder, or designated representative, of the GOA trawl catcher vessel, shoreside processor, or stationary floating processor. The owner, leaseholder, or designated representative must respond to inquiries from Pacific States within 20 days of the date of issuance of the inquiry. Responses after 20 days could be considered untimely and could result in a violation and enforcement action.

Accuracy of each EDR is verified by Pacific States to ascertain anomalies, outliers, and other deviations from averaged variables. The principal means for data quality assessment is follow-up interviews with EDR submitters to ensure consistent interpretation of the survey form and verification of selected data entries against submitter records. The Pacific States' auditor may request copies of additional data to be 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. The owner or leaseholder must provide copies of additional data to facilitate verification.

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 the Amendment 80 Program. 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 the 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 submitted online. In addition, the EDRs are fillable and may be downloaded from the NMFS web site at alaskafisheries.noaa.gov, printed, and submitted by mail or fax to Pacific States.

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 unlike any other.

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

Two shorebased/floating processor entities were classified as small using SBA guidelines. These processors meet the small entity criterion because of the number of employees worldwide. These processors also had no known cooperative affiliation.

Two Western Alaska Community Development Quota (CDQ) groups owned harvesting vessels that operate in the GOA. Two CDQ groups had ownership interests in trawl vessels that operated in the GOA groundfish fisheries that are considered small entities for RFA purposes.

Six trawl catcher vessels are considered 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 new GOA Trawl EDR Program would be implemented to collect baseline information on the economic structure of the groundfish fishery before modifications to the fishery are implemented. This collection will be a focused data collection program to provide data that are currently unavailable, can be collected with minimal burden on industry, and will provide information that is of interest to a wide cross-section of stakeholders. If data are not collected prior to implementing changes to the fishery structure, it is not possible to quantitatively measure the impacts of specific changes brought about by the program.

Collecting data on utility usage would be done to better understand the stresses that can be put on public utilities to meet peak demand during times where large volumes of fish are processed. Smoothing out the amount of processing activity overtime may reduce the burden on a community. Without collecting baseline information on the variation of utility usage by month and processor, those changes in demand for utilities as a result of processing activity will not be known.

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 proposed rule (RIN 0648-BE09) was published, August 11, 2014 (79 FR 46758) coincidentally with this analysis to request public comments; the comment period ended September 10, 2014. NMFS received five unique comments contained in two comment letters from fishing industry representatives associated with GOA trawl fisheries, and one comment letter from a member of the general public. The general public comment opposed the implementation of the action, but did not provide a reason for opposing the action. The comment letters from the two fishing industry representatives supported the implementation of the GOA Trawl EDR data collection program.

NMFS made no changes to the regulatory text in the final rule from the proposed rule. No public comments recommended revisions to the regulatory text.

Comments & Responses on Proposed Rule	
<p>Comment 1: The Trawl CV EDR form is much improved over the draft version issued in April 2014. It is clearer and better suited to the GOA CVs that participate in numerous fisheries, not just GOA groundfish trawl fisheries (i.e. IFQ halibut/sablefish, salmon, Tanner crab, pot Pacific cod, American Fisheries Act pollock, Pacific Coast whiting).</p>	<p>Response: NMFS acknowledges the comment.</p>
<p>Comment 2 Page 46762 of the proposed rule: “based on 2012 data, there are currently 84 LLP licenses endorsed as trawl catcher vessels in the GOA”. Whereas 84 trawl CV’s may have been active in the GOA in 2012, we believe there are more than 84 GOA trawl LLP’s. From page 21 of the April 2014 GOA Trawl Bycatch Management Discussion Paper, “Table 4 provides information on the number of groundfish LLPs that were issued as of March 2013, after the reduction was implemented, that include a trawl endorsement for either the Western GOA and/or the Central GOA. The GOA trawl LLP endorsement issued for the Central GOA allows the permit holder to use trawl gear in the West Yakutat District. The table shows that in 2013, 115 CV LLPs were issued with a trawl endorsement in at least one area in the GOA; a total of 21 C/P LLPs were issued with a trawl endorsement.</p>	<p>Response NMFS retains a database of the federal LLP licenses and endorsements held by a vessel for each year for each vessel with a Federal Fishing Permit (FFP). For example, a vessel with an FFP and holding one or more LLP licenses and endorsements can be identified for each year it had the necessary LLP licenses and endorsements to participate in the Western or Central GOA trawl fisheries. A different groundfish catch and accounting database maintained by NMFS also provides information on the catch of groundfish and prohibited species for any vessel with an FFP, including each of the vessels regulated by this final rule. Data from these two databases can be and was merged to produce tables and information to inform the RIR/IRFA and final RIR/FRFA for this action. When NMFS identified vessels that both had LLP licenses and endorsements that were also “active” in the GOA Trawl fisheries, these active vessel counts (approximately 84) included vessels that met both the criteria of having certain LLP licenses, and made landings in a specified year. Those active vessels are a subset of the total number of vessels that held these particular licenses. Some vessels may hold particular LLP licenses in a year or interval of years, and not make groundfish landings in Alaska fisheries or a particular area of Alaska fisheries, such as the Western and Central GOA. The 115 trawl CV LLPs is a correct estimate of the number of vessels that were endorsed as a CV operation type with trawl gear in the GOA in 2013, and the 84 vessels also is a correct estimate of the number of vessels that both were licensed under the LLP program to fish in the Western and Central GOA, but also were “active,” in- other-words, made landings of groundfish in the Western and Central GOA during 2012. NMFS proposes no additional revisions to the Final RIR/FRFA or the final rule to explain these numbers.</p>
<p>Comment 3 Processor EDR: We believe that the Processor EDR form is not clear. According to the preamble, Page 46763 of proposed rule, “these employment data elements would be aggregated in the EDR for all fisheries, GOA management areas, and gear types”. NMFS determined that employment data from processors should not be broken out by fishery because</p>	<p>Response NMFS agrees that the instructions for the Annual Processor EDR should be revised to clarify to the submitters that they are required to report totals for all groundfish processing labor, aggregating over all groundfish species, fisheries, and locations of catch, and excluding salmon, shellfish, or other non-groundfish processing. NMFS will include a list of groundfish</p>

<p>employees may process fish from more than one fishery in a month or week, or participate in more than one type of processing job. The reporting burden for processors to report labor data that is separated by fishery would be burdensome, and potentially delay implementation of this program. Because the preamble states “that the processor EDR form would collect monthly data on the average number of groundfish processing employment positions and associated labor hours and wage payments” and that is what is being asked for in Table 1, we assume that these qualifications in the preamble are in reference to groundfish processing only and not non-groundfish processing (i.e. salmon, crab, etc.).</p> <p>However, nowhere on the EDR forms are these clarifications articulated. The introduction states, “This report collects information on shoreside processor and stationary floating processors (SFP) operations that process groundfish from the Gulf of Alaska (GOA) groundfish trawl fisheries”.</p> <p>Table 1: Asks for groundfish processing employment and labor cost. Nowhere in the instructions does the form define groundfish (i.e. what species are included in the definition of groundfish), what groundfish fisheries to report (federal and state, all gear type harvests, GOA and/or BSAI). Better definition needs to be included for the groundfish processing employment and labor cost reporting requirements so all processing entities report the same data elements.</p>	<p>species codes to explicitly specify what species are included or excluded. This clarification in the instructions does not revise any data to be collected by the EDR, and would require no change to regulation or the data fields in any of the data forms implemented by this action.</p> <p>For any proposed revision to the final GOA Trawl EDRs that NMFS believes is a minor revision, (e.g. a minor revision to such as instructions to clarify how to aggregate labor accounting) NMFS procedure is to provide a draft of the proposed revision to the Council, Executive Director. The Executive Director will advise NMFS if the proposed revision is considered by the Council to (1) be minor revision and request NMFS to implement through the Paperwork Reeducation Act, without further Council action, or (2) not minor, and if the Council prefers to address the proposed revision in a future Council meeting, as a regulatory or FMP amendment. NMFS and the Council believe that this procedure will allow for thorough Council vetting of any future proposed revision to the EDR.</p>
<p>Comment 4</p> <p>One issue that we would like you to clarify is the streamlining process that is discussed in the preamble to simplify regulations. According to the preamble, the regulations will not describe the data fields in regulation. This provides greater flexibility to modify specific data fields without requiring additional regulatory amendments and reduce potential confusion if the text in the regulations and forms differ. While allowing changes to the forms makes sense, these changes need to be fully vetted via the Council process versus just posted on the NMFS web page, and having EDR submitters submit comments under the Paperwork Reduction Act (PRA)</p>	<p>Response</p> <p>NMFS notes that the Council may choose to schedule a future review of and revisions to the EDR at any time that they deem appropriate. As noted in previous responses, NMFS Alaska Region does not anticipate proposing any revisions to the GOA Trawl EDR forms that have not been fully vetted through the Council.</p>
<p>Comment 5</p> <p>In the future, the present GOA EDR forms are likely to be redrafted once a catch share program or other new management regime is implemented by the Council. We anticipate that the EDR forms would be modified to capture the objectives of the new program as well as understanding the economic impacts of the new management program. Please clarify the streamlining process that is discussed in the preamble to simplify regulations.</p> <p>According to the preamble, the regulations will not describe the data fields in regulation. This provides greater flexibility to modify specific data fields without requiring additional regulatory amendments and reduce</p>	<p>Response</p> <p>For any proposed revision that NMFS determined would be useful, that proposed revisions would be vetted by submitting it to the Council, Executive Director for review. If the Executive Director advises NMFS that the proposed revision is minor, NMFS may proceed with submitting the proposed revision for clearance through the Paperwork Reduction Act. If the Executive Director advises NMFS that the proposed revisions are not minor, then NMFS would not commence clearance of the proposed revisions through PRA, until the Council recommended revisions through an FMP or regulatory amendment.</p>

<p>potential confusion if the text in the regulations and forms differ. While allowing changes to the forms makes sense, these changes need to be fully vetted via the Council process versus just posted on the NMFS web page, and having EDR submitters submit comments under the Paperwork Reduction Act (PRA).</p> <p>However, looking towards the future, the present GOA EDR forms will be redrafted once a catch share program is finalized by the Council. It would be anticipated that the EDR forms would need to be modified to capture the objectives of the new program as well as understanding the economic impacts of the new management program. Since the regulations allows this flexibility no additional regulations would be required and the changes to data collection elements will happen outside the rule making process. We strongly believe that these changes need to be fully vetted and developed within the transparent and public Council process. The success of the EDR data collection program depends on a cooperative working relationship between the agency and industry; support and understanding by the fisheries participants is key to a successful EDR data collection program.</p>	
--	--

Focus group Comments on GOA Trawl Catcher Vessel EDR

Comments & Responses from Focus Group, GOA Trawl Catcher Vessel EDR	
Table 1: Vessel Characteristics, Fuel Consumption	
<p>Comment 1: Fuel consumption rate, generally or by vessel activity, is not monitored or tracked systematically by most vessel operators, and would require purchase and installation of fuel flow meters that many (possibly most) vessels do not currently have. Participants generally agreed that the question should be dropped from the CV EDR.</p>	<p>Response: Question dropped</p>
<p>Comment 2:</p> <ul style="list-style-type: none"> o Fuel gallons and cost is likely to be somewhat more burdensome to report than for crab fleet or CPs due to greater frequency of fuel purchases o PA didn't specify whether lubrication costs to be included in fuel costs o Fuel gallons and cost will have to be extracted from itemization on fuel invoices to back out fuel and lubrication totals 	<p>Response: Requested clarification added</p>
<p>Comment 3: Specification of trawl gear and excluder costs as fully expensed doesn't adequately describe how to treat depreciated costs (note: when gear costs have been collected previously (original crab, A80 EDR), costs have been segregated into purchase costs of capitalized assets and expenditures on fully expensed items; unclear what is most consistent with Council intent)</p>	<p>Response: Requested clarification added</p>
<p>Comment 4: Excluders may be used for other purpose than halibut/salmon - should costs for excluders used for other purposes be included in trawl gear costs or</p>	<p>Response: Requested clarification added</p>

excluded altogether.	
----------------------	--

Comments & Responses from Focus Group, GOA Trawl Catcher Vessel EDR	
Table 3: Labor Payments to Captain and Crew	
Comment 1: Clarify whether GOA groundfish trawl fisheries includes or excludes GOA rockfish fishery; would be easier to report inclusive	Response: Requested clarification added
Comment 2: Possible to have more than 1 captain during the year; change reference to "captain" to plural, as appropriate	Response: Requested clarification added
Comment 3: Instructions should direct submitters to report total crew count/pay for all crew, including full- and part-time	Response: Requested clarification added

Focus group Comments on Shoreside Processor EDR

Comments & Responses from Focus Group, Shoreside Processor EDR	
Table 1: Groundfish Processing Labor Cost	
Comment 1: Processing "positions" may be difficult to quantify; more straightforward to report total # of payrollees	Response: Requested clarification added
Comment 2: Clarify treatment of other hourly labor types that not part of the "processing line", i.e., dock, QC, case up, maintenance, and administrative personnel; supervisory personnel in each group are salaried, not hourly and should be treated as non-processing, as well as hourly admin staff	Response: Requested clarification added
Comment 3: Monthly totals for man-hours may reflect variation in shift-length over time and across processors; as reported, it will not be possible to differentiate variation due to expanding/contracting shift lengths and/or changes versus number of individual shifts; suggestion that alternative reporting structure would be to collect man-hours segregated by normal and overtime hours.	Response: No change.
Comment 4: Besides total employment and wages, note that employment stability is important performance metric, may not be identifiable with data as currently specified.	Response: No change.

Comments & Responses from Focus Group, Shoreside Processor EDR	
Table 3: Kodiak Processor Utility Consumption and Cost, by Month	
Comment 1: Waste disposal costs (solid waste, fish meal) are a significant portion of utility costs but are excluded from EDR reporting; note that fish meal disposal can act as capacity constraint during peak periods when meal plant backs up.	Response: No change; waste disposal cost not included in original survey form

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

This protection would prevent the release of confidential data collected under this program through a Freedom of Information Act request. Data could still be released through an order from a Federal court but would only apply to specific observations relevant to the court proceedings.

All of the data collected would be covered by the confidentiality requirements that define who has access to the disaggregated data and how data must be aggregated prior to being publically released. Also, the Council recommended that a third party data collection entity (Pacific States) collect the data and assign a unique identification number to each submission by the catcher vessels and processors. This number will be held in confidence by the third party data collector, to provide an additional safeguard against the accidental release of confidential data by analysts working with the vessel/processor level data.

Pursuant to applicable regulations, data and identifiers reported may be used for program enforcement and determination of qualification for cooperative membership. Consequently, identifiers and data may be disclosed to NOAA Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Program.

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.

Total estimated unique respondents: 88. Total estimated responses: 88. Total estimated time burden: 1,104 hr. Total estimated personnel cost: \$40,848.

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 #12 above).

Total estimated miscellaneous costs: \$197.

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

Total estimated miscellaneous costs: \$ 25,000 hr. Total estimated initial costs: \$ 60,000.

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

This is a new program.

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

The information collected will not be published. 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 the GOA Trawl Program.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.