

**SUPPORTING STATEMENT
COMMERCIAL OPERATORS ANNUAL REPORT (COAR)
OMB CONTROL NO. 0648-0428**

This action requests extension of this existing information collection.

INTRODUCTION

Fishing for groundfish by United States (U.S.) vessels in the exclusive economic zone (EEZ) in waters off Alaska is authorized under [the Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801, *et seq.* (Magnuson-Stevens Act) as amended in 2006. The North Pacific Fishery Management Council prepares and amends fishery management plans for any fishery in waters under its jurisdiction. The National Marine Fisheries Service (NMFS) manages groundfish according to the Fishery Management Plan for Groundfish of the Gulf of Alaska and the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area.

The first buyer of raw fish, persons who catch and process fish, and persons who catch and have fish processed by another business are required to file an annual report of their purchasing and processing activities. This state-required report is called the State of Alaska Commercial Operators Annual Report (COAR) and is due by April 1 of the following year. NMFS also requires annual COARs from catcher/processors and motherships operating in the EEZ off Alaska, for production activities only.

The COAR requires submission of information on seafood purchasing, production, and both ex-vessel and wholesale values of seafood products. The buying information from COAR is reported by species, area of purchase, condition of fisheries resources at the time of purchase, type of gear used in the harvest, pounds purchased, and ex-vessel value. The ex-vessel value in COAR includes any post-season adjustments or bonuses paid after the fish was purchased.

The production information from COAR is reported by species, area of processing, process type (e.g., frozen, canned, smoked), product type (e.g., fillets, surimi, sections), net weight of the processed product, and the first wholesale value.

A. JUSTIFICATION

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

Catcher/processors and motherships operating in the EEZ off Alaska represent a significant part of the total capacity of groundfish processors in the Bering Sea and Aleutian Islands Management Area (BSAI) and Gulf of Alaska (GOA) and account for a substantial part of the total landings each year. Under 50 CFR 679.5(p), NMFS requires motherships and catcher/processors that are issued a Federal fisheries permit (FFP) to annually complete and submit portions of the Alaska COAR.

The mothership and catcher/processor data, when added to the COAR information collected from shoreside processors and stationary floating processors required under State of Alaska requirements, yields a complete data base of equivalent annual product value information for all respective processing sectors. It also provides a consistent time series according to which groundfish resources may be managed more efficiently. Use of the information generated by the COAR is coordinated between NMFS and the State of Alaska, Department of Fish and Game (ADF&G).

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.

The COAR is used to gather statewide fish and shellfish information describing buying (ex-vessel) and production (wholesale or retail) activities. NMFS uses the COAR database in the annual NMFS Stock Assessment and Fishery Evaluation reports for the groundfish fisheries of the BSAI and GOA, annual Federal publications on the value of U.S. commercial fisheries, and in periodic reports that describe the fisheries and that serve as reference documents to management agencies, the industry, and others.

NMFS requires COARs from processing vessels operating in Federal waters of the EEZ. Annually, the owner of a mothership or catcher/processor is required to complete and submit one or more pages of the COAR to ADF&G, whether the processor operated that year or not. If no receipt or production took place for that year, the owner submits only the COAR certification page.

For each year in which the mothership or catcher/processor was issued an FFP, the owner of a mothership or catcher/processor must annually complete and submit to ADF&G the appropriate Forms A through M and COAR certification page. All production that occurred for each species during the applicable year must be recorded, including species:

- ◆ that were purchased from fishermen on the grounds and/or dockside, including both processed and unprocessed seafood
- ◆ that were then either processed on the mothership or exported out of the State of Alaska
- ◆ that were received from an associated buying station.

The COAR must be submitted by April 1 of the year following the year for which the report is required. ADF&G now accepts the report information in an Excel document that can be submitted by email addressed to <http://www.adfg.alaska.gov/index.cfm?adfg=fishlicense.coar>. Or, respondents can download the COAR as a fillable PDF or Word document and mail it to the address below:

Alaska Department of Fish & Game
Division of Commercial Fisheries
Attn: Seafood Industry Coordinator
P.O. Box 115526
Juneau, AK 99811-5526

Telephone: 907-465-6131
Email: dfg.seafood-coord@alaska.gov

The Excel COAR template and the fillable COAR form can be downloaded from the ADF&G Commercial Fish Reporting webpage at <http://www.adfg.alaska.gov/index.cfm?adfg=fishlicense.coar>.

The following information is submitted in the COAR:

Commercial Operator's Annual Report (COAR)

Certification page

MANDATORY for everyone

Everyone who buys, processes, and/or sells fishery resources MUST complete this page.

If a processor had more than one processor code for the reporting year, a separate form for each processor code must be completed along with a separate Certification Page.

If a processor did not operate with a processor code in the reporting year, either inside or outside of the 3-mile zone, the Certification Page is the only page needed to be returned to Fish & Game.

Production Information

Check YES or NO to indicate:

Did you operate using the above processor code this reporting year?

Were fish tickets written using the above processor code this reporting year?

Did you operate **only** in EEZ this reporting year?

Company name and address, including street, city, state and zip code

Physical location of land-based plant

Vessel/Facility name

Contact name and title

E-mail address, telephone number, and company fax number

Alternate contact name, title, email address, and telephone number

Printed name, signature, and date signed

Buying (ex-vessel) forms A (1-3), C (1-2), E, G, I (1-2), and K

Species name and species code

Area of harvest

Gear used

Delivery code

Total pounds purchased from fishermen

Total amount paid to fishermen

Average price per pound

Wholesale production forms B (1-6), D, F, H, J (1-2), and K)

Production, non-canned.

Area of processing

Process Code

Product code

Total net weight (in lbs)

Total value (\$)

Average price per pound

Canned production.

Complete an entry for each can size produced.

Indicate can size in hundredths of an ounce

Area of processing

Process code

Can size (in ounces)

Number of cans per case

Number of cases

Total value (\$)
Average price per pound
Custom production forms L (1-2)
For another processor L (1)
(Do not include any of that production in this form)
Name of company (for whom you processed fish)
State processor code (if known),
Location of company or vessel name
By another processor L (2)
(Use a separate page to list each processor)
Company name (company performing custom production)
Processor code (if known)
Location or vessel name
Custom fresh/frozen miscellaneous production
(wholesale/retail market and not frozen for canning later)
Species name
Species code
Area of processing
Process code
Product code
Total net weight (lbs)
Total value (\$)
Average price per pound
Custom canned production
(Complete an entry for each can size produced)
Species name
Species code
Area of processing
Process code
Can size (in ounces)
Number of cans per case
Number of cases
Total wholesale value
Average price per pound
Fish buying retro payments/post-season adjustments, form M
Year
Species name
Species code
Area of harvest
Gear code
Delivery code
Total pounds purchased from fishermen
Total amount paid to fishermen (base + adjustment)

Changed number of respondents from 179 to 98.

COAR, Respondent	
Estimated number of responses	98
81 catcher/processors	
17 motherships	
Total annual responses	98
Frequency of response = 1	
Total annual time burden	784 hr
Estimated response time = 8 hr	
Total personnel cost (\$37/hr x 784)	\$29,008

Total miscellaneous cost	\$392
Postage 98 x \$2.50 = 245	
Copy 98 x 0.05 x 30pp = 147	

COAR, Federal Government	
Total annual responses	0
Total annual time burden	0
Total personnel cost	0
Total miscellaneous cost	0

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. The COAR is a document of ADF&G. ADF&G maintains control of publication, distribution of the form, and maintenance of the data obtained from the form. See question No. 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](#) (the Information Quality Act).

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 COAR fillable Word and PDF forms are available for download on the ADF&G web page at <http://www.adfg.alaska.gov/index.cfm?adfg=fishlicense.coar>.

Additionally, ADF&G accepts the COAR in a downloadable spreadsheet format, the *Excel COAR Blank Template*, which is available on the same web page as the COAR form. The excel spreadsheet can be submitted via email to dfg.seafood-coordinator@alaska.gov or it can be printed and mailed to ADF&G.

eLandings has a mechanism that enables authorized users to generate a spreadsheet of data that includes their production information along with COAR reporting areas. This information can be used to verify production information that needs to be entered in the COAR, but is not a substitute for it. Instructions on how to generate COAR data from eLandings can be found on the same web page as the COAR form.

4. Describe your efforts to identify duplication.

No duplication exists with other information collections.

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

This information collection impacts some small entities. NMFS has attempted to minimize the burden on small entities by providing a mechanism in eLandings that extracts catcher/processor and mothership production data that can be used to verify COAR data provided by ADF&G.

This is described above in Question 3. Additionally, ADF&G has obtained 2018 FIS grant monies to pursue better COAR integration with eLandings.

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

The Federal requirement for catcher/processors and motherships to submit the COAR is a method to obtain complete and equivalent annual product value information for all respective processing sectors. The COAR data are fundamental to the agency's mandated obligations under [Executive Order \(E.O.\) 12866](#), the [Magnuson-Stevens Act](#), [American Fisheries Act](#), [Regulatory Flexibility Act](#), and National Standards 4, 5, 7, and 8 (Magnuson-Stevens Act section 301). The COAR database is used in the annual NMFS Stock Assessment and Fishery Evaluation reports for the groundfish fisheries of the BSAI and GOA, annual Federal publications on the value of U.S. commercial fisheries, and in periodic reports that describe the fisheries and that serve as reference documents to management agencies, the industry, and others. Without the COAR database, NMFS would be deficient in these very important data sectors.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The COAR is a State of Alaska form.

8. Provide information on the 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 November 17, 2017 (82 FR 54335), solicited public comments.

NMFS also solicited comments to respondents through email. Two comments were received.

Comment 1: It isn't clear which COAR forms I need to fill out, and I'm not sure how to find them.

Response: Prior to the COAR filing due date, ADF&G sends out letters and emails reminding users to submit their buying and/or processing activity for the prior year. These letters and emails provide information on where to find the appropriate COAR forms as well as ADF&G contact information in case filers have questions.

Comment 2: The COAR requirements are easy to understand, but the same, basic data are reported in eLandings, so it seems like extra work to complete the COAR. The COAR we submit is simple and driven by data already processed and takes less than 8 hours to complete.

Response: Currently, eLandings does not have data integration capabilities with the system ADF&G uses for COAR data. ADF&G has applied for a grant that will be used to improve eLandings COAR integration for future years.

NMFS consulted with ADF&G Commercial Fisheries spokesperson for COAR, Gail Smith (907-465-6157), to update records on the COAR. ADF&G now provides a process for COARs submitted by shoreside processors, stationary floating processors, and at-sea processors and motherships that allows the manager to use eLandings for part of the data required.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift is 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 information collected is confidential under section 402(b) of the Magnuson-Stevens Act and under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. The information submitted in the COAR also is protected by Alaska State confidentiality statute AS 16.05.815.

The System of Records Notice that covers this information collection is [COMMERCE/NOAA #6: Fishermen's Statistical Data](#).

Because the COAR is a state form, there is no privacy act statement on it, but the PAS is posted on the NOAA COAR web page:
<https://elandings.atlassian.net/wiki/spaces/doc/pages/379650058/PRIVACY+ACT+STATEMENT+for+the+ADF+G+Commercial+Operators+Annual+Report>

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: 98, decreased from 179. Total estimated responses: 98 decreased from 179. Total estimated burden: 784 hr, decreased from 1,432 hr. Total estimated personnel costs: \$29,008, decreased from \$52,984.

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).

Total estimated miscellaneous costs: \$392, decreased from \$716.

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

There are no appreciable costs to NMFS. The COAR is submitted by respondents to ADF&G, and data from the COAR are maintained and analyzed by ADF&G.

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

Adjustments are made in this collection, due to differences in numbers of participants, based on current permit counts.

COAR

- a decrease of 81 respondents and responses, 98 instead of 179
- a decrease of 648 hr burden, 784 instead of 1,432 hr
- a decrease of \$23,976 personnel costs, \$29,008 instead of \$52,984
- a decrease of \$324 miscellaneous costs, \$392 instead of \$716.

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

Individual data from the COAR is confidential. The public (e.g., fishermen, researchers, economists) requests and receives ad hoc reports (non-confidential data) from COAR data for various reasons. NMFS economists use data from COAR for a variety of tables that appear in an economic appendix to the annual Stock Assessment and Fishery Evaluation reports and also in regulatory analyses for groundfish fisheries such as supplemental environmental impact statements and regulatory impact reviews.

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.

This is a State of Alaska form; the OMB number and expiration date will not be displayed.

18. Explain each exception to the certification statement.

This is a State of Alaska form; the OMB number and expiration date will not be displayed.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.