

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**West Coast Region Groundfish Trawl Fishery Electronic Monitoring Program**  
**OMB Control No. 0648-0785**

**Abstract**

This is a request for the renewal of an approved information collection. Under the authority of the Magnuson-Stevens Fishery Conservation and Management Reauthorization Act (16 U.S.C. 1801 et seq.), the Pacific coast groundfish fishery is managed under the Pacific Coast Groundfish Fishery Management Plan (FMP) by the National Marine Fisheries Service (NMFS) West Coast Region (WCR). One sector of the groundfish fishery has limited entry permits endorsed for trawl gear and is managed under a catch share program. The catch share program implemented requirements for 100 percent observer coverage at-sea and dockside to ensure full accountability for catch of allocated species and a level playing field for all participants. To provide a cost-effective alternative to human observer coverage, vessels may choose to use electronic monitoring (EM). EM uses video cameras and integrated sensors (e.g., global positioning system (GPS), motion sensor, and hydraulic pressure sensor) to passively monitor fishing activity at-sea. An analyst onshore can review the video and sensor data after the trip to collect information about location and amount of catch and fishing effort. EM has the potential to reduce monitoring costs because it does not require deploying a person on the vessel and the logistical and travel expenses that generates. This information collection includes a permit application and associated documents for EM service provider companies, a permit application and associated documents for vessels participating in EM, and a logbook and video hard drive submissions for participating vessels. The information is used to allow vessels to utilize EM in lieu of the 100% human observer requirement and for fishery catch accounting to occur according to regulations in place at 50 CFR 660 subpart J.

**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.**

Under the authority of the [Magnuson-Stevens Fishery Conservation and Management Reauthorization Act](https://www.fisheries.noaa.gov/resource/document/magnuson-stevens-fishery-conservation-and-management-act)<sup>1</sup> (16 U.S.C 1801 *et seq*), the Pacific coast groundfish fishery is managed under the Pacific Coast Groundfish Fishery Management Plan (FMP). One sector of the groundfish fishery has limited entry permits endorsed for trawl gear and is managed under a catch share program. Amendments 20 and 21 to the FMP established the catch share program in 2011 that consists of an individual fishing quota (IFQ) program for the shore-based trawl fleet, and cooperative (co-op) programs for the at-sea mothership (MS) and catcher/processor (C/P) trawl fleets. The catch share program had a number of objectives, including: 1) increase net economic benefits, 2) create individual economic stability, 3) provide full utilization of the trawl sector allocation, 4) consider environmental impacts, and 5) achieve individual accountability for catch and bycatch. Amendment 21 established fixed allocations for limited entry trawl participants that were intended to improve management under the program by streamlining its administration, providing stability to the fishery, and limiting bycatch.

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<sup>1</sup> <https://www.fisheries.noaa.gov/resource/document/magnuson-stevens-fishery-conservation-and-management-act>

As part of the catch share program, Amendment 20 also implemented requirements for 100 percent observer coverage at-sea and dockside to ensure full accountability for catch of allocated species and a level playing field for all participants. Beginning in 2011, catcher vessels were required to obtain observers for 100 percent of trips in the shore based and mothership fisheries, and mothership vessels were required to obtain 200 percent coverage for each trip (2 observers per trip). Buyers of IFQ species, called first receivers, were also required to obtain catch monitors to monitor the offload and weighing of all IFQ species.

NMFS initially covered 100 percent of the costs of observers for industry, but this funding declined over time and finally ended in September 2015 when industry took on the full costs of monitoring. Since implementation of the program, industry has been concerned about their ability to bear the full costs of monitoring and has become interested in EM as a potential alternative. EM uses video cameras and integrated sensors (*e.g.*, GPS, motion sensor, hydraulic pressure sensor) to passively monitor fishing activity at-sea. An analyst onshore can review the video and sensor data after the trip to collect information about location and amount of catch and fishing effort. EM has the potential to reduce monitoring costs because it does not require deploying a person on the vessel and the logistical and travel expenses that generates. In response to industry's concerns, the Council initiated development of a regulatory amendment in November 2012, to consider implementing an EM program for catcher vessels in the mothership and shore-based sectors. Prior to Amendment 20, the Council had been developing an EM program for the whiting fishery in Amendment 10 to the Pacific Coast Groundfish FMP. The Council ultimately set this action aside to focus on the development of the catch share program, but did include some components of an EM program in Amendment 20. Amendment 20 allowed for catcher vessels to use EM in place of observers and implemented maximized retention requirements for the whiting fishery, which allows whiting vessels to put all catch directly into the hold with minimal discards (as opposed to sorting and discarding bycatch species). However, the requirements of the EM program were not sufficiently developed to be implemented with the rest of the catch share program in 2011. After many years of development under an exempted fishing permit, NMFS implemented a regulatory program for EM on January 1, 2024. The purpose of this action is to expand the range of monitoring tools for vessel operators to meet the 100 percent monitoring requirements of the catch share program, and to achieve the following objectives:

1. Reduce total fleet monitoring costs to levels sustainable for the fleet and agency;
2. Reduce observer costs for vessels that have a relatively lower total revenue;
3. Maintain monitoring capabilities in small ports;
4. Increase national net economic value generated by the fishery;
5. Decrease incentives for fishing in unsafe conditions;
6. Use the technology most suitable and cost effective for any particular function in the monitoring system; and,
7. Reduce the physical intrusiveness of the monitoring system by reducing observer presence.

The catch share program requires NMFS to accurately monitor the use of all quotas and allocations in order to prevent overfishing and ensure fairness and equity among fishery participants. A catch monitoring and account system is required for NMFS to: 1) track the total catch (retained and discarded) of groundfish species, including Pacific halibut; 2) adequately track the incidental take of Chinook salmon and other Endangered Species Act-listed species as required by the groundfish fishery's incidental take statement (ITS) and 3) ensure compliance with the requirements of the catch share program. The catch share program uses a framework of monitoring and reporting requirements to ensure

accountability for catch of allocated species:

1. 100-percent coverage of vessels at-sea to account for discards of allocated species (OMB Control No. 0648-0593);
2. 100-percent coverage of offloads at first receivers to ensure the accurate accounting of retained allocated species, and declarations (OMB Control No. 0648-0620);
3. Declarations by vessels before each trip to enable NMFS to track participation (OMB Control No. 0648-0573);
4. Shore based IFQ catch reported on electronic fish tickets to provide timely reporting of IFQ landings (OMB Control No. 0648-0738); and,
5. Near real-time accounting of landings and discards in a Vessel Account System (VAS) and the North Pacific Database Program (NorPac).

Fishery managers and participants that this monitoring and reporting framework has vastly improved the quality of information available for science and management in the groundfish trawl fishery generally accept it.

Starting January 2024, catcher vessels using whiting and non-whiting midwater trawl, bottom trawl, and fixed gear types have been allowed the option to use EM in place of observers to meet objective #1 above, the requirements for 100-percent observer coverage at-sea. In place of an observer documenting discards onboard, captains are required to submit a logbook reporting their discards of IFQ species to NMFS. NMFS uses the discards reported on the logbook to debit allocations in the VAS and NorPac. Vessel operators install and employ an onboard EM system to capture fishing activities at-sea. Following the trip, an analyst reviews the video and report estimates of discards of allocated species to NMFS to use to audit the validity of the logbook estimates. EM data is also used to monitor compliance with the requirements of the catch share program. In this way, logbooks and EM systems are used in tandem in place of observers to meet the objectives of 100-percent at-sea monitoring of the catch share program.

To provide the information necessary to achieve the objectives of the catch share program, NMFS requests the following data collection requirements from program participants:

#### For EM service providers

- The preparation and submission of an application to receive a permit to be an EM service provider, including an EM service plan (EMSP), descriptions of prior experience, and certifications of no conflict of interest.
- Appeals for submissions by businesses not issued a permit or for which a permit was invalidated.
- Preparation of a statement certifying the sufficiency of the EM system installed to be included in the vessel owner's application.
- The preparation and submission of standard operating procedures (SOPs) and other documentation describing the EM service provider's operations, if requested by NMFS.
- The submission of two EM units, software, associated manuals, and other documentation for evaluation, if requested by NMFS.
- The submission of reports regarding requests for technical assistance and reports of non-compliance or harassment.
- The submission of catch reports, feedback reports, and storage of EM data and other records.
- The requirement to make employees of the EM service provider available to NMFS and

enforcement personnel for debriefing.

- The requirement to provide program and technical support to NMFS upon request to enable NMFS to administer the program effectively.

#### For vessel owners

- The preparation and submission of an application for an authorization to use EM in place of an observer, including an individual vessel-monitoring plan (VMP) and a statement certifying the sufficiency of the EM system installed.
- The requirement to have an approved EM system from a NMFS-permitted EM service provider to monitor fishing activity at-sea.
- The requirement to obtain services from a NMFS-permitted EM service provider to install and maintain the EM system.
- The requirement to obtain services from a NMFS-permitted EM service provider to analyze and store EM data, and report it to NMFS.

#### For vessel operators

- Attendance of an EM program training provided by NMFS.
- The preparation and submission of a logbook for each landing.
- The submission of hard drives with EM data for each trip.

**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.**

### **EM Service Provider Application, Appeal, and Renewal**

An EM service provider application is a narrative application submitted to NMFS by businesses interested in being certified to provide EM services. This is a biennial application process, but additional applications would be required if a business changes ownership or if the provider is decertified. NMFS would use the application to determine if a business can provide adequate services to support the needs of the EM program and that are no apparent conflicts of interest. Information required to be provided includes the following (as specified in the regulations at 50 CFR 660.603(b)(1) in the final rule 0648-BF52<sup>2</sup>):

(i) Certify that the applicant meets the following eligibility criteria:

(A) The EM service provider and its employees do not have a conflict of interest as defined at § 660.603(h), and,

(B) The EM service provider is willing and able to comply with all applicable requirements of this section and to operate under a NMFS-accepted EM Service Plan.

(ii) Applicant's contact information.

(iii) Legal name of applicant organization. If the applicant organization is a United States business entity, include the state registration number.

(iv) Description of the management, organizational structure, and ownership structure of the applicant's business, including identification by name and general function of all controlling

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<sup>2</sup> <https://www.federalregister.gov/documents/2019/06/28/2019-13324/fisheries-off-west-coast-states-pacific-coast-groundfish-fishery-electronic-monitoring-program>

management interests in the company, including but not limited to owners, board members, officers, authorized agents, and employees. List all office locations and their business mailing address, business phone, fax number, and email addresses. If the applicant is a corporation, the articles of incorporation must be provided. If the applicant is a partnership, the partnership agreement must be provided.

(v) A narrative statement describing prior relevant experience in providing EM services, technical support, or fishery data analysis services, including recruiting, hiring, training, deploying, and managing of individuals in marine work environments and of individuals working with fishery data in the groundfish fishery or other fisheries of similar scale.

(vi) A statement signed under penalty of perjury by an authorized agent of the applicant about each owner, or owners, board members, and officers if a corporation, authorized agents, and employees, regarding:

(A) Conflict of interest as described in § 660.603(h),

(B) Criminal convictions,

(C) Federal contracts they have had and the performance rating they received on each contract, and

(D) Any previous history of decertification or permit sanction action while working as an observer, catch monitor, observer provider, catch monitor provider, or electronic monitoring provider.

(vii) EM Service Plan. An EM Service Plan that describes in detail how the applicant will provide EM services for vessels. To ensure that the EM Program achieves its purpose, NMFS has developed [EM Program Guidelines](https://media.fisheries.noaa.gov/2021-05/2021EM_ServicePlanGuidelines.pdf)<sup>3</sup> (see § 660.600(b)) and use them to evaluate proposed EM Service Plans. NMFS may consider alternative, but equivalent, methods proposed by EM service providers and vessel owners in their plans to meet the requirements of this subpart, if they achieve the purpose of the EM program. An EM Service Plan must include descriptions of the following (using pictures and diagrams where appropriate):

(A) Contact information for a primary point of contact for program operations in season;

(B) A plan for provision of services including communications, service locations, response timelines, and procedures for services, repairs, technical support, and other program services;

(C) Procedures for hiring and training of competent program staff to carry out EM field services and data services, including procedures to maintain the skills of EM data processing staff in:

(1) Use of data processing software;

(2) Species identification;

(3) Fate determination and metadata reporting requirements;

(4) Data processing procedures;

(5) Data tracking; and,

(6) Reporting and data upload procedures.

(D) Procedures for tracking hard drives and/or data files throughout their use cycle, including procedures to ensure the integrity and security of hard drives or data files in transit, and for removing EM data from hard drives or other medium before returning them to the field;

(E) Procedures for data processing, including tracking of EM datasets throughout their processing

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<sup>3</sup> [https://media.fisheries.noaa.gov/2021-05/2021EM\\_ServicePlanGuidelines.pdf](https://media.fisheries.noaa.gov/2021-05/2021EM_ServicePlanGuidelines.pdf)?null

cycle and documenting any access and modifications;

(F) Procedures for correction and resubmission of EM summary data reports and other reports that NMFS has determined are not of sufficient quality to meet the purpose of the EM program, as described at § 660.603(m)(5), and to ensure that future reports are sufficient for use by NMFS.

(G) Policies on data access, handling, and release to prevent unauthorized disclosure of EM data and other records specified in this section by the EM provider as required under § 660.603(n);

(H) Procedures for retention of records as required under § 660.603(m)(6);

(I) Identifying characteristics of the EMS to be deployed and the video review software to be used in the fishery, including but not limited to: manufacturer, brand name, model name, model number, software version and date, firmware version number and date, hardware version number and date, monitor/terminal number and date, pressure sensor model number and date, drum rotation sensor model number and date, and GPS model number and date.

(J) EM system and software specifications, including a narrative statement describing how the EM system and associated equipment meets the performance standards at § 660.604(j).

(K) EM video review software specifications, including a narrative statement describing how the software meets the EM Program Guidelines and will provide NMFS with data to achieve the purpose of the EM Program as defined at § 660.600(b).

(viii) Provide NMFS the following, if requested:

(A) Two EM system units loaded with software for a minimum of 90 calendar days for testing and evaluation.

(B) Thorough documentation for the EM system including user manuals, any necessary interfacing software, and performance specifications, technical support information and tamperproof or tamper evident features.

(C) The results of at-sea trials of the EM system.

(D) Two copies of video review and analysis software for a minimum of 90 calendar days for testing and evaluation.

(E) Thorough documentation for the video review and analysis software, including user manuals, performance specifications, and technical support information.

(F) Descriptions of database models and analysis procedures for EM data and associated metadata to produce required reports.

EM service provider appeals submissions are narratives that may be received from businesses that were not issued an EM service provider permit or businesses that have been decertified. The purpose of the appeals submission is to provide NMFS with information that may result in the business receiving a permit or not being decertified. One appeal letter is expected to be submitted annually.

EM service provider permit renewals would be a simplified process in which the EM service provider would review and submit a pre-filled form provided by NMFS and the most current EM Service Plan along with a statement certifying that the provider's information and the EM Service Plan are valid and correct. Renewals would be required to be submitted annually to ensure NMFS has the most up-to-date information.

EM service plan amendments would be allowed to be made to give EM service providers the flexibility to modify their operations over time. An amendment would be made by submitting an email to NMFS

with the following information:

- (1) The date and the name and signature of an authorized agent of the EM service provider;
- (2) Address, telephone number, fax number, and email address of the person submitting the addendum;
- (3) A complete description of the proposed EM Service Plan change.

One amendment is expected to be submitted by each provider annually.

### **EM Service Provider Reports and Support**

Program and technical support would be required to be provided to NMFS, free of charge to NMFS. This information is necessary for NMFS to be able to evaluate the performance and compliance of the EM service provider and participating vessels and ensure compliance with program requirements. It is expected that the EM service provider would receive 10 requests from NMFS for some or all of the following information annually:

- (1) Assistance in EM system operation, diagnosing and resolving technical issues, and recovering corrupted or lost data.
- (2) Responses to inquiries related to data summaries, analyses, reports, and operational issues with vessel representatives.
- (3) Technical and expert information, if the EM system/data are being admitted as evidence in a court of law. All technical aspects of a NMFS-approved EM system may be analyzed in court for, inter alia, testing procedures, error rates, peer review, technical processes, and general industry acceptance. To substantiate the EM system data and address issues raised in litigation, an EM service provider must provide information, including but not limited to:
  - (i) If the technologies have previously been subject to such scrutiny in a court of law, a brief summary of the litigation and any court findings on the reliability of the technology.
  - (ii) A non-disclosure agreement limiting the release of certain information that might compromise the effectiveness of the EM system operations.
- (4) All software necessary for accessing, viewing, and interpreting the data generated by the EM system, including maintenance releases to correct errors in the software or enhance the functionality of the software.
- (5) Notification NMFS within 24 hours after the EM service provider becomes aware of the following:
  - (i) Any information, allegations, or reports regarding possible harassment of EM provider staff;
  - (ii) Any information, allegations, or reports regarding possible EM system tampering;
  - (iii) Any information, allegations, or reports regarding any action prohibited under §§ 660.12(f) or 660.602(a)(13); or,
  - (iv) Any information, allegations or reports regarding EM service provider staff conflicts of interest.
- (6) Notification to NMFS of any change of management or contact information or a change to insurance coverage.
- (7) A copy of any contract between the service provider and entities requiring EM services;
- (8) Proof of sufficient insurance as defined in paragraph (i);

(9) Copies of any information developed and used by the EM service provider and distributed to vessels, including, but not limited to, informational pamphlets, payment notifications, and description of EM service provider duties; and,

(10) EM data and associated metadata, and other records specified in this section.

Most of these reports would be copies of materials already created by the service provider for their own use.

EM service provider report submissions would provide NMFS with the catch and compliance information derived from the video review to use in debiting discards and enforcing the regulations. Service providers would be required to report vessel requests for assistance so that NMFS can monitor the reliability of the EM systems and ensure that vessels are not fishing unmonitored due to malfunctioning equipment. Service providers would report instances of harassment or intimidation of their employees by vessel personnel, so that NMFS can ensure the impartiality of the EM data used to validate vessel-reported data. Service providers would be required to report feedback to vessel operators for EM system maintenance, and provide NMFS copies of such feedback. The specific information providers would be required to report would include:

(1) The EM service provider must submit to NMFS reports of requests for technical assistance from vessels, including when the call or visit was made, the nature of the issue, and how it was resolved. Reports of technical assistance must be submitted to NMFS within 24 hours of the EM service provider being notified by the vessel owner or operator.

(2) The EM service provider must communicate with vessel operators and NMFS to coordinate data service needs, resolve specific program issues, and provide feedback on program operations. The EM service provider must provide feedback to vessel representatives, field services staff, and NMFS regarding:

(i) Adjustments to system settings;

(ii) Changes to camera positions;

(iii) Advice to vessel personnel on duty of care responsibilities;

(iv) Advice to vessel personnel on catch handling practices; and,

(v) Any other information that would improve the quality and effectiveness of data collection on the vessel.

(3) On behalf of vessels with which it has a contract (see § 660.604(k)), the EM service provider must submit to NMFS within 3 weeks from the date of receipt of EM data for processing from the vessel operator, EM summary reports, including discard estimates, fishing activity information, and metadata (*e.g.*, image quality, reviewer name), and incident reports of compliance issues according to a NMFS-accepted EM Service Plan, which is required under § 660.603(b)(1)(vii), and as described in the EM Program Manual or other written and oral instructions provided by the EM Program, such that the EM program achieves its purpose as defined at § 660.600(b). If NMFS determines that the information does not meet these standards, NMFS may require the EM service provider to correct and resubmit the datasets and reports.

(4) Retention of records. Following an EM trip, the EM service provider must maintain all of a vessel's EM data and other records specified in this section, or used in the preparation of records or reports specified in this section or corrections to these reports, for a period of not less than three years after the date of landing for that trip. EM data and other records must be stored such that the integrity and security of the records is maintained for the duration of the retention period. The EM service provider must produce EM data and other records immediately upon request by NMFS or an



authorized officer.

NMFS anticipates that each provider would submit 20 reports for technical assistance and 35 reports of harassment annually.

EM service provider employee debriefings would be required to be available to NMFS and enforcement personnel upon request. NMFS would use these debriefings to QA/QC data and investigate reports of non-compliance and harassment. Debriefings may be required as frequently as after each trip, at 350 debriefings by each provider annually.

### **Vessel Owner Application, Appeal, and Renewal**

A vessel owner application would be used by NMFS to determine if a vessel owner is capable of meeting the EM program requirements and qualified to use EM in place of an observer. The application would be a two-step process, consisting of an initial application that NMFS would use to determine eligibility, and a final application that NMFS would use to determine if a vessel owner qualifies for the EM authorization. The initial application would provide the vessel owner with some assurance of their ability to qualify for an EM authorization before investing in the EM unit. Once the EM unit is installed, the vessel owner would submit a final application that includes an individual VMP describing the unique configuration of the EM unit on that vessel and the way it will be used to monitor discards. This would be an annual application, but additional applications would be required if the business changes ownership or if the authorization becomes invalid. The application would include the following information:

(1) Initial application. To be considered for an EM Authorization, the vessel owner must submit a completed application form provided by NMFS, signed and dated by an authorized representative of the vessel, and meet the following eligibility criteria:

- (i) The applicant owns the vessel proposed to be used;
- (ii) The vessel has a valid Pacific Coast Groundfish limited entry, trawl-endorsed permit registered to it;
- (iii) If participating in the mothership sector, the vessel has a valid MS/CV endorsement;
- (iv) The vessel is participating in the Pacific whiting IFQ fishery, mothership sector, or the Shore based IFQ sector using groundfish trawl or fixed gear;
- (v) The vessel is able to accommodate the EM system, including providing sufficient uninterrupted electrical power, suitable camera mounts, adequate lighting, and fittings for hydraulic lines to enable connection of a pressure transducer;
- (vi) The vessel owner and operator are willing and able to comply with all applicable requirements of this section and to operate under a NMFS-accepted VMP.
- (vii) The vessel owner and operator are willing and able to comply with the terms and conditions of a NMFS-approved self-enforcing agreement, if applicable, and if so, include a copy of the proposed self-enforcing agreement in their initial application

(2) Final application. A final application must be complete and must include:

- (i) EM system certification. A certification form, provided by NMFS, signed by a representative of a NMFS-permitted EM service provider that attests that an EM system and associated equipment that meets the performance standards at paragraph (k) was installed on the vessel, that the system was tested while the vessel was underway, and that the vessel operator was

briefed on the EM system operation and maintenance. NMFS will maintain a list of permitted EM service providers on its [website](#)<sup>4</sup>.

- (ii) Tentative fishing plan. A description of the vessel owner's fishing plans for the year, including which fishery the vessel owner plans to participate in, from what ports, and when the vessel owner intends to use EM and observers. This information is for purposes of planning observer deployments and is not binding.
- (iii) Vessel monitoring plan. A complete VMP for the vessel that accurately describes how fishing operations on the vessel will be conducted and how the EM system and associated equipment will be configured to meet the performance standards at paragraph (k). NMFS has developed EM Program Guidelines containing best practices and templates and make them available on NMFS' [website](#)<sup>5</sup> to assist vessel owners in developing VMPs (see § 660.600(b)). NMFS may consider alternative, but equivalent, methods proposed by EM service providers and vessel owners in their plans to meet the requirements of this subpart, if they achieve the purpose of the EM program. An EM service provider may prepare and submit a VMP on behalf of the applicant. The VMP must include descriptions of the following (using pictures and diagrams where appropriate):
  - (A) General vessel information including the vessel name, hull number, gear type(s), home port, captain name, and target fishery or sector;
  - (B) The coordinates of the homeport box, if a geo-referenced port box will be used to trigger data collection;
  - (C) A diagram of the vessel layout with measurements of the deck and denoting the location of any designated discard control points;
  - (D) The number and location of cameras and with images of corresponding views;
  - (E) The location of lighting, control center, GPS, sensors, monitor, and other EM equipment;
  - (F) Frame rates, image resolution, frequency of data logging, sensor trigger threshold values, and other EM system specifications;
  - (G) The location and procedures for any catch handling, including designated discard control points within camera view, procedures for sorting and measuring discards, the number of crew sorting catch, and what steps will be taken to ensure that all catch remains in camera view;
  - (H) The measurements of all bins, baskets, compartments, and other tools that will be used to calculate estimates of weight;
  - (I) The detailed steps that will be taken to minimize the potential for EM system malfunctions and the steps that will be taken, when malfunctions occur, to ensure the adequate monitoring of catch;
  - (J) The name, address, phone number, and email address of a primary point of contact for vessel operations;
  - (K) The name, address, and phone number of the vessel's EM service provider, and contact information for a primary point of contact at the EM service provider;
  - (L) The name, address, phone number, and signature of the applicant, and the date of the application; and,

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<sup>4</sup> <https://www.fisheries.noaa.gov/resource/data/list-approved-electronic-monitoring-em-service-providers>

<sup>5</sup> <https://www.fisheries.noaa.gov/west-coast/resources-fishing/electronic-monitoring-west-coast>

- (M) Any other information required by NMFS.
- (iv) Any updates to information submitted in the initial application.
- (v) If applicable, a copy of the complete self-enforcing agreement, or an adherence agreement under which they agree to be bound by the terms of the self-enforcing agreement

A group of eligible vessel owners may obtain a group EM authorization for a cooperative self-enforcing agreement in lieu of individual EM authorizations. Through a private, contractual arrangement, the self-enforcing agreement allows a co-signed group of vessels to cooperatively encourage compliance with EM program requirements. To be considered for a group EM authorization, a group of vessel owners must submit a complete EM authorization application package to NMFS for review and approval and must include in their initial application a self-enforcing agreement. The self-enforcing agreement must include the following information:

- (A) A list of all participating vessels, owners, operators, and other parties;
- (B) The name and contact information of a designated representative who will be responsible for ensuring that each vessel is complying with the terms and conditions of the agreement and the requirements of this section, and who will promptly inform the appropriate parties and NMFS if any vessel fails to comply;
- (C) Eligibility criteria for participating vessels, owners, and operators;
- (D) The roles and responsibilities of participating vessels, owners, operators, the designated representative, and any other parties to the agreement;
- (E) Procedures for communication between participating vessels, owners, operators, the designated representative, and any other parties to the agreement, NMFS or its designated agent, and EM service providers, for the execution of the agreement and the requirements of this section;
- (F) Performance standards or requirements for equipment, if applicable;
- (G) Reporting requirements, if applicable;
- (H) Time and area restrictions, if applicable;
- (I) Provisions for the use and protection of confidential data necessary for execution of the agreement;
- (J) Provisions to encourage or enforce the compliance of members with the agreement and the requirements of this section;
- (K) Procedures for addressing the non-compliance of members with the agreement and the requirements of this section, including procedures for restricting or terminating vessel's participation in the agreement;
- (L) Procedures for notifying NMFS when a participating vessel or its owner(s) or operator(s) are not complying with the terms of the agreement or the requirements of this section;
- (M) Procedures for participating vessels, owners, operators, the designated representative, or other parties to the agreement, to exit the agreement;
- (N) Any other provisions that the applicants deem necessary for the execution of the agreement; and,
- (O) Procedures for the designated representative to submit an annual report to the Council prior to applying to renew a group EM authorization containing information about the group's

performance from the previous year, including a description of any actions taken by the self-enforcing group in response to the non-compliance of members with the agreement.

Many vessels in the fishery are already using EM as part of research projects. NMFS intends to allow vessel owners that previously used EM to submit an abbreviated application consisting of their current VMP and a pre-filled application form.

Vessel owner appeals submissions are narratives that may be received from businesses that were not issued an EM authorization. The purpose of the appeals submission is to provide NMFS with information that may result in the business receiving an authorization. As many as five appeal letters are expected to be submitted annually.

Vessel owner authorization renewals would be a simplified process in which the vessel owner would review and submit a pre-filled form and current VMP provided by NMFS. The form would include a statement certifying that the vessel owner's information and VMP are still valid and correct. Renewals would be required to be submitted annually to ensure NMFS has the most up-to-date information.

VMP amendments would be allowed to be made to give vessel owners the flexibility to modify their operations over time. An amendment would be made by submitting an email to NMFS with the following information:

- (1) The date and the name and signature of an authorized agent of the EM service provider;
- (2) Address, telephone number, fax number and email address of the person submitting the addendum;
- (3) A complete description of the proposed VMP change.

One amendment is expected to be submitted by each vessel owner annually.

### **Vessel Operator Reports**

Training. Vessel operators would be required to attend a training provided by NMFS once. The training would familiarize vessel operators with the EM program requirements, their responsibilities to maintain the EM system, and how to complete and submit logbooks. This information would assist vessel operators in complying with the EM program and maintaining their eligibility to use EM in place of an observer.

Logbooks. Vessel operators would be required to complete and submit a logbook for each trip reporting trip, effort, and catch information, including: fish ticket numbers, vessel registration and permit numbers, departure and return ports, tow times and locations, characteristics of gear used, pounds and counts of retained and discarded species, coded capacity, amount and type of lost gear, and EM system status and malfunctions. For each trip, one logbook would be submitted to a third-party EM service provider for review, for an average of 10 per vessel annually.

Hard Drives. Vessel operators would be required to submit the hard drive from the EM system for each trip to their third-party EM service provider. The hard drive contains the raw video and sensor data that must be reviewed by an analyst to audit the logbook. This would be accomplished by either uploading the file to a secure website or downloading the data to a hard drive and shipping it. Hard drive submission deadlines differ by gear type, but on average would be submitted six times annually by each vessel.

**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.**

All applications, renewals, VMPs, EMSPs, and amendments would be able to be submitted via an online application portal.

Logbooks will also be able to be submitted electronically via email or using an electronic logbook application. NMFS will provide the vessel operator training via webinar for the convenience of vessel operators in remote ports. Most EM service provider reports will be submitted electronically via email or database uploads. Vessels choosing to use EM would be required to install an EM system that includes video cameras, a global positioning system (GPS), computer monitors, a control box, and motion and/or hydraulic pressure sensors. Some EM systems may include other integrated equipment, such as temperature loggers or satellite communications. Software would be used to analyze the EM data. In the future, algorithms may be used to automate the analysis of the EM data.

**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**

Currently, the states of Washington and Oregon require vessel operators to submit logbooks reporting retained catch. For California-based vessels, there is a federal requirement to complete and submit trawl logbooks. The state logbooks collect many of the same data elements as the federal discard logbook identified in this collection. To minimize duplication, the regulations allow vessel operators to submit a state logbook that contains all the required information in place of the federal discard logbook to third-party EM service providers.

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

Some of the vessel owners and service providers are considered small businesses. Given the relatively small numbers of potential service providers and fishery participants, separate requirements based on size of business have not been developed. However, representatives of small businesses had many opportunities to comment on the proposed collection during its development in the Council process. NMFS made many modifications to the proposed requirements based on comments from service providers and fishermen to minimize their burden. At the request of service providers to reduce the application burden, NMFS changed the application process from an annual application to a biennial application. NMFS is also providing pre-filled forms and VMP templates to vessel owners to reduce the burden of the application and renewal requirements. NMFS considered requiring hard drives be submitted after each trip, but instead established graduated deadlines based on the operations of individual gear types at the request of fishermen. Overall, only the minimum information required to meet the objectives of the overall monitoring program are requested from service providers and fishery participants.

For vessels choosing to use EM, this information would be collected in lieu of information collected from observer coverage under OMB Control No. 0648-0593.

**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.**

Data collected by certified observers, catch monitors and the EM program, and are necessary for the conservation and management of the Pacific coast groundfish fishery. Maintaining the integrity of the data collections is an important aspect of the trawl rationalization program and assuring a level playing field for all participants. The trawl fishery is a multispecies fishery in which the allowable harvest levels for some stocks (including overfished species) is quite low and can constrain access to harvest of target stocks. Loss of individual accountability due to ineffective monitoring programs could create an incentive to misreport catch of constraining stocks in order to maintain access to target stocks. Misreporting could result in underestimates of fishing mortality and overfishing, inconsistent with the mandates of the Magnuson-Stevens Act. The high level of monitoring in the catch share program has been credited with tremendous bycatch reductions in the trawl fishery since its implementation.

This continued collection is necessary to ensure the quality of the information used to make management decisions. Without this collection, the EM program would be ineffective and would not achieve the objectives of individual accountability of the catch share program. The EM program is needed to provide a lower-cost option for vessel owners to meet the requirements of the catch share program for 100 percent observer coverage. The EM program is also needed to increase flexibility for vessel owners to choose which monitoring tool is most efficient for their operation. Without the EM program, vessel owners would only be able to use observers to meet the 100 percent monitoring requirement, potentially at a greater cost to their businesses. The provider permits are necessary to allow only qualified businesses to provide EM services so that the integrity of the data collections is maintained. EM programs shift the responsibility for discard data collection from the observer to vessel operators. The application process for vessel owners would be used to ensure that only vessel owners and operators capable of complying with the requirements of the EM program and producing quality data are authorized to use EM. The application is quite extensive specifically to provide NMFS the flexibility to consider different business models proposed by different providers and vessels, rather than specifying one-size-fits-all requirements. The renewal and amendment processes for providers and vessel owners ensure that NMFS has the latest information without having to resubmit applications each year. The EM service provider and vessel operator reports provide NMFS with the information to debit discards from allocations and to ensure data quality and compliance with the program regulations.

**7. Explain any special circumstances used to conduct an information collection in a manner inconsistent with OMB guidelines.**

Some of the requirements may not be consistent with OMB guidelines with regard to the reporting frequency. While OMB guidelines suggest that respondents not be required to report more often than quarterly, requirements for logbooks, hard drives, technical assistance reports, catch reports, compliance reports, and reports of harassment require greater frequency.

Timely submission of catch reports, logbooks, and hard drives are necessary to debit allocations in near real-time. Vessel owners must have quota balance available in their accounts for all species landed and must cover any inadvertent overages within 30 days. Vessel owners need catch information debited in a timely manner in order to have accurate balances to use in planning future fishing trips. Any delay in catch information can cause an unexpected overage of an account and force the vessel owner to scramble to purchase quota from other vessel owners to cover the overage. Near real-time reporting of compliance issues, harassment, and EM system malfunctions are necessary for NMFS to be able to correct deficiencies in a timely manner, to ensure they do not undermine the quality of the data

collected, and to address compliance issues and take enforcement action, if appropriate.

Absent the reporting frequency, the collection will 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.**

On June 16, 2025, NMFS published a notice in the Federal Register (90 FR 25237) to solicit public comment. The comment period closed August 15, 2025. No comments were received during the public comment period.

NMFS contacted participating vessels respondents outside the agency to obtain their views on frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format. Comments were received from several respondents indicating that the response time previously listed for some activities as either too high or too low. Response times have been updated based on these responses.

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

No payments nor gifts will be given to the 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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

As stated on the forms, all data will be handled in accordance with NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form (and without identifying the source of data, *i.e.*, vessel name, owner, etc.). In addition, any information collected would be considered confidential and would not be disclosed except as provided in Section 402(b) of the [Magnuson-Stevens Act](#).

System of record notice [NOAA-19](#)<sup>6</sup>, Permits and Registrations for United States Federally Regulated Fisheries, covers the information in this collection. The information is captured in the privacy impact assessment for [NOAA4500](#)<sup>7</sup>.

**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 involved in this collection of information.

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<sup>6</sup> <https://www.commerce.gov/node/4991>

<sup>7</sup> [https://www.commerce.gov/sites/default/files/2025-06/NOAA4500%20PIA%20FY25-SAOP\\_Approved\\_Delegated.pdf](https://www.commerce.gov/sites/default/files/2025-06/NOAA4500%20PIA%20FY25-SAOP_Approved_Delegated.pdf)

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

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)
<b>Vessel Operator Requirements</b>								
Captain Training	Ship Captain	70	1	70	1.5	105	\$46.95	\$4,930
Logbook	Ship Captain	200	10	2,000	0.17	340	\$46.95	\$15,963
Hard Drive Submission	Ship Captain	180	6	1,080	0.17	184	\$46.95	\$8,639
<b>Vessel Owner Requirements</b>								
Initial Application	Vessel Representative	15	1	15	0.5	8	\$21.82	\$175
<b>Final Application</b>		<b>15</b>	<b>1</b>	<b>15</b>	<b>6.33333</b>	<b>95</b>		<b>\$2,073</b>
Updated Application Form	Vessel Representative	15	1	15	0.17	3	\$21.82	\$65
EM Unit, Installation	Vessel Representative	15	1	15	4	60	\$21.82	\$1,309
Vessel Monitoring Plan	Vessel Representative	15	1	15	2	30	\$21.82	\$655
EM System Certification Form	Vessel Representative	15	1	15	0.15	2	\$21.82	\$44
Self-Enforcing Agreement	Vessel Representative	1	1	1	3	3	\$21.82	\$65
Change to VMP	Vessel Representative	170	1	170	0.5	85	\$21.82	\$1,855
Appeal	Vessel Representative	3	1	3	5	15	\$21.82	\$327
Authorization Renewal	Vessel Representative	80	1	80	1.5	120	\$21.82	\$2,618
EM System Maintenance	Vessel Representative	80	1	80	0	0	\$21.82	\$0
<b>EM Service Provider Requirements</b>								
<b>Application + EM Service Plan + 2 Units</b>		<b>2</b>	<b>1</b>	<b>2</b>	<b>49</b>	<b>98</b>		<b>\$7,062</b>
Application	Program Manager	2	1	2	8	16	\$72.06	\$1,153
EM Service Plan	Program Manager	2	1	2	40	80	\$72.06	\$5,765
Two Units (if requested)	Program Manager	2	1	2	1	2	\$72.06	\$144
<b>Copies of Contracts / Add'l Docs</b>		<b>5</b>	<b>45</b>	<b>225</b>	<b>0.5</b>	<b>113</b>		<b>\$8,143</b>
Copy of contracts	Program Manager	5	35	175	0.5	88	\$72.06	\$6,341
Copies of additional documents	Program Manager	5	10	50	0.5	25	\$72.06	\$1,802
Appeal	Program Manager	1	1	1	4	4	\$72.06	\$288
Change to EMSP	Program Manager	6	1	6	2	12	\$72.06	\$865
Renewal (biennial)	Program Manager	6	1	6	3	18	\$72.06	\$1,297
EM System Certification Form	Program Manager	4	12	48	0.5	24	\$72.06	\$1,729
<b>Reports</b>	<b>Program Manager</b>	<b>24</b>	<b>168.083</b>	<b>4,034</b>	<b>0.3587</b>	<b>1,447</b>		<b>\$104,271</b>



Technical Assistance	Program Manager	4	100	400	0.2	80	\$72.06	\$5,765
Harassment, etc.	Program Manager	4	2	10	1	10	\$72.06	\$721
Compliance Reports	Program Manager	4	100	400	0.3333	133	\$72.06	\$9,584
Catch Reports	Program Manager	4	348	1,392	0.5	696	\$72.06	\$50,154
Feedback to Vessel	Program Manager	4	348	1,392	0.3	418	\$72.06	\$30,121
Data Storage	Program Manager	4	110	440	0.25	110	\$72.06	\$7,927
Debrief of EM staff	Program Manager	4	200	800	1.225 hrs avg (720 x 0.25) (80 x 10 hrs)	980	\$72.06	\$70,619
<b>Totals</b>		<b>866</b>		<b>8,636</b>		<b>3,651</b>		<b>\$ 228,846</b>

<https://www.bls.gov/bls/blswage.htm>

Occupational Code used for Ship Captain 53-5021 (Captains, Mates, and Pilots of Water Vessels) Mean Hourly Wage: \$46.95

Occupational Code used for Vessel Representative 43-4051 (Customer Service Representatives) Mean Hourly Wage: \$21.82

Occupational Code used for Program Manager 11-9199 (Managers, All other) Mean Hourly Wage \$72.06

The EM service provider's employees must be available for quality assurance debriefings, if requested by NMFS or law enforcement personnel, following each trip. Most debriefings would be short phone conversations to quality assure/quality check trip data at approximately 15 minutes per trip. Some trips may require more extensive debriefings if an EM system malfunction or compliance issue occurred, potentially up to 10 hours. Assuming 90 percent of trips (720) require some follow-up at 15 minutes per trip and 10 percent of trips (80) require more extensive investigation (10 hours/trip) results in a total annual burden of 980 hours ((720 trips x 15 minutes/60 minutes) + (80 trips x 10 hours/trip)).

**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).**

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)
<b>Vessel Operator Requirements</b>					
Captain Training	70	1	70	-	0
Logbook	200	10	2,000	\$0.78	\$1,560
Hard Drive Submission	180	6	1,080	\$15.00	\$16,200
<b>Vessel Owner Requirements</b>					
Initial Application	15	1	15	-	0
<b>Final Application Total</b>	<b>15</b>		<b>15</b>		<b>\$180,030</b>
Final Application	15	1	15	-	-
Updated Application Form	15	1	15	-	-
EM Unit, Installation	15	1	15	\$12,000	\$180,000
Vessel Monitoring Plan	15	1	15	\$2.00	\$30
EM System Certification Form	15	1	15	-	-
Self-Enforcing Agreement	1	1	1	\$3.00	\$3
Change to VMP	170	1	170	-	0
Appeal	3	1	3	\$9.30	\$28
Authorization Renewal	80	1	80	\$6.30	\$504
EM System Maintenance	80	0	0	\$6,000	\$480,000
<b>EM Service Provider Requirements</b>					
<b>Application + EM Service Plan + 2 Units</b>	<b>2</b>	<b>1</b>	<b>2</b>		<b>\$20,149</b>
Application	2	1	2	\$6.50	\$13
EM Service Plan	2	1	2	\$5.00	\$10
Two Units (if requested)	2	1	2	\$10,063	\$20,126
<b>Copies of Contracts / Add'l Docs</b>	<b>5</b>		<b>225</b>		<b>\$349</b>
Copy of contracts	5	35	175	\$1.55	\$271
Copies of additional documents	5	10	50	\$1.55	\$78
Appeal	1	1	1	\$16.30	\$16
Change to EMSP	6	1	6	\$11.30	\$68
Renewal (biennial)	6	1	6	\$6.30	\$38
EM System Certification Form	4	12	48	\$0.65	\$31
<b>Reports (totals)</b>	<b>24</b>	<b>168.083</b>	<b>4,034</b>	<b>-</b>	<b>\$12,266</b>
Technical Assistance	4	100	400	-	0
Harassment, etc.	4	2	10	\$0.75	\$8
Compliance Reports	4	100	400	-	0

Catch Reports	4	348	1,392	-	0
Feedback to Vessel	4	348	1,392	-	0
Data Storage	4	110	440	\$27.86	\$12,258
Debrief of EM staff	4	200	800	-	0
<b>TOTALS</b>	<b>866</b>		<b>8,636</b>		<b>\$711,242</b>

**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.**

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	Band II / Step 1	\$98,534	25%		\$24,634
Other Federal Positions	Band III / Step 1	\$135,825	26%		\$35,315
	Attorney	\$177,840	4%		\$7,114
Administrative Support Staff	Band II / Step 1	\$98,534	22%		\$21,677
<b>TOTAL</b>					<b>\$88,740</b>

The federal salaries were determined using the Department of Commerce Alternative Personnel Pay System (CAPS) pay tables for the Rest of U.S. location.

[https://www.commerce.gov/sites/default/files/2024-01/CAPS\\_rpStandard\\_2024.pdf](https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf)

The rest of U.S. location was used as NOAA employees are geographically dispersed. A multiplier of 1.5 was used to calculate the loaded salary.

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

The number of respondents has decreased in most instances due to fewer entrants into the program. Burden hours have been updated to be consistent with the current data. This is a result of having a better understanding of burden response times based on respondent feedback since implementation of the program.

Additionally, burden response time has been inconsistently calculated, with some collections using minutes versus other collections using fractions of an hour. All collections have been updated to use fractions of an hour.

Finally, some information collections (ICs) in ROCIS are made up of several rows. Previous Supporting Statements did not accurately account for the multiple rows that made up a single IC. This Supporting Statement has shaded those rows that make up a single IC, and the proper total for that single IC has been shown above the shaded rows.

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	
Vessel Operator Requirements							
Captain Training	70	83	70	83	105	125	
Logbook	200	174	2,000	1,740	340	290	
Hard Drive Submission	180	174	1,080	1,044	184	174	
Vessel Owner Requirements							
Initial Application	15	58	15	58	8	29	
Final Application	15	58	15	58	95	474	
Updated Application Form	15	58	15	58	3	10	
EM Unit, Installation	15	58	15	58	60	232	
Vessel Monitoring Plan	15	58	15	58	30	232	
EM System Certification Form	15	58	15	58	2	0	
Self-Enforcing Agreement	1	1	1	1	3	3	
Change to VMP	170	174	170	174	85	174	
Appeal	3	5	3	5	15	7	
Authorization Renewal	80	174	80	174	120	87	
EM System Maintenance	80	174	80	174	0	0	
EM Service Provider Requirements							

<b>Application + EM Service Plan &amp; 2 Units</b>	<b>2</b>	<b>6</b>	<b>2</b>	<b>6</b>	<b>98</b>	<b>92</b>	
Application	2	6	2	6	16	10	
EM Service Plan	2	6	2	6	80	80	
Two Units (if requested)	2	6	2	6	2	2	
<b>Copies of Contracts / Add'l Docs</b>	<b>5</b>	<b>5</b>	<b>225</b>	<b>225</b>	<b>113</b>	<b>37</b>	
Copy of contracts	5	6	175	175	88	29	
Copies of additional documents	5	5	50	50	25	8	
<b>Appeal</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>1</b>	error in ROCIS; should have been 4
<b>Change to EMSP</b>	<b>6</b>	<b>5</b>	<b>6</b>	<b>5</b>	<b>12</b>	<b>10</b>	
<b>Renewal (biennial)</b>	<b>6</b>	<b>5</b>	<b>6</b>	<b>5</b>	<b>18</b>	<b>2</b>	
<b>EM System Certification Form</b>	<b>4</b>	<b>5</b>	<b>48</b>	<b>58</b>	<b>24</b>	<b>29</b>	
<b>Reports</b>	<b>24</b>	<b>5</b>	<b>4,034</b>	<b>5,765</b>	<b>1,447</b>	<b>1,457</b>	
Technical Assistance	4	5	400	100	80	33	
Harassment, etc.	4	5	10	10	10	10	
Compliance Reports	4	5	400	1,740	133	580	
Catch Reports	4	5	1,392	1,740	696	435	
Feedback to Vessel	4	5	1,392	1,740	418	290	
Data Storage	4	5	440	435	110	109	
<b>Debrief of EM staff</b>	<b>4</b>	<b>5</b>	<b>800</b>	<b>1,740</b>	<b>980</b>	<b>2,132</b>	
<b>Total for Collection</b>	<b>866</b>	<b>1,225</b>	<b>8,636</b>	<b>11,316</b>	<b>3,651</b>	<b>5,123</b>	
<b>Difference</b>	<b>-359</b>		<b>-2,680</b>		<b>-1,472</b>		

Information Collection	Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	
Vessel Operator Requirements			
Captain Training	\$0	\$0	
Logbook	\$1,560	\$957	
Hard Drive Submission	\$16,200	\$15,660	
Vessel Owner Requirements			
Initial Application	\$0	\$44	
Final Application	\$180,030	\$696,998	

Updated Application Form		\$12	
EM Unit & Installation	\$180,000	\$696,000	
Vessel Monitoring Plan	\$30	\$116	
EM System Certification Form		\$6	
<b>Self-Enforcing Agreement + copies</b>	\$3	\$33	
<b>Change to VMP</b>	\$0	\$0	
<b>Appeal</b>	\$28	\$47	
<b>Authorization Renewal</b>	\$504	\$1,096	
<b>EM System Maintenance</b>	\$480,000	\$974,400	
<b>EM Service Provider Requirements</b>			
<b>Application + EM Service Plan &amp; 2 Units</b>	<b>\$20,149</b>	<b>\$20,216</b>	
Application	\$13	\$39	
EM Service Plan	\$10	\$30	
Two Units (if requested)	\$20,126	\$20,147	
<b>Copies of Contracts / Add'l Docs</b>	<b>\$349</b>	<b>\$349</b>	
Copy of Contracts	\$271	\$271	
Copies of additional documents	\$78	\$78	
<b>Appeal</b>	\$16	\$16	
<b>Change to EMSP</b>	\$68	\$57	
<b>Renewal (biennial)</b>	\$38	\$32	
<b>EM System Certification Form</b>	\$31	\$38	
<b>Reports</b>	<b>\$12,266</b>	<b>\$12,127</b>	
Technical Assistance	\$0	\$0	
Harassment, etc.	\$8	\$8	
Compliance Reports	\$0	\$0	
Catch Reports	\$0	\$0	
Feedback to Vessel	\$0	\$0	
Data Storage	\$12,258	\$12,119	
<b>Debrief of EM Staff</b>	\$0	\$0	
<b>Total for Collection</b>	<b>\$711,242</b>	<b>\$1,722,070</b>	
<b>Difference</b>	<b>-\$1,010,828</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.**

Results from this collection may be used in scientific, management, technical, or general informational publications such as Fisheries of the United States (<https://www.fisheries.noaa.gov/national/sustainable-fisheries/fisheries-united-states>), which follows prescribed statistical tabulations and summary table formats. Data are available to the general public on request in summary form only. Data are available to NMFS employees in detailed form on a need-to-know basis only.

NMFS will retain control over the information submitted and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. For the information in the control of third-party service providers, NMFS will monitor their compliance with the regulations that require they maintain the integrity, security, and confidentiality of the information consistent with the requirements of the Magnuson-Stevens Act. 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 information 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](#).

**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 of the NMFS-supplied forms. NMFS requests approval to not display the expiration for OMB approval of the collection on the EM Fixed Gear logbook, which is an existing requirement of the states. In order to avoid duplication and reduce the time and effort to obtain the information we require, NMFS is piggybacking our discard data onto the state forms. This serves to expedite the collection of information with the least amount of time and effort while keeping the data consolidated. Currently, three states (WA, OR, and CA) will be printing them and distributing them.

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