

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
NMFS Implementation of International Trade Data System
OMB Control No. 0648-0732

Abstract

This request is for a renewal of a currently approved collection. Domestic law and international obligations require or authorize the National Marine Fisheries Service (NMFS) to collect information about the harvest of certain fishery products when these products enter U.S. commerce and/or are exported from the United States. To this end, NMFS has implemented four trade monitoring programs to collect information from the seafood industry regarding the origin of certain fishery products. The purpose of these programs is to determine the admissibility of the products in accordance with the specific criteria of the trade measure or documentation requirements in effect for the species of fish that are being imported or exported. NMFS collects the required information electronically through the International Trade Data System (ITDS) maintained by U.S. Customs and Border Protection. The ITDS information collection is merged with the Seafood Import Monitoring Program, both previously approved by OMB.

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 National Marine Fisheries Service (NMFS) established procedures for U.S. importers and exporters to electronically file trade documentation for certain fishery products to meet requirements of the Safety and Accountability for Every Port Act of 2006, the Magnuson-Stevens Fishery Conservation and Management Act, other applicable statutes, and obligations that arise from U.S. participation in regional fishery management organizations (RFMOs). Specifically, NMFS has worked with U.S. Customs and Border Protection (CBP) to automate entry and export filing of NMFS-required information through its implementation of the International Trade Data System (ITDS).

Domestic law and international obligations require that NMFS collect information about the harvest of certain fishery products when these products enter U.S. commerce and/or are exported from the United States. Accordingly, NMFS has implemented four trade monitoring programs to collect information from the seafood industry regarding the origin of certain fishery products. The purpose of these programs is to determine the admissibility of the products in accordance with the specific criteria of the trade measure or the documentation requirements in effect for the species of fish that are being imported or exported.

On August 3, 2016, NMFS issued a final rule (81 FR 51126) to establish an electronic International Fisheries Trade Permit (IFTP) that integrated the collection of fisheries trade documentation under three existing monitoring programs with approved information collections: Antarctic Marine Living Resources (AMLR) (50 CFR 300 Subpart G, OMB Control No. 0648-0194), Highly Migratory Species (HMS) (50 CFR 300 Subpart M, OMB Control No. 0648-0040 and OMB Control No. 0648-0327), and

the Tuna Tracking and Verification Program (TTVP) (50 CFR Part 216, OMB Control No. 0648-0335). On December 9, 2016, NMFS published a final rule (81 FR 88975) to implement the Seafood Import Monitoring Program (SIMP) (50 CFR part 300 Subpart Q, OMB control No. 0648-0739). On April 24, 2018, NMFS issued a final rule (83 FR 11762) to include shrimp and abalone within the requirements of the Seafood Import Monitoring Program (50 CFR part 300 Subpart Q, OMB control No. 0648-0776).

To clarify, information collection approval 0648-0732 covers the electronic filing of all four NMFS trade monitoring programs into the CBP Automated Commercial Environment (ACE)/ITDS and SIMP recordkeeping (audit) requirements. The information required for the Data Set Submission in ACE/ITDS is collected on forms under other OMB-approved information collections. NOAA trade monitoring information collections 0648-0040 (Highly Migratory Species Dealer Reporting Family of Forms), 0648-0194 (Antarctic Marine Living Resources Conservation and Management Measures), and 0648-0335 (Fisheries Certificate of Origin) cover the information approval on hard copy forms, with the appropriate OMB Control Number(s) and expiration date(s). 0648-0732 contains the burden required for the respondent to transcribe the information from the appropriate form(s) (under 0648-0040, 0194, and 0335) into the CBP ACE/ITDS.

These trade monitoring programs enable the United States to identify and/or exclude certain fisheries products that do not meet the criteria for admissibility to U.S. markets, including screening products resulting from illegal, unreported, and unregulated fishing activities and products that are misrepresented as dolphin-safe. For exports, the United States can validate lawful acquisition of U.S. harvested or re-exported seafood products to ensure acceptance in foreign markets.

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.

As a result of domestic authorities and/or multilateral agreements, NMFS has implemented its four trade monitoring programs to collect information from industry regarding the origin of certain fishery products. The purpose of these programs is to determine the admissibility of the products, in U.S. or foreign markets, in accordance with the specific criteria of the trade measure or documentation requirement in effect. NMFS trade monitoring programs cover tunas, swordfish, billfish, shark fins, Patagonian and Antarctic toothfish, Antarctic krill and certain other fishery products under the authority of the Magnuson-Stevens Fishery Conservation and Management Act and/or the High Seas Driftnet Fisheries Enforcement Act. Generally, these trade monitoring programs require anyone who intends to import, export, and/or re-export covered species to: obtain a permit from NMFS, obtain documentation on the flag-nation authorization for the harvest from the foreign exporter, and submit this information to NMFS at the time of entry or export. Depending on the commodity, specific information may also be required, such as the flag state of the harvesting vessel, the ocean area of catch, the fishing gear used, the harvesting vessel name, and details and authorizations related to harvest. The latter includes landing, transshipment, and export.

These monitoring programs require the importer to submit documentation that provides catch and/or other statistical information to NMFS, while other relevant information on the inbound shipments is provided by the dealer, importer, shipper, carrier, or customs broker to CBP by filing an electronic entry in ACE. The SAFE Port Act requires all federal agencies collecting data for the purposes of determining admissibility to use the ACE portal to collect that data electronically as part of the entry filing. Therefore, NMFS has issued regulations to require electronic filing of a message set in the ACE portal.

NMFS reviews and reconciles the information reported by importers in ACE that is received from CBP and, where applicable, from the relevant RFMO or harvesting or exporting/re-importing nation to determine if the admissibility requirements have been satisfied. Entry into U.S. commerce may be prohibited for that shipment and the shipment may be subject to forfeiture if the documentation is incomplete, fraudulent, or missing, or if the shipment is not admissible based on its ocean area of harvest, flag country of the harvesting vessel, or the circumstances under which the product was harvested. In addition, the importer or other responsible party may be subject to enforcement action. Likewise, U.S. exporters must provide similar documentation for use by foreign importing nations that are also parties to the trade monitoring agreements.

As an ITDS partner government agency, access to the ACE portal maintained by CBP has improved NMFS' ability to evaluate trends and potential problems with seafood imports, including potential cases of seafood fraud (*e.g.*, tariff code misspecification), or imports lacking proper documentation. ACE helps NMFS communicate with the seafood industry to educate importers and brokers on documentation requirements. It has also helped NMFS target enforcement resources using a risk management approach and has improved the Agency's ability to intercept illegal shipments by providing access to real time information on shipments coming into U.S. ports of entry. NMFS estimates that ITDS integration has resulted in reduced reporting burden for the seafood industry, reduced data processing time for government, increased compliance with product admissibility requirements, faster admissibility decisions, and more effective enforcement.

With the establishment of a consolidated International Fisheries Trade Permit (IFTP), NMFS collects application information electronically via a portal website. This one permit meets the requirements of all of the NMFS trade programs. After receiving an IFTP, the importer or exporter (in most cases working through a customs broker) should provide CBP with a required data set and electronically attach any required additional image files of documents to help CBP and NMFS authorities determine whether the listed shipment is eligible for entry into, or exit from, the United States.

Although the information collected is not expected to be disseminated directly to the public, it may be used in the development or review of fishery management plans and associated regulatory documents. The summarized/aggregated data is provided to RFMOs to fulfill the reporting requirements of international trade monitoring programs. When information is reported, it is subject to NOAA's Information Quality Guidelines. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction. This is consistent with NOAA standards for confidentiality, privacy, and electronic information. Should NMFS decide to disseminate the information, it will be subject to 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.

NMFS has established a web-based National Permitting System for initial application and annual renewal of the consolidated IFTP. The permitting system is accessible by the public at: https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp.

IFTP holders are required to submit a data set electronically to CBP via the ACE portal in conjunction with the filing of the CBP entry summary (CBP Form 7501, OMB Control No. 1651-0022) or a

shipper's export declaration via the Automated Export System (AES). When entries are selected for audit, importers may send scanned copies of supply chain records to NMFS via electronic means.

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

The consolidated IFTP reduces duplication for applicants who previously applied for international trade permits in multiple programs. Also, the implementation guide for submitting the NMFS Message set via ACE (<https://www.cbp.gov/trade/ace/catair>) enables software developers to reduce duplication in data entry to meet the requirements of multiple trade monitoring programs by simply re-formatting the data for each specific message set. The ACE implementation guide lays out the information to be provided under each of the trade programs (TTVP, AMLR Trade Program, the HMS International Trade Program, and SIMP). Additionally, the supply-chain recordkeeping of SIMP allows importers to use documents already in commercial use or already completed to meet other government requirements. No new forms are required to document the supply chain under SIMP (see the audit guide at: <https://www.fisheries.noaa.gov/resource/document/guide-audit-requirements-seafood-import-monitoring-program>).

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

As most of the respondents (importers/exporters) are considered small businesses, separate requirements based on size of business have not been developed. Only the minimum data required to determine admissibility and satisfy RFMO reporting requirements is required as part of entry filing or export declaration.

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.

If the collection is not conducted, the Secretary of Commerce will not be able to meet the mandates of the laws and international obligations described above. The United States would not be able to implement RFMO trade monitoring program requirements, which could result in U.S. fishermen and fish dealers being excluded from business opportunities should other nations deny entry of U.S. products to their markets. In addition, U.S. consumers and fish harvesters would not be protected as illegal or misrepresented fish could easily enter the U.S. supply chain.

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

Collection of information will be made 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.

NMFS published a Federal Register Notice to seek public feedback on its renewal of 0648-0732 (87 FR 58065, September 23, 2022). To promote outreach and public comment submission from industry, NMFS emailed all IFTP holders announcing the notice of information collection and request for comment on October 20, 2022. In addition, NMFS published its notice of information collection and request for comment on its Fisheries Rules and Regulations web page for public reference (<https://www.fisheries.noaa.gov/action/nmfs-international-trade-data-system-information-collection-activities>).

The comment period ran through November 22, 2022, and NMFS received one comment to seek incremental efficiencies in its trade programs and associated requirements for the seafood industry. NMFS agrees with this comment. As mentioned previously, NMFS has optimized efficiencies in ITDS and continues to work toward improving efficiencies and identifying future harmonization efforts across its regulatory trade programs and reporting and recordkeeping requirements for the industry.

Additionally, NOAA reached out to a select few IFTP holders 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. No comments were received in response to this outreach.

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

No payments or gifts are made to respondents under these trade monitoring programs.

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 relevant websites and in compliance/implementation guides, the information collection is considered confidential as required by section 402(b) of the Magnuson-Stevens Act, 16 U.S.C. 1881a(b), and NOAA Administrative Order 216-100. Where other information collection authorities apply (e.g., Atlantic Tunas Convention Act, Antarctic Marine Living Resources Convention Act), information collected will be handled in compliance with agency filing and retention policy as well as the data sharing provisions of the authorizing statutes.

The IFTP is included in SORN NOAA-19:

<https://www.federalregister.gov/documents/2020/08/25/2020-18659/privacy-act-of-1974-amended-system-of-records>

And potentially relevant PIAs are NOAA 4011 and NOAA 4020:

<https://www.noaa.gov/organization/information-technology/privacy-act-system-of-record-notices-sorns>

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.

There are no questions of a sensitive nature.

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

In estimating the burden, NMFS assembled data on respondents currently engaged and responses currently received under existing trade programs. These estimates include only the time needed for preparation and submission of the message set to the ACE portal, and in the case of entries selected for audit, the time needed to submit supply chain records to NMFS. Other aspects (*e.g.*, forms and recordkeeping) of the respective information collections for each program are approved under the individual programs (i.e., 0648-0194 for AMLR, 0648-0040 for HMS and 0648-0335 for TTVP), which were consolidated under 0648-0732 in 2020.

All aspects of the SIMP reporting program are included in this collection because it is entirely electronic. No forms are prescribed for SIMP because the regulations allow for the harvest event information to be recorded and transmitted through the supply chain by any paper or electronic means that is otherwise required (foreign government or business to business contracts) or efficient for industry. However, NMFS provided a model (example) catch certificate for the benefit of foreign exporters and U.S. importers so that the information requirements of the NMFS-specific message set are clear and industry can record required data at harvest for transmission through the supply chain in the event that no other government or business requirements pertain to the specific harvest event. The model certificate is posted at: <https://www.fisheries.noaa.gov/resource/form/model-catch-certificate-seafood-import-monitoring-program>

To estimate labor costs of respondent burden, NMFS applied the mean wage rate of Buyers and Purchasing Agents (Bureau of Labor Statistics Code 13-1020). This labor category most closely corresponds to fish importers and customs brokers who will be knowledgeable of the origin of the fish products and will code the message set, submit electronic entries in ACE and respond to record requests when selected for audits. As of August 2022, the mean wage rate for this occupation series was estimated at \$34.88 per hour (see: <https://www.bls.gov/oes/current/oes131020.htm>).

1. International Fisheries Trade Permit

NMFS estimates that approximately 2,380 International Fisheries Trade Permits are issued annually. The online permit application process, including an abbreviated process for renewals, is estimated to require 20 minutes on average. For 2,380 respondents, this represents a burden of 793 hours and a total annual labor cost of \$27,660.00 at an estimated \$34.88/hour labor rate.

2. Data Set Submission in ACE/ITDS

For the four trade monitoring programs combined, approximately 150,000 entries and export declarations are filed annually in ACE. Response time in terms of preparing the relevant message set varies depending on the specific program requirements and the number of harvest events contributing to the contents of the individual shipment. A weighted average across all programs is estimated to be approximately 18 minutes to prepare and submit the message set to ACE.

For 150,000 responses, this represents a burden of 45,000 hours and a total annual labor cost of \$1,569,600 at an estimated \$34.88/hour labor rate.

3. Supply Chain Recordkeeping

For approximately 150,000 entries and export declarations that are filed annually in ACE, it is estimated that organizing and filing records takes about 16 minutes per event on average. Records must be maintained for two years and made available to NMFS upon selection for an audit.

For 150,000 responses, this represents a burden of 40,000 hours and a total annual labor cost of \$1,395,200 at an estimated \$34.88/hour labor rate.

4. Audit Response

Approximately 2,000 entries are selected for audit under SIMP annually. It is estimated that retrieving and submitting records electronically to NMFS takes about 30 minutes per event on average. For 2,000 responses, this represents a burden of 1,000 hours and a total annual labor cost of \$34,880 at an estimated \$34.88/hour labor rate.

The number of actual SIMP audits completed is lower than the estimated rate due to reduced capacity and staff fluctuations over the past two years. Additionally, the hours to complete a SIMP audit has increased to eight hours from the estimated four hours.

5. Total Burden

The total number of respondents is estimated to be 2,380 based on annual issuance/renewal of International Fisheries Trade Permits.

The total number of responses is estimated to be 304,380. This figure includes permit applications, message set submissions on entry/export, preparation of records associated with each event, and the response to audit requests under SIMP.

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)
Int'l Fisheries Trade Permit	Importer, Exporter	2,380	1	2,380	20 min	793	\$34.88	\$27,660
Data set submission in ACE/ITDS	Customs House Broker	2,380	63	150,000	18 min	45,000	\$34.88	\$1,569,600
Supply Chain Recordkeeping	Importer	2,380	63	150,000	16 min	40,000	\$34.88	\$1,395,200
Audit Response	Importer	2,380	0.84	2,000	30 min	1,000	\$34.88	\$34,880
Totals				304,380		86,793		3,027,340

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).

NMFS has calculated a cost recovery fee of \$49 per IFTP to cover administrative expenses associated with issuing the annual permit. Based on the number of permits issued, the total annual cost burden to respondents would be 2,380 importers X \$49 = \$116,620.

In addition, NMFS estimates that each respondent would invest in technology to maintain and retrieve records associated with entry filings. For each of the 2,380 permitted traders, it is estimated that investment in information technology resources (computer, scanner, data storage) would cost \$3,000 and have a service life of 3 years. This would amount to costs of about \$1,000 per year per respondent or \$2,380,000 per year for all affected importers. Annualized costs in terms of permit fees and IT investment would amount to \$2,496,620 for all respondents.

Information Collection	# of Permit Holders (a)	Annual Cost per Permit Holder (b)	Total Annual Cost (c) = (a) x (b)
Int'l Fisheries Trade Permit Fee	2,380	\$49.00	\$116,620
Data set submission in ACE/ITDS/Technology Investment	2,380	\$1,000	\$2,380,000
TOTALS			2,496,620

***There are no capital costs or operating and maintenance costs associated with this information collection.**

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.

The cost for issuing the IFTP is covered by an administrative cost recovery fee of \$49 per permit, and thus there will be no cost to the Federal government. Customs and Border Protection has allocated funds for its Automated Commercial Environment portal that are used to handle the submission of data sets and admissibility documents.

NMFS personnel will review data and image files submitted through ACE/ITDS. With the exception of SIMP, the programmatic costs of reviewing information are captured within the respective information collections (-0335, -0194 and -0040). As SIMP (-0739) was merged with ITDS (-0732), those costs to government are estimated here (-0732).

The costs of ACE portal development for the NMFS message set submission have already been incurred and were shared by NMFS and CBP. Ongoing costs for ACE maintenance are borne by CBP.

For SIMP audits, the costs include staff time for review of the supply-chain records from harvest to entry filing. On average, it requires eight hours of staff time to select an entry for audit, request and

review materials, and respond to the importer with the results of the audit. For 2,000 audits per year, at eight hours per audit, total staff time amounts to 16,000 hours. At a labor rate of \$65.00 per hour (salary and benefits), total government costs for the SIMP auditing program are estimated at \$1,040,000 annually.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZA-03	\$135,200	769%		1,040,000
Other Federal Positions					
Contractor Cost					
Travel					
Other Costs:					
TOTAL					\$1,040,000

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

NMFS updated its estimate of the IFTPs issued annually based on actual permits issued to importers and exporters the past two years, from the estimated 1,800 to 2,380 IFTPs. Estimates of burden remain the same.

NMFS also updated its estimate on the number of SIMP audits completed based on the number of audits completed the past two years, from the estimated 4,000 to 2,000 audits. The number of actual SIMP audits completed is lower than the estimated rate due to reduced capacity in NMFS (and the SIMP audit team) and staff fluctuations. Additionally, the hours to complete a SIMP audit have increased to eight hours from the estimated four hours. During the first few years of SIMP implementation, SIMP auditors have focused on working with IFTP holders to aid in their understanding of program requirements and the records required to corroborate the data reported in ITDS and verify harvest legality. To that end, SIMP auditors have spent approximately eight hours on average to complete a single audit. As capacity increases, NMFS estimates that the number of SIMP audits completed over time will increase to the initial estimate. The burden to importers and exporters to collect the records remains the same.

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	
Int'l Fisheries Trade Permit	2,380	1,800	2,380	1,800	793	600	Updated estimate based on actual IFTPs issued annually: +580 respondents, +580 responses and +193 hours.
Data set submission in ACE/ITDS	2,380	1,800	150,000	177,600	45,000	54,550	Updated estimate: +580 respondents, -27,600 responses, -9,550 hours.
Supply Chain Recordkeeping	2,380	1,800	150,000	177,600	40,000	46,567	Updated estimate: +580 respondents, -27,600 responses, -6,567 hours.
Audit Response	2,380	1,800	2,000	4,000	1,000	2,000	Updated estimate: +580 respondents, -2,000 responses and -1,000 hours.
Total for Collection	2,380*	1,800*	304,380	361,000	86,793	103,717	
Difference	580		-56,620		-16,924		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Int'l Fisheries Trade Permit	\$27,660	\$20,928	\$116,620	\$54,000	Updated estimate and increase in permit fee: +6,732 labor costs, +62,620 misc costs
Data set submission in ACE/ITDS	\$1,569,600	\$1,858,406	\$2,380,000	\$1,800,000	Updated estimate: -288,806 labor costs, +580,000 misc costs
Supply Chain Recordkeeping	\$1,395,200	\$1,651,917	0	0	Updated estimate: -256,717
Audit Response	\$34,880	\$69,760	0	0	Updated estimate: -34,880.
Total for Collection	\$3,027,340	\$3,541,011	\$2,496,620	\$1,854,000	
Difference	-\$513,671		\$642,620		

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.

This collection will not be published.

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 web site for the International Fisheries Trade Permits (IFTPs) contains the OMB Control Number and Expiration Date of this collection.

The Supply Chain Recordkeeping and Audit Response collections do not have any prescribed forms. The U.S. importer must obtain and retain any business or government documents that link (*i.e.*, chain-of-custody) the harvest of fish (the event reported in the ACE message set) to the shipment entered into U.S. Commerce.

The information required for the Data Set Submission in ACE/ITDS is collected on forms under other OMB approved information collections. NOAA trade monitoring information collections 0648-0040 (Highly Migratory Species Dealer Reporting Family of Forms), 0648-0194 (Antarctic Marine Living Resources Conservation and Management Measures), and 0648-0335 (Fisheries Certificate of Origin) contain the hard copy forms that are subject to electronic filing under 0648-0732 (NMFS Implementation of International Trade Data System). Those forms contain the appropriate OMB Control Number(s) and expiration date(s). 0648-0732 contains the burden required for the respondent to transcribe the information from the appropriate form(s) (under 0648-0040, 0194, and 0335) into the CBP ACE/ITDS. Once the information is transcribed into the ACE/ITDS, an electronic message set is delivered to NMFS from the system notifying us of the entry/export filing. It is not possible to put the control number and expiration date on this CBP ACE/ITDS generated message.

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\(b\)\(3\)](#).