

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic and Atmospheric Administration
Alaska Council Cooperative Annual Reports
OMB Control No. 0648-0678

INTRODUCTION

This request is for a revision and extension of an existing information collection. This request combines a cooperative report from OMB Control No. 0648-0401 with this information collection (OMB Control No. 0648-0678), which contains required and voluntary information collection instruments.

The [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act) authorizes the North Pacific Fishery Management Council (Council) to prepare and amend fishery management plans for any fishery in waters under its jurisdiction. The groundfish and crab fisheries in the Exclusive Economic Zone off Alaska are managed under the Fishery Management Plan (FMP) for Groundfish of the Gulf of Alaska, the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI), and the Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crab (crab FMP). The groundfish FMPs are implemented by regulations at [50 CFR part 679](#) and the crab FMP is implemented by regulations at [50 CFR part 680](#).

The cooperative annual reports covered by this collection are part of the following fishery programs:

Crab Rationalization (CR) Program

In 2005, NMFS implemented the Bering Sea and Aleutian Islands (BSAI) CR Program. Based on participation in the industry within a set of qualifying years, NMFS issued crab quota share (QS) to vessel owners and captains, as well as processor quota share to processors in all federally managed crab fisheries except the Norton Sound Red king crab and the Pribilof Islands golden king crab. The CR Program was designed to allocate crab resources among harvesters, processors, and coastal communities for nine BSAI crab fisheries. This program also allowed for the voluntary formation of cooperatives.

Central Gulf of Alaska (GOA) Rockfish Program (Rockfish Program)

The Rockfish Program was designed to enhance resource conservation and improve economic efficiency in the Central GOA rockfish fisheries by establishing cooperatives that receive exclusive harvest privileges. NMFS assigns rockfish quota share (QS) to eligible License Limitation Program licenses for rockfish primary and secondary species. QS holders form cooperatives to pool the harvest of the cooperative quota (CQ) on fewer vessels to minimize operational costs and to provide additional flexibility in harvesting operations. The Rockfish Program also provides greater stability for processors by spreading out production over a greater period of time. Halibut prohibited species catch (PSC) is allocated to participants based on historic halibut mortality rates in the primary rockfish species fisheries.

Amendment 80 (A80) Program

The A80 Program was established as a limited-access privilege program to reduce excessive fishing capacity, end the race to fish, reduce bycatch, and reduce discards for commercial fishing vessels using trawl gear in the non-pollock groundfish fisheries in the BSAI. The A80 Program encourages the formation of harvesting cooperatives in the non-American Fisheries Act (non-AFA) trawl catcher/processor sector among all persons holding A80 QS permits. The cooperatives that receive allocations of cooperative quota (CQ) allow vessel operators to make operational choices to improve fishery returns, reduce PSC usage, and reduce fish discards.

American Fisheries Act (AFA)

The purpose of the AFA was to tighten U.S. ownership standards for U.S. fishing vessels under the Anti-Reflagging Act, and to provide the BSAI pollock fleet the opportunity to conduct their fishery in a more rational manner while protecting non-AFA participants in other fisheries.

The AFA eliminated the race for pollock through the establishment of cooperatives with specific provisions for their allocations, structure, and participation by catcher vessels and processing plants, as well as annual reporting requirements and excessive share limits. In response to a directive in the AFA, the Council added measures to protect other fisheries from adverse effects arising from the exclusive pollock allocation.

A. Justification

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

The Council has developed several cooperative programs as options in larger catch share programs for the federally managed fisheries off Alaska. As part of these cooperative programs, the Council has either recommended that NMFS require the cooperative managers to submit an annual written report detailing various activities of the cooperative, or the Council has requested that cooperative managers voluntarily submit an annual report to the Council. These reports are intended to be a resource for the Council and the public to evaluate the effectiveness of the cooperative and its ability to meet the Council's goals. Additionally, they are a tool for the cooperatives to provide feedback on a catch share program and how the cooperative element is functioning. Regulations provide a framework for the minimum required information for some of the cooperative annual reports.

As noted above, some of the cooperative annual reports are required in Federal regulation and others are requested by the Council as a voluntary annual submission. NMFS provided an interpretation to the Council by letter dated March 29, 2013, that the Council's requests to cooperative managers and representatives to voluntarily provide information to the Council in annual reports was an information collection subject to the Paperwork Reduction Act. Therefore, this information collection covers both the mandatory and voluntary components of the cooperative annual reports.

In general, the cooperative managers present the cooperative reports during the April Council meeting. Regulations do not require cooperative managers to present cooperative reports to the Council; however, they are encouraged to do so, and this has been common practice for many cooperative representatives. Public dissemination of the annual cooperative reports and

presentation of an overview of the reports at the April Council meeting each year provides stakeholders and members of the public the opportunity to provide public comment to the Council about the cooperatives and the catch share programs. The cooperative annual reports are published on the [Council's website](#).

Moving the AFA Cooperative Annual Report from OMB Control No. 0648-0401 into this information collection with the other fishery program cooperative annual reports is intended to consolidate similar reports into the same collection and make updates for additional information requests from the Council easier to accommodate.

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.

All 0648-0678 information collection components are submitted annually. The following table lists each element of the collection, whether the report is mandatory or voluntary, the purpose of the report, and whether the information is disseminated to the public. Additional information about the specific data collection under each component and the use of these data is provided in the text that follows the table.

Summary information about components of the Alaska Council Cooperative Annual Reports collection.

Information Collection	Submitter	Submitted to and information about whether mandatory or voluntary submission	Regulatory citation for mandatory requirements	Purpose	Disseminated to the Public?
Alaska Crab Rationalization Program Cooperative Annual Report	Cooperative managers	Voluntary: NPFMC	n/a	Provide information to the Council	Yes
Annual Rockfish Cooperative Report	Cooperative managers	Mandatory: NMFS Voluntary: NPFMC	679.5(r)	Program evaluation and feedback to NMFS and the Council	Mandatory – Not by NMFS ¹ Voluntary –Yes
Annual Amendment 80 Cooperative Report	Cooperative managers	Mandatory: NMFS Voluntary: NPFMC	679.5(s)	Program evaluation and feedback to NMFS and the Council	Mandatory – No Voluntary –Yes
Amendment 80 Halibut Prohibited Species Catch (PSC) Management Plan	Cooperative managers	Voluntary: NPFMC	n/a	Program evaluation and feedback to the Council	Yes
Amendment 80 Halibut Bycatch Avoidance Progress Report	Cooperative managers	Voluntary: NPFMC	n/a	Program evaluation and feedback to the Council	Yes
American Fisheries Act Catcher Vessel Inter-cooperative Agreement	Inter-cooperative managers	Voluntary: NPFMC	n/a	Program evaluation and feedback to the Council	Yes
American Fisheries Act Annual Catcher Vessel Inter-cooperative Report	Inter-cooperative managers	Voluntary: NPFMC	n/a	Program evaluation and feedback to the Council	Yes
American Fisheries Act Cooperative Annual Report	Cooperative managers:	Mandatory: NPFMC	679.61(f)	Program evaluation and feedback to NMFS and the Council	Yes

¹ Some of the Rockfish Program cooperatives voluntarily release to the public the report that they submit to NMFS. NMFS does not release this report because it contains information that is confidential under the Magnuson-Stevens Fishery Conservation and Management Act.

a. Alaska Crab Rationalization Program Cooperative Annual Report [renamed from Alaska Crab Rationalization Program Cooperative Report]

NMFS is renaming this component in the information collection to be consistent with the names of the other annual reports in this collection (to add the word “annual” to the title).

In a motion passed at its February, 2013 meeting:

The Council requests that each of the BSAI crab rationalization cooperatives voluntarily provide an annual report detailing measures the cooperative is taking to facilitate the transfer of quota share to active participants, including crew members and vessel owners, and available measures which affect high lease rates and crew compensation. The annual reports should convey to the Council the effectiveness of the measures implemented through the cooperatives and the estimated level of member participation in any voluntary measures and include supporting information and data.

The Council further addressed its request in a subsequent motion at its April 2014 meeting, after receiving the crab cooperative’s annual reports:

The Council’s preferred reporting format for crab cooperatives answer the seven questions asked by the Council, as exemplified by the ICE (Inter-Cooperative Exchange) report of 2013. Additionally, the Council encourages all coops’ answers to be as quantitative as possible, as well as encourage 100% compliance with filing the reports by March 1 of each year.

This voluntary, non-regulatory collection summarizes the reported effectiveness of each measure and estimates the number of participants using each measure. This allows the Council to determine if the cooperatives are taking adequate action to facilitate the transfer of QS to active participants and control QS lease rates, or if potential future regulatory action may be needed to address these concerns.

The seven questions addressed in the ICE annual report of 2013 that the Council referenced in its April 2014 motion are the voluntary information collection elements listed below.

Report contents:

Voluntary information

1. What measures are the cooperative taking to facilitate the transfer of QS to active participants, including crew members and vessel owners?
2. What is the level of participation from cooperative members regarding these measures?
3. How effective have these measures been?
4. What measures are the cooperative taking to address the issue of high lease rates, as they affect crew compensation?
5. What is the level of participation from cooperative members regarding these measures?
6. How effective have these measures been?
7. What future measures does the cooperative plan to take to address the Council concerns about active participation and lease rates as they affect crew compensation?

In addition, the Council also has requested that the CR cooperatives

- Use consistent terminology with terms defined under the CR Program regulations.
- Provide a glossary of key terms used in the reports.
- Provide a comparison of the current year’s lease rates to previous year’s lease rates.
- Presentation of report at April Council meeting.

Regarding the Council’s request for information about crew compensation, in the annual report submitted to the Council in April 2019 by the Inter-Cooperative Exchange (ICE), ICE stated that “[G]iven the complexity and sensitivity of crew compensation arrangements, ICE has decided that it is not appropriate to collect or report that data. ICE believes that Council concerns regarding crab fishery crewmember compensation should be evaluated in light of crewmember “daily rate of pay” information that is collected from vessel owners through the Economic Data Reports (EDRs).”

The table below shows the number of voluntary CR cooperative annual reports received by the Council in recent years.

Cooperative	Number of Members ^{1/}	Did the cooperative submit an annual report to the Council this year?		
		2019 (for 2018)	2018 (for 2017)	2017 (for 2016)
Inter-Cooperative Exchange (ICE)	182	Yes	Yes	Yes
Alternative Crab Exchange (ACE)	151	Yes	Yes	Yes
Trident Affiliated Crab Harvesting Cooperative	27	Yes	Yes	Yes
CPH Association	25	Yes	No	No
Dog Boat Cooperative	19	Yes	Yes	Yes
Aleutian Island Cooperative	11	Yes	No	Yes
Coastal Villages Crabbing Cooperative	7	Yes	Yes	No
R&B Cooperative	13	No	No	No
Ak King Crab Harvesters	4	No	No	No

^{1/} Source: [NMFS Crab Harvesting Cooperatives and Membership](#), 2019.

b. Annual Rockfish Cooperative Report [renamed from Rockfish Annual Cooperative Report]

NMFS is renaming this component in the information collection to be consistent with the name of the report in 50 CFR 679.5(r)(6).

Each Rockfish Program (RP) cooperative must submit an Annual Rockfish Cooperative Report to NMFS that provides the information listed below under “required information.” The annual report to NMFS is due by December 15 each year. In addition, each RP cooperative voluntarily provides additional information requested by the Council. These reports provide information to the Council and NMFS about how the catch share program, and its associated cooperative elements, are functioning. This is particularly important as the Council is evaluating reauthorization of the Rockfish Program in 2019 and 2020.

Report contents:

Required information (50 CFR 679.5(r)(6)(iii))

- The cooperative's CQ, sideboard limit (if applicable), and any rockfish sideboard fishery harvests made by the rockfish cooperative vessels on a vessel-by-vessel basis.
- The cooperative's actual retained and discarded catch of CQ, and sideboard limit (if applicable) by statistical area and vessel-by-vessel basis.
- A description of the method used by the cooperative to monitor fisheries in which cooperative vessels participated.
- A description of any actions taken by the cooperative in response to any members that exceeded their catch as allowed under the rockfish cooperative agreement.

Voluntary information

- Inter-temporal harvest information.
- Use consistent terminology
- Voluntary presentation of report at April Council meeting.

In a previous supporting statement, NMFS listed “monthly Chinook bycatch numbers by stock of origin (from NMFS in-season management reports)” as an element of the requests for information from the Council. However, review of the Council’s discussion in April 2016 indicates that the Council discussed requesting this information but did not end up formally requesting the RP cooperatives to provide this information in future annual reports. Therefore, NMFS removed this element from the list of voluntary information requests.

The information required to be reported to NMFS about harvests, retained catch, discarded catch on a vessel-by-vessel basis is confidential. Even if this information is aggregated to the cooperative level, NMFS still considers harvest information by cooperative as confidential and does not release that information to the public. However, some of the RP cooperatives voluntarily provide the same report they submit to NMFS to the Council. The Council posts these reports on its website, which makes the reports available to the public.

NMFS does not need the information submitted in the RP cooperative annual report to manage the RP fisheries. Therefore, NMFS is recommending that the Council consider in the future whether to revise the current RP cooperative annual reporting requirements to request that the RP cooperatives submit information directly to the Council rather than to NMFS. If the Council

recommends revising the RP annual reporting requirements and NMFS prepares a proposed rule to do so, this supporting statement will be amended. NMFS cannot change the reporting requirements without consultation with the Council. Reauthorization of the Rockfish Program is scheduled for Council discussion in late 2019 and early 2020.

c. Annual Amendment 80 Cooperative Report [renamed from Amendment 80 cooperative report]

NMFS is renaming this component in the information collection to be consistent with the name of the report in 50 CFR 679.5(s)(6).

1An A80 cooperative issued a CQ permit must submit annually to the NMFS AKR Regional Administrator an A80 Cooperative Annual Report detailing the use of the cooperative's CQ, including the actual retained and discarded catch of CQ species and GOA sideboard species. In addition, the A80 Cooperative Annual Report provides voluntary, non-regulatory information on Program activities by each cooperative, including a summary of the report presented at the April Council meeting. This provides information to the Council and NMFS about how the catch share program is functioning, and if potential future changes may be needed.

In 2019, the Council added a voluntary element to this report requesting information on cooperatives or other measures implemented to reduce bycatch in the BSAI yellowfin sole Trawl Limited Access Sector fishery by A80 participants. This additional information does not change the overall estimate of the time that it will take to complete the annual report. The current estimate of the time that it takes to prepare the annual A80 cooperative report has enough variability in it to encompass the relatively small amount of time it will take to add this information.

Report contents:

Required information (50 CFR 679.5(s)(6)(iii))

- Actual retained and discarded catch of CQ and GOA sideboard limited fisheries (if applicable) by statistical area and on a vessel-by-vessel basis.
- A description of the method used by the cooperative to monitor fisheries in which cooperative vessels participated.
- A description of any actions taken by the cooperative against specific members in response to a member that exceeded the amount of CQ that the member was assigned to catch for the Amendment 80 cooperative.
- For each A80 cooperative, the percent of groundfish retained by that A80 cooperative of the aggregate groundfish retained by all A80 vessels assigned to that A80 cooperative according to the equations specified at § 679.5(s)(6)(iii)(D).
- For each A80 cooperative, a third party must audit the A80 cooperative's annual groundfish retention calculations and the A80 cooperative must include the finding of the third party audit in its A80 annual cooperative report.

Voluntary information

- Catch information from the Northern Bristol Bay Trawl Area.
- A retrospective indication of A80 catch capacity.
- Inter-temporal harvest information.

- Information on cooperatives or other measures implemented to reduced bycatch in the BSAI yellowfin sole Trawl Limited Access Sector fishery. (NEW)
- Presentation of report at the April Council meeting.

The information required to be reported to NMFS about retained and discarded catch of CQ and GOA sideboard limited fisheries by statistical area and on a vessel-by-vessel basis is confidential under the Magnuson-Stevens Act. Therefore, NMFS does not release the Annual Amendment 80 Cooperative Report to the Council or public. The A80 cooperative prepares a modified annual report for the Council that excludes the confidential information.

NMFS does not need the information about retained and discarded catch and some of the other information provided in the annual report to manage the Amendment 80 fisheries, however, NMFS cannot change the annual reporting requirements without consulting the Council. NMFS anticipates that this issue will be discussed with the Council in December 2019 and April 2020 during discussion of a similar situation with the Annual Rockfish Cooperative Reports. NMFS also will provide this information to the Council for its discussion of the annual cooperative reporting requirements in April 2020.

d. Amendment 80 Halibut Prohibited Species Catch (PSC) Management Plan

A80 cooperatives provide a Halibut PSC Management Plan to the Council to inform it of their plan to use voluntary, non-regulatory methods to avoid halibut bycatch in the BSAI groundfish fisheries.

The Council requested participants describe methods their fleets or cooperatives are currently developing or have undertaken to implement measures in their cooperative and inter-cooperative agreements to minimize the incidental catch of halibut. Obtaining this information through a voluntary collection is expected to provide the fleet with more flexibility to adapt fishing operations to changing environmental and market conditions than would result from placing specific requirements in regulation.

Report contents:

Voluntary information

- Halibut avoidance practices on the grounds
- Increased communication between participating harvesters
- Sharing data for performance tracking
- Use and development of excluders
- Deck sorting
- Performance measurement and assessment at the boat and company level
- Incentives for continuous efforts to minimize bycatch
- Consequences for substandard performance

e. Amendment 80 Halibut Bycatch Avoidance Progress Report

The A80 Progress Report allows each sector in the BSAI groundfish fisheries to inform the Council of their progress on voluntary, non-regulatory methods used within their fishery cooperatives to avoid halibut bycatch in the BSAI groundfish fisheries.

The Council requested participants describe the methods their fleets or cooperatives are currently developing or have undertaken to implement measures in their cooperative and inter-cooperative agreements to minimize the incidental catch of halibut. The voluntary information is expected to provide the fleet with more flexibility to adapt fishing operations to changing environmental and market conditions than would result from placing the information as a regulatory requirement.

Report contents:

Voluntary information

- Development of effective and verifiable measures for halibut avoidance
- Performance measurement and assessment at the boat and company level.
- Voluntary presentation at December Council meetings

f. American Fisheries Act Catcher Vessel Inter-cooperative Agreement

The AFA Catcher Vessel Inter-cooperative Agreement is the contract under which the AFA cooperatives operate. Additionally, it provides information to the Council and the public about Inter-cooperative fishery allocations, PSC allocations, transfers of allocations and PSC, monitoring methods, and bycatch reduction methods.

Report contents:

Voluntary information

- Allocation, monitoring, and compliance of the BSAI and GOA sideboard limits and PSC caps among the AFA catcher vessel cooperative members
- Establishment of penalties for coops that exceed pollock and sideboard allocations
- Provides for harvest of BSAI pacific cod by the “under 1700 mt” exempt vessels while complying with PSC limits
- Establishment and monitoring of sideboard species transfers between cooperatives
- Promotes compliance of the Council’s recommended sideboard measures and PSC limits allowing for the maximum harvest of AFA pollock and sideboard allocations
- Promotes reduction of PSC in the Bering Sea pollock fishery

g. American Fisheries Act Annual Catcher Vessel Inter-cooperative Report

The AFA Annual Catcher Vessel Inter-cooperative Report summarizes the activity of catcher vessel cooperatives under an inter-cooperative agreement. While the individual cooperative reports track the annual activities of each cooperative at the vessel level, the Inter-cooperative Report is a summary of AFA catcher vessel harvests in the Bering Sea and Gulf of Alaska fisheries. This is useful to the Council and NMFS because catcher vessel sideboard limits and PSC caps are allocated in the aggregate, not by individual cooperatives. As a result, this information collection provides detailed information about how sideboard limits and PSC are being utilized to determine if program objectives are being satisfactorily met.

The AFA Annual Catcher Vessel Inter-cooperative Report provides the Council and the public, with a simple means of evaluating the AFA catcher vessel fleets’ aggregate fishing performance under the AFA regulations. Additionally, this voluntary report contains information requested by the Council beyond the required regulatory elements of the individual cooperative reports to provide a broader understanding of catcher vessel cooperative activities.

Report contents:Voluntary information

- Bering Sea pollock fishery allocations and harvest
- Salmon bycatch reduction measures
- Sideboard fishery groundfish sideboards
- PSC catch

h. American Fisheries Act Cooperative Annual Report [moved from 0648-0401; renamed from AFA Annual Cooperative Report]

The AFA Cooperative Annual Report is required to provide information to the Council about how each cooperative allocated pollock, other groundfish species, and prohibited species among the vessels in the cooperative; the catch of these species by area by each vessel in the cooperative; information about how the cooperative monitored fishing by its members; and a description of any actions taken by the cooperative to penalize vessels that exceeded the catch and prohibited species catch allocations made to the vessel by the cooperative. The purpose of this report is to provide the Council with information about the on-going operations and performance of the cooperatives on which to base its decisions about management of the Bering Sea pollock fishery.

In 2019, the Council added an additional voluntary element requesting information on cooperatives or other measures implemented to reduce bycatch in the BSAI yellowfin sole Trawl Limited Access Sector fishery by AFA participants. This additional information does not change the overall estimate of the time that it will take to complete the annual report. The current estimate of the time that it takes to prepare the annual AFA cooperative reports has enough variability in it to encompass the relatively small amount of time it will take to add this information.

Report contents:Required information (50 CFR 679.61(f)(2))

- Cooperative's allocated catch of pollock and sideboard species.
- Any sub-allocations of pollock and sideboard species made by the cooperative to individual vessels on vessel-by-vessel basis.
- Cooperative's actual retained and discarded catch of pollock, sideboard species, and PSC on an area-by-area basis and on a vessel-by-vessel basis.
- Method used to monitor fisheries in which cooperative vessels participated.
- Actions taken in response to any vessels that exceed their allowed catch and bycatch in pollock and all sideboard fisheries.
- Total weight of pollock landed outside the State of Alaska on a vessel-by-vessel basis.
- Number of salmon taken by species and season.
- List each vessel's number of appearances on the weekly "dirty 20" lists for non-Chinook salmon.

Voluntary information

- Information on cooperatives or other measures implemented to reduced bycatch in the

BSAI yellowfin sole Trawl Limited Access Sector fishery. (NEW)

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

Section 515 of Public Law 106-554 (the Information Quality Act) requires NMFS to ensure the quality, objectivity, utility, and integrity of information it publicly disseminates. Public dissemination of these reports is governed by [NOAA's information quality guidelines](#), which were issued on October 30, 2004. The voluntary cooperative annual reports fall under NOAA's information quality category "Natural Resource Plans," which are information products that are prescribed by law and have content, structure, and public review processes that are based upon published standards (e.g., statutory or regulatory guidelines). These plans are a composite of several types of information (e.g., scientific, management, stakeholder input, policy) from a variety of internal and external sources.

NMFS does not disseminate the RP or Amendment 80 Annual Cooperative Reports that are required to be submitted to NMFS, because these reports contain information that is confidential under the Magnuson-Stevens Fishery Conservation and Management Act.

The cooperative annual reports submitted to the Council are posted on the Council's website, which makes them available to the public. They are accepted by the Council as they are prepared by industry, provided to the public in that form, and clearly identified as information products prepared by industry.

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.

With the exception of required elements of the Annual Rockfish Cooperative Reports and the Annual A80 Cooperative Reports, which may be submitted by fax to NMFS, all other responses to these collections are received electronically via e-mail.

4. Describe efforts to identify duplication.

In the analysis prepared for reauthorization of the Rockfish Program, NMFS identified to the Council the potential duplication involved in requiring the RP cooperatives to submit an annual report to NMFS that NMFS cannot release to the public and does not need to manage the RP fisheries. The Council will consider if duplication actually is occurring and, if so, will consider options to reduce this duplication through its ongoing consideration of reauthorizing the Rockfish Program. This same situation occurs with some of the required elements of the Annual Amendment 80 Cooperative Report.

The comments submitted by the Inter-cooperative Exchange identified some potential duplication between the information the Council has requested the CR cooperatives provide and the information vessel owners and operators are required to provide through Economic Data Reports (EDR). See NMFS's response to ICE's comments in Question 8 below. The Council and

NMFS will be evaluating the EDR requirements in 2020 and will consider these comments as part of that review.

Otherwise, NMFS has reviewed the annual cooperative reporting requirements and requests for voluntary information from the Council and has not identified other areas of potential duplication.

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

The cooperatives submitting information under this OMB collection are not small businesses or small entities as those terms are defined under the Regulatory Flexibility Act.

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

The cooperative reports are required by NMFS or requested by the Council annually. These reports provide the Council and the public an opportunity to assess program performance and to be informed about emerging issues or problems. Annual reporting is a standard reporting period for many government and private sector reports and the Council recommended that this time schedule best fit its needs and the public's needs. If the collection was not conducted or was conducted less frequently, less information would be available to the Council and the public to inform the management of fishery programs. Emerging conservation or management concerns may go unnoticed for longer.

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

The information in this collection is collected in a manner consistent with OMB guidelines. No special circumstances exist.

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 was published on July 22, 2019 (84 FR 35099), to solicit public comments. In addition, a questionnaire was emailed to the following fishery cooperative and inter-cooperative managers:

- Jake Jacobsen – Inter-Cooperative Exchange (Crab Rationalization Program)
- Joe Sullivan – Inter-Cooperative Exchange (Crab Rationalization Program)
- Christopher Oliver – Gulf of Alaska Rockfish Best Use Cooperative
- Julie Bonney – Alaska Groundfish Databank (Rockfish Program)
- Beth Concepcion – Alaska Seafood Cooperative. (Amendment 80)

- John Gruver – United Catcher Boats (AFA)

Eight responses were received from these six people by letter or email. Two respondents provided follow-up information to their first response. The comments are summarized and addressed below.

Comments on the Alaska Crab Rationalization Program Cooperative Annual Report

Comment 1: A letter of comment was received by the Executive Director of the Inter-Cooperative Exchange (ICE), a CR cooperative. The comment letter stated that ICE represents 197 crab Individual Fishing Quota (IFQ) holders who operate 52 harvesting vessels in for the red king and snow crab fisheries and harvest approximately 70 percent of the IFQ.

Since cooperative reports were requested by the Council, ICE has made significant effort to be responsive to the interests of the Council by annually collecting lease rate information from each of its 52 vessels. ICE is very concerned about the collection and reporting of lease rate information. Lease rate data is collected by a third-party paralegal in order to maintain the confidentiality of the information.

ICE also creates a website (www.crabqs.com) to track transfers (sales) of crab QS and to facilitate the transfer of QS to qualified crew members. ICE maintains this website (crabqs.com) to facilitate a program we run as part of what we do in preparation for the report and our cost estimates include maintenance of the website and analysis of the information. Information regarding QS transfers is downloaded from the NMFS website. Transfers are broken down by cooperative and reported to the Council.

ICE addressed four issues in its letter of comment.

(i) Burden hour and cost estimates. The estimated time for preparation of the cooperative annual report was estimated by NMFS to be 30 hours. ICE reviewed the expense and time requirements for report preparation and estimates the actual reporting, preparation, and presentation time to be 340 hours as per the table below.

Process	Person	Hours
Legal	Attorney	6
Legal	Paralegal	17
Reporting	52 vessels @ 5 hours per vessel	260
Report Preparation	ICE Executive Director	10
Website maintenance	Contractor	5
Presentation	ICE Executive Director	16
Presentation	ICE President	10
	Total	324

ICE reports that the annual cost of the cooperative report is estimated at \$42,200, including payments for time and expenses including airfare and lodging. ICE wants to be responsive to the concerns of the Council and is willing to provide the requested information as accurately as

feasible. However, the time and expense of the report is onerous, especially considering that the report is largely presenting to the Council information that it already has access to.

Response: The time burden and cost estimates submitted by ICE include the work done to maintain the systems and programs ICE has set up to respond to the Council's concerns about the transfer of crab QS to active participants in the fisheries, including crew members and vessel owners, and high lease rates, and the work that is done each year to prepare and present the annual report to the Council describing these efforts and the results.

Instructions for completing the supporting statement and estimating the time burden and cost of the information collection require NMFS to include time for "reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information." In addition, OMB's online guide to the PRA also identifies these additional burden activities: compiling materials necessary for the collection; acquiring, installing, and utilizing technology and systems; and compiling information. Based on this guidance, NMFS is including ICE's full estimate of the cost of establishing, maintaining, and reporting about the information collections it conducts among its members in the estimates of burden hours and costs in this supporting statement, because ICE gathers this information to provide the report requested by the Council. Accordingly, the burden hour and cost estimates for the CR cooperative annual reports have been updated to reflect these new estimates for ICE.

ICE's letter stated that the total burden hours were 340, the sum of the elements of the table it provided added to 324, so NMFS used 324 in this supporting statement. In addition, NMFS is unable to discern from ICE's comments how the total cost estimate of \$42,200 is distributed among the burden hour and cost categories needed for this supporting statement. To avoid further information collection burden on ICE to submit additional detail about its costs, NMFS makes the following assumptions about how to distribute these burden hours and costs:

Airfare and lodging for the ICE Executive Director and President to attend the April Council meeting and present the cooperative annual report to the Council: \$3,000.

The remaining \$39,200 estimated cost (\$42,200 - \$3,000) is assumed to be associated with the total burden hour estimate for ICE.

To use this information to answer Questions 12 and 13 in this supporting statement, NMFS has to categorize the information submitted by ICE into the burden hours and costs incurred by ICE members and employees directly (Question 12) and the costs incurred for contractors hired by ICE (Question 13).

The hours associated with the vessel owners, ICE Executive Director and ICE President total 296 hours. This represents 91% of the burden hours, so NMFS assumes that 91% of the total costs of \$39,200 are incurred by ICE members and employees (\$35,700). These burden hours and costs are used in the response to Question 12.

The hours associated with attorney, paralegal, and website maintenance contractor total 28 (9% of total burden hours). Nine percent of the total costs of \$39,200 is \$3,500. This information is used in the response to Question 12.

NMFS will adjust these cost estimates in the future if ICE provides additional detail to more accurately associate costs with the various burden hour categories.

NMFS did not receive comments from any of the other eight CR cooperatives providing updates to time burden or cost estimates to prepare their cooperative annual reports. Six of these cooperatives provide short written reports to the Council each year. Two CR cooperatives do not provide the voluntary reports to the Council. The reports prepared by the six cooperatives that do report are much less extensive than the report prepared by ICE, and generally have the same format and content each year. NMFS estimates that these reports take five hours per year to prepare. NMFS assumes a labor cost of \$86.36 (U.S. Department of Labor, Bureau of Labor Statistics occupational code 11-1011 for Chief Executives).

(ii) Comments related to obtaining needed information through the Economic Data Reports

- Lease rate information: Much of the lease rate information provided in the Cooperative Report is, or can be, provided by vessels in their annual Economic Data Report (EDR). Because reports are typically submitted for the April Council meeting, the lease information is collected earlier than the EDR data (submitted prior to July 31), giving Council members an advance look at what the EDR data will later show. Information from EDRs could be easily analyzed by a simple algorithm.
- Crew compensation: ICE contends that the daily rate of pay, a figure derived from the EDR data, more accurately addresses the Council's concerns.

Response: NMFS acknowledges these comments and has included them in a list of comments to consider during the Council's future review of the Economic Data Reporting requirements for the CR fisheries. NMFS also will provide a summary of the comments on this information collection to the Council at its next review of cooperative annual reports in April 2020.

(iii) Information about transfers. The transfer data is provided by NMFS and organized by ICE for the purposes of the report. The same result could be achieved by the addition of a few additional fields in the transfer request, viz. cooperative membership of the seller and the sellers adherence to a "Right of First Offer" (ROFO) cooperative membership provision. A simple organizing algorithm could be used to present the information to interested Council members.

Response: ICE is suggesting consideration of the addition of additional fields in the crab IFQ transfer request, which is covered under information collection 0648-0514. This would require discussion by the Council, revisions to the forms and instructions, approval of the revisions by OMB, revisions to the structure of the data managed by NMFS, and NMFS or Council staff work to prepare the reports the Council wished to see from this new data collection. NMFS will provide information about this suggestion to the Council at its April 2020 meeting, the next time the cooperative annual reporting requirements are considered by the Council. This work also would be subject to the cost recovery fee assessment for the CR fisheries. When the Council requested the information it wished to receive each year in the CR cooperative annual report, it was aware that it could develop regulations requiring the submission of this information, but chose not to make these annual reports mandatory. The Council could consider these suggestions and may recommend additional mandatory data collection requirements in the future, if it wishes

to do so.

(iv) Ways to improve the collection. In response to NMFS's request for comments on "ways to enhance the quality, utility, and clarify of the information to be collected," ICE responded that it makes every reasonable effort to insure the accuracy of its information, but currently has no way of auditing the information. In addition, ICE relies on NMFS for much of its data, and has no way of determining the accuracy of the data provided by NMFS.

Response: NMFS acknowledges this comment.

Comment 2: ICE submitted a second letter of comment which included ICE's 2019 annual cooperative report (submitted to the Council on March 22, 2019) in its entirety. This letter of comment addressed two issues related to the cooperative annual report information collection.

(i) Notwithstanding the description NMFS included in the *Federal Register* notice soliciting comments on this information collection, ICE clarifies that it does not take actions to decrease high quota share (QS) lease rates or improve low crew compensation. ICE has determined that promoting the transfer of Program QS to "active participants" through a right of first offer ("ROFO") requirement is an "available measure." In addition, ICE has determined that it can collect and report data concerning the lease rates paid by its members' vessels, but only under the explicit understanding that its collection and reporting of that data is not expected or intended to restrain competition in the lease rate market. However, given the complexity and sensitivity of crew compensation arrangements, ICE has decided that it is not appropriate to collect or report that data.

Response: NMFS acknowledges this comment.

(ii) ICE believes that Council concerns regarding crab fishery crewmember compensation should be evaluated in light of crewmember "daily rate of pay" information that is collected from vessel owners through the Economic Data Reports (EDRs).

Response: See Response to Comment 1(ii) above. NMFS acknowledges this comment and has included it in a list of comments to consider during the Council's upcoming review of the Economic Data Reporting Program.

Comments on the Annual Rockfish Cooperative Report

Comment 3: The manager of the Rockfish Program catcher/processor cooperative provided an updated table with the time and cost burden for preparation of the Annual Rockfish Cooperative Report.

Annual Rockfish Cooperative Report, Respondent Burden	
Number of respondents	1
Total annual responses	1
Total annual time burden hours	45 hrs
Time per response = 45 hrs	
Total personnel cost (\$32/hr x 45)	\$1,440
Total internal review cost (\$40/hr x 8)	\$320
Total miscellaneous cost (\$6.25)	\$7
Email (0 x 1 = 0)	
Fax cost (\$6 x 1 = 6)	
Photocopy cost (0.05 x 5pp x 1 = 0.25)	
Total time burden hours for NPFMC report	40 hrs
Time for travel/preparation = 40 hrs	
Total personnel cost (\$32/hr x 40)	\$1,280
Total travel cost (\$600 round trip)	\$600
Total lodging cost (\$200/night x 4)	\$800

Response: NMFS acknowledges this comment. This information has been used to update the burden hour and cost estimates in Questions 12 and 13.

Comment 4: The manager of the Rockfish Program catcher vessel cooperatives stated that they do not do separate Annual Rockfish Cooperative Reports for NMFS and Council (they are the same). There is no extra cost for the reports voluntarily given to the Council (we email the PDFs to the Council staff at no cost).

Whereas initially the time needed to draft the reports was likely more than our current estimate, over the years the steps have become more automated and cost efficient. Updating the reports and PowerPoint presentation for the Council really doesn't take that much time.

Annual Rockfish Cooperative Report, Respondent Burden	
Number of respondents	1
Total annual responses	
Total annual time burden hours	25
Time per response	
Total personnel cost (\$36/hr x 25)	900
Total miscellaneous cost (\$6.25)	0
Email (0 x 1 = 0)	
Fax cost (\$6 x 1 = 6)	
Photocopy cost (0.05 x 5pp x 1 = 0.25)	0

Response: NMFS acknowledges this comment. This information has been used to update the burden hour and cost estimates in Questions 12 and 13.

Comments on the A80 Cooperative Annual Report, PSC Management Plan, and Halibut Bycatch Avoidance Progress Report

Comment 5: Miscellaneous costs seem to be a bit outdated at this point. We are on an all-inclusive plan (as probably many other businesses of the 21st century are), so a per email/copy/fax breakdown is not really how things are calculated. I gave a best estimate, but also referenced Kinko’s prices if we really needed a price.

The A80 Halibut Bycatch Avoidance Progress Report and A80 Halibut PSC Management Plan, are really the same report. The PSC Management plan has always been included in the December Bycatch Avoidance report to the Council. I am unsure why they are separated here and don’t think they should be. As a result, the amount of time to prepare the Management Plan and Progress report are combined below.

For the following A80 Cooperative report element:

“Actual retained and discarded catch of CQ and GOA sideboard limited fisheries (if applicable) by statistical area and vessel.”

This is redundant information that takes some time to compile. This is information that NMFS receives separately through their e-landings program, and in fact, I go to the NMFS website to pull this data.

A80 cooperative report, Respondent	
Number of respondents	1
Total annual responses	1
Number responses per respondent = 1	
Total burden hours	18 hrs
Time per response = 18 hrs	
Total personnel cost (\$45/hr x 18)	\$810
Total miscellaneous costs	\$5
Email (0 x 1 = 0)	
Fax cost (\$ x 1 = 6)	
External Audit cost (1 x 200)	\$200

BSAI Halibut PSC Progress Report, Respondent	
Number of respondents	1
Total annual responses	1
Frequency of response = 1	
Total burden hours	25 hrs
Time per response = 25 hrs	
Total personnel cost (\$45/hr x 25)	\$1,125
Total miscellaneous cost	\$3
Email (30 x 0.10 = \$0)	

Response: NMFS acknowledges this comment. The A80 Cooperative Report time per response

has been changed from 40 hours to 18 hours, and the hourly personnel cost changed from \$37 to \$45 to reflect this comment. Additionally, the A80 Halibut PSC Management Plan and A80 Halibut Bycatch Avoidance Progress Report have been changed from 12 to 12.5 and 40 to 12.5 hours per response, respectively, and the hourly personnel cost changed from \$37 to \$45 to reflect comment.

Regarding combining the A80 Halibut PSC Management Plan and A80 Halibut Bycatch Avoidance Progress Report, NMFS disagrees. While the two reports can usefully be presented together for established cooperatives, in the event a new A80 cooperative forms, it would begin by preparing the management plan, but would not have a progress report until it had the opportunity to implement and then evaluate its plan in subsequent years.

Regarding the need for the “actual retained and discarded catch of CQ and GOA sideboard limited fisheries (if applicable) by statistical area and vessel,” NMFS agrees that reevaluation of these annual reporting requirements may be necessary. NMFS will provide a summary of the comments on this information collection to the Council at its next review of cooperative annual reports in April 2020.

We have revised our miscellaneous costs to \$5 to account for the typical inclusive general office services packages that the respondents have reported using. This includes expenses for e-mail, fax, copying, mailing, and printing.

Comment 6: Since the last renewal there have been multiple changes within A80 that should reduce the agency’s estimate of burden. Since 2011, there has been no limited access A80 participants with all vessels belonging to either the Alaska Seafood Cooperative (AKSC) or Alaska Groundfish Cooperative. Since 2018, all 19 A80 vessels are operating exclusively within the AKSC. Because of these recent changes, a reduction in the estimate of burden may be appropriate to the following categories:

- Flatfish Flexibility Application would be reduced by 3 respondents
- Application for A80 Quota Share would be reduced to 1 respondent as all other possible QS holder have been account for within the A80 program
- Application for A80 Cooperative and CQ permit would be reduced to 1 respondent
- Application to Transfer A80 QS would be reduced from 25 to no more than 5 respondents
- Application for A80 vessel replacement would be reduced from 28 to no more than 5 respondents
- A80 cooperative reports would be reduced to one
- Application for Inter-cooperative transfer of A80 CQ could be reduced to 0

Most of the proposed collection of information has practical utility and is necessary for the proper performance of the functions of the agency. One exception to this is the annual A80 cooperative report. This report is exclusively comprised of detailed data information that the agency already receives and reviews through other information collections by the agency. As such, this report is redundant, limited in its utility and creates unnecessary burden on AKSC. Lastly, the ability to submit the cooperative application and the annual cooperative report either online or via electronic mail would help minimize the burden of this information collection.

Response: NMFS acknowledges this comment. Within the scope of the renewal, the number of respondents for the A80 Cooperative Annual Report has been reduced to 1. Regarding the utility and necessity of the A80 Cooperative Annual Report, NMFS agrees that reevaluation of these annual reporting requirements may be necessary. NMFS will provide a summary of the comments on this information collection to the Council at its next review of cooperative annual reports in April 2020.

The applications noted by the commenter are approved under a separate information collection, OMB Control No. 0648-0565, which is currently undergoing OMB review for its 3-year renewal. Based on a comment received during the comment period on that collection, the number of respondents for these applications were reduced.

Comment 7: The A80 Cooperative Annual Report is a waste of time because it is unclear how it is used and it is comprised of a lot of information that NMFS already has.

Response: NMFS acknowledges this comment. NMFS will provide a summary of the comments on this information collection to the Council at its next review of cooperative annual reports in April 2020.

Comments on the AFA Catcher Vessel Inter-cooperative Agreement and Report

Comment 8: Reviewing the Inter-cooperative Agreement burden, the 40 hours captured is on the low side for years that portions of the Agreement are rewritten. Rewriting the Agreement typically involves several meetings (a minimum of 2, maximum of 4) with at least 1 representative from each of the 8 AFA catcher vessel cooperatives attending (a couple of hours at each meeting). It also involves an attorney to attend at least one meeting and develop the revised language at \$350.00 / hour. I'd estimate this is a 4 to 6 hour minimum amount of billing time. My time in a rewrite of the Agreement is probably in the neighborhood of 40 hours. That said, we don't usually rewrite the Agreement every year, and haven't since the 2013 rewrite. Instead I make the appropriate data changes, and required updates, and circulate a draft to the cooperative managers that they in turn circulate among their members for approval. Once approved I circulate a final version of the Agreement for signing by each cooperative's representative. I would estimate that no more than 40 total hours is involved in a year with no rewrite. The \$150.00 per hour is high for all involved except for the attorney; \$100.00 an hour is probably a little closer for time and overhead.

The Inter-cooperative Report burden is probably 40 hours, some years a little more, some years a little less. The text of the report from one year to the next is roughly the same. As different types of reporting requirements have changed (for example the burden of salmon bycatch reporting has shifted away from being included in the Inter-cooperative Report and is now included in each Incentive Plan Agreement annual report) the Inter-cooperative report has become a little shorter. As mentioned for the Inter-cooperative Agreement, the rate per hour is closer to \$100.00 per hour.

I really can't accurately comment on the time involved in creating individual cooperative reports. The number of vessel members in each cooperative varies significantly and would have a lot to

do with how much time is involved in writing a report. The cost per hour would also vary as one cooperative currently relies on an outside company to write their report while most others have it done “in house.”

Response: NMFS acknowledges this comment. The AFA Catcher Vessel Inter-cooperative Agreement time burden estimate has been changed from 40 hours to 48 hours per response to reflect the additional time needed for years when the agreement is rewritten. The AFA Annual Catcher Vessel Inter-cooperative Report time burden estimate has been changed from 8 hours to 40 hours per response to reflect this comment. The hourly personnel costs for both reports have been changed to \$100 to reflect this comment. Additionally, 6 hours of attorney time at \$150 an hour have been added to miscellaneous costs to account for the required review of the AFA Catcher Vessel Inter-cooperative Agreement.

No changes have been made to the estimated time burden or costs for the AFA Cooperative Annual report.

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 annual reports submitted to NMFS are confidential under section 402(b) of the Magnuson-Stevens Act. They are also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics.

The annual reports submitted to the Council are not confidential. They are posted on the Council’s website and available to the public.

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.

Information Collection	Type of Respondent	# Respondents	Annual # of Responses/ Respondent	Total # Annual Responses	Burden Hrs / Response	Total annual burden hours	Hourly Wage Rate	Total Annual Wage Burden Costs
Alaska Crab Rationalization Program Cooperative Annual Report	Cooperative manager	1 (ICE)	1	1	296	296	Varies, see response to Question 8	\$35,700
	Cooperative managers	6 (other CR coops)	1	6	5	30	\$86.36 ¹	\$2,591
Annual Rockfish Cooperative Report	Cooperative managers	1 catcher/processor cooperative report to NMFS	1	1	45	45	\$32	\$1,440
		1 catch/processor cooperative report to Council	1	1	40	40	\$32	\$1,280
		1 respondent for 6 catcher vessel cooperatives	1	1	25	25	\$36	\$900
Annual Amendment 80 Cooperative Report ^{1/}	Cooperative manager	1	1	1	18	18	\$45	\$810
Amendment 80 Halibut Prohibited Species Catch (PSC) Management Plan ^{2/}	Cooperative managers	1	1	1	12.5	12.5	\$45	\$563
Amendment 80 Halibut Bycatch Avoidance Progress Report ^{3/}	Cooperative managers	1	1	1	12.5	12.5	\$45	\$563
American Fisheries Act Catcher Vessel Inter-cooperative Agreement ^{4/}	Inter-cooperative manager	1	1	1	48	48	\$100	\$4,800
American Fisheries Act Annual Catcher Vessel Inter-cooperative Report ^{4/}	Inter-cooperative manager	1	1	1	40	40	\$100	\$4,000
American Fisheries Act Cooperative Annual Report	Cooperative managers	8	1	8	16	128	\$75	\$9,600
Total for collection		19		23		695		\$62,247

Footnotes to Question 12 Table

^{1/} U.S. Department of Labor, Bureau of Labor Statistics wage for occupational code 11-1011 Chief Executives.

^{2/} Annual Amendment 80 Cooperative Report time per response changed from 40 to 18 hours and labor cost changed from \$37 to \$45 to reflect comment.

^{3/} Amendment 80 PSC Management Plan and Amendment 80 Halibut Bycatch Avoidance Progress Report changed from 12 to 12.5 hours and 40 to 12.5 hours per response, respectively, and labor cost changed from \$37 to \$45 to reflect comment.

^{4/} American Fisheries Act Catcher Vessel Inter-cooperative Agreement and American Fisheries Act Annual Catcher Vessel Inter-cooperative Report changed from 40 to 48 hours and 8 to 40 hours per response, respectively, and labor cost changed from \$150 and \$75, respectively, to \$100 to reflect comment.

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).

Information Collection	Annual # of Respondents	Cost Burden/Respondent	Total Annual Cost Burden
Alaska Crab Rationalization Program Cooperative Annual Report	ICE – 1	Print/Fax/Email - \$5 Travel and lodging expenses - \$3,000 Legal and other contractors \$3,500	\$6,505
	Other Cooperatives 6	Print/Fax/Email - \$5	\$30
Annual Rockfish Cooperative Report	2, 1 of which submits two different reports	Print/Fax/Email - \$5 Travel and lodging expenses (1 person) only	\$15 \$1,400
Annual Amendment 80 Cooperative Report	1	Print/Fax/Email - \$5 Report audit - \$200	\$205
Amendment 80 Halibut Prohibited Species Catch (PSC) Management Plan	1	Print/Fax/Email - \$5	\$5
Amendment 80 Halibut Bycatch Avoidance Progress Report	1	Print/Fax/Email - \$5	\$5
American Fisheries Act Catcher Vessel Inter-cooperative Agreement	1	Print/Fax/Email - \$5 6 hrs Attorney - \$2,100	\$2,105
American Fisheries Act Annual Catcher Vessel Inter-cooperative Report	1	Print/Fax/Email - \$5	\$5
American Fisheries Act Cooperative Annual Report	8	Print/Fax/Email - \$5	\$40
Total for collection	19 (unique)		\$10,315

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

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight					\$0
Other Federal Positions	GS12 step 10	\$164,253	0.01%		\$1,643
TOTAL					\$1,643

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

	Respondents		Responses		Burden Hours		Labor Costs		Misc. Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	Current	Previous	Current	Previous	Current	Previous	
Alaska Crab Rationalization Program Cooperative Annual Report	7	10	9	10	326	300	\$38,291	\$30,000	\$6,535	\$3,259	Respondent comment and change in number of cooperatives.
Annual Rockfish Cooperative Report	2	9	3	9	110	405	\$3,620	\$14,985	\$1,415	\$9	Respondent comments and change in number of cooperatives.
Annual Amendment 80 Cooperative Report	1	2	1	2	18	80	\$810	\$2,960	\$205	\$8	Respondent comment and change in number of cooperatives.
Amendment 80 Halibut Prohibited Species Catch (PSC) Management Plan	1	2	1	2	12.5	24	\$563	\$888	\$5	\$8	Respondent comment and change in number of cooperatives.
Amendment 80 Halibut Bycatch Avoidance Progress Report	1	6	1	6	12.5	240	\$563	\$8,888	\$5	\$7	Respondent comment and change in number of cooperatives.
American Fisheries Act Catcher Vessel Inter-cooperative Agreement	1	1	1	1	48	40	\$4,800	\$6,000	\$2,105	\$1	Respondent comment.
American Fisheries Act Annual Catcher Vessel Inter-cooperative Report	1	1	1	1	40	40	\$4,000	\$600	\$5	\$1	Respondent comment.
American Fisheries Act Cooperative Annual Report ^{1/}	8	8 ^{1/}	8	8 ^{1/}	128	128 ^{1/}	\$9,600	\$9,600 ^{1/}	\$40	\$15	Moved into this collection from OMB Control Number 0648-0401.
Total for Collection	19	26	23	31	695	1,129	\$62,247	\$69,121	\$10,315	\$3,293	

^{1/}The report was moved from 0648-0401. Previous totals for collection 0648-0678 did not include this report. The previous estimates for each element are included in the row, but not included in the “previous” totals for the collection for this table or the 83i.

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

The reports are posted on the Council's website at <http://www.npfmc.org/cooperative-reporting/> or <https://www.npfmc.org/council-meeting-archive/>.

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.

The reports are produced as a letter and no specific format is required. In addition, they are presented in person at the Council meeting and a copy of the document is provided for posting.

18. Explain each exception to the certification statement.

There are no exceptions for compliance with provisions in the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

These collections do not employ statistical methods.