

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-BF17**, to the previously approved information collection which covers the collection of Atlantic bluefin tuna import, export, and re-export data from dealers holding international trade permits (ITP) (OMB Control No. 0648-0040). International trade data are necessary to improve tracking of bluefin tuna catch and commerce, as well as to detect fraud and deter illegal, unregulated, and unreported (IUU) shipments. Collection of Atlantic bluefin tuna trade data is required by recommendations adopted by the International Commission for the Conservation of Atlantic Tunas (ICCAT). Under the Atlantic Tunas Convention Act, the Secretary shall promulgate such regulations as may be necessary and appropriate to carry out ICCAT recommendations. ITP holder reporting is implemented under the highly migratory species international trade documentation and tracking regulations at 50 CFR § 300.180-189.

International fisheries regulations at §300.185 require bluefin tuna international trade data to be collected via paper bluefin tuna catch documents (BCDs). The data fields collected include vessel number, vessel name, vessel flag, landing date, landing area, number of fish, average weight, total weight, gear, tag number, product description, exporter information, and importer information. In 2015, ICCAT adopted Recommendation 15-10 requiring international trade data collection via an electronic bluefin tuna catch documentation system (eBCD system), with implementation on May 1, 2016. In conjunction with implementation of the eBCD system under **Final Rule 0648-BF17**, electronic entry of these data will be necessary for Atlantic bluefin tuna imported, exported, or re-exported by ITP holders. Electronic data are necessary to improve the timely management of international bluefin tuna trade.

ITP holders will be pre-registered in the eBCD system using previously collected permit data. The same data fields will be collected in the eBCD system as in the paper BCD. Many of the data fields will be either prepopulated (i.e., dealer information, date) or available via drop-down menu (landing area, gear, product description) to reduce reporting burden. The reporting burden for paper BCDs is estimated at 5 minutes per form and the electronic BCDs would have an equivalent reporting burden. All other dealer reporting requirements and associated reporting burden under 0648-0040 remain the same.

NMFS received a comment from an environmental non-governmental organization, both in writing and verbally during a public conference call/webinar on October 13, 2015. A summary of that comment is provided below along with NMFS's response.

Comment 1: We fully support the transition to an electronic system by May 2016. Full implementation of the eBCD system will benefit the U.S. fishing community by reducing opportunities for criminal activity, rewarding compliant fishermen, and supporting this valuable fishery's long-term sustainable management.

Response: NMFS agrees. The measures implemented by this rule would improve tracking of bluefin tuna catch and trade, enhancing ICCAT's ability to monitor trade and identify

any discrepancies between the amount of product in international trade and authorized quotas, and reduce the possibility of IUU bluefin tuna entering U.S. commerce. NMFS also agrees that use of the eBCD system should be implemented by the May 1, 2016 deadline adopted by ICCAT in Recommendation 15-10 and consistent with the provisions in that Recommendation.