

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Gulf of Alaska Catcher Vessel and Processor Trawl (CVPT) Economic Data Report (EDR)
OMB Control No. 0648-0700

Abstract

The National Marine Fisheries Service (NMFS) Alaska Region requests an extension of this currently approved information collection for the Annual Trawl Catcher Vessel Economic Data Report and the Annual Shoreside Processor Economic Data Report.

The Annual Trawl Catcher Vessel Economic Data Report and the Annual Shoreside Processor Economic Data Report are part of the Gulf of Alaska Trawl Economic Data Report Program, which evaluates the economic effects of current and future groundfish and prohibited species catch (PSC) management measures for the Gulf of Alaska (GOA) trawl fisheries. This program includes a third economic data report (EDR), which is approved under OMB control number 0648-0564. The EDRs provide the North Pacific Fishery Management Council (Council) and other analysts with baseline information on affected harvesters, crew, processors, and communities in the GOA. The data collected includes labor information, revenues received, capital and operational expenses, and other operational or financial data. The information collected through the EDRs can be used by NMFS and the Council as a baseline intended to assess major changes in groundfish management, including potential catch share programs for PSC species and target species.

These EDRs provide baseline information to better understand the economic impacts of NMFS-provided measures on industry. This data will allow comparisons of the effects of potential GOA management changes before and after implementation, with the primary focus on harvesting and processing crew employment and compensation.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through National Oceanic and Atmospheric Administration/NMFS. NMFS manages the GOA groundfish trawl fisheries in the EEZ off Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska (FMP). The Council prepared the FMP under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act). Regulations implementing the FMP appear at [50 CFR part 679](#).

The GOA Trawl EDR Program evaluates the economic effects of current and future groundfish and PSC management measures for the GOA trawl fisheries. Information collected in these EDRs is used to understand employment and compensation changes in the GOA trawl fisheries and to better understand the current structure of the GOA trawl fishing industry.

Collection of these crew identifiers allow NMFS to track the harvesting crew (captains, engineers, deck crew, and cook) over time and provide baseline data for studies to understand how employment and compensation change in the GOA trawl fisheries.

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

- ◆ Annual Trawl Catcher Vessel EDR. All catcher vessels that harvest groundfish using trawl gear from the GOA or state parallel fisheries ¹(inside 3nm).
- ◆ Annual Shoreside Processor EDR. All shoreside processors and stationary floating processors that take deliveries from vessels that harvest groundfish using trawl gear from the GOA or state parallel fisheries (inside 3nm).

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

- ◆ Crew members that participate in the GOA trawl fishery;
- ◆ Processing workers that work in plants processing trawl-caught groundfish from the GOA and their worker's compensation; and
- ◆ Harvesting costs from fuel and gear purchases by catcher vessels.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

a. Annual Trawl Catcher Vessel Economic Data Report (EDR)

The owner or leaseholder of a catcher vessel named on a Limited License Program (LLP) groundfish license with catcher vessel and trawl gear designations and endorsed for the GOA during a calendar year must submit an Annual Trawl Catcher Vessel EDR for that vessel.

The Annual Trawl Catcher Vessel EDR focuses on vessel identifiers, employment data, and variable cost data (associated with fuel usage and gear purchases). Harvesting crew data includes annual payments to captains, annual payments to the crew, and the number of crew members that are engaged in commercial fishing. Crew identifiers are collected and can be linked to the State of Alaska commercial crew database to get more detailed information on the residence of crew members. Comparing total vessel revenue to crew payments should provide an estimate of crew shares relative to total vessel revenue from fish harvested.

Annual fuel use (both gallons and expenditures) is collected from catcher vessels. These costs are not apportioned among fisheries, because it would require too many assumptions by the person completing

¹ The trawl fisheries of the GOA occur in the GOA EEZ, in a parallel (occurring simultaneously) state waters fishery inside of 3nm, and in separate state managed trawl fisheries within 3nm. This ICR applies to operators in the GOA EEZ and in the state parallel waters fishery but not in the separate state managed trawl fisheries occurring within 3nm.

the survey. However, the fuel usage is maintained and readily available by vessel for all GOA trawl fisheries in aggregate.

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

b. Annual Shoreside Processor Economic Data Report (EDR)

The owner or leaseholder of a shoreside processor or stationary floating processor with a Federal Processor Permit that processes groundfish caught by vessels fishing with trawl gear in the Western and Central GOA reporting area must submit an Annual Shoreside Processor EDR for that calendar year.

Only processors that accept deliveries of groundfish harvested with trawl gear from the Central or Western GOA are required to submit the EDR. Most of the shore-based processors, including custom processors, are located on Kodiak Island, and these are the primary shore-based processors of fish harvested from the Central GOA and Western GOA trawl fisheries. Other shoreside processors that are located in communities adjacent to the waters of the GOA and Bering Sea and Aleutian Islands management area (BSAI) take deliveries of groundfish harvested in the Central and Western GOA trawl fisheries. These processors are located in Akutan, Dutch Harbor/Unalaska, King Cove, and Sand Point. There are also two stationary floating processors taking groundfish deliveries in recent years.

In addition, Kodiak has one processor that produces fish meal using by-products from other processors. Because this is a processor of groundfish harvested from the GOA with trawl gear, this processor is included under this program. Monthly information on workers is collected from shoreside processors and stationary floating processors. This information helps identify the impacts of regulations on employment throughout the year, but may be especially important for understanding how the numbers of employees and their aggregate monthly compensation changes.

In addition, electric and water usage by processors in Kodiak, Alaska, is collected. This information is important to Kodiak because the suppliers must adjust production of those utilities based on the demand for each plant. This requires utility suppliers to have sufficient capacity to meet peak demand. The Council does not have the authority to require utility providers to supply the data under the Magnuson-Stevens Act. However, these entities can supply an annual summary of usage by month to each processor. Processors then pass those summaries on to NMFS at minimal or no cost. This information is collected from processors that use a community owned water and electric system. Applying the data requirement to community owned water and electric systems focuses the data collection on Kodiak. Stakeholders from Kodiak felt that this information was important to the community and requested that it be considered as part of the data collection program. The other locations do not have this requirement.

How is the Information Collected and How Frequently?

A complete EDR must be submitted for each calendar year on or before June 1 of the following year. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

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

The EDRs may be submitted online or downloaded in fillable PDF format and then faxed or mailed. Completed EDRs may be submitted as follows:

By mail to: Pacific States Marine Fisheries Commission NMFS
Economic Data Reports
205 SE Spokane, Suite 100
Portland, OR 97202

By fax to: 503-595-3450

Online at: <https://survey.psmfc.org>

Data Verification of the EDRs

Pacific States verifies the information in the Annual Trawl Catcher Vessel EDR and the Annual Shoreside Processor EDR with the owner, leaseholder, or designated representative of the GOA trawl catcher vessel, shoreside processor, or stationary floating processor. The owner, leaseholder, or designated representative must respond to inquiries from Pacific States within 20 days of the date of issuance of the inquiry. Responses after 20 days could be considered untimely and could result in a violation and enforcement action.

Pacific States verifies the accuracy of each EDR to ascertain anomalies, outliers, and other deviations from the values of averaged variables. The principal means for data quality assessment is follow-up interviews with EDR submitters to ensure consistent interpretation of the survey form and verification of selected data entries against submitter records. The Pacific States' auditor may request copies of additional data to be provided by the owner or leaseholder, including but not limited to previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data. The owner or leaseholder must provide copies of additional data to facilitate verification.

Will the Information Be Shared?

NMFS anticipates that the information collected will be disseminated in aggregated and non-confidential forms to the public or used to support publicly disseminated information on the GOA trawl fisheries. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See the response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

How is Data from the GOA Trawl EDR Program Used?

To assess the performance of the GOA trawl fleet under a potential rationalization program and subsequent changes in fishery management, economists and analysts at the Alaska Fisheries Science Center use the GOA Trawl EDR data collection to prepare an annual summary report that is included as a chapter to the annual publication *Economic Status of the Groundfish Fisheries off Alaska*. The summary reports statistics that are intended to indicate trends in a variety of economic indicators and metrics. The reported statistics provide a general overview of fishery performance over time, and are not intended as a rigorous statistical analysis of specific hypotheses regarding economic efficiency or other performance metrics.

Council staff, NMFS staff, contractors, and academic partners have used EDR data, both from published reports and custom queries, in several important ways. EDR data have been used extensively in catch share program reviews. In addition, it has been used in several regulatory action analyses, such as for analyzing crew employment in the 2014 Final Environmental Impact Statement: Steller Sea Lion Protection Measures for Groundfish Fisheries in the Bering Sea and Aleutian Islands Management Area.

Several recent Council action analyses have used EDR data. The 2016 GOA trawl bycatch management analysis included a Social Impact Assessment that made extensive use of EDR data. In addition, EDR data was used in the recently completed (March 8, 2019) analysis *BSAI Final Review Draft Social Impact Assessment: Catcher/Processor Mothership Restrictions in the Bering Sea and Aleutian Islands and the Gulf of Alaska when taking Directed Non-CDQ Pacific Cod Deliveries from Trawl Catcher Vessels*. However, in this case, complete data was not available for any of the different sectors involved and no EDR data was available for some of the sectors involved. This action was essentially an allocation (or reallocation) between sectors, and it would not be acceptable to present detailed data on one sector and not another. To overcome this limitation, the analysts used some of the crew residence data for catcher vessels that filled out an Annual Trawl Catcher Vessel EDR and worked both in the GOA and the BSAI, with important caveats, as a work around solution.

Information Requirements and Needs and Uses of Information Collected

Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
1	Annual GOA CV EDR	16 U.S.C. 1801 <i>et seq.</i>	50 CFR 679.110	On-line or by mail, no form number	Used by NMFS in annual report and regulatory analysis. Used by Council staff and contractors for Limited Access Privilege Program (LAPP) evaluation and in regulatory analysis. Used by partnered researchers to conduct fishery economic research.
2	Annual GOA Shoreside Operator EDR	16 U.S.C. 1801 <i>et seq.</i>	50 CFR 679.110	On-line or by mail, no form number	Used by NMFS in annual report and regulatory analysis. Used by Council staff and contractors for LAPP evaluation and in regulatory analysis. Used by partnered researchers to conduct fishery economic research.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The EDRs may be submitted online. In addition, the EDRs are fillable and may be downloaded from Pacific States web site at <http://www.psmfc.org/goatrawl/index.html>, printed, and submitted by mail or fax to Pacific States.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

None of the information collected as part of this information collection duplicates other collections. This information collection is part of a specialized and technical program that is unlike any other. This collection is the only source of observational cross section time series data regarding the economic performance of this fleet.

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

Two shore-based stationary floating processor entities are classified as small using Small Business Administration (SBA) guidelines. These processors meet the small entity criterion because of the number of employees worldwide. These processors also have no known cooperative affiliation. Approximately 17 unique shoreside plants meet the small entity criterion.

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

There are 78 trawl catcher vessels that completed EDRs in 2020, with 26 vessels considered small business entities under SBA guidelines that are affected by this information collection.² The number of actual vessels fishing in 2020 was 72, and the number of entities filling out an EDR varies due to multiple LLP licenses being fished on the same vessel or an LLP license holder complying with the EDR requirement in a year when they did not fish for groundfish in the GOA. The SBA information reflects the number of vessels that actually fished, not individual LLP license holders.

NMFS attempts to minimize the burden of this collection on all respondents. The online submission system is designed to provide a user-friendly and efficient format to submit the EDR. A toll-free phone number is available for participants to contact Pacific States staff for help or information. Beginning in 2020, NMFS has procedurally suspended automated auditing and relies primarily on the Data Collection Agent to conduct data verification, thus reducing auditing cost burdens.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The GOA Trawl EDR Program collects baseline information on the economic structure of the groundfish fishery before modifications to the fishery are implemented. This collection is a focused data collection program to provide data that are currently unavailable, can be collected with minimal burden on industry, and provide information that is of interest to a wide cross-section of stakeholders. If data are not collected prior to implementing changes to the fishery structure, it is not possible to quantitatively measure the impacts of specific changes.

Collecting data on utility usage is done to better understand the stresses that can be put on public utilities to meet peak demand during times where large volumes of fish are processed. Management actions that affect the amount of processing activity affect the burden on community infrastructure and can help analysts estimate the impacts of proposed actions. Without collecting baseline information on the variation of utility usage by month and processor, those changes in demand for utilities as a result of processing activity will not be known.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection is conducted in a manner consistent with OMB guidelines

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A *Federal Register* Notice was published on July 23, 2020 ([85 FR 44523](#)), to solicit public comment. The comment period ended on September 21, 2020. No public comments were received.

² Alaska Fisheries Information Network data, 2019.

Comments were also solicited through public testimony in the Council process on January 31, 2020. The Council has been reviewing all of the EDR collections over the past several years, first with a request for a discussion paper comparing the various EDRs. Second, the Council moved to consider a regulatory amendment to possibly revise the EDR program collections and received an initial review draft of that analysis in January 2020. The Council has postponed action and charged its Social Sciences Planning Team (SSPT) to conduct further stakeholder outreach in August and September of 2020 and to develop recommendations for further analysis of regulatory amendments.

Public testimony related to this collection during the Council meeting focused on frustration that the Council has not moved forward with developing the Limited Access Privilege Program (LAPP) (e.g., catch shares program) that this collection was intended to support. Several commenters requested that the Council “suspend” the GOA Trawl EDR collection and reinitiate the collection if and when the Council considers developing a LAPP in the future. A commenter suggested that all annual EDRs be suspended and only required in years of LAPP (e.g., catch shares) review. Respondents who testified contend that some of the information is available from other sources and duplication needs to be reviewed for elimination. However, the data sources identified by commenters provide aggregated data, not repeatable observational cross-section and time series data tied to individual vessel operational and economic characteristics. Several commenters contend that the EDR data is not being used in the Council’s fisheries management decision making process; however, EDR data from this collection is used in the Council process to develop analyses that the Council then reviews in order to take management actions (see discussion for question 2). All of these issues will be considered during the upcoming SSPT outreach efforts, and the SSPTs comprehensive review of the EDR programs.

It is important to note that during Council deliberations of their motion they did not choose a preliminary preferred alternative to eliminate the GOA Trawl EDR, which was an available alternative in the analysis. Further, in developing their three meeting outlook of actions and in the staff tasking portion of the meeting the Council did not choose to schedule the analysis for final review and action, as their preference is to allow the SSPT process of a comprehensive evaluation of the EDR collections to move forward prior to taking any further action on revision or elimination of the EDR collections.

The SSPT has held an EDR program stakeholder comment meeting, a separate team meeting, and is now planning four separate stakeholder meetings, one for each EDR collection. It is anticipated that a team report will be provided to the Council with EDR program revision recommendations in February 2021.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided under the GOA Trawl EDR Program.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*). It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect the confidentiality of fishery statistics.

This protection prevents the release of confidential data collected under this program through a Freedom of Information Act request. Data could still be released through an order from a Federal court but would only apply to specific observations relevant to the court proceedings.

All of the data collected is covered by the confidentiality requirements that define who has access to the disaggregated EDR data and how data must be aggregated prior to being publically released. Pacific States collects the data and assigns a unique identification number to each submission by the catcher vessels and processors. The Pacific States data confidentiality policy is attached. This number is held in confidence by Pacific States to provide an additional safeguard against the accidental release of confidential data by analysts working with the vessel/processor level data.

Pursuant to applicable regulations, data and identifiers reported may be used for program enforcement and determination of qualification for cooperative membership. Consequently, identifiers and data may be disclosed to NOAA Office of Law Enforcement, NOAA General Counsel, the Antitrust Division of the Department of Justice, the Federal Trade Commission, and NOAA Restricted Access Management Division.

The system of records notice that covers this information collection is [COMMERCE/NOAA #16, Economic Data Reports for Alaska Federally Regulated Fisheries off the Coast of Alaska.](#)

The Privacy Impact Assessment that covers this information collection is [NOAA NMFS Alaska Region Local Area Network \(NOAA4700\).](#)

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not involve information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The number of respondents in the Annual Trawl Catcher Vessel EDR was increased from 102 to 106 to reflect the number of EDRs required, based on the number of LLP licenses issued in 2019, to be submitted in 2020, for year 2019. The number of respondents for the Annual Shoreside Processor EDR was decreased from 18 to 11 to reflect a decrease in the number of registered custom processing entities in 2019. The 2017 renewal adjusted the response burden hours to 15 hours based on public comments received. This renewal maintains that burden hour estimate.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Annual Trawl Catcher Vessel EDR	Accountant/ Manager	106	1	106	15	1,590	\$37	\$58,830
Annual Shoreside Processor EDR	Accountant/ Manager	11	1	11	15	165	\$37	\$6,105
Totals				117		1,755		\$64,935

* The \$37 per hour is the Bureau of Labor Statistics, Occupational and Employment Wages, May 2020 estimate for series 13-1051, Cost Estimators (https://www.bls.gov/oes/current/oes_ak.htm). The EDR submissions are sufficiently similar to cost estimation processes in that they require reporting of cost of production data from multiple differing target fisheries. Further, NMFS has used this cost estimate in several of our recent EDR renewals and presents its burden hour and cost per hour estimates for public comment and generally updates and revises them if it receives information that supports doing so.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection, as it is a renewal of an existing collection and equipment used is customary business equipment.

This collection does not require additional recordkeeping burden or additional record keepers as records already customarily maintained are used to complete the collection form. This collection may involve use of photocopying, faxes, mail and online access estimated to be approximately \$5 per respondent.

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
GOA Trawl CV EDR	106	1	106	Operating Costs: \$5	\$530
GOA Shoreside Processor EDR	11	1	11	Operating Costs: \$5	\$55
TOTALS	117		117		\$585

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

These costs are actual costs, as identified in the table below, for a Federal Oversight Economist’s proportion of time applied to this collection within the overall EDR Program. Costs for the contacted services of the Pacific States Marine Fisheries Commission administration of data collection are based on a firm fixed prices mechanism and are inclusive of salaries, fringe benefits, supplies and other miscellaneous costs. These costs are not subject to cost recovery at this time.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP III/03	\$ 166,081	11		\$ 18,269
Other Federal Positions					
Contractor Cost					\$ 66,545
Travel					
Other Costs:					

TOTAL					\$84,814
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15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There are no changes to the information collection burden hours per response since the last OMB approval. Miscellaneous costs have been estimated as a flat rate of \$5 per response. The number of responses has been increased to reflect the current number of LLP license holders that must complete an EDR in order to have their LLP license issued. The number of Shoreside Processing responses has been reduced to reflect a decrease in the number of registered custom processors that must complete an EDR.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Trawl Catcher Vessel EDR	106	102	106	102	1,590	1,530	Adjustment for number of LLP license holders in 2019
Shoreside Processor EDR	11	18	11	18	165	270	Adjustment for number of shore plants operating in the fishery in 2019
Total for Collection	117	120	117	120	1,755	1,800	
Difference		-3		-3		-45	

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Trawl Catcher Vessel EDR	\$58,830	\$56,610	\$ 530	\$ 0	Adjustment for number of LLP license holders in 2019. Miscellaneous costs are now estimated as a flat rate per response.
Shoreside Processor EDR	\$6,105	\$9,990	\$55	\$0	Adjustment for number of shore plants operating in the fishery in 2019.. Miscellaneous costs are now estimated as a flat rate per response
Total for Collection	\$64,935	\$66,600	\$585	\$0	
Difference		-\$1,665		\$585	

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collected will not be published. It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information about the GOA Trawl EDR Program. The Council and NMFS will continue to use the aggregated and non-confidential information to inform management and policy decisions.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions to the certification.

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).