

SUPPORTING STATEMENT
ATLANTIC HIGHLY MIGRATORY SPECIES DEALER, IMPORTER, OR EXPORTER
REPORTING FAMILY OF FORMS
OMB CONTROL NO. 0648-0040

A. JUSTIFICATION

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

This request is for revision and extension of previously approved information collections from seafood dealers regarding purchases, sales, imports, exports, or re-exports of Atlantic highly migratory species (HMS), including federally managed bigeye, albacore, yellowfin, and skipjack (BAYS) tunas, bluefin tuna (BFT), sharks, and swordfish (SWO). Transactions that are covered under this collection include purchases of Atlantic HMS from commercial fishermen and portions of required reporting for import/export of all BFT, frozen bigeye tuna (BET), southern bluefin tuna (SBT) or SWO, regardless of geographic area of origin. The information collected is used to monitor the harvest of domestic fisheries, and/or track international trade of internationally managed species.

Domestic catch/landing data are necessary to effectively manage domestic fisheries. This information is used to monitor quotas, estimate fishing mortality, and identify the geographic and temporal distribution of fish and fisheries. Collection of this information for use in domestic fishery management is authorized under the [Magnuson-Stevens Fishery Management and Conservation Act](#) (16 U.S.C. 1801 *et seq.*) (MSA). Regulations at [50 CFR 635.5](#) implement domestic dealer reporting requirements. The domestic reporting covered by this collection includes domestic weekly or bi-weekly landings reports and negative reporting (*i.e.*, reports of no activity, when applicable), and bluefin tuna daily landings, including tagging of individual fish.

International trade-tracking programs are required by both the International Commission for the Conservation of Atlantic Tunas (ICCAT) and the Inter-American Tropical Tuna Commission (IATTC). An overall goal of these programs is to reduce illegal, unreported and unregulated fishing for the covered species, and improve management of associated fisheries. The programs are designed to account for all international trade of covered species by requiring that a statistical document (SD) or catch document (CD) accompany each export from and import into a member nation, and that a re-export certificate (RXC) accompany each re-export. Collection of this information to implement certain international fishery management recommendations is authorized under the [Atlantic Tunas Convention Act](#) [ATCA; 16 U.S.C. 971(d)] and implemented in regulations at [50 CFR 300 Subpart M](#). *These information collections were transferred to OMB Control No. 0648-0732 in 2016, and this change is reflected here.*

The United States (U.S.) is a member of ICCAT and authorized by ATCA to promulgate regulations, as necessary and appropriate, to implement recommendations adopted by ICCAT. ICCAT has adopted recommendations for the mandatory implementation of CD, SD and RXC trade-tracking programs for BFT, frozen BET and SWO. In 2016, ICCAT implemented an

electronic version of its CD program for BFT (eBCD). U.S. regulations implementing ICCAT SD and CD programs require SDs and CDs for international transactions of the covered species from all ocean areas, so Pacific imports and exports must also be accompanied by SDs and CDs. Since there are SD programs in place under other international conventions (*e.g.* the Indian Ocean Tuna Commission), an SD from another program may be used to satisfy the SD requirement for imports into the United States.

The United States is also a member of the IATTC, and required under the [Tunas Convention Act of 1950](#) (TCA; 16 U.S.C. 955) to implement recommendations adopted by IATTC. IATTC has mandated a trade-tracking program for frozen BET, which the National Marine Fisheries Service (NMFS) has implemented for shipments of frozen BET from the Pacific Ocean.

Dealers who internationally trade SBT are required to participate in a trade-tracking program implemented by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). This facilitates enforcement of ICCAT's BFT CD program by ensuring that imported Atlantic and Pacific BFT will not be intentionally mislabeled as SBT in order to circumvent reporting requirements. This action is authorized under ATCA, which provides for the promulgation of regulations as may be necessary and appropriate to carry out ICCAT recommendations.

In 2016, NMFS implemented the US International Trade Data System which consolidated trade reporting as required by the SAFE Ports Act of 2006 (Pub. L. 109-347). Collection of SDs, CDs, and RXCs was removed from this collection, and transferred to the collection OMB Control No. 0648-0732 that supported RIN 0648-AX63. However, this collection continues to include associated biweekly reports and SC, CD and RXC validation.

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.

Atlantic BFT Daily Landing Reports and Tagging

NMFS uses the information collected in this portion of the reporting package to monitor U.S. landings of Atlantic BFT in relation to the assigned quota, thereby ensuring that the United States complies with its international obligations to ICCAT. In addition, provisions of domestic regulations such as time/area closures, fishing seasons, and subquotas by gear type and/or user group are monitored through these reporting instruments. The data collected are also used to assess the status of the BFT resources. Data reports are reviewed by ICCAT annually, and provide the basis for ICCAT management recommendations that become binding on member nations.

This portion of the package describes daily Atlantic BFT reporting requirements. A uniquely numbered tail tag must be affixed to each Atlantic BFT purchased from a fisherman. These tag numbers must be recorded on the electronic Atlantic BFT Daily Landing Report found in the SAFIS electronic reporting system (https://safis.accsp.org:8443/safis_prod/f?p=SAFIS:101), the Atlantic BFT Individual Bluefin Quota (IBQ) Electronic Landing Report

(<https://portal.southeast.fisheries.noaa.gov/cs/main.html#>; only for BFT caught by pelagic longline or purse seine gear), and the Atlantic BFT Domestic Biweekly Dealer Landing and Trade Report (discussed below). SAFIS electronic dealer landing reporting is used for daily, real-time quota monitoring, and dealers must enter landing data into the SAFIS electronic dealer reporting system within 24 hours of purchasing an Atlantic BFT. The Atlantic BFT IBQ Electronic System keeps track of individual bluefin quota usage, allocation, and allocation sale. Note -- Domestic landings of Pacific BFT are not included in this collection, and the use of tail tags is optional for trade of Pacific BFT.

SAFIS BFT electronic dealer landing reporting

The following information is collected:

- 1) Date the fish was landed;
- 2) Gear type used to capture the BFT - used for estimating catch per unit effort as part of stock assessment;
- 3) Length and weight of fish & measurement method (curved or straight length / round or dressed weight) - used to determine age of fish and population structure; weight used for quota management;
- 4) Tail tag number - identifies fish and provides cross reference with biweekly report, and is used in place of CD validation;
- 5) Area caught - provides information on spatial and temporal distribution of fish and fishing, and aids in enforcement of area closures;
- 6) Port landed - identifies principal ports for the fishery, temporal distribution of fish, and aids in enforcement;
- 7) Fisherman and vessel name, and vessel identification number (state registration or USCG documentation number) - provides vessel permit enforcement information.

Atlantic BFT Daily IBQ Electronic Landing Report (for purchases from pelagic longline or purse seine vessels only)

The following information is collected;

- 1) Vessel name;
- 2) Length and weight of bluefin tuna purchased;
- 3) Size class and number of all bluefin tuna discarded by vessel during trip;
- 4) Tail tag number for bluefin tuna purchased;
- 5) PIN for vessel IBQ account to verify purchase.

Atlantic BFT Biweekly Landing & Trade Reports

NMFS uses biweekly reports to monitor Atlantic BFT landings and to track the trade of Atlantic BFT. Information on the purchase, sale, and disposition of Atlantic BFT is collected. The following information is collected on the Atlantic BFT Biweekly Dealer Landing and Trade Report:

- 1) Biweekly reporting period;
- 2) Dealer name, Atlantic Tunas Dealer permit number, and name of person filling out report;
- 3) Date of landing;

- 4) Vessel permit I.D. number - used for enforcement purposes;
- 5) Tail tag number - used to identify the fish and cross-reference with daily landing report and BFT SD;
- 6) Weight of the fish (round or dressed) - used to cross-reference daily landing report information and collect economic information;
- 7) Nature of sale (dockside or consignment) - used in assessing the relative importance of the Japanese and U.S. domestic markets;
- 8) Price per pound - important for evaluating economic characteristics of the fishery;
- 9) Quality rating - assists in determining how regulations affect price of BFT; and
- 10) Destination of fish (domestic, import, export, or re-export) - used for assessing importance of foreign market, cross-referencing export data, and identifying variables that can affect all markets.
- 11) Nature of sale, price and fish destination are collected for use in economic analyses required for federal action.

Non-BFT Electronic Landing Reports

NMFS requires electronic reporting by all federally-permitted Atlantic HMS dealers for Atlantic SWO, BAYS tunas, and Atlantic sharks. This includes both positive and negative reports. Swordfish, shark, and BAYS tunas dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (SAFIS, Bluefin LLC Tripticket programs, etc.) are automatically sent to the HMS *e-Dealer* system and fulfill HMS weekly electronic reporting requirements. In addition, NMFS requires Atlantic HMS dealers to provide a current e-mail address for official communication with dealers, and a phone number. If not already included in their permit data (collected under OMB 0648-0327), HMS dealers may submit their email address and phone number via e-mail, fax, or phone.

The information collected through the electronic reporting system is used to account for domestic landings of managed species; track landings against Atlantic swordfish, BAYS tuna, and Atlantic shark quotas; and assess stocks of these species. This information may be submitted in conjunction with non-HMS species purchased during the same reporting period, thus reducing the reporting burden on dealers. If no HMS, or other federally-managed species, are purchased or accepted during the specified reporting period, a negative report must still be filed. This requirement clarifies for NMFS whether or not a report is pending from the dealer for the reporting period. The following information is required in the HMS electronic landing report:

- 1) Dealer information (including dealer name, dealer contact information, and dealer permit numbers);
- 2) Species-specific information (including which species purchased/accepted, state landed, grade and market information, purchase price and/or total sale information, weight of fish purchased by species, and information on shark fins);
- 3) Vessel information (including date landed, vessel documentation number, fishing vessel name (if applicable) the area where the fish was caught, fishing vessel logbook number,

- Southeast observer log identification, gear types used, name of port where fish landed, and trip number);
- 4) Report information (including date and time submitted and disposition of product);
 - 5) Dealer explanations (including information regarding late reporting, modified data, and whether or not shark fins were naturally attached, and explanation for no fishing logbook ID, if applicable);
 - 6) Negative reports (including the date and time submitted).

Voluntary Fishing Vessel and Catch Form

In order to assist dealers in completing the HMS Non-BFT Electronic Landing Report, NMFS has developed a voluntary form that dealers can obtain via the electronic reporting system and give to fishermen. Dealers can ask fisherman from whom they obtain fish to complete the form and return it to them. Otherwise, dealers would need to follow up with fishermen to collect required information in their electronic HMS dealer reports. This provides a convenient tool for fishermen to convey catch information to HMS dealers, who are required to include such information in their HMS e-Dealer reports. The following types of information can be collected by the dealers on this form:

- 1) Fishing vessel trip information (contact name, phone number, and e-mail address; fishing vessel name and fishing vessel documentation number);
- 2) Date HMS were offloaded;
- 3) Indication if any landings came from the Atlantic shark research fishery;
- 4) Southeast Observer log ID number (if applicable);
- 5) Fishing vessel logbook ID number (or explanation if no logbook available); 6) Species landed (check from list);
- 7) Area where HMS were caught (fishermen can provide grid area code from included map);
- 8) Gear used to land HMS (select from list).

HMS Trade Biweekly Report

NMFS monitors international trade of BFT, SBT, frozen BET, and SWO on a biweekly basis. This information is used to cross-check and verify SD data (discussed below), as well as obtain economic information that is essential for domestic management policy and rulemaking with respect to management impacts on prices. The following information is required on the HMS Trade Biweekly Report:

- 1) Dealer Name;
- 2) HMS International Fisheries Trade Permit number;
- 3) Contact name and phone number;
- 4) Report time period;
- 5) For each shipment/fish:
 - a. Species
 - b. Statistical document and re-export certificate (if applicable) number - cross checks trade documentation;
 - c. Entry number from U.S. customs form 7501 (import only) - allows for cross check of trade data with customs data;

- d. Date of import or export;
- e. Total weight of shipment (import only) - cross check with trade data;
- f. Condition (fresh or frozen) and product form (round, headed, gutted, steaks, fillets, loins, dressed) - used to assess how regulations and other factors affect ex-vessel prices and gross revenues;
- g. Weight of each fish (if available) - used to estimate gross revenues and cross-check trade data;
- h. Price per kilogram - used to evaluate the status of the market and gross revenues;
- i. State/landing document # - cross check used for non-government validation;
- j. Tag number (if applicable) - cross checked with trade data for verification;

Destination of fish (import, domestic, export, re-export) - cross checks with trade data and customs data.

Catch Documents, Statistical Documents, and Re-export Certificate Validation

NMFS has worked with ICCAT with the intent of minimizing the public reporting burden for the government validation requirement. ICCAT/IATTC require that CDs, SDs, and RXCs, be validated by a government institution at export. For example, in the United States, Atlantic BFT are tagged when landed, and the numbered tag stays with the carcass. ICCAT and U.S. regulations exempt tagged fish from validation requirements since the BFT data associated with the tag number must be provided to NMFS and can be tracked. In addition, NMFS has instituted a validation service, which is available on a 24 hour/7 day per week basis to accommodate the requirement for government validation of RXC's covering products being re-exported from the United States. NMFS may also authorize non-governmental industry partners to validate CDs, once they have met the necessary requirements. The entity must apply for authorization in writing to NMFS, and indicate the procedures to be used for verification of information to be validated, list the names, addresses, and phone/fax numbers of individuals to perform validation, and provide an example of the stamp or seal to be applied to the statistical document or re-export certificate. Upon approval, NMFS will issue a letter specifying the duration of effectiveness and conditions of authority for validation. Authorization must be renewed annually.

Although the information collection described above is not expected to be disseminated directly to the public, it may be used to develop or review fishery management plans and associated regulatory documents, and is therefore subject to NOAA's Information Quality Guidelines. 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. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NMFS decide to disseminate the information, it will be subject to the quality control measures and 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.

SAFIS BFT Daily Landing Reporting:

SAFIS BFT daily landing reports are submitted electronically via the SAFIS electronic reporting system. For Atlantic BFT purchased from Longline and Purse seine category vessels, dealers must submit an electronic IBQ daily landing report to support the management of IBQ shares. NMFS is working to connect these reporting systems and Biweekly Landing Reports into an integrated system.

Atlantic Swordfish, Sharks, and BAYS Tunas Electronic Landing Reports (e-Dealer): HMS dealers of Atlantic swordfish, sharks, and BAYS tunas are required to report to NMFS using an electronic reporting system (e-Dealer). The availability of electronic form submissions reduces the overall cost and administrative burden to the public by providing access to electronic forms that can be completed on the computer and submitted electronically. The electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas, is available through the current SAFIS website based system (<http://safis.accsp.org/>), the Southeast electronic reporting system built and maintained by Bluefin Data LLC, an HMS-only system housed in the ACCSP environment (edealer), and through a customized electronic system used by large Atlantic Coast dealers, which is managed by the Northeast Fisheries Science Center. This reduces the need for dealers to report to multiple programs and reduces duplication of reporting (see also response to Question 4).

4. Describe efforts to identify duplication.

The impacts of the reporting requirements were analyzed prior to implementation through rulemaking processes including public review. In addition, a Federal Register notice announced the extension of this reporting package. No duplicative efforts were identified and considerable effort has been put forth to utilize existing reporting systems and thereby avoid duplication. The HMS Management Division of NMFS works closely with other NMFS offices on reporting and permitting issues, and ensures that reporting regulations are not duplicative. Although daily and weekly landing reports and reporting forms may include some of the same data fields, this information is necessary to cross reference and cross check reports. NMFS has attempted to combine SDs with other reporting requirements into a single form in the past; however, ICCAT did not approve the use of forms other than those developed specifically by ICCAT. NMFS has combined its electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas with the other three main electronic reporting systems used in the Greater Atlantic and Southeast regions in order to reduce the number of places dealers must report. In addition, the United States is participating in discussions through regional fishery management organizations to determine ways of using technology to reduce paperwork and improve the efficacy of trade monitoring programs, such as ICCAT's eBCD program.

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

Small businesses will be the respondents of this data collection and this collection will not have a significant impact on them. As described in Question 4, reporting requirements have been condensed as much as possible. In addition, electronic dealer reporting has been implemented, as discussed in Questions 3 and 4.

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

Atlantic BFT Landing Reports and Tagging - If reporting were conducted less frequently or not conducted at all, the United States could overharvest its internationally approved BFT quota, and would fall out of compliance with its international obligations under ICCAT, in violation of ATCA. In addition, the status of the resource would be indeterminable since approximately 55 percent of the western Atlantic BFT Total Allowable Catch is allocated for landing by U.S. fishermen. Furthermore, it would be impossible for the United States to formulate domestic policy consistent with the Magnuson-Stevens Act, which is based on sound socioeconomic and biological data and analyses. If BFT landings data were not included in the IBQ electronic reporting system, then NMFS would not be able to implement individual bluefin tuna quotas that were included as a management measure in Amendment 7 to the 2006 Consolidated HMS FMP. These quotas are awarded to individual pelagic longline and purse seine vessels and most of the pelagic longline quotas are less than one metric ton (mt). Timely and accurate electronic IBQ monitoring is vital for IBQ accounting purposes and thus, for implementation of the IBQ program..

Atlantic Swordfish, Sharks, and BAYS Electronic Landing Reports (e-Dealer) - A reporting frequency of two weeks was in effect prior to electronic reporting requirements, with an additional 10 days to submit reports, and did not provide timely data for species with small quotas, such as Atlantic sharks. Thus, to effectively monitor quotas, NMFS determined that more frequent reporting was needed for Atlantic swordfish, sharks, and BAYS tunas. In 2013, NMFS implemented an electronic reporting system to streamline dealer reporting and allow for dealer data to be collected in a more real-time basis, and to be consistent with reporting in both the Greater Atlantic and Southeast regions. Inefficient quota monitoring or altogether loss of monitoring could result in over-harvest of the ICCAT-recommended U.S. swordfish quota, which would violate obligations under ICCAT and ATCA. Over-harvest of HMS quotas (including sharks) could negatively impact stocks and the fishing industry, and violate the Magnuson-Stevens Act. Lastly, this information is necessary for the development of domestic policy, since it provides socio-economic and biological data upon which policy decisions are based.

Government Validation of Catch Documents, Statistical Documents, and Re-export Certificates - If government validation for the SD and CD programs were not implemented, then U.S. product would not be accepted for import by other RFMO member nations Without the

authorization of non-government validation, NMFS would be required to individually validate each export and re-export, which would impose a greater reporting burden on industry. If authorization were not renewed annually, in the same manner that dealer and vessel permits are annually renewed, NMFS would not be able to effectively monitor implementation of the trade program.

Voluntary Fishing Vessel and Catch Form – This is a voluntary form that fishermen could leave with HMS dealers to help with their required electronic dealer reports. If this information were not collected via the form, dealers would need to follow up with fishermen to collect required information in their electronic HMS dealer reports.

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

The frequency with which data are collected in this package is inconsistent with OMB guidelines that respondents should not be required to report information more often than quarterly. To accurately monitor the domestic quota allocation among a diverse group of users, Atlantic BFT, swordfish, sharks, and BAYS tunas landings data must be collected on a real-time basis (or as close to real-time as possible). Failure to maintain the reporting frequency as described under Question 2 could jeopardize the agency's ability to close fisheries prior to exceeding a quota. (See Question 6 also regarding reporting frequency).

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 January 23, 2018 (83 FR 3131) solicited public comment regarding the renewal of this information collection. All of the reporting requirements covered under this collection were established via the federal rulemaking process which required analyses of the impacts of the permits and provided an opportunity for public comment. In addition, the HMS Advisory Panel (AP) meets twice annually to provide input on HMS regulatory and operations programs. Information about the renewal of this collection was presented to the AP in the overview presentation on March 7, 2018 and AP members were asked to provide their comments at some during the rest of the meeting.

No comments were received in direct response to the Federal Register notice or the presentation at the AP meeting; however, several comments have been provided by other affected individuals over the course of the past year. Several dealers active in bluefin tuna dealer reporting have commented that the SAFIS electronic system is not an ideal platform for reporting landings. One high-volume dealer in particular has contacted HMS Division staff several times regarding electronic reporting for bluefin tuna. He has had difficulty in developing effective business

processes that do not require duplication of effort. HMS Management Division staff and Port Agent staff from the Greater Atlantic Region have assisted this dealer in implementing file upload for bluefin tuna reporting as a means to reduce the data entry burden. Staff have also met with him to discuss specific business processes, and have made recommendations on changes to those business practices to reduce complexity and effort, and improve compliance

NMFS is currently working with the Atlantic Coast Cooperative Statistics Program (ACCSP) to redesign SAFIS so it will provide an enhanced user experience, as well as improve back-end data management. It is estimated that this new system will be available sometime within the next 5 years. In the meantime, Greater Atlantic Region Port Agent staff provide support using a dedicated customer service line and with site visits. The HMS Management Division also maintains a customer service line for any questions regarding electronic reporting of HMS (301-427-8590).

Dealers who purchase bluefin tuna from pelagic longline vessels have commented that the IBQ system is complex and difficult to operate. NMFS agrees that the system is complex to a certain degree, however complexity is somewhat necessary because of the nature of the operations. NMFS has made several modifications to the system to make it more user-friendly, and provides support during business hours via a dedicated customer service line (301-427-8591).

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

No payments or gifts are offered as part of this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

Pursuant to Section 402(b) of the Magnuson-Stevens Act, as amended in 2007, and consistent with [NOAA Administrative Order 216-100](#) (Confidentiality of Fisheries Statistics), NMFS does not release confidential information submitted in compliance with provisions of the MSA, other than in aggregate form and under circumstances required or authorized by law. Whenever data are requested or released to the general public, NOAA ensures that information on the financial business activity of a dealer is not identified.

This information is covered by a Privacy Act System of Records Notice COMMERCE/NOAA-6, Fishermen's Statistical Data, amended version published on March 10, 2017 (82 FR 47259).

A Privacy Act Statement for these reports is posted at: <https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/atlantic-highly-migratory-species-permits-and-reporting-forms>.

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.

No information of a sensitive nature is requested in this collection of information.

12. Provide an estimate in hours of the burden of the collection of information.

For this collection, there are 10,391 respondents, 164,564 responses and 18,285 hours (responses and hours totals added from Tables 3, 4, and 5). Total annual labor costs are \$278,280.

Burden hours associated with each reporting instrument are given in Table 1 and estimation of burden hours is discussed below by reporting requirement. All reports covered by this collection are required to be kept by the dealer for a period of 2 years. The burden hour estimate for each report includes the time required for filing and storing reports.

Table 1. Burden estimates for each reporting instrument included in this collection,

Reporting Requirement	Burden
Atlantic BFT Daily Landing Reports	0.03 hrs (2 mins.)
Tagging (for BFT domestic landing reporting)	0.02 hrs (1 min.)
Atlantic BFT IBQ Daily Electronic Landing Reports (for landings from purse seine & pelagic longline vessels)	0.02 hrs (1 min.)
HMS Electronic Landing Reports (e-Dealer)	0.25 hrs (15 mins.)
HMS Electronic Landing Reports (e-Dealer) “file upload” version	0.50 hrs (30 mins.)
Weekly Negative Reports (e-Dealer)	0.08 hrs (5 mins.)
Submission of e-mail address (e-Dealer)	0.02 hrs (1 min.)
Biweekly Landing & Trade Reports	0.25 hrs (15 mins.)
CD/SD/RXC validation by govt. official	0.25 hrs (15 mins.)
Authorization for non-government validation	2 hours (120 mins.)
Voluntary Fishing Vessel and Catch Form	0.25 hrs (15 mins.)

The universe of respondents for this collection is identified in Table 2, and includes the following: all U.S. dealers importing or exporting BFT, frozen BET, SWO, or SBT (International Fisheries Trade Permit holders); U.S. Atlantic dealers that purchase Atlantic SWO, BAYS tuna, or sharks; all dealers purchasing BFT; and non-government institutions requesting validation

authorization. Finally, an estimated number of international dealers is provided, because burden hours must be calculated for international respondents as well as domestic respondents. International dealers impacted by this collection include exporters that must obtain validation for SDs, CDs, and RXCs prior to exporting a shipment to the United States. The number of international dealer respondents was calculated by identifying the number of countries exporting frozen BET (3), Atlantic, Pacific and Southern BFT (14), or SWO (34) to the United States during 2017, and assuming that there were approximately 10 active exporters per country. This information was obtained from: <http://www.st.nmfs.noaa.gov/commercial-fisheries/foreign-trade/applications/monthly-productby-countryassociation>.

The number of non-government institutions authorized for validation is estimated at two, since the most authorizations ever issued in a year was two. The total number of respondents is likely overestimated and ensures burden and costs are not underestimated because some individuals may hold more than one type of permit.

Table 2 Estimated total number of respondents for this collection

Respondent Type	Number*
International Fisheries Trade Permits*	348
Shark Dealer Permits	113
Swordfish Dealer Permits	189
Tuna Dealer Permits (BFT, BAYS or both), includes:	70
BAYS only dealers	32
BFT only dealers	291
BAYS and BFT dealers	
International Dealers	510
HMS commercially permitted fishermen (submitting voluntary fishing vessel and catch form)	8,836
Non-government Institutions for Validation	2
TOTAL	10,391

Shark, Swordfish, and Tuna Dealer permits, and HMS commercial fishing permits, are based upon 2016 data from the *2017 Atlantic HMS SAFE Report*.

* Number of International Fisheries Trade Permits as of January 13, 2017.

Burden hour calculations for each reporting instrument are given in Table 3, and discussed below by reporting instrument.

Atlantic BFT Daily Landing Reports and Tagging

Atlantic BFT daily landing reports must be electronically submitted to NMFS via SAFIS within 24 hours of purchase by a dealer from a vessel, and each of those fish must be tagged. The burden associated with the Atlantic BFT daily landing reports is estimated based upon the number of BFT landed in 2017 (4,297 rounded to 4,300), as provided by the HMS Management Division in Gloucester, MA (4,300 reports * 2 min./report)/60 = 143 hours). Tagging burden = (4300 * 1)/60 = 72 hours.

Dealers must submit an Atlantic BFT IBQ Electronic Landing Report for landings from pelagic longline and purse seine vessels to support management of IBQ shares. In 2017, 501 BFT landings were from pelagic longline and purse seine vessels; thus, with an additional one minute for each of 505 (rounded) reports, there will be a burden of 8 hours (Table 3).

Estimation of biweekly reporting for Atlantic BFT dealers is based upon the number of reports submitted in 2017 ((222 rounded to 225 reports * 15 min./report)/60 = 56 hours).

Non-BFT Landings Reports (e-Dealer)

Non-BFT landings reports are to be submitted to NMFS through electronic dealer reporting systems. The burden associated with these reporting activities, in addition to a voluntary form that fishermen may fill out and leave with HMS dealers for their electronic dealer reports, are summarized in Table 3, and explained in detail below.

Swordfish, shark, and BAYS tunas dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (SAFIS, trip tickets, etc.) are automatically sent to the HMS e-Dealer system and fulfill HMS weekly electronic reporting requirements. The individual reporting burden for persons issued an Atlantic swordfish, shark, and/or BAYS tuna dealer permit varies, depending upon the number of trips a dealer purchases. The response burden for 'key entered' reports is estimated at 15 minutes per report, and dealers utilizing the "file upload" versions of reporting systems are estimated to need 30 minutes per report. Based upon the number of electronic reports submitted in 2017 by swordfish, shark, and BAYS tunas dealers, and received through the e-Dealer system (10,180 responses = 7,955 key entered + 2,225 file upload), the annual reporting burden is estimated at 3,101 hours ((7,955 responses * 15 minutes)/60 + (2,223 rounded to 2,225 responses * 30 minutes)/60 minutes = 1,988 + 1113 = 3,101 hours).

If no purchases are made during a weekly reporting period, a negative report must be filed. Negative reports are estimated to take 5 minutes to complete and send to NMFS. The number of negative reports used in this analysis (128,152 rounded to 128,155) is based upon the number of negative e-Dealer reports submitted to NMFS in 2017. The annual reporting burden is estimated at 10,680 = (128,155*5/60).

NMFS also requires Atlantic HMS dealers to provide an e-mail address so communications with dealers can be made through the HMS e-Dealer system. HMS dealers may submit their e-mail address via e-mail, fax, or phone. From 2013-2016, the average change in number of dealers

between years was 19 (rounded to 20). NMFS is using this number as a proxy for the number of new dealers per year that may need to provide their e-mail address. This requirement is estimated to take approximately one minute. Total burden = $(20 * 1)/60 = 1$ hour (rounded).

Voluntary Vessel and Catch Form

Fishermen may fill out a voluntary form to provide dealers with fishing vessel and Atlantic swordfish, sharks, and BAYS tunas catch information. This form would take fishermen approximately 15 minutes to complete and would be completed on a trip basis. Since these forms are not required, no data on their use is available. In previous requests, NMFS estimated that these voluntary forms were used on 100% of trips; however, as fishermen and dealers have acclimated to electronic dealer reporting, NMFS estimates that use of this form has reduced to 50% of trips. In 2017, approximately 10,180 trips landed HMS and were reported through the e-Dealer system. NMFS estimates that for approximately half of these trips (5,090), fishermen used the voluntary form, for a total of $1,273 = (5,090 * 15)/60$ burden hours per year.

Biweekly Trade Report

The international trade biweekly reporting requirements for this collection occur on the HMS Trade Biweekly Dealer Report. Estimation of burden hours associated with this form was calculated by multiplying the number of responses submitted to the NMFS Import Monitoring Program at the National Seafood Inspection Laboratory in Pascagoula, MS in 2017 (4,433 reports rounded to 4,435) by the estimated burden per response (15 minutes) = $4,435 * 15/60 = 1,109$ hours.

Non-governmental Validation

Non-government institutions may apply for authorization to validate statistical documents or re-export certificates by applying in writing, indicating the procedures to be used for verification of information to be validated, the names and contact information of individuals that will perform the validation, and an example of the stamp or seal applied to the statistical document or re-export certificate. Authorizations must be renewed on an annual basis. The largest number of validation authorizations ever granted by NMFS in one year was 2, and NMFS estimates this will continue to be the case. Preparing the necessary application is expected to take approximately 2 hours. Total burden hours = $2 * 2$ hours = 4 hours.

Table 3. Domestic dealer reporting activities for this collection.

Instrument or Activity	Responses	Burden (hrs.) per response	Burden (hrs)
Domestic BFT Landing & Trade Reports			
Atlantic BFT Daily Landing Report	4,300	2 minutes	143
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from purse seine & longline vessels)	505	1 minute	8
Atlantic BFT Landing Tag	4,300	1 minute	72
Atlantic BFT Biweekly Landing and Trade Report	225	15 minutes	56

Other HMS Landing & Trade Reports			
HMS Trade Biweekly Report	3,435	15 minutes	858
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer)	7,955	15 minutes	1,988
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer) “file upload” version	2,225	30 minutes	1,113
HMS Weekly Negative Reports (e-Dealer)	128,155	5 minutes	10,680
Submission of e-mail address (for new HMS dealers)	20	1 minute	1
Voluntary Form for Fishermen			
Fishing Vessel and Catch Form	5,090	15 minutes	1,273
Validation Authorization			
Non-governmental validation authorization	2	120 minutes	4
TOTAL	156,212		16,198

Total reporting burden for Atlantic BFT domestic reporting, all landings reports (including negative reports), voluntary forms, and non-governmental authorization for document validation is estimated at **156,212 responses** and **16,198 hours** with an estimated opportunity cost of \$15/hour. This results in approximate labor costs of **\$242,970**.

Validation of Catch Documents, Statistical Documents, and Re-export Certificates

Validation burden estimates for CDs, SDs, RXCs are calculated in Table 4. The annual number of shipments by species for BFT, frozen BET, SBT, and SWO for each trade activity(import/export/re-export) for 2017 was provided by The National Seafood Inspection Laboratory’s Import Monitoring Program using data from statistical and catch documents and the ICCAT eBCD system. ICCAT requires that exports (including some re-exports) associated with its SD programs are validated. This validation requirement is implemented by either tagging each fish in a shipment and maintaining the necessary records, or obtaining verification from a government official or their designee. The tagging option is currently available for Atlantic and Pacific BFT (all Atlantic BFT are tagged upon landing (see above)). A FAX-in system is available for all other validation, whereby a dealer faxes a complete document to a NMFS contractor, and the document is returned to the dealer with the necessary validation stamp in place and a document number.

Table 4. International dealer trade reporting burden estimates for bigeye tuna (BET), bluefin tuna (BFT), southern bluefin tuna (SBT) and swordfish (SWO) statistical documents (SD), re-export certificates (RXC), and shipment certification. Estimates are given by species for imports (I), exports (E) and re-exports (R) and by coast (Atlantic - A, Pacific - P) for bluefin tuna.

Activity	# of CDs, SDs, or RXCs (based on # of shipments for 2014)	Validation Burden (15 min. per shipment)		TOTAL HOURS
		Domestic	Foreign	
BET (frozen)				
I	217		54	54
E	1	1		1
R	12	3		3
BFT (Atlantic/Pacific)				
I (A)	688		172	172
E (A)	N/A	N/A ¹		0
R (A)	73	18		18
I (P)	1,752		438	438
E (P)	0	0		0
R (P)	10	3		3
SBT				
I	251		62	62
E	0	0		0
R	0	0		0
SWO				
I	5,235		1,308	1308
E	0	0		0
R	113	28		28
TOTAL S	8,352	53	2,034	2,087

The total burden estimate associated with validation of catch and statistical documents, and re-export certificates is **8,352 responses** and **2,087 hours**. Using \$15/hour as the opportunity cost, the reporting labor cost estimate for these documents is **\$31,305**.

¹ Domestically landed BFT are required to be tagged, which is used for certification of exports. Burden hours for tagging are calculated under the domestic portion of this collection (Table 3).

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Total annual capital and recordkeeping/reporting cost is \$1,635 (excluding the value of burden hours discussed in Question 12).

Costs for the public resulting from this collection include the cost of submitting reports to NMFS either electronically, via U.S. mail, or via FAX. Electronic submission will not result in any additional cost to the public, since small businesses are already set up with computers and internet service as part of their regular business operations. Forms and tags are provided free of charge. Mailing cost estimates are given in Table 5. In addition, non-government institutions approved for validating exports would spend approximately \$10 for a validation stamp, and total cost estimates are in Table 5.

NMFS does not keep records about most data submission methods. However, for Atlantic BFT catch documents, NMFS has data on the number of entries into the eBCD system, which NMFS used to project the number of other electronic submissions.

Bluefin Catch Document submissions:

Electronic: Import (287) + Export (1966) + Re-export (73) = Total electronic (2,326)

Paper: Import = Total = 401

Percent submitted electronically = $2326 / (2,326 + 401) = 2326 / 2727 = 85\%$

In Table 5, NMFS estimates that 85% of reports are submitted electronically for each reporting instrument with an electronic option.

Table 5. Costs to the public as a result of this collection, not including those associated with burden hours.

Reporting Instrument	Number of Responses		Submission		Total Cost (\$)
			Method	Cost per Item (\$)	
Atlantic BFT Daily Landing Report	4,300		Electronic	N/A	N/A
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from purse seine & longline vessels)	505		Electronic	N/A	N/A
Atlantic BFT Landing Biweekly Report	225	191	Electronic	N/A	N/A
		34	Mail or FAX	0.50	17
Atlantic BFT Landing Tag	4,300		N/A	N/A	N/A
HMS landings report (e-Dealer) 7,955 key entered + 2,225 file	10,180		Electronic	N/A	N/A

upload = 10,180				
HMS negative reporting (e-Dealer)		128,155	Electronic	N/A
Submission of e-mail address (for newHMS dealers)	20	17	Electronic	N/A
		3	Mail, phone or FAX*	0.50
Voluntary vessel and catch form		5,090	N/A	N/A
HMS Trade Biweekly Dealer Report	4,435	3,770	Electronic	N/A
		665	Mail or FAX	0.50
Validation for CDs, SDs, & RXCs (all documents except Atlantic BFT export)		8,352	FAX	0.15
Non-governmental validation authorization (<i>total cost includes \$10/dealer for validation stamps</i>)		2	Mail	0.50
TOTAL		165,564		1,635

Total annual recordkeeping/reporting costs are now \$1,635.

Total capital costs are \$0.

Total recordkeeping/reporting and capital costs are = \$1,635.

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

Costs to the Federal government for this collection include the reproduction of documents and tags, and contracted validation services in addition to the initial cost to create the electronic reporting system for HMS dealers. For domestic BFT reporting tags must be purchased and issued. Tags cost approximately \$.75 per tag and approximately 4,300 will be needed for a total of **\$3,225**. Since 2012, annual maintenance fees and enhancement costs associated with the electronic reporting system for Atlantic swordfish, sharks, and BAYS tunas have averaged **\$264,000** (including a major enhancement in FY 2015). The average cost of validation services is \$300 per month or approximately **\$3,600** per year.

Total cost to the Federal government for the items listed, including staff time, is \$623,065.

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

Table 6. Program changes and adjustments

Program change/Adjustment Category	Previous	New Estimates	Program Adjustment	Program Change
Number of Respondents	9,585	10,391	806	0
Number of Responses	169,196	164,564	-4,632	-0
Number of Burden Hours	39,961	18,285	--21,675	0
Total Annual Costs	\$12,570	1,635	-10,349	-450

Changes: Electronic reporting was implemented for BFT landings reports during 2016, and would be considered a program change. The number of respondents, number of responses, and burden hours were not affected by this change; however, the cost of submitted records has decreased since the instrument is now submitted electronically. The savings for electronic submission of bluefin landings reports was \$450, which was the cost of report submission included in the last collection of information request.

Adjustments: When available, actual 2016 or 2017 data have been used to project the number of responses, number of respondents, and associated time and cost burden estimates for this collection. In many cases, the new estimates differ substantially from previous estimates as a result of incorporating recent data. In a few cases, the adjustments were attributable to a specific factor.

For example, the number of respondents has increased primarily because of an increase in the number of permitted HMS fishermen (approximately one thousand more in 2016). The number of responses has decreased because of decreases in use of the voluntary catch form and edealer landing reports (partially offset by increases in statistical document validation and edealer negative reporting).

The number of burden hours has also decreased because of decreases in edealer landing reports and use of the voluntary catch form, and transfer of the SD, CD, and RXC burden to 0648-0732 (partially offset by increases in negative reporting and statistical document reporting). As one would logically expect, a decrease in number of responses is linked to a subsequent decrease in burden hours; however, there was an unexpected difference in magnitude between these two factors. Specifically looking at types of edealer landings reports, responses decreased by 8%, while reporting burden decreased by 69% (Table 7). This difference is the result of a decrease in number of responses attributed to edealer landings reports, which have an individual reporting burden of 15 mins, and increase in number of responses attributed to edealer negative reporting, which have a reporting burden of 5 minutes per form.

Likewise, one would expect that the transfer of statistical document burden to collection 0648-0732 would result in an overall decrease in the number of reports and burden hour attributed to this instrument; however, a large increase in the number of documents that must be validated

between 2015-2018 resulted in an overall increase in number of responses and burden hours for this instrument (bottom of Table 7).

Table 7. Reporting burden changes for edealer landing instruments and statistical document validation.

Reporting Instrument	Burden per Response (mins.)	No. of Responses				Response Burden (hrs.)			
		2015	2018	Change in No.	% Change	2015	2018	Change in Hrs.	% Change
eDealer Landings		15 138,890	7,955	-130,935		34,723	1,988	-32,735	
eDealer File Upload	30	2,050	2,225	175		1,025	1,113	88	
eDealer Negative	5	7,300	128,155	120,855		608	10,680	10,072	
Total Change				-9,905	-8%			-22,575	-69%
Statistical Document Validation	120	708	8,352	7644		234	2,087	1,853	

Lastly, total annual costs have decreased primarily because currently permitted and new HMS dealers are expected to have a computer and internet access as part of their regular business operations. Thus, NMFS is not including any costs for computer systems associated with this information collection.

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

Results from data collection using the forms in this family are not planned for publication.

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.

Similar to the last renewal of OMB approval for the BFT CD (OMB Control No.0648-0040), it is requested that the burden statement, expiration date, and OMB Control Number not appear in the electronic eBCD, or on the CD form, but be posted on the HMS International Trade Program website. A link to the website and copy of the text is included in this submission. The reason for this request stems from concerns expressed by other ICCAT members that U.S. CDs not differ from the format agreed to at ICCAT. Further, the eBCD electronic system is not under the purview of the United States. In addition, SDs and RXCs for SWO, BET, and SBT are available to dealers either from NMFS or from the internet websites of the different international commissions (ICCAT, IATTC, CCSBT, IOTC). NMFS wants dealers to be able to access the forms directly from these websites. . NMFS has copies of these forms on its HMS ITP website,

and these documents include the OMB Control number and expiration date. The rest of the information will be available on the HMS ITP website. This will meet NMFS obligations under the PRA while reducing the likelihood of delays/problems in clearing customs in countries that are contracting parties to ICCAT.

18. Explain each exception to the certification statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.