

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**High Seas Fishing Permit Application, Logbook Reporting and Vessel Marking**  
**OMB Control No. 0648-0304**

**Abstract**

This request is for a revision to a previously approved collection. The National Marine Fisheries Service (NMFS) is promulgating a rule to implement, *inter alia*, a statutory change to the High Seas Fishing Compliance Act. The proposed rule, RIN 0648-BG11, would revise permitting and monitoring of U.S.-flagged high seas fishing vessels. Specifically, the revision would change the period of validity of vessel permits from five years to one year, thus requiring annual renewal.

This information collection is necessary to comply with the High Seas Fishing Compliance Act (HSFCA), 16 U.S.C. 5501 et seq., which, among other things, requires U.S. vessels that operate on the high seas to possess a permit issued in accordance with Section 104 of the HSFCA and be marked for identification purposes. HSFCA also requires permit holders to report their fishing activities.

**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 [High Seas Fishing Compliance Act](#) (HSFCA), 16 U.S.C. 5501 *et seq.*, was passed in 1995 to implement the Food and Agriculture Organization of the United Nations (FAO) Agreement to Promote Compliance with International Conservation and Management Measures by Fishing Vessels on the High Seas (Compliance Agreement). HSFCA requires, among other things, that U.S.-flagged vessels operating on the high seas be authorized by the Secretary of Commerce. To effect this requirement, NMFS regulations require that each vessel fishing on the high seas must possess a permit issued in accordance with Section 104 of the HSFCA and be marked for identification purposes, per 16 U.S.C. 5503. HSFCA also requires permit holders to report their fishing activities. The HSFCA prohibits use of high seas fishing vessels in contravention of international conservation and management measures recognized by the U.S. or in a manner that would violate a permit condition. 16 U.S.C. 5505. Implementing regulations are found at 50 CFR Part 300, Subpart R.

NMFS is preparing a proposed rule, RIN 0648-BG11, which, among other things, aims to improve the administration of the HSFCA program and facilitate the monitoring of vessels operating on the high seas. The rule includes, for all high seas fishing vessels, adjustments to the period of validity of the fishing permit issued.

The current collection of information, under OMB Control No. 0648-0304, includes a permit application, vessel marking requirements, and high seas fishing effort and catch reporting.

The current proposed rule, RIN 0648-BG11, if implemented, would result in the following revision to this collection of information:

- Vessel owners will apply for and renew the permit annually, versus every five years.

**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.**

Applicants request an HSFCA permit by submitting a completed application electronically via an online system ([https://fisheriespermits.noaa.gov/npspub/pub\\_cmn\\_login/index\\_live.jsp](https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp)). The applicant vessel's current US Coast Guard certificate of documentation or state registration number is required for purposes of identification and to establish that the applicant vessel is currently documented as a U.S. vessel. The certificate/registration also provides the applicant vessel's official number, port of record, when and where the vessel was built and the vessel's length, all of which are required by the HSFCA for authorization to fish on the high seas.

The majority of the additional information items in Sections 1, 3 and 4 of the application are either required by the HSFCA or deemed necessary for purposes of identification of the vessel, owner, and operator. The date of birth of the owner is requested to link to other fishery permit databases. A number of National Marine Fisheries Service (NMFS) permitting systems use date of birth as a key field. The crew size is required to provide enforcement personnel with advance information as to crew size to be accounted for during a boarding or other inspection, whether at sea or in port.

NMFS is required to comply with the Debt Collection Improvement Act of 1996 (Public Law 104-134), which states, at 31 U.S.C. 7701 (c) (1), "The head of each Federal agency shall require each person doing business with that agency to furnish that agency such person's taxpayer identifying number." The Act further states, at 31 U.S.C. 7701 (c) (2)(B), "For purposes of this subsection, a person shall be considered doing business with a Federal agency if the person is an applicant for, or recipient of, a federal . . . permit . . . administered by the agency." Therefore, because applicants for HSFCA permits are "persons doing business" with a Federal agency, NMFS must require applicants for HSFCA permits to provide a taxpayer identifying number such as a Tax Identification Number (TIN) assigned to an applicant's business or a Social Security Number (SSN) assigned to an individual applicant. The HSFCA application form includes a statement advising the applicant that any TIN or SSN provided is protected information and will not be released to the public.

The information in Section 2 is required to determine the nature and scope of activities to be carried out by U.S. vessels under the HSFCA for NMFS to ensure that applicants report catches in accordance with the requirements of the various authorized high seas fishing activities.

The first information item in Section 5 is required to assist in ascertaining whether the applicant vessel has flown a foreign flag within the last three years. The supplemental information, to be submitted if the vessel has flown a foreign flag, will be used to identify and verify from FAO data whether the applicant vessel, when under foreign flag, violated any natural resource statutes or had a permit or license suspended or revoked.

The second information item in Section 5 is required to assist in verifying whether the applicant vessel has violated natural resource statutes in the last three years. Any such violations occurring while the vessel flew a U.S. flag should be revealed during a check of the Enforcement Management Information System (EMIS - the standard reference database used in fisheries enforcement). This item provides a means to verify the information contained in EMIS, and is an opportunity for applicants to provide any additional details deemed relevant. This item is also designed to be an opportunity for the applicant to correct any misinformation that may be contained in EMIS. Similarly, if violations occurred while under foreign flag, this item is an opportunity to report relevant violations and any additional details deemed appropriate, in order to verify that any violation data held by FAO are accurate and valid.

Reviewing renewal applications is an opportunity for federal fishery managers to provide new information about regulations to the permit holder, or to review the permit holder's compliance record and ensure that reports on fishing effort and catch are up to date. NMFS Permit managers frequently use the renewal process to inform the vessel owner/operator on any changes to the fishery management regulations and reporting forms.

## **Unchanged requirements**

### *Vessel marking requirements*

Section 104 of the HSFCA and National Oceanic and Atmospheric Administration (NOAA)'s regulation require that a vessel's official number or international radio call sign be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. This information identifies each vessel and is intended to be visible at distances at sea level and from the air. This information provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, to ascertain whether a vessel's observed activities are in accordance with those authorized for that vessel. The identifying number is used by the National Marine Fisheries Service (NMFS), the U.S. Coast Guard (USCG), and other marine agencies in issuing violations, prosecutions, and other enforcement-related actions. Vessels that qualify for particular fisheries are readily identified, and more efficiently and expediently prosecuted, thereby allowing for more cost-effective enforcement. Cooperating fishermen and other interested parties also use the number to report suspicious activities. Fishermen in compliance with fishery management regulations ultimately benefit, as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

### *Vessel Photograph*

A photograph of the high seas fishing vessel will need to be submitted by vessel owners or operators who are applying for a high seas fishing permit. The photograph must clearly show

the entire bow-to-stern side-view of the vessel in its current form and appearance; it must also clearly and legibly display the vessel name and identification markings. The photographs will be used to identify or verify the identity of a vessel, particularly for enforcement purposes. The photographs could be used by U.S. enforcement agents as well as agents associated with regional fisheries management organizations.

#### *Request to authorize a fishery on the high seas*

A member of the public could request NMFS add an authorized fishery by submitting a written request that includes items described in the response to Question 1.

NMFS does not expect such requests on a regular basis. For the purposes of this information collection, NMFS estimates that one request might be submitted every 5 years. The information submitted with the request will be used by NMFS to analyze the potential impacts on the human environment from the proposed fishing activities, pursuant to NEPA, impacts to marine mammals under the MMPA, and to analyze the potential impacts to species listed as endangered or threatened under the ESA and their designated critical habitats. Depending on the outcomes of these analyses and any other relevant factors, NMFS will determine whether to add the fishery to the list of fisheries authorized on the high seas.

#### *Enhanced Mobile Transceiver Units*

Vessel owners or operators will need to purchase an EMTU, have it installed on the vessel, and submit an installation and activation form to NMFS. Current owners will have paid the capital expenses, incurred in 2015 and averaged over three years.

The EMTU will automatically provide position reports, along with vessel identification information, every hour to NMFS. The regular position reports allow NMFS to monitor the vessel in its vessel monitoring software. This tool allows NMFS to monitor high seas fishing vessels, communicate with the vessel through the EMTU, and promote compliance with applicable requirements.

Vessel owners and operators could use one of two exemptions from the EMTU operation requirement. The EMTU may be powered down if (1) the vessel will be at the dock or mooring for more than 72 consecutive hours, or (2) the vessel, for 30 or more consecutive days, will not be on the high seas or participating in a fishery that requires EMTU operation. A message notifying NMFS of the power-down must be sent to NMFS prior to powering down the unit and again when the EMTU will be powered back up.

Prior to powering down, the vessel owner or operator will be required to notify the NMFS Office of Law Enforcement (OLE) divisional office via email or other means as directed by the OLE divisional office the following information: the vessel's name; the vessel's official number; the intent to power down the EMTU; reason for power-down; port where the vessel is docked; and full name, telephone, and email contact information for the vessel owner or operator. When powering up the EMTU from an in-port exemption, the vessel owner or operator will need to report to the OLE divisional office the following information: that the EMTU has been powered

up; the vessel's name; the vessel's official number; port name; intended fishery; and full name, telephone, and email contact information for the vessel owner or operator.

When powering up from an in-port exemption the vessel owner or operator will need to report to the OLE divisional office, during office hours, at least 2 hours before leaving port or mooring. When powering up from a long-term exemption, the vessel owner or operator will need to notify the OLE divisional office during office hours. The vessel owner or operator will need to receive email confirmation from the OLE divisional office that proper transmissions are being received from the EMTU. This confirmation will need to be received before leaving port, after an in-port exemption, or entering the high seas or a fishery that requires EMTU operation, after a long-term exemption, if these activities are occurring during OLE divisional office hours. If the vessel leaves port, enters the high seas, or enters a fishery that requires EMTU operation outside of OLE divisional office hours, the OLE divisional office will confirm proper transmissions and send email confirmation at the beginning of the next business day.

### *Observers*

If a high seas fishing vessel is selected for observer coverage, the vessel owner or operator will need to provide NMFS a notice of their next fishing trip that may take place on the high seas. The specific notification procedures and information requirements, such as expected gear deployment, trip duration and fishing area, will be specified by NMFS in its selection letter. NMFS will use the notice to ensure that an observer is prepared to board the vessel for the next fishing trip. For trips on which an observer is deployed under this requirement, the affected entity will be at least responsible for the costs associated with providing the observer with food, accommodations, and medical facilities.

NMFS will pay the cost of the observer's salary and benefits. If and when a mechanism is established whereby the fishing vessel could pay these costs, the vessel could be responsible for all or a portion of these costs.

### *Transshipments on the High Seas*

A notice of a pending transshipment on the high seas, involving any U.S. vessel, will need to be provided to NMFS at least 36 hours prior to transshipment. The notice will need to include: the vessels participating in the transshipment (names, official numbers, and vessel types); the location (latitude and longitude to the nearest tenth of a degree) of transshipment, date and time that transshipment is expected to occur, and species, processed state, and quantities (in metric tons) expected to be transshipped. A full report of the transshipment, using a form developed by NMFS, will need to be provided to NMFS within 15 days after the vessel first enters into port following the transshipment. The form will collect vessel information for the offloading and receiving vessels, vessel operator information for offloading and receiving vessel, dates and location of transshipment, species and quantities transshipped, and other information related to the catch and ultimate landing of the transshipped product.

The prior notice will provide NMFS an opportunity to deploy enforcement agents to the location of the transshipment. The report of the transshipments will allow NMFS to be aware of the

activities of high seas fishing vessels and provide information on such activities to regional fisheries management organizations, as appropriate.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NMFS decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#). 44 U.S.C. 3516, note.

**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.**

Vessel owners have the option of completing paper applications, and submitting those documents to regional permit processors, or enter their applications directly into the NOAA Fisheries Permits System web site (NPS). [see: [https://www.fisheries.noaa.gov/fishing-and-seafood-permits?fishing\\_permits%5B1000008636%5D=1000008636](https://www.fisheries.noaa.gov/fishing-and-seafood-permits?fishing_permits%5B1000008636%5D=1000008636)]

The collection of information for permitting purposes via NPS is authorized under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C 1801 et seq., the High Seas Fishing Compliance Act, the Tuna Conventions Act of 1950, the Antarctic Marine Living Resources Convention Act, the Western and Central Pacific Fisheries Convention Implementation Act (WCPFCIA; 16 U.S.C. 6901 et seq), the Marine Mammal Protection Act, the Endangered Species Act. The authority for the mandatory collection of the Tax Identification Number (TIN) is 31 U.S.C. 7701.

In order to manage U.S. fisheries, NMFS requires the use of permits or registrations by participants in the United States. NMFS established the NPS to accept and maintain all Sustainable Fisheries permit applications and related data. Information on NOAA Fisheries permit applicants and renewing holders includes vessel owner contact information, date of birth, TIN, and vessel descriptive information. Furnishing this information is mandatory in order to receive a permit. Failure to provide complete and accurate information will prevent the determination of eligibility for a permit, and would preclude issuance of an authorization to fish.

**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.**

There are no other collections that can substitute for the information required to complete HSFCA applications. The completed applications define unique situations based on an applicant's particular vessel, fishing gear, target species, fishing area and operational strategies.

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

This collection will not have a significant impact on small businesses, organizations or governmental entities. An Initial Regulatory Flexibility Analysis was prepared in support of the proposed rule and concluded that the application fee for an annually renewable HSFCA permit is a negligible cost relative to average annual revenues of a high seas fishing vessel.

**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.**

Failure to collect the information would make it impossible for NMFS to carry out its responsibilities under Section 104 of the HSFCA.

The annual renewal of permits brings the HSFCA permit program in line with a majority of the other permits issued by NMFS. One-year renewal periods allow fisheries managers to communicate on a more frequent basis with permit holders, provide updates on management practices, and update permit owners of compliance issues.

A one-year period is more appropriate than the current five-year period for ensuring that vessels are up-to-date on compliance, and ensuring that vessels are current on the underlying permits necessary to obtain an HSFCA permit. For a vessel owner to qualify for an HSFCA, they must first possess a current, valid permit for one of the following:

- 50 CFR part 300, subpart C— Eastern Pacific Tuna Fisheries
- 50 CFR part 300, subpart D— South Pacific Tuna Fisheries
- 50 CFR part 300, subpart G— Antarctic Marine Living Resources
- 50 CFR part 300, Subpart O — Western and Central Pacific Fisheries Commission Area
- 50 CFR part 635 — Atlantic Highly Migratory Species Fisheries
- 50 CFR part 660, subpart K — West Coast Fisheries for Highly Migratory Species
- 50 CFR part 665, subpart F — Western Pacific Pelagic Fisheries
- South Pacific Albacore Troll Fishery
- Northwest Atlantic Fishery

All permits for these fisheries are issued for one year, with the exception of the Atlantic Highly Migratory Species (two years), the American Samoa Longline Limited Access Permit (three years), and the Western and Central Pacific Fisheries Commission Area Endorsement (a

supplement to the HSFCA, which mirrors the duration of validity for the HSFCA). Changing the HSFCA to one year will bring the high seas permit to reflect more closely the periods of validity for the underlying domestic fishery permits that are required.

Further, fisheries managers are able to exert better monitoring control and surveillance over managed fisheries on the high seas, and will have a more accurate count of how many and which vessels are in which fisheries on the high seas.

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

The collection is consistent with the 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 proposed rule, RIN 0648-BG11, will be published coincident with this submission. Comments on the proposed rule will be considered and, as appropriate, addressed in the final rule.

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

No payments or gifts are involved.

**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 applicable forms, data submitted to NMFS to fulfill HSFCA requirements will be managed consistent with [NOAA Administrative Order 216-100](#) (Confidentiality of Fisheries Statistics). NMFS does not release confidential information submitted in compliance with provisions of the Magnuson-Stevens Fishery Conservation and Management Act or HSFCA, other than in aggregate form and under circumstances required or authorized by law. Whenever data are requested or released to the general public, NMFS ensures that Personally Identifiable Information and information on the financial business activity of a vessel is not identified.

This information is covered by the Privacy Act System of Records Notice, [COMMERCE/NOAA-19](#), Permits and Registrations for U.S. Federally Regulated Fisheries.



**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 sensitive questions are asked.

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

The permit application process is now automated through use of the National Marine Fisheries Service National Permits System:

([https://fisheriespermits.noaa.gov/npspub/pub\\_cmn\\_login/index\\_live.jsp](https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp)).

All application information can be submitted online and the required vessel photograph can be uploaded to the system. For permit renewals, the applicant information is pre-populated by the system after logging in to the vessel operator account, thus reducing the data entry time accordingly. An average of 15 minutes per event is estimated for initial applications and renewals combined, with the majority of actions being renewals. As of March 2022, 347 high seas permits have been issued by NMFS and are currently active. Therefore, NMFS used an upper bound of 400 vessel permit applications/renewals for the burden estimate.

For 400 vessels, the estimated annual time burden for the permit application/renewal collection is 100 hours (400 per annum x 0.25 hours per application/renewal).

Relative to the current annualized approval of 120 responses and burden of 60 hours for 600 vessels to apply/renew every 5-years, the change to annual renewal together with the reduced time for automated permit processing and lower fleet size adds a net 280 responses and a net 40 hours to the annual burden estimate for this aspect of the information collection.

Given the permit system automation, the estimated reporting cost is reduced from \$10.13 to \$5.28 using the Bureau of Labor and Statistics 2021 mean hourly wage for Bookkeeping, Accounting, and Auditing Clerks of \$21.10. There is no additional recordkeeping or reporting requirement associated with the proposed annual permit renewal.

Apart from the proposed vessel permit annual renewal, the response burden for the other elements of the High Seas Fishing Compliance Act information collection (fishery authorization requests, vessel monitoring system notifications, observer notifications, transshipment notifications, and vessel/gear marking) remains unchanged.

### *Summary and Total*

The following table summarizes the time burden estimates for this information collection should the proposed rule change (annual renewal of vessel permits) be implemented:

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents (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)
Vessel Permit Application (initial or renewal)	Vessel Operator/Bookkeeper	400	1	400	0.25	100	\$ 21.10	\$ 2,110
Completing transshipment form	45-1011 First-Line Supervisors of Farming, Fishing, and Forestry Workers	5	3	15	1	15	\$25.25	\$379
Request to authorize a fishery on the high seas	45-1011	1	.1	.1	40	4	\$25.25	\$101
Power-down and power-on notices and EMTU operations	45-1011	400	1	400	.17	67	\$25.25	\$1692
Observer notification, food, accommodations, and medical facilities	45-1011	60	1	60	.08	5	\$25.25	\$126
<b>Totals</b>				<b>875</b>		<b>191</b>		<b>\$ 4,408</b>

**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).**

Through use of the automated NMFS National Permit System, payment of the HSFCA application-processing fee (\$56.00) is accomplished through use of the U.S. Treasury automated payment system (www.pay.gov).

The estimated annual cost burden for permit fees is \$22,400. The estimate is calculated, based on a fleet size of 400 vessels, as follows:

400 permit applications/renewals per annum x \$56.00 per application fee = \$22,400.

Adding the increase in permit fees attributable to the change to annual renewal, and adjusting for the reduced fleet size, the total cost for permits would increase from the currently approved \$6,720 to \$22,400.

There is no additional capital or operational and maintenance cost associated with the proposed regulation. If promulgated, the total cost (fee plus labor) per entity is estimated to be \$61.28 per year, included the labor cost of applying online and the direct cost of the application processing fee.

Apart from the vessel permits, the respondent costs for the other elements of this information collection (fishery authorization requests, vessel monitoring system notifications, observer notifications, transshipment notifications, and vessel/gear marking) remain unchanged.

The following table summarizes the burden estimates for this information collection should the proposed rule change (annual renewal of vessel permits) be implemented:

Information Collection	# of Respondents (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)
Vessel Permit Application (initial or renewal)	400	1	400	56*	\$ 22,400
Completing transshipment form	5	3	15	5	0.50
Request to authorize a fishery on the high seas	1	.1	.1	2	30
Power-down and power-on notices and EMTU operations	400	1	400	625**	250,000
Observer notification, food, accommodations, and medical facilities	60	1	60	0	0
<b>TOTALS</b>			<b>875</b>		<b>\$ 272,431</b>

\* Permit application fees

\*\* Based on the satellite communications service charges incurred by the vessel assuming transmission of 24 position reports per day multiplied by 365 days per year.

**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.**

Given the change to annual renewal, estimated Federal costs for processing applications and issuing permits through the National Permit System are calculated consistent with procedures laid out in the NOAA Finance Handbook for the recovery of administrative costs for special products and services. Note that NMFS uses the automated permit system to issue a variety of regional and national permits. The product/cost computations as prorated for HSFCA vessel permits are as follows:

- a. Direct labor costs are \$13,414.69.
- b. Other direct costs are \$8,850.00 (Contractor System Operations and Maintenance).
- c. Distributed (indirect) costs are \$9,843.70 (NOAA overhead charges).
- d. Financial Management Service fees (use of Treasury’s pay.gov) are \$1,644.00.

These items result in an annual estimated total cost of \$33,752.39 to the Federal government for operation and maintenance of the NMFS National Permit System, as prorated for the HSFCA vessel permits.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
<b>Federal Oversight</b>	ZA2/3/5	Weighted Average across positions: \$55.89/hr	0.11 % (240 hrs)		13,414.69
Other Federal Positions					
<b>Contractor Cost</b>					8,850.00
Indirect Costs (NOAA Support/Rent)					9,843.70
<b>Travel</b>					
<b>Other Costs: Treasury Fees for PAY.GOV</b>					1,644.00
<b>TOTAL</b>					33,752.39

NMFS previously estimated administrative costs for issuing 600 initial permits and/or permit renewals annually, and this figure reflects the current burden approved for this information collection. Using a total of 600 permits, the Federal administrative cost per permit is \$56.25. Per agency policy of full administrative cost recovery for special products or services, an application-processing fee of \$56.00 (rounded) is charged to each applicant. However, NMFS will recalculate administrative costs later in 2022 and determine a new annual fee based on an estimate of 400 vessels applying for, or renewing, permits each year.

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

As stated in the response to Question 6, the annual renewal of permits brings the HSFCA permit program in line with a majority of the other permits issued by NMFS. A one-year renewal period ensures that fisheries managers have current contact information to communicate on a more frequent basis with permit holders, provide updates on management practices, and update permit owners of compliance issues. In addition, annual renewal will ensure that NMFS has current information from vessel operators on fishery participation, fishing effort and catch, and can report on US high seas fishing activity to the United Nations Food and Agriculture Organization.

With the change to yearly renewal of HSFCA vessel permits, the reduced application time, and the adjustment to 400 active permits, the *annualized* number of respondents and responses will increase from the currently approved level of 120 (600 permits/5 years) to 400 (400 permits/each year). Also, the annualized time burden for respondents will increase from the currently approved 60 hours (600 permits/5 years x 0.5 hours per application) to 100 hours (400 permits/1 year x 0.25 hours).

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	
HSFCA Vessel Permits	400	120	400	120	100	60	Program change
<b>Total for Collection</b>	<b>400</b>	<b>600</b>	<b>875</b>	<b>595</b>	<b>191</b>	<b>151</b>	
<b>Difference</b>	<b>280</b>		<b>280</b>		<b>40</b>		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
HSFCA Vessel Permits	2,110	1,515	22,400	6,720	Program Change
<b>Total for Collection</b>	<b>4,408</b>	<b>3,813</b>	<b>272,431</b>	<b>256,751</b>	
<b>Difference</b>	<b>\$595</b>		<b>\$15,680</b>		

**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 results will not be published by individual vessel, but the number of vessels, fishing areas and catch will be reported in the aggregate to the Food and Agriculture Organization of the United Nations. In addition, aggregate catch on the high seas will be reported in the NMFS publication, "Fisheries of the United States."

**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."**

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