

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

A. This action requests extension of an existing 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 FMP 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

The Annual Trawl Catcher Vessel Economic Data Report and the Annual Shoreside Processor Economic Data Report are part of the Gulf of Alaska Trawl Economic Data Report Program, which evaluates the economic effects of current and future groundfish and prohibited species catch (PSC) management measures for the Gulf of Alaska (GOA) trawl fisheries. This program includes a third economic data report (EDR), which is approved under OMB collection number 0648-0564.

The EDRs provide the Council and other analysts with baseline information on affected harvesters, crew, processors, and communities in the GOA. The data collected includes labor information, revenues received, capital and operational expenses, and other operational or financial data. The information collected through the EDRs is used as a baseline intended to assess major changes in groundfish management, including potential catch share programs for PSC species and target species.

The Annual Trawl Catcher Vessel EDR is submitted by owners or leaseholders of catcher vessels fishing with trawl gear for GOA groundfish. The Annual Shoreside Processor EDR is submitted by owners or leaseholders of shoreside processors or stationary floating processors receiving deliveries from vessels using trawl gear fishing for groundfish in the GOA.

A. JUSTIFICATION

These EDRs provide baseline information to better understand the economic impacts of NMFS-provided measures on industry. This data will allow comparisons of the effects of potential GOA

management changes before and after implementation, with the primary focus on harvesting and processing crew employment and compensation.

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

The GOA Trawl EDR Program evaluates the economic effects of current and future groundfish and PSC management measures for the GOA trawl fisheries. Information collected in these EDRs is used 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 allow NMFS to track the harvesting crew (captains, engineers, deck crew, and cook) over time and provide baseline data for studies to understand how employment and compensation change in the GOA trawl fisheries.

To better understand the potential economic and employment impacts, the following owners or leaseholders must submit an EDR:

- ◆ Annual Trawl Catcher Vessel EDR. All catcher vessels that harvest groundfish using trawl gear from the GOA or parallel fisheries.
- ◆ Annual Shoreside Processor 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.

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

- ◆ Crew members that participate in the GOA trawl fishery;
- ◆ Processing workers that work in plants processing trawl-caught groundfish from the GOA (and the Bering Sea and Aleutian Islands [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) [adjusted]

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 focuses 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. Crew identifiers are collected and can be linked to the State of Alaska commercial crew database 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) is collected from catcher vessels. These costs are not apportioned among fisheries, because it would require too many assumptions by the person completing the survey. However, the fuel usage is maintained and readily available by vessel for all GOA trawl fisheries in aggregate.

Trawl gear cost data is collected. Reported costs include aggregate trawl gear purchases and leases in a calendar year (e.g., nets, doors, rollers, cables). These costs also include those incurred for prohibited species catch (PSC) excluder devices that are obtained with the intent that they will be used with trawl gear in the GOA. Data is based on costs that are fully expensed during the year (consistent with the structure used in the Annual Trawl Catcher/Processor EDR approved under OMB number 0648-0564).

A complete Trawl Catcher Vessel 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) has been designated by NMFS to be the Data Collection Agent for the GOA Trawl EDR Program. Pacific States mails EDR announcements and filing instructions to owners or leaseholders of GOA trawl catcher vessels by April 1. A printed EDR may be requested by telephone at 1-877-741-8913 or by email at edr@psmfc.org.

EDR submitters are encouraged to complete the form online. The 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>

Annual 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 (\$)

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
Printed name of vessel owner or designated representative

Vessel expenses, annual

Gallons: Record the total quantity of fuel purchased for the vessel during the previous calendar year, in gallons. Include all fuel purchased during the calendar year for fishing and non-fishing use of the vessel. Do not include the quantity of fluids other than fuel.

Cost: Record the total payment for fuel and fluids purchased for the vessel during the calendar year, including all sales taxes and surcharges. Include the cost of lubrication and other fluids added by fuel suppliers while fueling the vessel, but do not include costs of fluids added during vessel maintenance other than fueling.

Trawl Gear Cost: Record the total direct expenditures for lease, purchase, installation, and/or repair of trawl fishing gear. Include costs for all nets, doors, rollers, cables, excluder devices other than salmon and halibut excluders, and other associated items during the calendar year. Report all direct expenditures, including the cost for capitalized investment purchases as well as purchases that were fully expensed for the year. Exclude finance costs associated with purchases, such as lender fees or interest payments.

Excluder Device Cost: Record the total direct expenditures for lease, purchase, installation, and/or repair of excluder devices for salmon and halibut during the calendar year. Report all direct expenditures, including the cost for capitalized investment purchases as well as purchases that were fully expensed for the year. Exclude finance costs associated with purchases, such as lender fees or interest payments. Report costs for any excluder devices other than those intended to reduce salmon or halibut bycatch with other trawl gear costs below.

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 all persons who worked as captain of the vessel during GOA trawl fisheries. List the amount actually paid to the captains, 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 respondents was increased to 102 from 70 to reflect the number of EDRs submitted in 2016 (for year 2015). An adjustment was made to reflect that the EDR is submitted online, without additional miscellaneous costs (a decrease of \$197 to \$0).

Trawl Catcher Vessel EDR, Respondent	
Number of respondents	102
Total annual responses	102
Frequency of response = 1	
Total burden hours	1,530 hr
Time per response = 15 hr	
Total personnel cost (\$37/hr x 1530)	\$56,610
Total miscellaneous costs (\$0)	\$0
Online (\$0 x 102)	

Assuming that the data elements in this analysis are imposed on 102 catcher vessels, the cost would be about \$65,000 per year to maintain the program through a contractor. These costs would include collecting, verifying, storing, maintaining, and analyzing the data.

Trawl Catcher Vessel EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Total annual maintenance costs	\$65,000

b. Annual Shoreside Processor Economic Data Report (EDR) [adjusted]

The owner or leaseholder of a shoreside processor or stationary floating processor with a Federal Processor Permit that processes groundfish caught by vessels fishing with trawl gear in the Western and Central GOA reporting area must submit an Annual Shoreside Processor 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. 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, and Sand Point. There are also two stationary floating processors taking groundfish deliveries in recent years.

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, this processor is included under this program. Monthly information on processing workers is collected from shoreside processors and stationary floating processors. This information helps 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, is 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 can supply an annual summary of usage by month to each processor. Processors then pass those summaries on to NMFS at minimal or no cost. This information is collected from processors that use a community owned water and electric system. Applying the data requirement to community owned water and electric systems focuses the data collection on Kodiak. 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 is 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 provide information on peak utility usage. If peak utility usage is reduced under a PSC management plan or other types of management actions are implemented that affect harvesting and processing efficiency, then costs to Kodiak associated with gearing up for peak demand may be affected. The 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 is estimated at three hours per submission.

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 has been designated by NMFS to be the Data Collection Agent for the GOA Trawl EDR Program. Pacific States mails EDR announcements and filing instructions to permit holders by April 1. To request a printed EDR by mail, call 1-877-741-8913, or email a request to edr@psmfc.org.

The 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>

ANNUAL SHORESIDE PROCESSOR EDR

CERTIFICATION PAGE

Shoreside Processor Information

Shoreside Processor Name
Federal Processor Permit Number
ADF&G Processor Code
Physical Location of Land-based Plant (street address, city, state, and zip code)
Borough Assessed Value of Plant and Equipment (\$)
Current Estimated Value of Plant and Equipment (\$)

Stationary Floating Processor (SFP) Information

Stationary Floating Processor Name
Federal Processor Permit Number
ADF&G Processor Code
USCG Documentation Number
Current Estimated Market Value of SFP and Equipment (\$)
Current Estimated Replacement Value of SFP and Equipment (\$)

Owner Information

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)

EDR Requirement

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
 Printed name of processor owner or designated representative

Monthly employment data

Labor, Processing crews
 Average Number of processing employees (monthly)
 Processing employee Man-hours, monthly by housing status
 Processing employee wages, monthly by housing status (excluding managers, foremen, & other non-processing employees)

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

An adjustment was made to reflect that all EDR forms are submitted online and do not have miscellaneous costs and the increase in burden hours from 3 hours to 15 hours per respondent (270 hours increased from 54 hours) and an associated cost increase from \$1,998 to \$9,990, and the estimated annual maintenance cost to the Federal Government (\$8,000 instead of \$10,000 as reported in 2014). The respondent hours were increased in response to comments received. All EDRs are submitted online, resulting in \$0 miscellaneous costs, a decrease of \$12.

Shoreside 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	270hr
Time per response = 15 hr	
Total personnel cost (\$37/hr x 270)	\$9,990
Total miscellaneous costs (0)	\$0
Online (\$0 x 18)	

The agency cost of the processor EDR is projected to be about \$8,000 per year to cover the collection, verification, storage, and maintenance of the data from about 18 processors.

Shoreside Processor EDR, Federal Government	
Total annual responses	0
Total burden hours	0
Total personnel cost	0
Annual maintenance costs	\$8,000

Data Verification

Pacific States verifies the information in the Annual Trawl Catcher Vessel EDR and the Annual

Shoreside Processor EDR 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.

Pacific States verifies the accuracy of each EDR to ascertain anomalies, outliers, and other deviations from the values of 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.

NMFS anticipates that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information the GOA trawl fisheries. 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 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 Pacific States web site at <http://www.psmfc.org/goatrawl/index.html>, 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 stationary floating processor entities are classified as small using Small Business Administration (SBA) guidelines. These processors meet the small entity criterion because of the number of employees worldwide. These processors also have no known cooperative affiliation. Approximately 17 unique shoreside plants meet the small entity criterion.

Two Western Alaska Community Development Quota (CDQ) groups own harvesting vessels that operate in the GOA groundfish fisheries that are considered small entities for purposes of the Regulatory Flexibility Act.

There are 72 trawl catcher vessels that completed EDRs in 2016, with 26 vessels considered small business entities under SBA guidelines that are affected by this information collection.¹ The number of actual vessels fishing in 2016 was 72 and the number of entities filling out an EDR varies due to multiple LLPs being fished on the same vessel or an LLP holder complying with the EDR requirement in a year when they did not fish for groundfish in GOA. The SBA information reflects the number of vessels that actually fished, not individual LLP holders.

The collection of information was designed to collect information that was not already a collection.

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

The GOA Trawl EDR Program collects baseline information on the economic structure of the groundfish fishery before modifications to the fishery are implemented. This collection is a focused data collection program to provide data that are currently unavailable, can be collected with minimal burden on industry, and 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.

Collecting data on utility usage is 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.

Management actions that affect the amount of processing activity affect the burden on community infrastructure and can help analysts estimate the impacts of proposed actions. 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.

¹ Alaska Fisheries Information Network data, 2017.

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.

NMFS published a Federal Register Notice on July 6, 2017 (82 FR 31305), to solicit public comment. The comment period ended on September 5, 2017. NMFS received three comments on the notice. Two comments addressed the GOA Trawl Catcher Vessel EDR and one comment addressed the GOA Trawl Processor EDR.

NMFS also solicited comments through a questionnaire emailed to stakeholders that filed an EDR in 2015, the most recent year that was completed. The questionnaires were sent to stakeholders that operate and represent the vessels and processing facilities that harvest and process groundfish. NMFS received six comments in total. Three were from two individuals that were familiar with the information collection, two stakeholders stated they had no comments regarding this information collection, and one comment addressed the GOA Trawl Processor EDR.

All of the comments are summarized below.

GOA Trawl Catcher Vessel EDR	
Does this information collection continue to be necessary?	
Comment 1: Yes Comment 2: No	NMFS Response: NMFS acknowledges the comments.
Is the information needed to complete the EDR readily available? If not, please explain.	
Comment 1: Yes	NMFS Response: NMFS acknowledges the comment.
What section of the form is the most complex to fill out?	
Comment 1: Table 3 (Harvest Crew Licenses/Permits) are the most difficult and time consuming.	NMFS Response: NMFS notes this response. The EDR was designed to collect standardized data and provide economic data to aid the Council, with a focus on collecting crew employment and compensation information.
Is our estimate of 15 hours to complete and submit this report accurate? If not, please explain.	
Comment 1: Depends on how detailed records are for the year prior, most take 1-3 hours, but can take up to 15 hours.	NMFS Response: Based on this comment, NMFS made no changes to the estimate of hours to complete this EDR.
Do you have additional comments related to this information collection?	
Three commenters suggested that information requested should be made clearer and to specify the consequences for failure of compliance.	NMFS response: NMFS will review the EDR instructions to determine if they could be clarified. Any changes to the EDR form would be implemented consistent with the recordkeeping and reporting requirements established by the PRA.

Additional comments offered suggestions for specific elements of the collection:

Comment 1: Two commenters recommended that NMFS discontinue collecting the information in Table 1 (Cost Estimates for Fuel and Fishing Gear) because these costs are not specific to GOA trawl groundfish.

Comment 2: Two commenters supported continued collection of the information in Table 2 (Labor Payments to Captains and Crew).

Comment 5: One commenter recommended that NMFS discontinue collecting the information in Table 3 (Harvest Crew Licenses/Permits).

NMFS has the flexibility to modify EDR data fields without a corresponding regulatory amendment. This approach allows NMFS to consult with EDR submitters and the Council, and based on consultation, amend, add, or remove specific data requests as needed. This approach ensures the EDRs are providing relevant data for conservation and management purposes. In response to the comments suggesting that NMFS discontinue collection of specific information, NMFS will evaluate how the information is being used and determine whether the collection should be modified in the future. NMFS also will review the EDR instructions and determine if they could be clarified. If NMFS determines that modifications to the collection are necessary, NMFS will consult with EDR submitters and the Council under the established process.

GOA Annual Shoreside Processor EDR	
Does this information collection continue to be necessary?	
Comment 1: Yes	NMFS Response: NMFS acknowledges the comment.
Is the information needed to complete the EDR readily available? If not, please explain.	
Comment 1: Two commenters noted they were required to create a new report for Processing Labor Man-Hours and Processing Labor payment section to provide the requested information.	NMFS Response: NMFS acknowledges that portions of the EDR may compile data that is not readily available. The public burden hours have been increased to 15 hours.
What section of the form is the most complex to fill out?	
Comment 1: Two commenters specified that the Processing Labor Man-Hours and Processing Labor payment section was the most complex.	NMFS Response: NMFS notes this response. The design of the EDR was to collect standardized data and provide economic analysis to aid the Council, with a focus on collecting crew employment and compensation information.
Is our estimate of 3 hours to complete and submit this report accurate? If not, please explain.	
Comment: It took a couple of days to make the report for Processing Labor. It took only a couple of hours to complete other sections. Comment 2: Takes up to two working days so 15 hours is more accurate.	NMFS Response: NMFS acknowledges that the report for Processing Labor took longer than initially estimated. NMFS increased the burden hours estimate from 3 to 15 hours to reflect this comment.
Do you use the online access to submit the report? Please explain why or why not.	
Comment 1: Yes, we use the online access to submit the EDR since it is easier.	NMFS Response: NMFS acknowledges that online access is easier and more efficient.
Do you have additional comments related to this information collection?	
Comment 1: Our members believe that the instructions are clear. Comment 2: The introduction to the EDR should state that the form should be completed by the shoreside processor or floating processor and the consequences if they fail to comply.	NMFS response: NMFS will review the EDR instructions to determine if they could be clarified. Any changes to the EDR form would be implemented consistent with the recordkeeping and reporting requirements established by the PRA.

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 to respondents for the GOA Trawl EDR 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 prevents 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 is covered by the confidentiality requirements that define who has access to the disaggregated EDR data and how data must be aggregated prior to being publically released. Pacific States collects the data and assigns a unique identification number to each submission by the catcher vessels and processors. This number is held in confidence by Pacific States 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 Office of Law Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Division.

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: 120, increased from 88. Total estimated responses: 120, increased from 88. Total estimated time burden: 1,800 hr, increased from 1,104 hr.

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 personnel cost: \$66,600, increased from \$40,848.

Total estimated miscellaneous costs: \$0, decreased from \$197.

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

Total costs to the Federal government: \$73,000, increased from \$45,000. The first estimate, for the then new collection, turned out to be much lower than the time it actually takes to review the reports.

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

NMFS made cost burden adjustments to both EDRs due to revisions in miscellaneous costs and the number of respondents and in response to public comments. The specific revisions are listed below. This includes a reduction in miscellaneous costs, with all submission on line at this point.

Trawl Catcher Vessel EDR

An increase of 32 in respondents, 102 instead of 70

An increase of 32 in responses, 102 instead of 70

An increase of 480 in burden hours, 1,530 hours instead of 1,050 hours

An increase of \$17,760 in personnel costs, \$56,610 instead of \$38,850

An decrease of \$197 in miscellaneous costs, \$0 instead of \$197

Shoreside Processor EDR

An increase of 216 in burden hours, 270 hours instead of 54 hours

An increase of \$7,992 in personnel costs, \$9,990 instead of \$1,998

A decrease of \$12 in miscellaneous costs, \$0 instead of \$12

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 EDR Program. The Council and NMFS will continue to use the aggregated and non-confidential information to inform management and policy decisions.

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.