

SUPPORTING STATEMENT
ALASKA REGION CRAB ECONOMIC DATA REPORTS (EDR)
OMB CONTROL NO. 0648-0518

This action is a request for extension of this existing information collection. The title of this collection is being changed from *Alaska Region Bering Sea and Aleutian Islands (BSAI) Crab Economic Data Reports (EDR)* to *Alaska Region Crab Economic Data Reports (EDR)*.

INTRODUCTION

In January 2004, the United States (U.S.) Congress amended Section 313(j) of [Magnuson-Stevens Fishery Conservation and Management Act](#) (Magnuson-Stevens Act) as amended in 2006 to mandate the Secretary of Commerce (Secretary) to implement the Crab Rationalization Program for the Bering Sea and Aleutian Islands Management Area (BSAI) crab fisheries. The North Pacific Fishery Management Council (Council) prepared, and NMFS approved, the Fishery Management Plan for BSAI King and Tanner Crabs (Crab FMP). The Crab FMP establishes criteria for the management of certain aspects of the BSAI crab fisheries by the State of Alaska Department of Fish and Game (ADF&G) and is implemented by regulations at [50 CFR part 680](#).

The National Marine Fisheries Service (NMFS) Alaska Region implemented the Crab Rationalization Program (CR Program) to both maintain rigorous safeguards on use of fishing privileges for a public resource and to provide safeguards for program constituents. The CR Program is a limited-access system that allocates BSAI crab resources among harvesters, processors, and coastal communities. The rationalized fishery began in fall 2005 with quota allocated to harvesters and processors based on historical participation in the fishery. Because of the expected impact on the industry, an economic data collection program was developed to better understand the economic impacts on the industry.

The CR Program components include quota share (QS), processor quota share (PQS), individual fishing quota (IFQ), individual processing quota (IPQ), quota transfers, use caps, crab harvesting cooperatives, protections for Gulf of Alaska groundfish fisheries, arbitration system, monitoring, economic data collection, and cost recovery fee collection.

NMFS selected the Pacific States Marine Fisheries Commission (PSMFC) to be the Data Collection Agent (DCA) for the CR Program. PSMFC and NMFS administer the Crab Economic Data Report (EDR) data collection program under the guidance of the Council.

Economic data reports (EDRs) were developed to help determine the effects of the rationalization program, including changes to the costs of production and the effect of consolidation. In order to ensure that the data submitted by respondents in the EDRs is accurate, Congress and the Council specified that EDR data be subject to mandatory audits conducted by the third party collection agent, Pacific States Marine Fisheries Commission (PSMFC). PSMFC contracted AKT LLP to develop and implement an EDR review and verification system which involves reviewing the data contained within submitted EDRs, conducting verification audits for those EDRs containing data values outside of the expected range, and conducting random audits for a certain percentage of submitted EDRs.

Previously, the Council conducted a five year review of the CR Program data collection program. Several elements of the EDR data being collected were found to be duplicative of other data collection programs. In some cases, redundancies were partial and in other cases, the data collected in the EDRs are completely redundant. Based on the EDR review and testimony from EDR Program respondents, the Council considered a number of alternatives for revising EDRs to improve data quality, simplify the reporting requirement, and reduce reporting burden and duplication with other reporting requirements.

Persons submitting the completed EDR certification pages as part of the entire EDR must attest to the accuracy and completion of the EDR by signing and dating the certification pages. Persons submitting the completed EDR certification pages only must attest that they meet the conditions exempting them from submitting the entire EDR, by signing and dating the certification pages.

A. JUSTIFICATION

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

Participation in the EDR program is mandatory under Federal fisheries regulations 50 CFR Part 680.6 for all active vessel and processing sector participants in the CR Program fisheries.

In summary, the purpose of the economic data report and data validation is to:

- Aid the Council and NMFS in assessing the success of the program;
- Understand the economic performance of crab fisherman;
- Understand how the economic performance has changed after rationalization;
- Isolate the effects attributable to the crab rationalization program;
- Assess the validity of data reported in submitted EDRs; and
- Provide guidance on improvements in the EDR process to improve the validity of future data reporting.

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.

Any owner or leaseholder of a vessel or processing plant, or a holder of a Registered Crab Receiver permit (RCR) who harvested, processed, custom processed, or obtained custom processing for CR crab, during a calendar year, must submit a complete CR EDR by following the instructions on the applicable EDR.

A completed EDR or EDR certification pages must be submitted to the DCA for each calendar year on or before 1700 hours, A.l.t., July 31 of the following year.

Annual EDR forms for catcher vessels, catcher/processors, shoreside crab processors, and stationary floating crab processors are available on the NMFS Alaska Region Web site at <http://alaskafisheries.noaa.gov> or the Pacific States Marine Fisheries Commission (PSMFC)

Alaska Crab Rational Program Web site at http://www.psmfc.org/alaska_crab/ or by contacting NMFS at 1-800-304-4846.

The EDR Program is administered by NMFS through contracts with PSMFC. The EDRs were developed to analyze the effects of the CR Program, including changes to the costs of production and the effect of consolidation. The information collected in the EDRs is intended to provide comprehensive data to analysts to examine changes in resource utilization, excess harvesting and processing capacity, economic returns, variable costs and revenues, economic efficiency, and the stability of harvesters, processors and coastal communities.

PSMFC sends out certified letters each year to respondents that include a new login and password. A randomly generated password is issued each year along with in most cases a new login for confidentiality purposes. Time spent to compare submitted EDRs with permit application is all done through the computer. No one in RAM physically checks a list or documents. The government cost to download the data from PSMFC for all three crab EDRs vs permits is nominal ($\$37/3 = 12.33$).

The CR Crab EDR program details may be found at <https://alaskafisheries.noaa.gov/fisheries-680regs>.

a. Annual catcher vessel crab EDR [CHANGED]

Any owner or leaseholder of a catcher vessel that landed CR crab in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed catcher vessel EDR for annual data for the previous calendar year.

Catcher vessel crab EDR Certification Page

Catcher Vessel Information

- Vessel Name and ADF&G Vessel Registration Number
- Crab License Limitation Permit Number(s)
- USCG Documentation Number
- Current Estimated Market Value of Vessel and Equipment
- Replacement Value of Vessel and Equipment
- Name of Crab Harvesting Cooperative (if applicable)

Vessel Owner Information

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

Vessel Leaseholder Information (if applicable)

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

Person Completing this Report (check one)

- Owner (If name and address are the same as the Owner Information block, do not repeat)
- Leaseholder (If name and address are the same as the Leaseholder Information block, do not repeat)
- Designated Representative
 - Name and Title
 - Business Telephone Number and Business fax Number
 - Business E-mail address (if available)

EDR filing Status

- Check appropriate statement to describe EDR filing status
- Buyer/Leaseholder Information (if applicable)

Buyer/Leaseholder Name
Telephone No (include area code)
Business Address
Date of Sale or Lease (day/month/year)
Certification Signature and date signed

Catcher Vessel Crab EDR

CR Crab Ex-vessel Sales, by CR Fishery and Quota Type

Total pounds of BSAI crab landed by this vessel and sold to crab buyers during the previous calendar year
Exclude deadloss crab that is discarded unsold at the landing
Gross revenue from crab delivered to processors during the calendar year

CR Crab Fishing Quota Costs, by CR Fishery and Quota Type Market-Value and Negotiated-Price Transfers Only

Total pounds of transferred crab fishing quota used to land crab caught by the vessel during the previous calendar year
Total gross cost paid as monetary compensation, after taxes or fees are deducted

CR Crab Crew Labor Costs, by CR Fishery

Total amount paid to vessel crew members for fishing labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master. Include all post-season adjustments paid as of the date of submitting this EDR

Total payment made to the captain(s) for vessel master services in CR fisheries during the previous calendar year. Include all post-season adjustments paid as of the date of submitting this EDR

Vessel Operating Expenses, by CR Fishery

Total cost of food and provisions purchased for use in each CR fishery during the previous calendar year
Total cost of bait purchased for use in each CR fishery during the calendar year
Total gallons of fuel consumed by the vessel while operating in each CR fishery

Vessel Operating Expenses, Annual

Fuel Cost, Annual

Total quantity of fuel purchased for the vessel during the previous calendar year, in gallons
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

Vessel Labor Cost

Total direct payment to vessel crew and captain for labor performed in all vessel operations during the calendar year, including shipyard labor and tendering

Indicate whether the vessel performed tendering in any fishery during the previous calendar year

BSAI Crab Crew Licenses and CFEC Permits

Record either the Alaska Commercial Crew license number or a State of Alaska Commercial Fisheries Entry Commission (CFEC) gear operator permit number for each individual who worked as a captain or crewmember during the previous calendar year

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).

Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number. Record one license or permit number per crewmember. Do not record any crewmember more than once.

Revised number of respondents from 95 to 2, based on actual data. Revised photocopy cost from 10 cents per page to 5 cents per page. Changed time to complete from 10 hr to 20 hr and changed accountant expense from \$100 to \$165 in response to a comment on OMB Control No. 0648-0401, which also requires accountant services.

Catcher vessel crab EDR, Respondent	
Number of respondents	2
Full EDRs = 2	
Certification only = 0	2
Total annual responses	
Frequency of response = 1	40 hr
Total burden hours	
Time per full EDR response (20 hr x 2)	
Total personnel cost (completed by contractor)	\$0
Total miscellaneous costs (501.50)	\$6,242
Photocopy -- Full EDR = \$0.05 x 15pp x 2 = 1.50	
Online submittal costs (0 x 2)	
Accountant completion of EDR (165 x40= \$6,240)	

Catcher vessel crab EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel costs	0
Total miscellaneous costs	0

b. Annual catcher/processor crab EDR [CHANGED]

Any owner or leaseholder of a catcher/processor that harvested or processed CR crab in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed catcher/processor EDR for annual data for the previous calendar year.

Catcher/processors participate in both harvesting and processing and therefore, the catcher/processor crab EDR includes elements for the collection of harvesting and processing information.

Annual catcher/processor crab EDR Certification page

Catcher/processor Information

- Catcher/processor Name and ADF&G Processor Code
- Registered Crab Receiver Permit Number
- Crab License Limitation Permit Number(s)
- USCG Documentation Number
- Current Estimated Market Value of Vessel and Equipment
- Replacement Value of Vessel and Equipment
- Name of Crab Harvesting Cooperative (if applicable)

Vessel Owner Information

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

Leaseholder Information (if applicable)

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

Person Completing this Report (check one)

- Owner (If name and address are the same as Owner Information block, do not repeat)
- Leaseholder (If name and address are as Leaseholder Information block, do not repeat)
- Designated Representative

Name and Title
Business Telephone Number and Business fax Number
Business E-mail address (if available)

EDR filing Status

Check appropriate statement to describe EDR filing status
Buyer/Leaseholder Information (if applicable)
Buyer/Leaseholder Name
Telephone Number (include area code)
Business Address
Date of Sale or Lease (day/month/year)

Signature and date signed

Annual catcher/processor crab EDR

CR Crab Ex-vessel Sales, by CR Fishery and Quota Type

Total pounds of BSAI crab landed by this vessel and sold to crab buyers during the previous calendar year.
Gross Revenue from crab delivered to processors during the calendar year

CR Crab Product Sales

Species Code for CR crab product sold in previous calendar year
Product Code for each product.
Process Code. If more than one process was used to create a specific crab product form (such as cooked and frozen crab sections), enter more than one process code in the process code box for that product
Box Size category code for each product sold
Total finished pounds of each product sold
Gross First Wholesale Revenue: Record the amount you received for each product sold

CR Crab Custom Processing Services Provided, by CR Fishery

CR Fishery Code for each CR fishery in which you provided custom processing services
Product Code for each product
Process Code for each product
Total Raw Pounds of CR crab provided by RCRs receiving custom processing services
Finished Pounds or total pounds of output for each custom processed product
Custom Processing Revenue received for custom processing the specified products

Raw CR Crab Purchases from Delivering Vessels, by CR Fishery and Quota Type

Total pounds of Raw Pounds Purchased
Total Gross value of raw crab purchases, including all post-season adjustments paid to sellers

CR Crab Custom Processing Services Purchased, by CR fishery

CR Fishery Code for each CR fishery in which you purchased custom processing services
Product Code for each product.
Process Code for each product.
Total Raw Pounds of CR crab provided to processors providing custom processing services
Finished Pounds or total pounds of output for each custom processed product
Processing Fee or payment made to custom processors for each crab product

CR Crab Fishing and Processing Quota Costs, by CR Fishery and Quota type - Market-Value and Negotiated-Price Transfers Only

Total pounds of transferred crab fishing (IFQ, CDQ) and/or processing (IPQ) quota used to harvest CR crab on the vessel or purchase CR crab from delivering vessels during the previous calendar year
Total gross cost paid as monetary compensation, before taxes or fees are deducted

CR Crab Crew Labor Cost, by CR Fishery

Total amount paid to vessel fishing crew and processing employees for labor services in CR fisheries during the previous calendar year, not including any amount paid to individuals as captain or vessel master
Total payment made to the captain(s) for vessel master services in CR fisheries during the calendar year
Indicate whether you provided paid health insurance or retirement benefits to captain or crew members in addition to labor payments reported above

Vessel Operating Expenses, by CR Fishery

Total cost of food and provisions purchased for use in each CR fishery during the previous calendar year
Total cost of bait purchased for use in each CR fishery during the calendar year
Total gallons of fuel consumed by the vessel while operating in each of the CR fisheries

Vessel Operating Expenses, Annual

Fuel Cost, Annual

Total quantity of fuel purchased for the vessel during the previous calendar year, in gallons.

Total payment for fuel purchased for the vessel during the previous calendar year, including all sales taxes and surcharges

Vessel Labor Cost, Annual

Total direct payment to vessel processing employees, fishing crew, and captain for labor performed in all vessel operations during the calendar year, including shipyard labor and tendering

BSAI Crab Crew Licenses and CFEC Permits

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).

Changed accountant expense from \$100 to \$165 in response to a comment on OMB Control No. 0648-0401, which also requires accountant services. Changed number of respondents from 3 to 75 based on actual numbers.

Catcher/processor crab EDR, Respondent	
Number of respondents	75
FULL = 74	
Certification only = 1	
Total annual responses	75
Frequency of response = 1	
Total burden hours	1,482 hr
Time per FULL EDR (20 hr x 74 = 1480)	
Time per Certification only (2 hr x 1 = 2)	
Total personnel cost (contractor)	\$0
Total miscellaneous costs	\$244,575
Photocopy \$0.05 x 12pp x 75 = 45	
Online submittal costs (0 x 75)	
Accountant completion of EDR (\$165/hr x 1482 = \$244,530)	

Catcher/processor crab EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Total miscellaneous costs	0

c. Annual Processor (Shoreside Processor, Stationary Floating Processor, or Registered Crab Receiver) Crab EDR [CHANGED]

Any owner or leaseholder of an SFCP or a shoreside crab processor that processed CR crab, including custom processing of CR crab performed for other crab buyers, in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed processor EDR for annual data for the previous calendar year.

Any holder of a registered crab receiver (RCR) permit that obtained custom processing for CR Program crab in the previous calendar year must submit to the DCA, electronically or at the address provided on the form, a completed processor EDR for annual data for the previous calendar year.

Processor EDR Certification page_

Processor Information

Name and ADF&G Processor Code

RCR Permit Number

USCG Documentation Number

Current Estimated Market Value of processor and Equipment
Replacement Value of SFCP and Equipment

Owner Information

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

Leaseholder Information (if applicable)

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

Person Completing this Report

Indicate if owner, leaseholder, or designated representative

If Designated Representative

Name and Title

Business Telephone Number and Business Fax Number

Business E-mail address (if available)

EDR Filing Status

Select the appropriate statement to describe EDR filing status

Buyer/leaseholder Information

Name

Business Telephone Number and Business Fax Number

Business E-mail address (if available)

Signature and date signed

Processor EDR

CR Crab Product Sales

CR Crab Sales to Affiliated Entities

Species Code for CR crab product sold

Product Code for each product

Process Code

Box Size Code for each product sold

Total finished Pounds of each product sold

Gross First Wholesale Revenue you received for each product sold

CR Crab Sales to Unaffiliated Entities

Species Code for CR crab product sold

Product Code for each product

Process Code

Box Size Code for each product sold

Total finished Pounds of each product sold

Gross First Wholesale Revenue you received for each product sold

CR Crab Custom Processing Services Provided, by CR Fishery

CR fishery code for each CR fishery in which you provided custom processing services

Product Code for each product

Process Code

Total raw pounds of CR crab provided by RCRs receiving custom processing services from this facility

Total finished pounds or total pounds of output for each custom processed product

Custom Processing Revenue received for custom processing the specified products

Raw CR Crab Purchases from Delivering Vessels, by CR Fishery and Quota Type

Total Raw pounds purchased

Total gross value of raw crab purchases, including all post-season adjustments paid to sellers

CR Crab Custom Processing Services Purchased, by CR Fishery

CR Fishery Code for each CR fishery in which you purchased custom processing services

Product Code for each product.

Process Code

Total Raw Pounds of CR crab provided to processors providing custom processing services

Finished Pounds or total pounds of output for each custom processed product

Processing Fee or payment made to custom processors for each crab product.

CR Crab Processing Quota Costs by CR Fishery - Market-Value and Negotiated-Price Transfers Only

Total pounds of transferred crab (IPQ) acquired for your use in purchasing landed CR crab during the previous calendar year

Total gross cost paid as monetary compensation, before taxes or fees are deducted. Include all post-season adjustments paid as of the date of submitting this EDR, but do not report any payments not paid by this date

Crab Processing Labor Cost, by CR Fishery

Total Man-Hours or the sum of all hours worked by crab processing workers for each CR fishery

Total Labor Payment or total gross wages paid to crab processing workers in each CR fishery

Computed Average Hourly Wage (web form only)

General Non-processing Labor Expenses, Annual

Number of Employees or the number persons employed in non-processing positions at the processing facility during the previous calendar year

Salaries and wages or total calendar year gross wages for non-processing employees

CR Crab Processing Employee Residence

Official locations of residence

Number of individuals employed, by location.

For residence locations in Alaska, list individual Alaska cities

For US locations outside of Alaska, list individual US states

For non-US locations, list individual counties

For each location of residence

Total number of individuals employed processing CR crab

Total number of individuals employed in seafood processing in all fisheries, including CR crab

Changed time to complete from 10 hr to 16 hours based on actual numbers. Changed accountant fee from \$100 to \$165/hr. Changed number of respondents from 18 to 22.

Processor crab EDR, Respondent	
Number of respondents	22
SFCP = 1	
Shoreside = 21	
Total annual responses	22
Frequency of response = 1	
Total burden hours	310 hr
Full EDR = 16 hr x 19 = 304	
Certification only = 2 hr x 3 = 6	
Total personnel cost (completed by contractor)	\$0
Total miscellaneous costs (77513.20)	\$51,163
Photocopy (\$0.05 x 12pp x 22 = 13.20)	
Online submittal costs (0 x 22)	
Accountant fee to complete EDR (\$165 x 310 = 51,150)	

Processor crab EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel costs	0
Total miscellaneous costs	0

d. Verification of data [CHANGED]

Crab EDRs were developed to aid the Council and NMFS in assessing the success of the program and developing amendments necessary to mitigate any unintended consequences. To ensure that the data submitted by respondents in the EDRs is accurate, PSMFC contracted an auditor, AKT CPAs and Business Consultants. The auditor developed a process to review the data contained within submitted EDRs, including verification audits for those EDRs containing odd or suspicious data values, and conducted random audits for a certain percentage of submitted

EDRs. Each year's audit report is posted (see http://www.psmfc.org/alaska_crab/documents/2014_audit_results.pdf).

In summary, the purpose of the CR EDR and data validation is to:

- Aid the Council and NMFS in assessing the success of the CR Program;
- Understand the economic performance of crab fisherman;
- Understand how the economic performance has changed after rationalization;
- Isolate the effects attributable to the CR Program;
- Assess the validity of data reported in submitted EDRs; and
- Provide guidance on improvements in the EDR process to improve the validity of future data reporting

The owner or leaseholder must provide copies of additional data to facilitate verification. The auditor may review and request copies of additional data 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.

Auditors will verify records by comparing specific elements of the report with participant accounting records. To make this activity as efficient and non-intrusive as possible, NMFS suggests that participants:

- ◆ Keep a copy of the completed EDR or certification pages submitted to PSMFC. Copy and attach extra sheets as needed.
- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Ensure that the EDR agrees to the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:
 - Audited financial statements
 - Reviewed financial statements
 - Compiled financial statements
 - Tax returns.

The verification questions are usually small in number and occur through a telephone call or other short communication made by the auditor. The owner or leaseholder must respond to inquiries by the auditor within 20 days of the date of issuance of the inquiry. The 20-day response period is necessary in case there are EDR verification questions that are sequential based on previous questions.

Changed number of respondents and responses from 101 to 99. Changed burden hours from 808 to 792. Changed personnel cost from \$20,200 to 0. Changed miscellaneous cost to include cost from accountant to respond to audit.

Verification of Data, Respondent	
Number of respondents	99
Catcher vessels = 2	
Catcher/processors = 75	
Processors = 22	
Total annual responses	99
Frequency of response = 1	
Total burden hours	792 hr
Time per response = 8 hr	
Total personnel cost (completed by contractor)	0
Total miscellaneous costs	\$16,434
Photocopy (\$0.05 x 20pp x 99 = 99)	
Accountant fee to respond to auditor (\$165 x 99=16,335)	

Verification of Data, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel costs	0
Total miscellaneous costs	0

It is anticipated that the information collected by the proposed action will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about Crab Rationalization. NMFS 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 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 downloaded from the NMFS web site at <http://alaskafisheries.noaa.gov/sustainablefisheries/crab/rat/edr/default.htm>, printed, and submitted by e-mail or fax to PSMFC or submitted online at: http://www.psmfc.org/alaska_crab/.

The online web application of the EDRs is used almost unanimously. The online version reduces the time required for data processing by PSMFC and allows data providers to enter data directly into an online database. The online form includes additional directions and built-in error checking; this reduces the number of follow-up calls from PSMFC for error-correction purposes.

4. Describe efforts to identify duplication.

No duplication exists in this collection.

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

Two catcher vessel owners will be required to submit EDRs under this action, hence are directly regulated by this action. Of these, one is a small entity based on the \$4.0 million threshold for defining small entities. The reason few of these vessels are small entities is that crab are relatively high value and most vessels belong to harvesting cooperatives, which pool IFQ for harvest.

Seventy-five catcher/processor owners are required to submit a catcher/processor EDR. None of these catcher processors is a small entity based on the \$4.0 million threshold for defining small entities.

Twenty-two entities are required to submit shore-based or floating processor forms (as either plant operators or individual processing quota holders that sell crab processed through custom processing arrangements). Of these, four are small entities that are controlled by community development corporations or non-profit entities; and five are estimated to be small entities because they employ fewer than 500 employees.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The intent of this collection is to study the impacts of the CR Program; to ensure that the program achieves equity between the harvesting and processing sectors; and to monitor the economic stability for harvesters, processors, and coastal communities. Without the specified reporting scheme described in this Supporting Statement, the program would be jeopardized.

NOAA Fisheries Office for Law Enforcement uses the individual and confidential EDR data to ensure industry compliance with the data reporting requirements of the CR Program. Compliance monitoring is an integral component of collecting reliable and accurate data. It would not be possible to ensure reporting compliance from the firms that are required to provide the data in a timely fashion without these enforcement tools.

If NMFS did not collect this information, all components of Pub. L. No. 108-199 would be threatened. Public Law No. 108-199 requires that each component of the CR Program enacted by Congress must be implemented or the whole program must be withdrawn. NMFS would be unable to provide data to the Council and the State of Alaska to evaluate the CR Program for each of the required review periods if the collection were not conducted.

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 Federal Register Notice published on December 15, 2015 (80 FR 77614) solicited public comment. No comments were received.

In addition, NMFS requested comments through a survey of participants and received the following comments:

Comments & Responses – 0518 renewal (3/16)

Sent 28 emails requesting comments March 21/22; one email was returned with incorrect address. Received 5 responses resulting in 5 comments.

Comment 1 (attached as a supplementary document):

This comment comes from a seafood industry trade association representing roughly 70% of the harvest sector participants in the BSAI crab fishery. The organization has been very involved in the Council process over the years and many of their members were integral to the development of the Crab Rationalization program over a decade ago. More specifically, they have been full participants in the ongoing discussion regarding the Crab EDRs. Several years ago the organization convened an internal working group to focus on EDR's. This working group consists of not only vessel owners and managers, but also many of the accountants and bookkeepers that actually "keep the books" and fill out the EDR's on behalf of their clients. As such, this letter reflects the collective expertise of many people who are intimately involved in the EDR process in any given year.

The Crab EDR program marked a significant change in the management of the BSAI crab fishery. As a publicly owned resource it is clearly the responsibility of managers at the state and Federal level to understand how this change impacts the resource, crab-dependent coastal communities, harvesters, processors, and other stakeholders. Based on that rationale, the Crab EDR program collected economic data for several years pre-Rationalization and has continued to collect data each year in the post-Rationalization period. While the working relationship has been strained at times, the harvest sector remains committed to working with NMFS to ensure that data are collected in the most efficient and least burdensome manner possible, while at the same time providing meaningful information upon which to base management decisions. As long as the data continues to be collected with these objectives in mind, we believe it has great public utility.

The commenter agreed that the instructions are fairly clear.

The commenter notes that the estimated time for response of 10 hours per response is a significant underestimate. They estimate the true time per response is closer to 20-25 hours over the course of a year. In the case of an EDR submission that is subject to an audit, we would estimate an additional 10 hours.

Response:

NMFS agrees with the increased time to complete and will change from 10 hours to 20 hours for the catcher vessel Crab EDR.

Comment 2:

Commenter said he does a lot of the coordination among crab harvesters regarding EDR's. He questions the two comment periods: one for the FR notice and one for the survey.

Response:

NMFS explained that there are two comment periods: one for the FRN and one for the survey. These two comment periods afford respondents two opportunities to provide comments to NMFS.

Comment 3:

The commenter said he completes Processor Crab EDRs for a Kodiak plant which takes one or two deliveries of EDR Crab annually. He suggests a minimum threshold should be established for how much crab must be purchased before the full EDR report is required to be completed. He gave this example: his plant purchased 173 million round pounds of fish last year and only 16,000 lbs of it was EDR Crab. Yet he was still required to spend 2 days working on this report and attempting to pick out the crab related expenses from the rest; it's actually difficult to apportion some of these expenses. He thinks the report actually takes longer than the estimated time of 10 hours, but even 10 hours is a lot for 16,000 lbs of qualifying crab.

Response:

NMFS disagrees with a minimum threshold because it is important to know how the EDR affects all respondents.

Comment 4:

Commenter says the Catcher vessel Crab EDR form is fine. Instructions are clear. Would prefer not to have to do these yearly, but the new forms are much less time consuming than the originals were. She is not sure about the public utility of the information. She does EDR reports for 2 crab catcher vessels.

Response:

NMFS acknowledges this comment.

Comment 5:

Commenter says that her husband is not available to complete the survey because he is in Alaska fishing herring. He will not return until early April to respond to the survey.

Response:

NMFS acknowledges that this comment shows that it is important to request comments more than once to allow fishermen to respond within their schedules.

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.

The EDR data are confidential and are not disseminated to the public. PSMFC disseminates the EDR data to NMFS, ADF&G, and the Council staff after removing all personal identifiers such as vessel identification numbers, names, addresses, and telephone numbers. PSMFC assigns a randomized identification number that can be matched between datasets.

As stated on the forms, the information collected is confidential under section 303(d) of the Magnuson-Stevens Act (16 U.S.C. 1801 et seq.) and under [NOAA Administrative Order \(AO\) 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. It was last revised in 1994.

NOAA also follows regulatory procedures for data confidentiality found at [50 CFR Sec. 600.405](#) et seq. The Magnuson-Stevens Act generally prohibits collection of economic data, particularly from processing entities. In the legislation for the CR Program, an exception was created to the prohibition. NMFS was directed to implement a mandatory economic data program and feed the data to prescribed entities, with or without identifiers, depending on the entity.

NMFS will retain control over the information that is supplied, and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information.

A system of records notice for COMMERCE/NOAA System-16; Crab Economic Data Report for Bering Sea/Aleutian Islands Management Area (BSAI) off the coast of Alaska, published on March 3, 2005 (70 FR 10360). An amended notice, Alaska Economic Data Reports including additional economic data collections collected under other OMB Control Nos. (0648-0518 (Crab Rationalization Program); 0648-0633 (Chinook Salmon); 0648-0564 (Groundfish Trawl Catcher/processor); and 0648-0700 (Gulf of Alaska Catcher/Vessel & Processor Trawl), was published on October 9, 2015 (80 FR 61157) and became effective on November 23, 2015.

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.

Estimated total respondents: 99, down from 101. Estimated total responses: 198, down from 217. Estimated total burden: 2,624 hr, up from 1,848 hr. Estimated total personnel costs: 0, down from \$20,200.

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 Question 12 above).

Estimated total miscellaneous costs: \$318,414, up from \$101,746.

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

Estimated total burden: 0 hr. Estimated total personnel costs: \$0.

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

There are no program changes.

Adjustments

Catcher Vessel EDR

- a decrease of 78 respondents and responses, 2 instead of 80
- a decrease of 760 hours, 40 instead of 800 hr
- a decrease of \$73,882 miscellaneous costs, \$6,242 instead of \$80,124

Catcher/processor EDR

- an increase of 72 respondents and responses, 75 instead of 3
- an increase of 1,452 hours, 1,482 instead of 30 hr
- an increase of \$241,574 miscellaneous costs, \$244,575 instead of \$3,001

Processor EDR

- an increase of 4 respondents and responses, 22 instead of 18
- an increase of 130 hours, 310 instead of 180 hr
- an increase of \$33,152 miscellaneous costs, \$51,163 instead of \$18,011

Audit/verification

- a decrease of 2 respondents and responses, 99 instead of 101
- a decrease of 16 hours, 792 instead of 808 hr
- a decrease of 20,200 personnel costs, \$0 instead of \$20,200
- an increase of \$15,828 miscellaneous costs, \$16,434 instead of \$606.

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

The Council uses the data for ongoing monitoring of and developing amendments to the CR Program. In addition, the EDR data are used in analyses for the Alaska Stock Assessment and Fishery Evaluation (SAFE) Report. The SAFE is a document or set of documents that provides the Council with a summary of information concerning the most recent biological condition of stocks and the marine ecosystems in the Fishery Management Unit and the social and economic condition of the recreational and commercial fishing interests, fishing communities, and the fish processing industries. The SAFE report may be used to update or expand previous environmental and regulatory impact documents, and ecosystem and habitat descriptions.

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.