

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Highly Migratory Species (HMS) Scientific Research Permits, Exempted Fishing Permits, Letters of Acknowledgement, Display Permits, and Shark Research Fishery Permits
OMB Control NO. 0648-0471

Abstract

This request is for extension of this currently approved information collection. This collection is necessary for the application and collection of data associated with exempted fishing permits (EFPs), scientific research permits (SRPs), display permits, letters of acknowledgement (LOAs), and shark research fishery permits for the shark research fishery. Each of these permits require an application be submitted to the agency that includes information about the research being conducted, fishing gear used for research, collaborating scientist, and vessels being used during research activities. These permits involve commercial and recreational fishermen as well as various researchers from academic institutions. EFPs, SRPs, LOAs, and display permits all require reporting on an interim and annual basis on forms specific to the EFP Program. The shark research fishery data is collected through the Shark Bottom Longline Observer Program. These data are used for a wide range of fishery management initiatives by the Atlantic Highly Migratory Species (HMS) Management Division.

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 EFP program includes not only EFPs but also SRPs, display permits, LOAs, and shark research fishery permits, which are issued to participants in the Shark Research Fishery.

The success of fisheries management programs depends on ensuring that allowable harvests are not exceeded. The requirements in this collection derive their authority from two separate statutes, and the differences in those statutes are responsible for the variations in the requirements applying to different species as discussed below.

The [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 et seq.) (Magnuson-Stevens Act) governs domestic fisheries and is the primary authority for management of fishing activities for Atlantic sharks. The [Atlantic Tunas Convention Act](#) (ATCA), in addition to the Magnuson-Stevens Act, regulates U.S. fishing activities of Atlantic tuna and tuna-like species including Atlantic tunas, swordfish and billfish. Under the Magnuson-Stevens Act, the NOAA Fisheries may authorize fishing activities outside the established regulations. NOAA Fisheries needs the ability to monitor such exempted fishing activities to ensure compliance with authorized harvest levels in a timely and accurate manner, as this is crucial to enforcement. ATCA at 16 U.S.C. 971 requires the Secretary of Commerce (Secretary) to promulgate regulations as necessary and appropriate to implement binding recommendations adopted by the International Commission for the Conservation of Atlantic Tunas (ICCAT). The authority to issue regulations under these statutes has been delegated from the Secretary of Commerce to the Assistant Administrator for Fisheries, NOAA. Section 971 d (c)(3) of ATCA provides the statutory authority to require the collection of information necessary to implement the recommendations of ICCAT. Note that while ICCAT currently focuses on tunas, swordfish, and billfish, it has agreed to add “oceanic, pelagic,

and highly migratory” sharks, which includes species such as silky, oceanic whitetip, and hammerhead sharks, to its Convention (Recommendation 19-01). This change to the Convention requires ratification by its members before it goes into effect.

Under both the Magnuson-Stevens Act and ATCA, non-scientific activities, including collection for education or display, may be authorized under the EFP Program. NOAA Fisheries issues a variety of permits depending on the purpose of the permit and the type of vessel upon which the activity is being conducted. For instance, EFPs are issued to allow research conducted from a commercial or recreational fishing vessel that would otherwise be prohibited by existing regulations, display permits are issued for the collection of HMS for the purpose of public display, and shark research permits are issued annually to a few, selected applicants who have submitted an application in response to NOAA Fisheries’ shark research fishery objectives for a given year.

When shark research permits first began to be issued in 2008, the application to participate in the shark research fishery was combined with the application for all other EFPs. However, because the scientific research implemented within the shark research fishery is specific (e.g., it facilitates limited testing of fishing gear and methods, allows for acquisition of data from some portion of the historical Atlantic shark fishery, investigates means of reducing bycatch, economic discards, and regulatory discards), combining the applications created confusion for applicants of all permit types. To minimize confusion for applicants, in 2016, NOAA Fisheries created a separate application for the shark research fishery. Though no new information is collected, having separate applications for the shark research fishery and for other permits under the purview of the exempted fishing permit program makes the application process more transparent for applicants.

Scientific research is exempted from regulation under the Magnuson-Stevens Act, so NOAA Fisheries does not issue EFPs for bona fide research activities (*i.e.*, research conducted from a research vessel and not a commercial or recreational fishing vessel) involving species regulated under Magnuson-Stevens Act fishery management plans (FMPs) (*i.e.*, most species of sharks). To avoid enforcement issues and to ensure the applicant is conducting scientific research, NOAA Fisheries requests copies of scientific research plans. In such cases, NOAA Fisheries issues an LOA to researchers to indicate concurrence by NOAA Fisheries that the proposed activity meets the definition of research and is therefore exempt from regulation.

In contrast to the Magnuson-Stevens Act, ATCA confers regulatory authority over scientific research so that all sources of mortality for species regulated by ICCAT can be reported by the United States to ICCAT. In cases where the species being collected is managed by ICCAT, NOAA Fisheries issues an EFP if the research/collection occurs in conjunction with regulated commercial or recreational fishing activity or an SRP if the collection of regulated species occurs as part of a research cruise (*e.g.*, NOAA Fisheries or university research vessel).

To regulate these fishing and research activities, NOAA Fisheries needs information to determine the justification of granting an EFP, display permit, LOA, SRP, or shark research permit. The application requirements for an EFP, display permit, LOA, SRP, or shark research fishery permit are detailed at 50 CFR § 600.745(b)(2). NOAA Fisheries is requesting clearance for the requirements as defined in the 50 CFR § 635.32 regulations. For consistency, the application requirements are the same as for non-HMS permits covered under § 600.745(b).

The specific requirements on the applications for an exempted activity through an EFP, display permit, LOA, SRP, or a shark research fishery permit are outlined below.

EFPs, Display permits, LOAs, and SRPs:

1. purpose for the exempted fishing permit,
2. permit received in previous years and for how many years,
3. advance notification of the fishing or research vessel to be used,
4. a list of authorized samplers,
5. the number and size classes of fish to be caught or retained,
6. anticipated interactions with endangered or protected species, including marine mammals and essential fish habitat,
7. the anticipated locations of fishing activities (possible closed area research),
8. commencement dates and duration of the activities,
9. sources of funding,
10. specifics of vessels to be used for collection or research,
11. the fishing methods to be employed, and
12. notification of departure to collect animals for public display.

Shark research fishery permits:

1. how the applicant plans to meet the research objectives set forth by the Agency,
2. past participation with the NOAA Fisheries observer program,
3. ability to carry a NOAA Fisheries observer,
4. past enforcement actions,
5. past involvement in the commercial shark fishery,
6. advance notification of the fishing or research vessel to be used,
7. the anticipated locations of fishing activities,
8. commencement dates and duration of the activities, and
9. the fishing methods to be employed.

Post-activity reports includes (for all permits except the shark research fishery permits):

1. catch/collection (interim) reports and “no-catch” reporting,
2. year-end (annual) reports of results.

These specific reporting requirements will be identified in each EFP. Failure to comply would result in a revocation of the authorization and/or issuance of a notice of violation. NOAA Fisheries needs to know the amount and species of fish caught, where they are caught, anticipated bycatch, and the catch disposition in order to effectively manage HMS fisheries, and the other information is needed for enforcement purposes.

2. 1 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.

For SRPs and/or LOAs, NOAA Fisheries Regions, NOAA Fisheries Science Centers, and both NOAA Fisheries and U.S. Coast Guard enforcement use information obtained from submitted research plans and subsequent reports to monitor activities and ensure they are bona fide scientific research activities. NOAA Fisheries reviews each scientific research plan submitted in order to determine whether the sponsoring organization and personnel involved are recognized scientific investigators, the specific project contemplated appears to be scientific research and not commercial or recreational fishing, and that the vessel(s) to be used are, or will be, used exclusively for research for the duration of the scientific research cruise. NOAA Fisheries uses any reports or articles voluntarily submitted to document catch

taken in scientific research for inclusion in the total catch, confirm the activities conducted were scientific research, and consider the appropriateness of acknowledging future requests.

For exempted fishing activities, NOAA Fisheries Regions, NOAA Fisheries Science Centers, and NOAA Fisheries and U.S. Coast Guard enforcement use EFP and shark research fishery permit requests and their reports to evaluate proposals for issuance of permits, ensure activities are carried out as described in the permit, and document the catch by exempted fishing for inclusion in the total catch. NOAA Fisheries evaluates EFP and shark research fishery permit requests to determine their usefulness to the overall goals of the 2006 Consolidated HMS FMP and its amendments; determine their impact on the fishery stocks, protected species, and marine mammals; and evaluate them comparatively with other applicants for the same fishery. Management and enforcement use the information to identify the entities and vessels involved and ensure the applicant carries out activities within the restraints of the permit. The shark research permit also allows commercial fishermen to retain and sell sandbar and other sharks, consistent with the Agency's shark research objectives for each year. Management and enforcement use the reports from EFPs, SRPs, display permits, LOAs, and shark research fishery permits to document catch for inclusion in the total catch, confirm the activities conducted were in accordance with the permit, and consider the permittee for future permits. Shark research fishery permit holders do not have to submit interim or annual reports through this program as they must report their commercial catch in the appropriate logbook for quota monitoring of other species. These permit holders are also subject to 100 percent observer coverage, and scientific observer reports describing all fishing activities (i.e., landings, discards, interactions with protected resources) are used by managers and enforcement to monitor catch.

For educational activities requiring display permits, NOAA Fisheries evaluates the authorization request for these activities to determine whether they are complete, confirms their educational value, and determines their consistency with the goals, objectives, and requirements of the 2006 Consolidated HMS FMP and its amendments. Management and enforcement use the information to identify the entities and vessels involved, and to ensure the applicant carries out activities within the restraints of the permit. Management and enforcement use reports to document catch taken for inclusion in the total catch, to confirm the activities conducted were in accordance with the permit, and for consideration of future requests.

Requiring EFP recipients to report their harvest per occurrence in both Federal and state waters, as well as "no-catch" reporting, allows NOAA Fisheries to document catch taken for inclusion in the total catch. Annual reports provide a validation check against the data submitted in interim reports as well as a means for NOAA Fisheries to determine if all individual reports have been submitted. Additionally, because many EFPs are issued for the purposes of research and/or public display, the scientific community as well as the general public, will benefit, as unauthorized and illegal fishing are deterred and more burdensome regulations are avoided. The information collected pursuant to scientific collection activities under EFPs may be incorporated in future stock assessments and fishery management actions. Inadequate harvest controls under these EFPs could result in curtailment of collection activity and the loss of public benefits.

NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA Fisheries decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological 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.

Applications and both interim and annual reporting forms can be sent electronically to permit holders, and permit holders may also fill out the forms electronically. These fillable forms are located on the HMS Management Division's website at:

<https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/atlantic-highly-migratory-species-exempted-fishing-permits>. The applications and both interim and annual reports may be e-mailed to the HMS Management Division, as applicable, and the fishing notifications must be called in to enforcement.

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

Scientific research plans: To the extent that scientific research organizations are required to submit scientific research plans to NOAA, NOAA Fisheries, or other agencies as a part of any contract or grant, those same plans would be acceptable for the purposes of this information collection. Copies of any scientific cruise report or research documentation required to be submitted by a scientific research organization would be acceptable as a voluntary report for the purposes of this collection.

Exempted fishing: There is no duplication with other collections. EFPs are issued relative to specific requirements determined by NOAA Fisheries and the applicant.

Shark research fishery permits: There is no duplication with other collections. These permits are issued relative to specific research objectives outlined annually by NOAA Fisheries.

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

Nearly all commercial fishing and collection vessels in the HMS fisheries are categorized as small businesses. The collection in and of itself will not have a significant impact on small businesses, and no special modifications of the requirements were considered necessary to accommodate the needs of small businesses.

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.

Scientific research plans: Violations of the Magnuson-Stevens Act and ATCA where the violator asserts he/she was conducting scientific research and not commercially or recreationally fishing may be difficult to prove if a scientific research plan is not obtained and an SRP or an LOA is not issued. Without an SRP or LOA, legitimate researchers may be inconvenienced and enforcement units may conduct needless and inappropriate boardings of scientific research vessels whose activities are confused with commercial and/or recreational fishing. In addition, if the catch of some scientific activities is large and

undocumented, then such activities cannot be managed properly and may contribute to overfishing. Therefore, SRPs and LOAs allow the Agency to more accurately monitor quotas and track landings conducted through research; data are used in future stock assessments.

Exempted fishing and fishing for public display: Issuance of EFPs and display permits allows NOAA Fisheries access to relevant information that can be used in the management of fisheries. If the information requested by applicants for these permits is not obtained, there will be no standard way of dealing with these activities from region to region, and there could be more incidents of persons who think they are conducting scientific research being found in violation of the Magnuson-Stevens Act and/or ATCA. In addition, requiring EFP and display permit applicants to report landings or collections and to provide an annual summary of these activities will increase the efficacy of management measures and reduce costs for both the U.S. Coast Guard and NOAA Fisheries Office of Law Enforcement. Less frequent reporting would not support this goal and would not allow NOAA Fisheries to track landings and monitor quotas. All data collected under these permits would be used in future stock assessments; without accounting for this mortality, such stocks could be subject to overfishing.

Shark research fishery permits: Issuance of shark research fishery permits identifies commercial shark fishermen that are participating in the shark research fishery. Without such a permit, these vessels would be unable to retain and sell sandbar sharks. Therefore, such a permit helps with enforcement of this fishery and allows commercial fishermen to retain and sell sandbar sharks. The shark research fishery also allows NOAA Fisheries to conduct research cooperatively with commercial shark fishermen. This research allows testing of novel fishing gear and methods; the acquisition of data from some portion of the historical Atlantic shark fishery; and/or investigating means of reducing bycatch, economic discards, or regulatory discards as well as any appropriate research objectives identified by NOAA Fisheries. Without such research, data collection from commercial shark fishermen for future stock assessments would not occur, modifications to fishing gears to reduce bycatch would not occur, and increased post-release survival of bycatch could not be investigated.

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

Interim reports (required within five days of the conclusion of a fishing trip) and “no catch” reports (required each month no fishing is conducted) are necessary for the management of different fisheries through quota monitoring.

Commercial fishermen carrying a shark research fishery permit do not need to submit an interim or annual report as they must report their commercial catch in the appropriate logbook for quota monitoring of other species. Participants in the shark research fishery must carry a scientific observer at all times when fishing within the shark research fishery; catch reports equivalent to interim reports regarding all catch during these trips will be submitted by scientific observers.

The collection of information will otherwise be 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 published on October 28, 2020 (85 FR 68306) solicited public comments. No comments were received during the 60-day comment period.

NMFS reached out to several permit holders in an effort 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. Though questions on some of the legal language and coverage the permits offer were received, no responses were received related to the application and the reporting processes themselves.

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

NOAA Fisheries does not make payments or gifts to respondents.

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.

As stated on the forms, generally, the information collected is confidential under section 402(b) of the Magnuson-Stevens Act, as amended in 2006. It is also confidential under [NOAA Administrative Order 216.100](#), which sets forth procedures to protect confidentiality of fishery statistics. However, applicants for exempted fishing permits and exempted educational activities may be required to waive confidentiality of information as a condition of a permit. The terms and conditions of the permit are regulated under [50 CFR part 635.32 \(h\)](#) which requires permit holders to complete interim and annual report forms containing confidential information. Whenever data are requested, the Agency ensures that information identifying the pecuniary business activity of a particular vessel operator is not disclosed.

The information from this collection is stored, used, and transmitted via NOAA system 4000, NMFS Fisheries WAN and Enterprise Services and a current Privacy Impact Assessment is available at https://www.osec.doc.gov/opog/privacy/NOAA%20PIAs/NOAA4000_PIA_SAOP_Approved.pdf.

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.

No information of a sensitive nature is requested.

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

An application for an EFP, SRP, Display Permit, and LOA must contain all the information required for an EFP application found at [50 CFR part 600.745\(b\)\(2\)](#). Information for a shark research fishery permit must contain all the information governing the issuance of a Federal shark research fishery permit at 50 CFR Part 635.32.

An application for a SRP and a LOA must include a research plan and/or all the information required for an EFP application. Based on recent information on the number of EFP, SRP, display, and LOA applications, NOAA Fisheries estimates: **2 hours for a scientific research plan; 40 minutes for an application for an EFP, display, SRP, or LOA for Highly Migratory Species and 40 minutes for a shark research fishery permit application; 1 hour for an interim report; 40 minutes for an annual fishing report; 15 minutes for an application for an amendment to an EFP; 5 minutes for notification of departure phone calls to NOAA Fisheries Enforcement; 2 minutes for “no-catch” reports.** NOAA Fisheries has updated the burden hours estimates based on past participation in the shark research fishery and in the exempted fishing program. The average number of participants/responses was used to update the burden estimates based on participation over the past three years (Table 1).

Table 1. Estimates of the annual number of respondents, responses, hourly reporting burden, and total annual wage burden associated with the Atlantic HMS exempted fishing permit program.

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)
Scientific Research Plans	Academics	15	1	15	2	30	\$32.31	\$969.30
Shark Research Fishery Permit Applications	Commercial Fishermen	12	1	12	.67	8	\$25.25	\$202.00
EFP, SRP, LOA, and display permit applications	Academics and Small Businesses	40	1	40	.67	27	\$32.31	\$872.37
Amendments to exempted fishing permits	Academics	5	2	10	.25	3	\$32.31	\$96.93
interim reports	Academics and Small Businesses	11	5	55	1	55	\$32.31	\$1,777.05
“No catch Reports”	Academics and Small Businesses	5	7	35	.03	1	\$32.31	\$32.31
Annual Reports	Academics and Small Businesses	40	1	40	.67	27	\$32.31	\$872.37
Departure notifications to NOAA Fisheries enforcement for collection of display animals	Small Businesses	5	2	10	.08	1	\$32.31	\$32.31
Notification calls to the Southeast Fisheries Science Center for observer coverage	Commercial Fishermen	12	~7	78	.10	13	\$25.25	\$328.25
Totals				295		165		\$5,182.89

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).

The cost to applicants is minimal, with only a letter, landing report forms, or local telephone call needed to apply, notify, or report. NOAA Fisheries estimates that the total annual cost burden at \$11 with the average cost per EFP, SRP, LOA, display, or shark research fishery permit application at \$0.55.

NOAA Fisheries typically receives reports, applications, and amendments via e-mail (approximately 90 percent of the submissions) so there would be no cost associated with submitting these requests. In addition, departure notification calls are made via telephone to local enforcement offices, so there is no charge associated with these responses. *Therefore, the number of responses that would use the mailing option to submit a form to NOAA Fisheries include:*

Table 2. Estimates of annual miscellaneous costs associated with the Atlantic HMS exempted fishing permit program.

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)
EFP/SRP/LOA/Display/Shark Research Fishery applications	5	1	5	.55	2.75
Scientific Research Plans	2	1	2	.55	1.10
EFP/SRP/LOA/Display/ reports	4	13	52	.55	28.60
TOTALS	11	15	59	.55	32.45

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.

No new overhead costs will be incurred for these collections because NOAA Fisheries will be using existing staff and equipment to conduct duplication, distribution, collection, and data entry.

Table 3. Estimated federal costs associated with administration of the Atlantic HMS exempted fishing permit program.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight					
Duplication, distribution, collection, and data entry	ZP 03/03	\$105,850	35 %		\$37,048
TOTAL					\$37,048

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Program Change: There are no program changes associated with this renewal.

Adjustments: NOAA Fisheries has updated the burden hour estimates based on average participation in the EFP program from 2018-2020.

Table 4. Adjustments to the number of estimated respondents, responses, and burden hours associated with the Atlantic HMS exempted fishing permit program.

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	
Scientific Research Plans	15	8	15	8	30	16	Increase in the number of plans submitted.
Shark Research Fishery Permit Applications	12	12	12	12	8	8	No change
EFP, SRP, LOA, and display permit applications	40	37	40	37	27	25	Increase in the number of applications received
Amendments to exempted fishing permits	5	10	10	10	3	3	No change, correcting administrative # of respondents error
interim reports	11	10	55	50	55	50	Increase in the number of reports submitted.
"No catch Reports"	5	10	35	35	1	1	No change, correcting administrative # of respondents error
Annual Reports	40	37	40	37	27	25	Increase in the number of reports submitted.
Departure notifications to NOAA Fisheries enforcement for collection of display animals	5	10	10	10	1	1	No change, correcting administrative # of respondents error
Notification calls to the Southeast Fisheries Science Center for observer coverage	12	17	78	84	13	14	Decrease in calls made on average over the past three years.

Total for Collection	145	151	295	283	165	143	
Difference	-6		12		22		

The estimate of annual labor costs has increased from \$0.00 to \$5,182.89 due to these costs having not been included in the previous renewal. The annual miscellaneous cost burden resulting from adjustments has increased from \$8.82 to \$32.45 (a difference of \$23.63). NOAA Fisheries has estimated that most of this cost increase is due to the change in postage rates and an increase in the number of applications and reports.

Table 5. Changes to the estimated labor and miscellaneous costs associated with the Atlantic HMS exempted fishing permit program.

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Scientific Research Plans	\$969.30	\$0.00	\$1.10	\$0.98	Inclusion of labor costs that were previously excluded; increase in postage costs and number of plans submitted
Shark Research Fishery Permit Applications	\$202.00	\$0.00	\$0.55	\$0.00	Inclusion of labor costs that were previously excluded; increase in postage costs and number of plans submitted
EFP, SRP, LOA, and display permit applications	\$873.37	\$0.00	\$2.20	\$1.96	Inclusion of labor costs that were previously excluded; adjustment to postage costs
Amendments to exempted fishing permits	\$96.93	\$0.00	\$0.00	\$0.00	Inclusion of labor costs that were previously excluded
Interim reports	\$1,777.05	\$0.00	\$2.75	\$1.98	Inclusion of labor costs that were previously excluded; increase in postage costs and number of reports submitted
“No catch Reports”	\$32.31	\$0.00	\$0.00	\$1.72	Inclusion of labor costs that were previously excluded
Annual Reports	\$872.37	\$0.00	\$25.85	\$1.96	Inclusion of labor costs that were previously excluded; increase in postage costs and number of reports submitted
Departure notifications to NOAA Fisheries enforcement for collection of display animals	\$32.31	\$0.00	\$0.00	\$0.00	Inclusion of labor costs that were previously excluded
Notification calls to the Southeast Fisheries Science Center for observer coverage	\$328.25	\$0.00	\$0.00	\$0.00	Inclusion of labor costs that were previously excluded
Total for Collection	\$5,182.89	\$0.00	\$33	\$9	
Difference	\$5,182.89		\$24		

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.

No publication is planned.

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 expiration date will be displayed.

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

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