

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

National Marine Fisheries Service (NMFS) is proposing a change to the OMB Control No. 0648-0212 family of forms to remove the requirement for vessels to send in negative fishing reports (“did not fish” reports). In 2014, 48% percent of the vessel trip reports (VTRs) that were sent in were for no fishing. There were 78,294 negative fishing reports, and at 2 minutes each, that equates to 2,609 hours. There would also be a saving of \$0.45 per each of those 78,294 responses, or a total of \$35,232 in recordkeeping/reporting costs.

This change removes the requirement for vessels to send in negative fishing reports during months or weeks when fishing did not occur. This is the result of an internal review of the trip-level reporting requirements conducted by the joint Greater Atlantic Regional Fisheries Office-Northeast Fisheries Science Center Fishery Dependent Data Committee (FDDC) during the past year. The division of the Office of Management and Budget (OMB) responsible for the Paperwork Reduction Act (PRA), in the interest of reducing compliance costs for small businesses, noted a potential cost savings for fishermen if we remove the DNF report and asked that we investigate the possibility of removing it. As a result of that review, the FDDC has recommended that the negative fishing reports are no longer necessary because the ability to determine if a vessel has engaged in fishing activity and submitted required trip reports has increased in recent years due to improved trip-level data matching and the expansion of other monitoring systems (e.g., Vessel Monitoring Systems). Therefore, in order to simplify the regulations and reduce reporting burdens for the industry, we are proposing to eliminate the negative fishing reports requirement. Vessel owners would still be required to report all fishing trip activity on a monthly or weekly basis, depending on the requirements associated with their vessel permits.

The burden table will be reduced by the amounts shown below:

	# of Entities	Items per Entity	Total # of Items	Response Time (min)	Public Burden	Public Cost
IVR Call	7,200	10.874	78,294	2	2,609	\$35,233

We did receive two comments on the proposed rule and both were supportive of removing negative fishing reports.