

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Highly Migratory Species Dealer Reporting Family of Forms**  
**OMB Control No. 0648-0040**

**Abstract**

This is a request for a revision and extension of an existing information collection, HMS Dealer Reporting Family of Forms (0648-0040). As part of this revision, the process for collecting email addresses from new HMS dealers has been updated. Previously, new HMS dealers were asked to submit their email addresses via email or phone. However, it is now a standard part of the annual dealer permit application process to collect email addresses. Consequently, there is no longer a need for new HMS dealers to provide their emails separately. Therefore, the burden estimates associated with collecting email addresses are no longer applicable for this ICR.

This information collection covers reports from seafood dealers regarding purchases, sales, imports, exports, or re-exports of Atlantic highly migratory species (HMS), including federally managed bigeye, albacore, yellowfin, and skipjack (BAYS) tunas, bluefin tuna (BFT), sharks, and swordfish (SWO). Domestic catch/landing data are necessary to effectively manage domestic fisheries. This information, consistent with the stated purpose of Executive Order (E.O.) 14276 of ensuring the integrity of the seafood supply chain, is used to monitor quotas, estimate fishing mortality, and identify the geographic and temporal distribution of fish and fisheries. The International Commission requires international trade-tracking programs for the Conservation of Atlantic Tunas (ICCAT). The overall goal of these trade-tracking programs is to reduce illegal, unreported, and unregulated (IUU) fishing for the covered species and improve the management of associated fisheries. This goal aligns with the policies outlined in Executive Orders (E.O.) 14276, which seeks to combat IUU fishing and protect U.S. seafood markets from unfair trade practices, and E.O. 14303, which ensures that federal decisions are based on the most credible, reliable, and impartial data available.

**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.**

This request is for revision and extension of previously approved information collections from seafood dealers regarding purchases, sales, imports, exports, or re-exports of Atlantic HMS, including federally managed BAYS tunas, bluefin tuna, sharks, and swordfish. Transactions that are covered under this collection include purchases of Atlantic HMS from commercial fishermen and portions of required reporting for import/export of all bluefin tuna, frozen bigeye tuna, southern bluefin tuna, or swordfish, regardless of geographic area of origin. The information collected is used to monitor the harvest of domestic fisheries and/or track international trade of internationally managed species. These data collections are consistent with the purpose of E.O.

14276, which, among other things, states that for seafood the United States must address unfair trade practices, eliminate unsafe imports, promote ethical sourcing, and ensure the integrity of the seafood supply chain. They are also consistent with E.O. 14303, which states that Federal decisions should be informed by the most credible, reliable, and impartial scientific evidence and data available to maintain the trust of the American people and ensure confidence in government decisions.

Domestic catch/landings data are necessary to effectively manage domestic fisheries. This information is used to monitor quotas, estimate fishing mortality, and identify the geographic and temporal distribution of fish and fisheries. Collection of this information for use in domestic fishery management is authorized under the [Magnuson-Stevens Fishery Conservation and Management Act](#)<sup>1</sup> (16 U.S.C. 1801 *et seq.*) (MSA) and is consistent with the policy of E.O. 14276, which, among other things, aims to promote the productive harvest of our seafood resources and protect our seafood markets from unfair trade practices. Regulations at [50 CFR 635.5](#)<sup>2</sup> implement domestic dealer reporting requirements. The domestic reporting covered by this collection includes domestic weekly or bi-weekly landings reports and negative reporting (*i.e.*, reports of no activity, when applicable), and bluefin tuna daily landings, including tagging of individual fish.

ICCAT and the Inter-American Tropical Tuna Commission (IATTC) require international trade-tracking programs. An overall goal of these programs is to reduce illegal, unreported, and unregulated fishing for the covered species, and improve management of associated fisheries. That goal is consistent with the policy of E.O. 14276, which, among other things, aims to combat IUU and protect our seafood markets from unfair trade practices. The programs are designed to account for all international trade of covered species by requiring that a statistical document (SD) or catch document (CD) accompany each export from and import into a member nation, and that a re-export certificate (RXC) accompany each re-export. Collection of this information to implement certain international fishery management recommendations is authorized under the [Atlantic Tunas Convention Act](#)<sup>3</sup> (ATCA; 16 U.S.C. 971(d)) and implemented in regulations at [50 CFR 300 Subpart M](#)<sup>4</sup>.

The United States is a member of ICCAT and authorized by ATCA to promulgate regulations, as necessary and appropriate, to implement binding recommendations adopted by ICCAT. ICCAT has adopted recommendations for the mandatory implementation of CD, SD, and RXC trade-tracking programs for bluefin tuna, frozen bigeye tuna, and swordfish. In 2016, ICCAT implemented an electronic version of its CD program for Bluefin tuna (eBCD). U.S. regulations implementing ICCAT SD and CD programs require SDs and CDs for international transactions of the covered species from all ocean areas, so Pacific imports and exports must also be accompanied by SDs and CDs. Since there are SD programs in place under other international conventions (*e.g.*, the Indian Ocean Tuna Commission), an SD from another program may be used to satisfy the SD requirement for imports into the United States.

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<sup>1</sup> [Magnuson-Stevens Fishery Management and Conservation Act](https://www.fisheries.noaa.gov/topic/laws-policies) <https://www.fisheries.noaa.gov/topic/laws-policies>

<sup>2</sup> <https://www.ecfr.gov/current/title-50/chapter-VI/part-635/subpart-A/section-635.5>

<sup>3</sup> <https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter16A&edition=prelim>

<sup>4</sup> <https://www.ecfr.gov/current/title-50/chapter-III/part-300/subpart-M>

The United States is also a member of the IATTC, and required under the [Tuna Conventions Act](#)<sup>5</sup> (TCA; 16 U.S.C. 955) to implement recommendations adopted by IATTC. IATTC has mandated a trade-tracking program for frozen bigeye tuna, which NMFS has implemented for shipments of frozen bigeye tuna from the Pacific Ocean.

Dealers who internationally trade southern bluefin tuna are required to participate in a trade-tracking program implemented by the Commission for the Conservation of Southern Bluefin Tuna (CCSBT). This facilitates enforcement of ICCAT's Bluefin tuna eBCD program by ensuring that imported Atlantic and Pacific bluefin tuna will not be intentionally mislabeled as southern bluefin tuna in order to circumvent reporting requirements. This action is authorized under ATCA.

In 2016, NMFS implemented the U.S. International Trade Data System which consolidated trade reporting as required by the SAFE Ports Act of 2006 (Pub. L. 109-347). Online submission of SDs, CDs, and RXCs via an online web portal that is part of the International Trade Permit system is covered under the collection OMB Control No. 0648-0732 that supported RIN 0648-AX63. However, this collection (0648-0040) continues to include associated biweekly reports; completion of the hard copy forms for SC, CD, and RXC, which must accompany the fish through trade; and validation of these statistical documents.

**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.**

### **Atlantic BFT Daily Dealer Landing Reports and Tagging**

This is a mandatory reporting requirement for all federally permitted Atlantic HMS dealers purchasing bluefin tuna from HMS vessels. NMFS uses the information collected in this portion of the reporting package to monitor U.S. landings of Atlantic BFT in relation to the assigned quota, thereby ensuring that the United States complies with its international obligations to ICCAT. In addition, provisions of domestic regulations such as time/area closures, fishing seasons, and sub-quotas by gear type and/or user group are monitored through these reporting instruments. The data collected are also used to assess the status of the BFT resources. Data reports are reviewed by ICCAT annually, and provide the basis for ICCAT management recommendations that become binding on member nations.

This portion of the package describes daily Atlantic bluefin tuna reporting requirements. A uniquely numbered tail tag must be affixed to each Atlantic bluefin tuna purchased from a fisherman. These tag numbers must be recorded on the electronic Atlantic BFT Daily Landing Report found in the [SAFIS electronic reporting system](#)<sup>6</sup>, the [Atlantic BFT Individual Bluefin Quota \(IBQ\) Electronic Landing Report](#)<sup>7</sup> (only for BFT caught by pelagic longline gear), and the Atlantic HMS Trade Electronic Biweekly Dealer Landing and Trade Report (discussed below). Electronic dealer reporting systems other than SAFIS may be used for submitting landing reports; however, the data must be transferred to SAFIS within 24 hours of landing date. SAFIS

<sup>5</sup> <https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter16&edition=prelim>

<sup>6</sup> <https://www.accsp.org/what-we-do/safis/>;

<sup>7</sup> <https://atlhmsscathshares.fisheries.noaa.gov/>

electronic dealer reporting is used for daily, real-time quota monitoring, and dealers must enter landing data into the SAFIS electronic dealer reporting system within 24 hours of purchasing an Atlantic bluefin tuna. The Atlantic HMS Catch Shares Online System keeps track of IBQ usage, allocation, and allocation sale. Note -- domestic landings of Pacific BFT are not included in this collection, and the use of tail tags is optional for trade of Pacific BFT.

### **SAFIS Atlantic BFT Daily landings reports**

The following is a representative sample of the information collected:

- 1) Date the fish was landed and purchased;
- 2) Gear type used to capture the BFT - used for estimating catch per unit effort as part of stock assessment and management strategy evaluation;
- 3) Length and weight of fish & measurement method (curved or straight length / round or dressed weight) - used to determine age of fish and population structure; weight used for quota management;
- 4) Tail tag number - identifies fish and provides cross reference with biweekly report, and is used in place of CD validation;
- 5) Area caught - provides information on spatial and temporal distribution of fish and fishing, and aids in enforcement of area closures;
- 6) Port landed - identifies principal ports for the fishery, temporal distribution of fish, and aids in enforcement;
- 7) Fisherman and vessel name, and vessel identification (ID) number (state registration or USCG documentation number) - provides vessel permit enforcement information.

### **Atlantic BFT IBQ Electronic Landing Report (for purchases from pelagic longline vessels only)**

The following information will continue to be collected;

- 1) Vessel name;
- 2) Date of landing and catch area (Gulf, Atlantic, Northeast Distant Gear Restricted Area);
- 3) Length and weight of bluefin tuna purchased;
- 4) Tail tag number for bluefin tuna purchased.

### **Atlantic BFT Electronic Biweekly Landing & Trade Reports**

This is a mandatory reporting requirement for all federally permitted Atlantic HMS dealers purchasing bluefin tuna from vessels or importing/exporting BFT. NMFS uses biweekly reports to monitor Atlantic BFT landings and to track the trade of Atlantic BFT. Beginning in 2021, respondents were able to submit this reporting electronically. Information on the purchase, sale, and disposition of Atlantic BFT is collected. The following information is collected on the Atlantic BFT Biweekly Dealer Landing and Trade Report:

- 1) Biweekly reporting period;
- 2) Dealer name, Atlantic Tunas Dealer permit number, and name of person filling out report;
- 3) Date of landing;

- 4) Vessel permit ID number - used for enforcement purposes;
- 5) Tail tag number - used to identify the fish and cross-reference with daily landing report and eBCD;
- 6) Weight of the fish (round or dressed) - used to cross-reference daily landing report information and collect economic information;
- 7) Nature of sale (dockside or consignment) - used in assessing the relative importance of the Japanese and U.S. domestic markets;
- 8) Price per pound - important for evaluating economic characteristics of the fishery;
- 9) Quality rating - assists in determining how regulations affect price of BFT; and
- 10) Destination of fish (domestic, import, export, or re-export) - used for assessing the importance of foreign market, cross-referencing export data, and identifying variables that can affect all markets.
- 11) Nature of sale, price and fish destination are collected for use in economic analyses required for federal action.
- 12) eBCD number - affiliates import /export/re-export product within international eBCD system

### **Atlantic Swordfish, Sharks, and BAYS Tunas Electronic Dealer Landing Reports**

NMFS requires mandatory weekly electronic reporting by all federally permitted Atlantic HMS dealers for Atlantic SWO, BAYS tunas, and Atlantic sharks. This includes both positive and negative reports. Swordfish, shark, and BAYS tuna's dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (SAFIS, Bluefin LLC Trip ticket programs, etc.) are automatically sent to the HMS e-Dealer system and fulfill HMS weekly electronic reporting requirements.

The information collected through the electronic reporting system is used to account for domestic landings of managed species (Atlantic swordfish, BAYS tunas, and sharks); track landings against appropriate quotas; and assess stocks of these species. This information may be submitted in conjunction with non-HMS species purchased during the same reporting period, thus reducing the reporting burden on dealers. If no HMS, or other federally managed species, are purchased or accepted during the specified reporting period, a negative report must still be filed. This requirement clarifies for NMFS whether or not a report is pending from the dealer for the reporting period. The following information is required in the HMS electronic dealer landing report:

- 1) Dealer information (including dealer name, dealer contact information, and dealer permit numbers);
- 2) Date purchased
- 3) Species-specific information (including which species purchased/accepted; state landed; grade and market information; purchase price and/or total sale information; weight of fish purchased by species, and information on shark fins);

- 4) Vessel information (including date landed, vessel documentation number, fishing vessel name (if applicable) the area where the fish was caught, fishing vessel logbook number, Southeast observer log identification, gear types used, name of port where fish landed, and trip number);
- 5) Report information (including date and time submitted and disposition of product);
- 6) Dealer explanations (including information regarding late reporting, modified data, and whether or not shark fins were naturally attached, and explanation for no fishing logbook ID, if applicable);
- 7) Negative reports (including the date and time submitted).

### **Voluntary Fishing Vessel and Catch Form**

In order to assist dealers in completing the HMS non-BFT Electronic Dealer Landing Report, NMFS has developed a voluntary form that dealers can obtain via the electronic reporting system and give to fishermen. Dealers can ask fishermen from whom they obtain fish to complete the form and return it to them. Otherwise, dealers would need to follow up with fishermen to collect required information in their electronic HMS dealer reports. This provides a convenient tool for fishermen to convey catch information to HMS dealers, who are required to include such information in their HMS *e-Dealer* reports. The voluntary forms are not collected by the agency, nor is the data provided within them used for management purposes outside of what is subsequently reported through the electronic HMS dealer reports.

The dealers can collect the following types of information on this form:

- 1) Fishing vessel trip information (contact name, phone number, and e-mail address; fishing vessel name and fishing vessel documentation number);
- 2) Date HMS were offloaded;
- 3) Indication if any landings came from the Atlantic shark research fishery;
- 4) Southeast Observer log ID number (if applicable);
- 5) Fishing vessel logbook ID number (or explanation if no logbook available);
- 6) Species landed (select from list);
- 7) Area where HMS were caught (fishermen can provide grid area code from included map);
- 8) Gear used to land HMS (select from list).

### **HMS Trade Electronic Biweekly Report**

This is a mandatory reporting requirement for all federally permitted Atlantic International Fisheries Trade Permit (IFTP) holders participating in international trade of Atlantic bluefin tuna, Southern bluefin tuna, frozen bigeye tuna, and swordfish, which NMFS monitors on a biweekly basis. Respondents are able to submit this report electronically. This information is used to crosscheck and verify SD data (discussed below), as well, as obtain economic information that is essential for domestic management policy and rulemaking with respect to management impacts on prices. The following information is required on the HMS Trade Biweekly Report:

- 1) Dealer Name;

- 2) International Fisheries Trade Permit number;
- 3) Contact name and phone number;
- 4) Report time period;
- 5) For each shipment/fish:
  - a. Species
  - b. Statistical document and re-export certificate (if applicable) number - cross checks trade documentation;
  - c. Entry number from U.S. customs form 7501 (import only) - allows for cross check of trade data with customs data;
  - d. Date of import or export;
  - e. Total weight of shipment (import only) - cross check with trade data;
  - f. Condition (fresh or frozen) and product form (round, headed, gutted, steaks, fillets, loins, dressed) - used to assess how regulations and other factors affect ex-vessel prices and gross revenues;
  - g. Weight of each fish (if available) - used to estimate gross revenues and cross-check trade data;
  - h. Price per kilogram - used to evaluate the status of the market and gross revenues;
  - i. State/landing document number - cross check used for non-government validation;
  - j. Tag number (if applicable) - cross checked with trade data for verification;
  - k. Destination of fish (import, domestic, export, re-export) - cross checks with trade data and customs data.

### **Catch Documents, Statistical Documents, and Re-export Certificate Validation**

NMFS has worked with ICCAT with the intent of minimizing the public reporting burden for the government validation requirement. ICCAT and IATTC require that a government institution at export validate CDs, SDs, and RXCs. For example, in the United States, Atlantic BFT are tagged when landed, and the numbered tag stays with the carcass. ICCAT and U.S. regulations exempt tagged fish from validation requirements since the BFT data associated with the tag number must be provided to NMFS and can be tracked. In addition, NMFS has instituted a validation service, which is available on a 24-hour/7-day-per-week basis to accommodate the requirement for government validation of RXC's covering products being re-exported from the United States. NMFS may also authorize non-governmental industry partners to validate CDs, once they have met the necessary requirements. The entity must apply for authorization in writing to NMFS, and indicate the procedures to be used for verification of information to be validated, list the names, addresses, and phone/fax numbers of individuals to perform validation, and provide an example of the stamp or seal to be applied to the statistical document or re-export certificate. Upon approval, NMFS will issue a letter specifying the duration of effectiveness and conditions of authority for validation. Authorization must be renewed annually.

**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.**

**BFT Daily Landing Reporting (SAFIS and IBQ):**

SAFIS BFT daily landing reports are submitted electronically via the SAFIS electronic reporting system. For Atlantic bluefin tuna purchased from Longline category vessels, dealers must submit an electronic IBQ daily landing report to support the management of IBQ shares.

**Atlantic Swordfish, Sharks, and BAYS Tunas Electronic Dealer Landing Reports:**

HMS dealers of Atlantic swordfish, sharks, and BAYS tunas are required to report to NMFS using an electronic reporting system. The HMS reporting requirements have been incorporated into existing electronic reporting programs. The availability of electronic form submissions reduces the overall cost and administrative burden to the public by providing access to electronic forms that can be completed on the computer and submitted electronically. The electronic reporting programs consist of individual, state-owned reporting programs built and maintained by Bluefin Data LLC, an HMS-only system housed in the Atlantic Coastal Cooperative Statistics Program (ACCSP) environment (*e-Dealer*), SAFIS, and customized electronic systems used by large dealers, predominantly located in the Northeast. The integration of HMS reporting requirements into existing reporting programs reduces the need for dealers to report to multiple programs and reduces duplication of reporting (see also response to Question 4).

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

The impacts of the reporting requirements were analyzed prior to implementation through rulemaking processes including public review. The Atlantic HMS Management Division of NMFS works closely with state and other NMFS offices on reporting and permitting issues, and ensures that reporting regulations are not duplicative. Although daily and weekly landing reports and reporting forms may include some of the same data fields collected in other data streams, this information is necessary to cross reference and cross check reports. In some cases, there are specific forms that are required to be submitted. For instance, NMFS has attempted to combine SDs with other reporting requirements into a single form in the past; however, ICCAT did not approve the use of forms other than those developed specifically by ICCAT. NMFS has combined its electronic reporting requirements for Atlantic swordfish, sharks, and BAYS tunas with the other existing electronic reporting systems used in the Greater Atlantic and Southeast regions in order to reduce the number of places dealers must report. In addition, the United States is participating in discussions through regional fishery management organizations to determine ways of using technology to reduce paperwork and improve the efficacy of trade monitoring programs, such as ICCAT's eBCD program.



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

Small businesses will be the respondents of this data collection. As described in Question 4, reporting requirements have been condensed as much as possible. In addition, electronic dealer reporting has been implemented, as discussed in Questions 3 and 4.

**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.**

***Atlantic BFT Landing Reports and Tagging*** - If reporting were conducted less frequently or not conducted at all, the United States could overharvest its internationally approved BFT quota, and would fall out of compliance with its international obligations under ICCAT, in violation of ATCA. In addition, the status of the resource would be indeterminable since U.S. fishermen allocate approximately 49 percent of the western Atlantic BFT Total Allowable Catch for landing. Furthermore, it would be impossible for the United States to formulate domestic policy consistent with the MSA, which is based on sound socioeconomic and biological data and analyses. If BFT landings data were not included in the IBQ electronic reporting system, then NMFS would not be able to implement IBQs that were included as a management measure in Amendments 7 and 13 to the 2006 Consolidated Atlantic HMS Fishery Management Plan. These quotas are awarded to individual pelagic longline vessels and most of the pelagic longline quotas are less than one metric ton (mt). Timely and accurate electronic IBQ monitoring is vital for IBQ accounting purposes and thus, for implementation of the IBQ program.

***Atlantic Swordfish, Sharks, and BAYS Electronic Dealer Landing Reports*** - NMFS implemented weekly, electronic reporting for all federally permitted shark, swordfish, and Atlantic BAYS tunas dealers in 2013. In addition, electronic reporting streamlined dealer reporting and allowed dealer data to be collected on a more real-time basis, and to be consistent with reporting in both the Greater Atlantic and Southeast regions as well as state-required dealer reporting. This streamlined reporting made it easier for small businesses to meet both federal and state reporting requirements as well as improve the timeliness and accuracy of dealer data used for quota monitoring of Atlantic HMS. Inefficient quota monitoring or altogether loss of monitoring could result in over-harvest of the ICCAT-recommended U.S. swordfish or albacore quotas, which would violate obligations under ICCAT and ATCA. Overharvest of HMS quotas (including sharks) could negatively affect stocks and the fishing industry and violate the MSA. Lastly, this information is necessary for the development of domestic policy, since it provides socio-economic and biological data upon which policy decisions are based.

***Government Validation of Catch Documents, Statistical Documents, and Re-export Certificates*** - If government validation for the SD and CD programs were not implemented, then U.S. product would not be accepted for import by other Regional Fisheries Management Organizations (RFMO) member nations. Without the authorization of non-government validation, NMFS would be required to individually validate each export and re-export, which would impose a greater reporting burden on industry. If authorization were not renewed

annually, in the same manner that dealer and vessel permits are renewed annually, NMFS would not be able to effectively monitor implementation of the trade program.

***Voluntary Fishing Vessel and Catch Form*** – This is a voluntary form that fishermen could leave with HMS dealers to help with their required electronic dealer reports. If this information were not collected via the form, dealers would need to follow up with fishermen to collect required information in their electronic HMS dealer reports.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

The frequency with which data are collected in this package is inconsistent with OMB guidelines that respondents should not be required to report information more often than quarterly. To accurately monitor the domestic quota allocation among a diverse group of users, Atlantic HMS landings data must be collected on a real-time basis (or as close to real-time as possible). Failure to maintain the reporting frequency as described under Question 2 could jeopardize the agency's ability to close fisheries prior to exceeding a quota. (See Question 6 also regarding reporting frequency).

This collection is consistent with all other 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 April 28, 2025 ([90 FR 17580](#)) solicited public comments. No comments were received during the 60-day comment period.

Additionally, NOAA reached out to 3 dealers via email to obtain their views on the need for and practical utility of the data collected, the accuracy of the burden and frequency of collection, suggestions to minimize the burden, and ways to improve the clarity of instructions and forms. No comments were received.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are offered as part of 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.**

Pursuant to Section 402(b) of the MSA, as amended in 2007, and consistent with [NOAA Administrative Order 216-100](#)<sup>8</sup> (Confidentiality of Fisheries Statistics), NMFS does not release confidential information submitted in compliance with provisions of the MSA, other than in aggregate form and under circumstances required or authorized by law. Whenever data are requested or released to the general public, NOAA ensures that information on the financial business activity of a dealer is not identified.

This information is covered by a Privacy Act System of Records Notice [COMMERCE/NOAA-6](#)<sup>9</sup>, Fishermen's Statistical Data, amended version published on March 10, 2017 (82 FR 47259). The privacy impact assessment for Federal Information Security Modernization Act (FISMA) system [NOAA4000](#)<sup>10</sup> captures the information in this collection.

A Privacy Act Statement for these reports is posted at <https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/atlantic-highly-migratory-species-dealer-reporting>.

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

No information of a sensitive nature is requested in this collection of information.

**12. Provide an estimate in hours of the burden of the collection of information.**

The number of respondents, responses, burden hours, and annual wage burden costs associated with each reporting instrument are given in Table 1 and estimation of burden hours is discussed below by reporting requirement. All reports covered by this collection are required to be kept by the dealer for a period of 2 years. The burden hour estimate for each report includes the time required for filing and storing reports.

Occupational Code used: Farming, Fishing, and Forestry Occupations (45-0000)  
<https://data.bls.gov/oes/#/industry/000000>

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<sup>8</sup> <https://www.noaa.gov/organization/administration/nao-216-100-protection-of-confidential-fisheries-statistics>

<sup>9</sup> <https://www.commerce.gov/node/4998>

<sup>10</sup> <https://www.commerce.gov/sites/default/files/2025-10/NOAA4000%20PIA%20FY25%20SAOP%20Approved.pdf>

**Table 1.** Respondent universe, number of responses, burden estimates, and burden annual wage cost estimates for each reporting instrument included in this collection.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondent s/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)
Non-governmental Validation Authorization	Non-government institution	2	1	2	2	4	\$20.06	\$80
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer)	HMS Dealers	122	21	2,562	0.25	641	\$20.06	\$12,858
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer) "file upload" version	HMS Dealers	12	25	300	0.50	150	\$20.06	\$3,009
HMS Weekly Negative Reports (e-Dealer)	HMS Dealers	540	31	16,740	0.083	1,389	\$20.06	\$27,863
<b>HMS Totals</b>		<b>674</b>	<b>29.083</b>	<b>19,602</b>	<b>0.111213</b>	<b>2,180</b>	-	<b>\$43,730</b>
Atlantic BFT Daily Landing Report	BFT Dealers	385	15	5,775	0.03	173	\$20.06	\$3,470
Atlantic BFT Landing Tag	BFT Dealers	385	15	5,775	0.02	116	\$20.06	\$2,327
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from purse seine & longline vessels)	BFT Dealers	385	1.5	578	0.02	12	\$20.06	\$241
<b>Atlantic BFT Totals</b>		<b>385</b>	<b>31.5</b>	<b>12,128</b>	<b>0.02481</b>	<b>301</b>	-	<b>\$6,038</b>
Validation of Catch Documents, Statistical Documents, and Re-export Certificates	International Dealers	235	51	11,985	0.25	2,996	\$20.06	\$60,100
Atlantic BFT Biweekly Landing and Trade Report	BFT Dealers/BFT Importers or Exporters (IFTP holders)	385	1	385	0.25	96	\$20.06	\$1,926
Fishing Vessel and Catch Form	HMS Fishermen	225	10	2,250	0.25	563	\$20.06	\$11,294
HMS Trade Biweekly Report	IFTP holders	235	12.3	2,891	0.25	723	\$20.06	\$14,503
<b>Totals</b>				<b>49,243</b>		<b>6,863</b>		<b>\$137,671</b>

The universe of respondents for this collection is identified in Table 2, and includes the following: all IFTP holders importing or exporting bluefin tuna, frozen bigeye tuna, swordfish, or southern bluefin tuna; U.S. Atlantic dealers that purchase Atlantic swordfish, BAYS tunas, or sharks from fishermen; all dealers purchasing bluefin tuna from fishermen; and non-government institutions requesting validation authorization. Finally, an estimated number of international dealers is provided, because burden hours must be calculated for international respondents as well as domestic respondents. International dealers impacted by this collection include exporters that must obtain validation for SDs, CDs, and RXCs prior to exporting a shipment to the United States.

The number of non-government institutions authorized for validation is estimated at two, since the most authorizations ever issued in a year was two. The total number of respondents is likely overestimated and ensures burden and costs are not underestimated because some individuals may hold more than one type of permit.

**Table 2. Estimated total number of respondents for this collection**

<b>Respondent Type</b>	<b>Number*</b>
International Fisheries Trade Permits*	235
Shark Dealer Permits	89
SWO Dealer Permits	197
Tuna Dealer Permits (BFT, BAYS or both), includes:	
BAYS-only dealers	63
BFT-only dealers	63
BAYS and BFT dealers	319
International Dealers	235
HMS Commercially Permitted Fishermen (submitting voluntary fishing vessel and catch form)	225
Non-government Institutions for Validation	2
<b>TOTAL</b>	<b>1,428</b>

Shark, Swordfish, and Tuna Dealer permits, and HMS commercial fishing permits, are based upon 2021 data from the 2022 *Atlantic HMS SAFE Report*.

\* Number of International Fisheries Trade Permits as of December 31, 2023.

Burden hour calculations for each reporting instrument are given in Table 3, and discussed below by reporting instrument.

### **Atlantic BFT Daily Landing Reports and Tagging**

Atlantic BFT daily a dealer must electronically submit landing reports to NMFS via SAFIS within 24 hours of purchase from a vessel, and each of those fish must be tagged. The burden associated with the Atlantic BFT daily landing reports and tagging is estimated based upon the

number of BFT dealer permits issued in 2022, and the number of reports submitted in the same year, as provided by the HMS Management Division. Dealers must submit an Atlantic BFT IBQ Electronic Landing Report for landings from pelagic longline vessels to support management of IBQ shares.

### **Atlantic Swordfish, Sharks, and BAYS Electronic Dealer Landing Reports**

Non-BFT landings reports are to be submitted to NMFS through electronic dealer reporting systems. The burden associated with these reporting activities, in addition to a voluntary form that fishermen may fill out and leave with HMS dealers for their electronic dealer reports, are summarized in Table 1, and explained in detail below.

Swordfish, shark, and BAYS tuna's dealers must submit an electronic report for each trip that they purchase of these species from a vessel. At a minimum, electronic reports (including negative reports) must be submitted weekly. Electronic dealer reports collected through other Atlantic reporting systems (SAFIS, VESL, etc.) are automatically sent to the HMS *e-Dealer* system and fulfill HMS weekly electronic reporting requirements. The individual reporting burden for persons issued an Atlantic swordfish, shark, and/or BAYS tuna's dealer permit varies, depending upon the number of trips a dealer purchases. The response burden for "key entered" reports is estimated at 15 minutes per report, and dealers utilizing the "file upload" versions of reporting systems are estimated to need 30 minutes per report. Based upon the number of electronic reports submitted in 2022 by swordfish, shark, and BAYS tunas dealers, and received through the *e-Dealer* system (2,862 responses = 2,562 key entered + 300 file upload), the annual reporting burden is estimated at 790.5 hours.

If no purchases are made during a weekly reporting period, a negative report must be filed. Negative reports are estimated to take 5 minutes (0.083 hrs) to complete and send to NMFS. The number of negative reports used in this analysis (16,740) is based upon the number of negative *e-Dealer* reports submitted to NMFS in 2022. The annual reporting burden is estimated at 1,389 hours (using 0.083 hrs to be consistent with the information in Table 1).

### **Voluntary Vessel and Catch Form**

Fishermen may fill out a voluntary form to provide dealers with fishing vessel and Atlantic swordfish, sharks, and BAYS tunas catch information. This form would take fishermen approximately 15 minutes to complete and would be completed on a trip basis. Since these forms are not required, no data on their use is available. In previous requests, NMFS estimated that these voluntary forms were used on 100% of trips; however, as fishermen and dealers have acclimated to electronic dealer reporting, NMFS estimates that use of this form has reduced to 15% of trips, or approximately 2,250 trips.

### **Biweekly Trade Report**

The international trade biweekly reporting requirements for this collection occur on the HMS Trade Biweekly Dealer Report. Estimation of burden hours associated with this form was calculated by multiplying the number of responses submitted to the NMFS Import Monitoring Program at the National Seafood Inspection Laboratory in Pascagoula, MS in 2022.

### Non-governmental Validation

Non-government institutions may apply for authorization to validate statistical documents or re-export certificates by applying in writing, indicating the procedures to be used for verification of information to be validated, the names and contact information of individuals that will perform the validation, and an example of the stamp or seal applied to the statistical document or re-export certificate. Authorizations must be renewed on an annual basis. The largest number of validation authorizations ever granted by NMFS in one year was 2, and NMFS estimates this will continue to be the case. Preparing the necessary application is expected to take approximately 2 hours. Total burden hours = 2 \* 2 hours = 4 hours.

### Validation of Catch Documents, Statistical Documents, and Re-export Certificates

The annual number of shipments by species for BFT, frozen BET, SBT, and SWO for each trade activity (import/export/re-export) for 2022 was provided by The National Seafood Inspection Laboratory's Import Monitoring Program using data from statistical and catch documents and the ICCAT eBCD system. ICCAT requires that exports (including some re-exports) associated with its SD programs are validated. This validation requirement is implemented by either tagging each fish in a shipment and maintaining the necessary records, or obtaining verification from a government official or their designee. The tagging option is currently available for Atlantic and Pacific BFT (all Atlantic BFT are tagged upon landing (see above)).

### 13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

**Total annual capital and recordkeeping/reporting cost is \$22 (excluding the value of burden hours discussed in Question 12).** Excluding labor costs, there are no recordkeeping and reporting costs to the public resulting from this collection as all reports submitted to NMFS are now submitted electronically. Electronic submission will not result in any additional cost to the public, since small businesses are already set up with computers and internet service as part of their regular business operations. Forms and tags are provided free of charge. Non-government institutions approved for validating exports would spend approximately \$11 for a validation stamp, and total cost estimates are in Table 3.

**Table 3. Costs to the public as a result of this collection, not including those associated with burden hours.**

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)
Non-governmental validation authorization	2	1	2	\$11	\$22

TOTALS			2		\$22
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**14. Provide estimates of annualized cost to the Federal government.**

**Table 4. Estimate of annualized cost to the federal government for this data collection.**

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-5	\$266,898	10%		\$26,690
Other Federal Positions	ZP-4 x4	\$224,384	50%		\$448,768
Other Federal Positions	ZP-3	\$164,681	50%		\$82,341
Other Federal Positions	ZA-3	\$164,681	10%		\$16,468
Other Federal Positions	ZP-2	\$119,860	30%		\$35,958
<b>Contractor Cost</b>					
Contractor Labor					\$500,000
Maintenance Costs					\$215,000
ACCSP Database Costs					\$40,000
Travel					\$4,500
<b>Other Costs:</b>					
Bluefin Tuna Reporting Tags					\$3,225
<b>TOTAL</b>					<b>\$1,372,950</b>

Labor rates were calculated using the Commerce Alternate Personnel System (CAPS) [pay tables](https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf)<sup>11</sup> for the Rest of U.S. locality. The Rest of U.S. locality was used for the base salary as NOAA personnel are geographically dispersed. A multiplier of 1.5 was used to calculate the loaded salary for each position cited.

<sup>11</sup> [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)



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

### **Adjustments:**

Bluefin Tuna Daily Landing, IBQ, Tag, and Biweekly Landings and Trade Reports: These burden estimates were adjusted to reflect a reduction in the number of permitted bluefin tuna dealers over the last three years, and a slight increase in the average number of daily reports submitted by each of the remaining dealers.

HMS Dealer Landings and Negative Reports: These burden estimates were adjusted to reflect a reduction in the number of permitted non-bluefin tuna HMS dealers over the last three years. We also revised the estimates of the number of annual responses per dealer based on the average number of dealer reports submitted over the last three years. The estimate of negative reports, in addition to being adjusted for a reduction in the number of permit holders, was also adjusted for a corrected count of the number of annual responses. These reports are required on a weekly basis, but the database includes a separate record for each day of the week the dealer did not purchase fish. Previous calculations had mistakenly counted each day without a purchase as a separate report.

HMS Trade Biweekly Reports: These burden estimates were adjusted based on data from the NMFS Office of International Affairs, Trade, and Commerce, which provided a count of the number of dealers holding International Fisheries Trade Permits. Previously, without this information, we had used our estimate of the total number of permitted HMS Dealers as a proxy, which resulted in a significant over-estimate of the number of respondents for these reports.

Fishing Vessel and Catch Form: This burden estimate was adjusted to better reflect the number of respondents believed to be using these voluntary forms.

NMFS also requires Atlantic HMS dealers to provide an e-mail address so communications with dealers can be made through the HMS e-Dealer system. Previously, new HMS dealers were asked to submit their e-mail address via e-mail or phone, but today the collection of email addresses is now a standard part of annual dealer permit applications. As such, there is no longer any need for new HMS dealers to provide their emails separately, so the burden estimates for collecting this information are no longer needed for this ICR.

**Table 5. Program respondent, response, and burden hour changes and adjustments.**

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	
Non-governmental validation authorization	2	2	2	2	4	4	No change
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer)	122	700	2,562	8,050	641	2,012	
HMS Electronic Landing Report for Swordfish, Sharks, & BAYS Tuna (e-Dealer) “file upload” version	12	700	300	2,240	150	1,120	
HMS Weekly Negative Reports (e-Dealer)	540	700	16,740	129,500	1,389	10,792	
<b>HMS Totals</b>	<b>674</b>	<b>700</b>	<b>19,602</b>	<b>139,790</b>	<b>2,180</b>	<b>13,924</b>	Change in number of respondents. Change in number of respondents and correction to estimate of number of responses per respondent.
Atlantic BFT Daily Landing Report	385	430	5,775	5,160	173	172	
Atlantic BFT Landing Tag	385	430	5,775	5,160	116	86	
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from longline vessels)	385	430	578	645	12	11	
<b>Atlantic BFT Totals</b>	<b>385</b>	<b>430</b>	<b>12,128</b>	<b>10,965</b>	<b>301</b>	<b>269</b>	Change in number of respondents
Validation of Catch Documents, Statistical Documents, and Re-export Certificates	235	510	11,985	15,016	2,996	3,754	Change in number of respondents
Atlantic BFT Biweekly Landing and Trade Report	385	430	385	430	96	108	Change in number of respondents
Fishing Vessel and Catch Form	225	8,836	2,250	5,302	563	1,325	Change in number of respondents
HMS Trade Biweekly Report	235	700	2,891	3,500	723	875	Change in number of respondents
Email Address Given to NMFS	0	20	0	20	0	1	Removed from Collection
<b>Total for Collection</b>	<b>2,141</b>	<b>11,628</b>	<b>49,243</b>	<b>175,025</b>	<b>6,863</b>	<b>20,260</b>	
<b>Difference</b>	<b>-9,487</b>		<b>-125,782</b>		<b>-13,397</b>		

**Table 6. Program labor and miscellaneous cost changes and adjustments.**

Information Collection	Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	
Non-governmental validation authorization	\$22.00	\$22.00	No change
HMS Electronic Dealer Landing Report for Swordfish, Sharks, & BAYS Tunas ( <i>e-Dealer</i> )	\$0.00	\$0.00	No change
HMS Electronic Dealer Landing Report for Swordfish, Sharks, & BAYS Tunas ( <i>e-Dealer</i> ) “file upload” version	\$0.00	\$0.00	No change
HMS Weekly Negative Reports ( <i>e-Dealer</i> )	\$0.00	\$0.00	No change
Atlantic BFT Daily Landing Report	\$0.00	\$0.00	No change
Atlantic BFT Landing Tag	\$0.00	\$0.00	No change
Atlantic BFT IBQ Daily Electronic Landing Report (for landings from longline vessels)	\$0.00	\$0.00	No change
Validation of Catch Documents, Statistical Documents, and Re-export Certificates	\$0.00	\$2,252.40	Elimination of postage costs by previous switch to electronic reporting
Atlantic BFT Biweekly Landing and Trade Report	\$0.00	\$0.00	No change
Fishing Vessel and Catch Form	\$0.00	\$0.00	No change
HMS Trade Biweekly Report	\$0.00	\$0.00	No change
Email Address given to NMFS	0	0	Removed from Collection
<b>Total for Collection</b>	<b>\$22.00</b>	<b>\$2,274.40</b>	
<b>Difference</b>	<b>(\$2,252.40)</b>		

**16. For collections whose results will be published, outline the 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 information publications such as the annual HMS Stock Assessment and Fishery Evaluation (SAFE) Report and Fisheries of the United States (FUS), both of which follow prescribed statistical tabulations and summary table formats. Data are available to the public on request in summary form only; data are available to NMFS employees in detailed form on a need-to-know basis only.

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

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

Similar to the last renewal of OMB approval for the BFT CD (OMB Control No.0648-0040), it is requested that the burden statement, expiration date, and OMB Control Number not appear in the electronic eBCD, or on the CD form, but be posted on the HMS International Trade Program (ITP) website. A link to the website and copy of the text is included in this submission. The reason for this request stems from concerns expressed by other ICCAT members that U.S. CDs should not differ from the format agreed to at ICCAT. Further, the eBCD electronic system is not under the purview of the United States. In addition, SDs and RXCs for SWO, BET, and SBT are available to dealers either from NMFS or from the internet websites of the different international commissions (ICCAT, IATTC, CCSBT, IOTC). NMFS wants dealers to be able to access the forms directly from these websites. NMFS has copies of these forms on its HMS ITP website, and these documents include the OMB Control number and expiration date. The rest of the information will be available on the HMS ITP website. This will meet NMFS obligations under the PRA while reducing the likelihood of delays/problems in clearing customs in countries that are contracting parties to ICCAT.

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