SUPPORTING STATEMENT

U.S. Department of Commerce

National Oceanic & Atmospheric Administration Alaska Region Bering Sea and Aleutian Islands Crab Economic Data Reports OMB Control No. 0648-0518

Abstract

The National Marine Fisheries Service (NMFS) Alaska Region (AKR) requests an extension of this currently approved information collection for the economic data reports (EDRs) for the Bering Sea and Aleutian Islands Crab Rationalization Program (CR Program).

The purpose of the crab EDRs is to gather information about ownership, revenue, cost, vessel operations, and employment to analyze the economic effects of the CR Program and the economic performance of participants in the program, and to estimate impacts of future issues, problems, or proposed revisions to the program. The data collected through the EDRs are used to prepare reports, program reviews, and analysis of proposed revisions to the CR Program.

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 CR Program is one of eight catch share programs in the federally managed fisheries off Alaska. The CR Program was developed by the North Pacific Fishery Management Council (Council) as Amendments 18 and 19 to the Crab FMP. In January 2004, the United States Congress amended the Magnuson-Stevens Fishery Conservation and Management Act¹ (16 U.S.C. 1801 *et seq.*; Magnuson-Stevens Act) by adding section 313(j) mandating NMFS to implement the Council's CR Program. The Council's recommended CR Program included an economic data collection component that is the subject of this information collection. Section 313(j)(3) also authorizes the Council to submit and the Secretary of Commerce to approve subsequent changes to or repeal provisions of the CR Program. The final rule implementing the CR Program was effective April 1, 2005 (70 FR 10174, March 2, 2005²), and fishing under the CR Program started in the fall of 2005.

The CR Program is a catch share program that allocates Bering Sea and Aleutian Islands (BSAI) crab resources among harvesters, processors, and coastal communities. The CR Program components include quota share (QS), processor quota share (PQS), individual fishing quota (IFQ), individual processing quota (IPQ), quota transfers, use caps, crab harvesting cooperatives,

¹ https://www.fisheries.noaa.gov/s3//dam-migration/msa-amended-2007.pdf

² https://www.federalregister.gov/documents/2005/03/02/05-3486/fisheries-of-the-exclusive-economic-zone-off-alaska-allocating-bering-sea-and-aleutian-islands-king

protections for Gulf of Alaska groundfish fisheries, arbitration system, monitoring, economic data collection, and cost recovery collection. Additional information about the CR Program is available on the NMFS AKR website.³

This information collection covers the economic data collection components of the CR Program, which are known as "Economic Data Reports" (EDRs). The Council recommended implementing economic data collection requirements and provided the following purpose and need for this information collection in its June 2002 motion:

A mandatory data collection program shall be developed and implemented as part of the crab rationalization program and continued through the life of the program. Cost, revenue, ownership and employment data will be collected on a periodic basis (based on scientific requirements) to provide the information necessary to study the impacts of the crab rationalization program as well as collecting data that could be used to analyze the economic and social impacts of future FMP amendments on industry, regions, and localities. This data collection effort is also required to fulfill the Council problem statement requiring a crab rationalization program that would achieve "equity between the harvesting and processing sectors" and to monitor the "...economic stability for harvesters, processors and coastal communities. Both statutory and regulatory language shall be developed to ensure the confidentiality of these data.

Any mandatory data collection program shall include:

A comprehensive discussion of the enforcement of such a program, including enforcement actions that would be taken if inaccuracies in the data are found. The intent of this action would be to ensure that accurate data are collected without being overly burdensome on industry for unintended errors."

The requirements for the crab EDRs are contained in Chapter 11, Section 14 of the Crab FMP and regulations at 50 CFR 680.6⁴.

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.

This information collection contains three forms:

- 1. Annual Catcher Vessel Crab Economic Data Report
- 2. Annual Catcher/Processor Crab Economic Data Report
- 3. Annual Processor Crab Economic Data Report

³ https://www.fisheries.noaa.gov/alaska/sustainable-fisheries/bering-sea-and-aleutian-islands-crab-rationalization-program

⁴ https://www.ecfr.gov/current/title-50/chapter-VI/part-680/subpart-A/section-680.6

Information Requirements and Needs and Uses of Information Collected

Requirement	Statute	Regulation	Submission Method	Needs and Uses
Annual Catcher Vessel Crab Economic Data Report		<u>50 CFR</u> 680.6(c)		 Used by NMFS in annual reports and regulatory analysis.
Annual Catcher/Processor Crab Economic Data Report	16 U.S.C. 1801 et seq.	50 CFR 680.6(d)	Online, mail, email, or fax	 Used by Council staff and contractors for limited access privilege program evaluation and in regulatory analysis.
Annual Processor Crab Economic Data Report		50 CFR 680.6(e)		 Used by partnered researchers to conduct fishery economic research.

Pacific States Marine Fisheries Commission (Pacific States) has been designated as the data collection agent (DCA) for the crab EDR program. NMFS provides funding to Pacific States through a grant. Pacific States provides primary administrative support for collection and database management for the crab EDR. NMFS and Pacific States collaborate on development and maintenance of work plans for implementation of the EDRs, including development procedures and requirements for soliciting and selecting bids for required IT application development. NMFS monitors implementation and oversees quality control of Pacific States' administrative process and communication with respondents.

Any owner or leaseholder of a vessel or processing plant, or a holder of a Registered Crab Receiver permit who harvested, processed, custom processed, or obtained custom processing for CR Program crab, during a calendar year, must submit a complete EDR by following the instructions on the applicable EDR. A completed EDR or the EDR certification pages must be submitted to Pacific States for each calendar year on or before 1700 hours, A.l.t., July 31 of the following year.

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

The purpose of the crab EDRs is to gather information about ownership, revenue, cost, vessel operations, and employment to analyze the economic effects of the CR Program and the economic performance of participants in the program, and to estimate impacts of future issues, problems, or proposed revisions to the program. The data collected through the EDRs are used to prepare reports, program reviews, and analysis of proposed revisions to the CR Program.

An annual summary of crab EDR data is prepared as part of the *Economic Status of the Bering Sea and Aleutian Islands King and Tanner Crab Fisheries off Alaska*. Statistics on harvesting and processing activity; effort; revenue; labor employment and compensation; operational costs; and quota ownership, usage and disposition among participants in the fisheries are provided.

The data collected through the crab EDRs can be used to conduct the CR Program reviews. The Magnuson-Stevens Act requires periodic program reviews for all catch share programs (also known as limited access privilege programs). Both the 5-year and 10-year CR Program reviews relied on EDR data to document fleet performance with regard to quota usage and leasing, effort levels, vessel operating costs, gross and net earnings, crew participation and crew earnings. This information is also used to document changes in crew employment and compensation and state of residency of crew. Processing labor, employment, and wages are also assessed using EDR data. The 10-year CR Program review Social Impact Assessment used EDR data along with other data sources to provide, within the bounds of data confidentiality constraints, a quantitative participation description by community, including harvest trends by crab fishery, local community fleet participation, catcher vessel crab harvest volume and value by community, community processor participation, processor volume and value by community by share type, and quota share distribution by community for Alaska, Washington, Oregon, and other U.S. states combined. The 10-year program review also summarizes the social impacts of crab rationalization by community, including discussions of vessel participation, catcher vessel owner shareholdings, crew participation, catcher vessel crew shareholdings, locally operating processors, support services, and local governance and revenues.

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.

Pacific States manages a web portal that allows respondents to submit their EDR forms online. Pacific States sends out certified letters each year to respondents that include a new login and password and instructions about how to use the web portal to submit EDR forms online using an electronic signature. The online system provides the option for the respondent to print out the completed forms for their records. Respondents also have the option of downloading the EDR forms, filling them out, and submitting them as attachments to an e-mail⁵ to Pacific States, or submitting the completed forms by mail. Pacific States reports that approximately 99 percent of respondents submit their EDRs online using an electronic signature.

The annual EDR forms are available on the Pacific States Alaska CR Program website at http://www.psmfc.org/alaska_crab/. Links to the Pacific States website are provided on the NOAA Fisheries Alaska Region's webpage⁶.

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.

A recent review of the four Alaska Region/North Pacific EDR programs identified areas where the data collected through the EDRs may duplicate data collected through other information collections. Results of this review were incorporated into the analysis supporting Amendment 52 to the Fishery Management Plan for Bering Sea and Aleutian Islands King and Tanner Crabs (88 FR 7586⁷, February 6, 2023). In addition, the Council will consider an analysis documenting the potential regulatory impact of eliminating this information collection at its October 2025 meeting.

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

All catcher-vessel and catcher-processor crab EDR respondents are cooperative affiliated within nine cooperatives.

⁵ The EDR forms require a respondent signature and can be submitted as an electronically signed PDF document or as scanned from an original form containing a manual signature.

 $^{^6\} https://www.fisheries.noaa.gov/permit/bering-sea-and-aleutian-islands-crab-rationalization-applications-and-reporting-forms$

⁷ https://www.federalregister.gov/documents/2023/02/06/2023-02117/fisheries-of-the-exclusive-economic-zone-off-alaska-revisions-to-the-economic-data-reports

All processor respondents are cooperative affiliated under the American Fisheries Act (AFA) and considered large entities. 2023 is the latest data for which revenue data is available. In 2023, nine crab cooperatives were active with four of them having 3-year average revenue falling under the \$11 million dollar threshold (note that group revenue represents the total of all known revenue from all sources for member sources, including revenue from non-crab fisheries). Of the vessels active in crab in 2024, six individual vessels are considered directly regulated small entities based on the 2023 revenue data.

In the 2023 EDR information collection, submitted by July 31st of 2024, there were 16 active Registered Crab Receivers (RCRs), one of which reported over 500 employees in their 2023 EDR data. It may be worth noting that some RCRs are "custom-only" buyers, meaning they purchase crab that is then custom-processed for them by other processors. It's unclear whether those receivers are affiliated with cooperatives or AFA/A80 large entities.

The 16 RCRs would be considered small entities based on their EDR data submissions regarding number of employees. However, most of these entities are cooperative affiliated and/or ownership affiliated with American Fisheries Act or Amendment 80 large entities. Complete information on ownership structure for these firms is not available at this time.

In addition, six Western Alaska Community Development Quota (CDQ) Program entities were granted allocations and may own harvesting and processing vessels/plants that operate in the crab fisheries or may be permitted as registered crab receivers. Under the Regulatory Flexibility Act (RFA), the CDQ groups are considered to be small entities regardless of their revenue. These entities either directly own crab fishery participating vessels or catcher/processors or have wholly owned subsidiaries that own crab fishery vessels or plants. They may also own a portion of the fishing company that owns these crab fishery participants. Although they would be considered large via cooperative affiliations, they are specially defined as small under the RFA. Thus, the six CDQ groups are considered small entities for purposes of the RFA and would fall under this information collection depending on their annual fishing operations.

Several steps have been taken to reduce the burden of this information collection. Since inception, the collection has shifted from paper to electronic submission and this is now the standard method of responding. In addition, changes were made in 2023 to eliminate data verification audits, end use of blind formatting of data, and end the use of a "rule of five" confidentiality policy.

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.

The crab EDR data is required by regulation in 50 CFR part 680 and supported by section 313(j) of the Magnuson-Stevens Act. The data collection was designed by the Council to annually collect information for each participant in the CR Program fisheries to achieve the objectives of collecting the data necessary to monitor and evaluate the CR Program, a program that provides

significant economic benefits to participants and impacts individuals and communities reliant on the crab fisheries.

Amendments to the Crab Rationalization program routinely include EDR data in some capacity. For example, Amendment 54 on Crab C Shares participation utilized the Crab EDR data to illustrate the number of crew members participating in the crab fishery, crew compensation and crew residency information. While the number of crew *positions* by vessel can be gleaned from eLandings, this may be different than the total number of people participating in the crab fisheries in a season, which is only available with EDRs. This difference was relevant when considering the pool of people eligible for continuing to hold C shares prior to Amendment 54 and is relevant for the current action considering changing C share transfer requirements.

BSAI Crab Program Review contained payments to crew, captains, and processing workers. The total number of positions, crew residency and estimated crew compensation by community as well. Lease rates and leasing were analyzed but not presented as part of the review.

The Alaska Fisheries Science Center (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 Stock Assessment and Fishery Evaluation (SAFE) reports which present the data in tables for public use through the Economic SAFE documents for crab⁸ and groundfish, respectively. AFSC staff also use EDR data in a variety of applications and publications. In recent years, AFSC and the Alaska Fisheries Information Network (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 Crab Economic SAFE

The Magnuson-Stevens Act requires a formal and detailed review of limited access privilege programs 5 years after the implementation of the program, and thereafter to coincide with scheduled Council review of the relevant fishery management plan. The CR Program 10-year review was completed in 2017⁹ And the 17-year review was completed in 2024. ¹⁰ The review provides an overview of the fishery, stock status, quota holdings, markets and prices, entry opportunities, and social and economic community impacts. Without this information, these elements of the program reviews would not be available.

In February 2022, the Council received a Final Review Draft Regulatory Impact Review that was developed following a comprehensive review of the crab 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 CR Program. An option was specifically considered to change the frequency of the information collection from annually to either every other year or every third year. The Council chose to retain annual EDR submission in all remaining EDRs (88 FR 7586, February 6, 2023). This decision was influenced by the fact that

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⁸ https://files.npfmc.org/resources/SAFE/CrabSAFE/CrabEconSAFE.pdf

⁹ https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/Crab10yrReview_Final2017.pdf

¹⁰ https://files.npfmc.org/Publications/CrabProgramReviewFinal.pdf

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 CR 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 is instrumental in evaluating the overall impacts to participants and communities and in assessing any economic disaster declarations that may occur. The Council did choose to eliminate costly data verification audits, blind formatting of data, and a "rule of five" confidentiality policy.

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

No circumstances require the crab EDR data to be conducted in a manner inconsistent 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 60-day Federal Register notice published (90 FR 31165, July 14, 2025) to solicit 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. No Comments were received.

NOAA consulted with nine past respondents to this information collection 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. One comment was received.

Comment: The EDR is not pertinent to the program and should be discontinued. The data collected hasn't changed in years and the rates to crew and lease holders has been the same for years as well. the only thing that changes is when the quotas are set lower everyone suffers equally as you know. and if they are up then everyone is rewarded. I believe this could be a useful tool if there was a change to the program like lease rate caps or required ownership in vessels to hold CVO IFQ. then you would be able to compare the data you have collected over

the years. But as it stands this is just redundant info.

Response: The Council and NMFS considered whether to revise or remove the EDR collections in 2023. At that time, the Council and NMFS evaluated whether the EDR program is meeting the intended purpose and need. At that time, the Council and NMFS determined that the Crab EDR has practical utility and chose to retain the 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. NMFS also acknowledges the challenges with regard to reduced quota in the crab fishery in recent seasons. NMFS appreciates suggestions regarding program management changes and recommends that any suggestions be provided to the Council, the Council's Pacific Northwest Crab Industry Advisory Committee, and/or the Council's Advisory Panel.

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

No payment or gift will be provided under this information collection.

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.

EDR data records are considered confidential information and are protected from public disclosure consistent with section 402(b) of the Magnuson-Stevens Act, 50 CFR 600.402–425, and NOAA Administrative Order 216-100. Access to confidential EDR records is limited to agency personnel, Pacific States staff, contractors, and Council staff that are authorized to access confidential fishery data. All staff and contractors with access to the crab EDR data sign a confidentiality agreement attesting that they have read and understand the confidentiality requirements and penalties for disclosing confidential information, and agreeing not to disclose confidential information.

This information collection also is covered by the Privacy Act System of Records Notice COMMERCE/NOAA #16, Economic Data Reports for Alaska Federally Regulated Fisheries off the Coast of Alaska.

The Privacy Impact Assessment that covers this information collection is <u>NOAA NMFS Alaska</u> 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 the collection of information of a sensitive nature as described in this question.

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)
Annual Catcher Vessel Crab EDR	Accountant/ Manager	56 – full EDR	1	56	20 hr	1,120	\$43.07	\$48,238
		1 – cert. only²	1	1	1 hr	1	\$43.07	\$43
Annual Catcher/Processor Crab EDR	Accountant/ Manager	2 - full EDR	1	2	20 hr	40	\$43.07	\$1,723
		0 – cert. only²	1	0	1 hr	0	\$43.07	0
Annual Processor Crab EDR	Accountant/ Manager	18 - full EDR	1	18	16 hr	288	\$43.07	\$12,404
		0 – cert. only²	1	0	1 hr	0	\$43.07	0
Totals				77		1,449		\$62,408

¹The Bureau of Labor Statistics occupation code 13-2011 (Accountants and Auditors) mean average wage rate of \$43.07 for Alaska is now used to estimate burden hour respondent costs. https://data.bls.gov/oes/#/area/0200000

²Respondents submit only the certification page indicating that they are not required to complete the full EDR.

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 forms. 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 Catcher Vessel Crab EDR	56 – full EDR	1	56	operating costs: \$5	280
	1- cert. only*	1	1	operating costs: \$5	5
Annual Catcher/Processor Crab EDR	2- full EDR	1	2	operating costs: \$5	10
	0- cert. only*	1	0	operating costs: \$5	0
Annual Processor Crab EDR	18- full EDR	1	18	operating costs: \$5	90
	0- cert. only*	1	0	operating costs: \$5	0
Totals	77		77		385

^{*} Respondents submit only the certification page indicating that they are not required to complete the full EDR.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The cost of the crab EDR program to the Federal government includes the costs of Pacific States and their subcontractors in their role as NMFS's data collection agent. Pacific States provides administrative support for the data collections, software development, web services, and database administration. Costs also include NMFS staff at the Alaska Fisheries Science Center for oversight of Pacific States' work; performing additional data quality evaluations; form development and refinement; collaboration on PRA clearance and publication of authorizing regulations; and associated public outreach (meetings, consultations, and user support). Alaska Fisheries Science Center also provides office space, computer equipment, and other administrative services. The estimated annual costs to the Federal government in 2023 was \$145,209.

Section 303A(c)(9)(e) of the Magnuson-Stevens Act authorizes NMFS to implement a fee on the permit holders in the CR Program to recover the costs of management, data collection and analyses, and enforcement activities for the program. The crab EDRs fall under the category of costs that are recovered from participants in the CR Program. Under this program, all Federal and contractor costs for the crab EDRs 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					\$145,209
Travel					
Other Costs:					
TOTAL					011

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.

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

As indicated above the crab 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.

There are no changes to this information collection.

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.

An annual summary of crab EDR data is prepared as part of the *Economic Status of the Bering Sea and Aleutian Islands King and Tanner Crab Fisheries off Alaska*, which is an annual publication of the NMFS Alaska Fisheries Science Center that is provided to the public via the NMFS website¹² and is presented to the Council's Crab Plan Team and Scientific and Statistical Committee. Statistics on harvesting and processing activity; effort; revenue; labor employment and compensation; operational costs; and quota ownership, usage, and disposition among participants in the fisheries are provided.

Section 515 of Public Law 106-554 (the Information Quality Act) requires NMFS to ensure the quality, objectivity, utility, and integrity of information it publicly disseminates. Data collected through the CR EDRs will continue to be disseminated to the public in aggregated and nonconfidential form in summary reports, program reviews, or analyses of the impacts of proposed changes to the CR Program. Public dissemination of these data is governed by NOAA's information quality guidelines. Reports and analyses prepared with EDR data generally fall under NOAA's information quality category "synthesized products." These products have been developed through analysis of original data by applying methods that require some scientific evaluation and judgment; however, these methods of analysis generally are well documented and relatively routine. Therefore, peer review is generally not required for reports and analyses prepared using EDR data. However, peer review will be conducted if the report will be published in a journal that requires peer review. Reports and analyses undergo internal agency review by people familiar with the underlying data and fisheries being described. In addition, analyses presented to the Council are reviewed by its Scientific and Statistical Committee.

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

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

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

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

¹² https://www.fisheries.noaa.gov/alaska/sustainable-fisheries/alaska-crab-stock-assessment-and-fishery-evaluation-reports