

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Groundfish Trawl Catcher/Processor Economic Data Report (EDR)
OMB Control No. 0648-0564

Abstract

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

The Annual Trawl Catcher/Processor EDR is submitted by fishing companies harvesting in the Bering Sea and Aleutian Islands management area (BSAI). The type of data collected includes labor information, revenues received, capital and operational expenditures, and other operational or financial data. The Annual Trawl Catcher/Processor EDR was implemented by the North Pacific Fisheries Management Council (Council) to help evaluate the Amendment 80 Program, including program eligible trawl catcher/processors, and is used by NMFS and the Council to assess the impacts of major changes in the groundfish management regime, including programs for prohibited species catch species and target species.

Justification

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

The Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through National Oceanic and Atmospheric Administration (NOAA)/National Marine Fisheries Service (NMFS). Groundfish in the BSAI are managed under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. The Council prepared these fishery management plans under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 *et seq.*; Magnuson-Stevens Act). Regulations implementing these fishery management plans appear at [50 CFR part 679](#).

The Council adopted Amendment 80 to the BSAI FMP in June 2006 ([72 FR 52668, September 14, 2007](#)). Amendment 80 allocated several BSAI non-pollock trawl groundfish species among trawl fishery sectors, established a limited access privilege program (LAPP), and facilitated the formation of harvesting cooperatives in the non-American Fisheries Act (non-AFA) trawl catcher/processor sector. The BSAI groundfish species directly affected by Amendment 80 include Atka mackerel, Aleutian

Islands Pacific ocean perch, flathead sole, Pacific cod, rock sole, and yellowfin sole. In addition, Amendment 80 modified the management of halibut and crab prohibited species catch limits.

The Annual Trawl Catcher/Processor EDR was implemented by the Council to help evaluate the Amendment 80 Program, including program eligible trawl catcher/processors, and is used by NMFS and the Council to assess the impacts of major changes in the groundfish management regime, including programs for prohibited species catch species and target species. The Annual Trawl Catcher/Processor EDR was modified by the Council to eliminate data verification audits, blind formatting of data, and confidentiality policy (88 FR 7586, February 6, 2023). Regulations at [50 CFR 679.94](#) require submission to NMFS of the Annual Trawl Catcher/Processor EDR. The Annual Trawl Catcher/Processor EDR is submitted by fishing companies harvesting in the BSAI management area.

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.

In 2014, NMFS implemented the GOA Trawl EDR Program and revised the existing Amendment 80 EDR, which was used by trawl catcher/processors in the BSAI, to include GOA groundfish fisheries. NMFS changed the name of the Amendment 80 EDR to the Annual Trawl Catcher/Processor EDR and included it in this program.

This collection (-0564), the Annual Trawl Catcher/Processor EDR, is submitted by Amendment 80 catcher/processors and Amendment 80 eligible catcher/processors. The type of data collected includes labor information, revenues received, capital and operational expenditures, and other operational or financial data.

Pacific States and NMFS authorized personnel will continue to conduct data verification procedures to ensure completeness and accuracy of the submitted data. To make sure that each company is consistently and accurately completing the EDR, all reported values will be reviewed by PSMFC or NMFS authorized personnel for the purpose of validating the data reported in the forms. This will ensure that the data can be relied upon to produce accurate and reliable information for the Alaska groundfish trawl fisheries. Authorized personnel verify the accuracy of each EDR to ascertain anomalies, outliers, and other deviations from the values of averaged variables. The principal means for data quality assessment is follow-up interviews with EDR submitters to ensure consistent interpretation of the survey form and verification of selected data entries against submitter records.

Regulations at [50 CFR 679.94](#) require submission to NMFS of an Annual Trawl Catcher/Processor EDR by person who held an Amendment 80 quota share (QS) permit.

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

Pacific States Marine Fisheries Commission (Pacific States) has been designated by NMFS to be the Data Collection Agent (DCA) for the Annual Trawl Catcher/Processor EDR. Pacific States mails EDR announcements and filing instructions to affected QS permit holders, vessel owners, and applicable leaseholders.

To receive an EDR by mail, respondents may call 1-877-741-8913, or email their request to edr@psmfc.org.

An EDR may be submitted online or may be downloaded in fillable PDF format and then faxed or mailed. Submit the completed EDR—

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

By fax to: 503-595-3450

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

Uses of the Annual Trawl Catcher/Processor EDR Data

To assess the performance of the Amendment 80 trawl catcher/processor fleet under the rationalization program and subsequent changes in fishery management, economists and analysts at the Alaska Fisheries Science Center use the Annual Trawl Catcher/Processor EDR data collection to prepare an annual summary report that is included as a chapter to the annual publication *Economic Status of the Groundfish Fisheries off Alaska*.¹ The summary reports statistics that are intended to indicate trends in a variety of economic indicators and metrics. The reported statistics provide a general overview of fishery performance over time, and are not intended as a rigorous statistical analysis of specific hypotheses regarding economic efficiency or other performance metrics.

The Magnuson-Stevens Act requires a formal and detailed review of Limited Access Privilege Programs (LAPPs) 5 years after the implementation of the program, and thereafter to coincide with scheduled Council review of the relevant fishery management plan (but no less frequently than once every 7 years). The Amendment 80 Program 5-year review was completed in 2014 (Northern Economics, 2014²). The review provides an overview of the EDR data collected and uses the data to summarize expenses and revenues fleet wide. Operating expenses, including payments to labor, are documented and the EDR data is used to develop a cash flow model.

Council staff, NMFS staff, contractors, and academic partners have used EDR data, both from published reports and custom queries, in several important ways. EDR data have been used in catch share program

¹ <https://www.fisheries.noaa.gov/alaska/ecosystems/economic-status-reports-gulf-alaska-and-bering-sea-aleutian-islands>

² <https://www.fisheries.noaa.gov/resource/document/five-year-review-effects-amendment-80>

reviews. In addition, it has been used in several regulatory action analyses, such as for analyzing crew employment in the 2014 Final Environmental Impact Statement: Steller Sea Lion Protection Measures for Groundfish Fisheries in the Bering Sea and Aleutian Islands Management Area.³ EDR data was also used in analyses of regulatory actions affecting the Amendment 80 fleet and was recently used in a regulatory impact review of allowing deck sorting of halibut in non-pollock groundfish trawl fisheries (RIN 0648-BI53, effective November 14, 2019; 84 FR 55044, October 15, 2019).

Information Requirements and Needs and Uses of Information Collected

Requirement	Statute	Regulation	Submission Method	Needs and Uses
Annual Trawl Catcher/Processor EDR	16 U.S.C. 1801 <i>et seq.</i>	50 CFR 679.94	On-line or by mail	<ul style="list-style-type: none"> ● Used by NMFS in annual report and regulatory analysis. ● Used by Council staff and contractors for LAPP evaluation and in regulatory analysis. ● Used by partnered researchers to conduct fishery economic research.

AFSC Economics and Social Science Research Program economists analyze EDR data in two almanacs of data produced for the Council as appendices to the annual SAFE reports which present the data in tables for public use through the Economic SAFE documents for crab and groundfish, respectively. AFSC staff also use EDR data in a variety of applications and publications. In recent years, AFSC and AKFIN have collaborated on development of the Human Dimensions Data Explorer, which provides a platform for public access to AFSC’s fishery management decision support tools and data reports, including the BSAI Crab Economic SAFE, Groundfish Economic SAFE and the Annual Community Engagement and Participation Overview reports in document form, as well as providing public, non-confidential access, in the form of customizable data queries, to the most current available statistical data published in the respective reports.

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

The EDR instructions and online submission are available on the internet (<http://www.psmfc.org/am80edr/>). Applications can be emailed, faxed, or mailed to applicants if requested. The intent of the online submission system is to provide a user-friendly and efficient format to submit the EDR.

³ <https://www.fisheries.noaa.gov/resource/document/final-environmental-impact-statement-steller-sea-lion-protection-measures>

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

No duplication exists for this information collection. This collection is the only source of observational cross-section time series data regarding the economic performance of this fleet.

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

This information collection does not impose a significant adverse impact on directly regulated small entities nor does it affect a substantial number of directly regulated small entities. There are potentially 22 entities that submit EDRs. Of these, only one entity owning a single catcher/processor is considered a small entity for purposes of the Regulatory Flexibility Act (RFA). However, this single small entity has chosen not to exercise its Amendment 80 eligibility to obtain quota share and is not required to complete the annual Amendment 80 EDR. All others are cooperative affiliated Amendment 80 large entities.

In addition, two of the six Western Alaska Community Development Quota Program entities own harvesting and processing vessels that operate in the Amendment 80 fisheries. Under the RFA, the Western Alaska Community Development Quota groups are considered to be small entities regardless of their revenue. These entities either directly own Amendment 80 trawl catcher/processors or have wholly owned subsidiaries that own Amendment 80 trawl catcher/processors. They may also own a portion of the fishing company that owns these Amendment 80 trawl catcher/processors. Thus, although they would be considered large via cooperative affiliations, they are specially defined as small under the RFA. Thus, up to two Western Alaska Community Development Quota groups are considered small entities for purposes of the RFA and would fall under this information collection depending on their annual fishing operations.

NMFS attempts to minimize the burden of this collection on all respondents. The online submission system is designed to provide a user-friendly and efficient format to submit the EDR. A toll-free phone number is available for participants to contact Pacific States staff for help or information.

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.

This information collection is used to assess the impacts of major changes in the groundfish management regime of the Amendment 80 program, including management of prohibited species catch species and target species. The most recent Amendment 80 Program Review contained a summary of key metrics of fleet structure, operations, economic performance, and employment and labor earnings based on A80 EDR data. Without this data, NMFS staff would be unable use these data to assess the performance of the Amendment 80 trawl catcher/processor fleet under the rationalization program and subsequent changes in fishery management.

Economists and analysts at the Alaska Fisheries Science Center would not be able to prepare an annual summary report that is included as a chapter to the annual publication *Economic Status of the Groundfish Fisheries off Alaska*.⁴ The summary reports statistics that are intended to indicate trends in a variety of economic indicators and metrics. If this collection was not conducted or conducted less frequently these trends could not be tracked or gaps in the trends could result in important changes to the fishery not being detected.

The Magnuson-Stevens Act requires a formal and detailed review of Limited Access Privilege Programs (LAPPs) 5 years after the implementation of the program, and thereafter to coincide with scheduled Council review of the relevant fishery management plan. The Amendment 80 Program 5-year review was completed in 2025 (McCracken and Associates⁵). The review provides an overview of the EDR data collected and uses the data to summarize expenses and revenues fleet wide. Operating expenses, including payments to labor, are documented and the EDR data is used to develop a cash flow model. Without this information, these elements of the 5-year program reviews would not be available.

Council staff, NMFS staff, contractors, and academic partners would not be able to use EDR data to develop regulatory action analyses, such as for analyzing crew employment in the 2014 Final Environmental Impact Statement: Steller Sea Lion Protection Measures for Groundfish Fisheries in the Bering Sea and Aleutian Islands Management Area.⁶

In February 2022, the Council received a Final Review Draft Regulatory Impact Review that was developed following a comprehensive review of the Annual Trawl Catcher/Processor EDR, along with the three other Alaska Region/North Pacific EDR Programs. One of the issues that was addressed in the review of the EDRs is whether annual submission of data by each respondent continues to be necessary to provide the data needed to monitor and evaluate the Alaska groundfish trawl fisheries. An option was specifically considered to change the frequency of the information collection from annually to either every other or every third year. The Council chose to retain annual EDR submission in all remaining EDRs. This decision was influenced by the fact that the agency and contractor infrastructure would likely have to be maintained annually, as would industry bookkeeping practices, resulting in little reduction in either recoverable agency costs or industry compliance costs. Concerns about data quality were also raised in that if an anomalous event occurred in a year when data is not collected the resulting impact to the analyst's ability to evaluate economic impacts, to both fishery participants and fishery dependent communities would be severely constrained. An apt example of this risk specific to the BSAI crab rationalization program fisheries is the complete closure of the Bristol Bay red king crab fishery in 2022, and a nearly 90 percent reduction in the Bering Sea snow crab catch in 2022–23. Annual crab EDR data will be instrumental in evaluating the overall impacts to participants and communities and in assessing any economic disaster declarations that may occur. Similarly, the Annual Trawl Catcher/Processor EDR will be instrumental in evaluating potential impacts that abundance based management of halibut prohibited species catch may have in the future on the Amendment 80 fleet.

⁴ <https://www.fisheries.noaa.gov/alaska/ecosystems/economic-status-reports-gulf-alaska-and-bering-sea-aleutian-islands>

⁵ https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/AM80/AM80ProgramReview_0425.pdf

⁶ <https://www.fisheries.noaa.gov/resource/document/final-environmental-impact-statement-steller-sea-lion-protection-measures>

The Council is currently considering an action to recommend eliminating EDRs, including the Annual Trawl Catcher/Processor EDR. However, currently regulations at 50 CFR 679.94 require the submission of EDR information.

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

This collection is conducted in a manner consistent with OMB guidelines.

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

A Federal Register notice published on July 11, 2025 (90 FR 30883) solicited public comment. The Federal Register notice requested that commenters (a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility; (b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used; (c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected; and (d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

One comment letter was received from an industry representative. A summary of this comment letter and responses are included below.

NOAA consulted, via email, with all five entities that own Amendment 80 groundfish trawl License Limitation Permits to obtain their views on the accuracy of the burden estimate (time and cost) to comply with program requirements and whether there are paths to minimize the burden of these requirements, or any other aspect of these requirements.

Comment 1: The information collection is not necessary for proper fisheries management, and this collection should not be renewed because the North Pacific Fisheries Management Council (Council) is considering an action that would eliminate the collection. Maintaining and approving an information collection that is anticipated for removal imposes additional and unnecessary costs.

Response: The Council and NMFS established the EDR program to meet a specific purpose and need statements that differ substantially from one another. Further, the Council and NMFS fully vetted issues of equity when considering how to revise the EDR collections with Amendment 52 in 2023. At that time, the Council and NMFS evaluated whether the four different EDR programs implemented in fisheries off Alaska were meeting their intended purpose and need. At that time, the Council and NMFS determined that the remaining information collections have practical utility and chose to retain them, including the Annual Groundfish Trawl EDR information collection. NMFS is aware that the Council is considering making a recommendation to remove the EDR program; however, the regulations

implementing the EDR program remain in effect and have not been removed or invalidated. While the regulations remain in effect, NMFS must implement the program and seek renewal of the information collection under the PRA. If the Council recommends removal of the EDR program, NMFS will take the necessary steps to review the Council's recommendation and revise applicable regulations in compliance with all applicable laws.

Comment 2: It is not fair to require Amendment 80 fishery participants comply with the EDR program when other Alaska fisheries and fisheries managed by other regions are not also required to comply with similar data collection programs. The EDR program does not have practical utility.

Response: The Council and NMFS established the EDR program to meet a specific purpose and need statements that differ substantially from one another. Further, the Council and NMFS fully vetted issues of equity when considering how to revise the EDR collections with Amendment 52 in 2023. At that time, the Council and NMFS evaluated whether the four different EDR programs implemented in fisheries off Alaska were meeting their intended purpose and need. At that time, the Council and NMFS determined that the remaining information collections have practical utility and chose to retain them, including the Annual Groundfish Trawl EDR information collection.

Comment 3: Maintaining the EDR program does not align with Executive Order 14276. Executive Order 14276 directs federal agencies to reduce unnecessary regulatory burdens on U.S. fisheries and promote domestic seafood production. The Order explicitly calls on the Secretary of Commerce and the Regional Fishery Management Councils to identify overregulated fisheries and eliminate requirements that unnecessarily constrain American fishermen. The EDR program exemplifies such a burden. It consumes resources that could be redirected toward productive fishing activities, job support, and operational efficiency. Moreover, continuing to mandate EDR submissions undermines the intent of EO 14276 to "unburden our commercial fishermen from costly and inefficient regulation" and to "increase production."

Response: As the commenter has indicated the Council and NMFS are undertaking a process to consider eliminating the EDR Program. However, as indicated in the response to comment 1, NMFS must comply with all applicable laws to discontinue the EDR program, including providing opportunity for notice and comments and analysis of potential regulatory impacts. NMFS will comply with procedures to seek approval from OMB to renew this information collection until such time as a final rule amending or eliminating the EDR Program is published.

Comment 4: The burden hour estimate of 20 hours per response is half of what is actually needed to maintain annual records and complete the EDR submission.

Response: The burden hour estimate has been adjusted in this supporting statement to reflect this comment.

Comment 5: The \$110 cost estimate underestimate costs to individual participants because it does not account for costs billed to fishery participants under the cost recovery provision.

Response: The \$110 cost estimate estimates the miscellaneous costs to fishery participants for submission of the information under this collection. Burden hour estimates and Bureau of Labor Statistics wage rates are used to estimate labor costs separately from miscellaneous costs. Contractor cost and agency labor cost identified in this supporting statement part 14 are actual costs for the information collection and are obtained from budgeted staff costs and actual grants to the Pacific States Marine Fisheries Commission. Note that NMFS does not use General Services wage scales identified in the comment and part 14 of this supporting statement identifies the wage rate of a ZP-3 step 3 with the percentage of time allocated to estimate agency labor cost. The supporting statement also acknowledges that these contractor and agency labor costs are subject to industry paid cost recovery; however, the labor costs are respondent costs that are documented to show the respondent labor cost burden of this information collection.

Comment 6: The clearest way to enhance quality and utility is to stop collecting information under the EDR program.

Response: However, as indicated in the response to comment 1, NMFS must comply with all applicable laws to discontinue the EDR program, including providing opportunity for notice and comments and analysis of potential regulatory impacts. NMFS will comply with procedures to seek approval from OMB to renew this information collection until such time as a final rule amending or eliminating the EDR Program is published. NOAA Fisheries is statutorily required to renew this information collection until such time as Council action and proposed and final rules are published.

Comment 7: The most effective way to minimize the reporting burden is to disapprove this collection of EDR information.

Response: However, as indicated in the response to comment 1, NMFS must comply with all applicable laws to discontinue the EDR program, including providing opportunity for notice and comments and analysis of potential regulatory impacts. NMFS will comply with procedures to seek approval from OMB to renew this information collection until such time as a final rule amending or eliminating the EDR Program is published., NOAA Fisheries is statutorily required to renew this information collection until such time as Council action and proposed and final rules are published.

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

No payment or gift is provided.

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

The information collected is confidential under section 402(b) of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801, *et seq.*). It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. Storage for the information includes a computerized database that is password protected and to which access is limited. Paper records are filed in folders in locked cabinets in areas that are accessible only to authorized personnel. Buildings where the records are maintained employ security systems with locks /and access limits. Only those that have the need to know, to carry out the official duties of their job, have access to the information. The personnel of NMFS Alaska Region and its contractors (Pacific States) are instructed on the confidential nature of this information.

The system of records notice that covers this information collection is [COMMERCE/NOAA #16. Economic Data Reports for Alaska Federally Regulated Fisheries off the Coast of Alaska](#). Consistent with OMB's guidance implementing the Privacy Act of 1974, "an agency record-keeping system on firms it regulates may contain "records" (i.e., personal information) about officers of the firm incident to evaluating the firm's performance. Even though these are clearly "records" under the "control of" an agency, they would not be considered part of a system as defined by the Act unless the agency accessed them by reference to a personal identifier (name, etc.). That is, if these hypothetical "records" are never retrieved except by reference to company identifier or some other nonpersonal indexing scheme (e.g., type of firm) they are not a part of a system of records." This guidance speaks directly to this scenario and suggests that while the information system certainly will collect and maintain personally identifiable information (PII), they are not maintained in a system of records.

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

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

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

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

The Annual Trawl Catcher/Processor EDR applies to 22 licensed vessels. All but one are Amendment 80 vessels, while one additional vessel is Amendment 80 eligible.⁷

⁷ The EDR is done by LLP license, so if a CDQ group is an owner or partial owner then they are included here.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Annual Trawl Catcher/Processor EDR	Accountant / Manager	22	1	22	40	880	\$43.07*	\$37,902
Totals				22		880		\$37,902

* Accountant/manager staff complete the EDR form and the Bureau of Labor Statistics occupation code 13-2011 (Accountants and Auditors) mean average wage rate of \$43.07 for Alaska is used to estimate burden hour respondent costs. <https://data.bls.gov/oes/#/area/0200000>

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

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

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

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Annual Trawl Catcher/Processor EDR	22	1	22	Operating Costs: \$5	\$110
TOTALS	22		22		\$110

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.

NMFS costs associated with data collection for the Amendment 80 program, as a LAPP, are recoverable through program cost recovery fees. Under this cost recovery program, NMFS is authorized to collect direct program costs from the permit holders, including agency costs for administration of mandatory recordkeeping and reporting requirements associated with the LAPP. Therefore, the estimated Federal

oversight and contractor costs associated with administration of the Annual Trawl Catcher/Processor EDR shown in the table below do not impose a cost on the Federal Government.

These costs are actual costs for a Federal oversight economist’s proportion of time applied to this collection within the overall EDR Program. Costs for the contracted services of the Pacific States Marine Fisheries Commission administration of data collection are based on a firm fixed prices mechanism and are inclusive of salaries, fringe benefits, supplies, and other miscellaneous costs.

The Commerce Alternative Personnel System (CAPS) pay tables at https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf were used to determine the base salary for a ZP-III Interval 3. A multiplier of 1.5 was used to calculate the loaded salary.

Section 303A(e) of the Magnuson-Stevens Act authorizes NMFS to implement a fee on the permit holders in the Amendment 80 Program to recover the costs of management, data collection and analyses, and enforcement activities for the program. The Annual Trawl Catcher/Processor EDR falls under the category of costs that are recovered from participants in the Amendment 80 Program. Under this program, all Federal and contractor costs for the Annual Trawl Catcher/Processor EDR are recovered and deposited into the U.S. Treasury. Therefore, the costs to the Federal government for this information collection program are zero.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP III/03	\$191,547	45		\$86,196
Other Federal Positions					
Contractor Cost					\$130,943
Travel					
Other Costs:					
TOTAL					\$0 ⁸

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

One public comment letter was received during the 60-day comment period. Responses to the letter appear under item 8, above. The comment letter indicated that the 20-hour estimate of time necessary to prepare the Annual Groundfish Trawl EDR forms is in error and should be corrected to 40 hours per response. In addition, the labor hour wage rate applied to burden hours increased from \$38.47 per hour to \$43.07 per hour resulting a total increase in labor costs of \$20,975. This adjustment is in response to public comment received and a change in wage and slightly more than doubles the labor cost estimate as

⁸ As indicated above the Amendment 80 EDR is subject to full cost recovery. These costs are the program costs estimated over the next three years. These costs are recovered annually from industry; thus, the actual cost to the Federal government is zero, as indicated in the total.

shown below; however, there are no changes to the information collected in the forms, estimated respondent numbers or any other methodology regarding this information collection.

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	
Annual Trawl Catcher/Processor EDR	22	22	22	22	880	440	Burden hours adjusted to reflect actual burden time provided by respondents.
Total for Collection	22	22	22	22	880	440	
Difference	0		0		440		

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

The information collected will not be published. It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information. Annually, the Alaska Fisheries Science Center prepares the *Economic Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the BSAI*. That report contains an appendix summarizing the information from this collection and is usually published in December each year. In addition, all respondents subject to this data collection are Amendment 80 LAPP eligible, and the data from this collection was last used to evaluate program performance in 2025. Both the annual report and the periodic program reviews are publicly distributed documents.

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

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

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

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

There are no exceptions to this certification. The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).