**JUSTIFICATION FOR CHANGE**

**Highly Migratory Species Dealer Reporting Family of Forms**

**OMB Control No. 0648-0040**

This request seeks to make a minor change, per Final Rule 0648-BC09, to the previously approved information collection which covers the collection of landings data from Atlantic bluefin tuna dealers. Domestic landings data are necessary to effectively manage domestic bluefin tuna fisheries, and international Atlantic bluefin tuna stocks. Collection of fishery information including landings data is authorized under the Atlantic Tunas Convention Act and Magnuson-Stevens Fishery Conservation and Management Act, and dealer reporting is implemented under the Atlantic highly migratory species (HMS) regulations at 50 CFR 635.5

HMS regulations at §635.5 (b)(2)(i)(A) require bluefin tuna landing card data to be collected via a fax-in system or electronic data entry. The data fields collected include date, dealer number, vessel number, vessel master signature, gear, fishing location, tag number, landing port and fish size.

Up until now, only the fax-in system has been operationally available. However, in conjunction with the development of an individual bluefin quota (IBQ) management system under the final rule for Amendment 7 to the 2006 Consolidated HMS Fishery Management Plan (RIN 0648-BC09), electronic entry of these data will be necessary for bluefin purchased from Longline and Purse seine category vessels, about 50% of the bluefin landings. Real-time landings data are necessary to support the management of individual bluefin quota shares.

In the longer term, the overall reporting burden on dealers will be reduced by the reporting efficiencies of the electronic system. Dealers will be pre-registered in the IBQ data management system using previously collected dealer permit data. Many of the landings data fields will be either prepopulated (i.e., dealer number, date, gear type) or available via drop-down menu (vessel identification number, landing port) to reduce dealer reporting burden. Eventually the data fields that have been collected on the biweekly form will be integrated into the electronic system. However, for a limited time period, dealers will be asked to submit both electronic and faxed versions of landing cards for purse seine and pelagic longline vessels until IBQ system development and testing concludes, within a year.

There will be an additional one minute for each of 1000 reports, resulting in an added burden of 17 hours, **annualized to 333 responses and 6 hours**. For each of the 255 vessels, this will mean only an additional 4 responses, and 4 minutes, total.

**Revised total of all responses, hours and costs (no change to costs): 7,8942, 18,700 and $154,155.**

There were no comments on this new requirement in the proposed rule.