

December 20, 2025



Adrienne Thomas
NOAA Paperwork Reduction Act Officer
1315 East West Highway, SSMC3
Silver Spring, MD 20910-301

RE: OMB Control Number 0648-0323 Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Highly Migratory Species (HMS) Tournament Reporting Requirements

Dear PRA Officer Thomas,

The Viking Marine Group appreciates the opportunity to comment on NOAA Fisheries' proposed information collection related to Highly Migratory Species (HMS) tournament reporting. Viking submits these comments both as an HMS tournament director and as a leading U.S. manufacturer of recreational fishing vessels that are purpose-built for offshore and highly migratory pelagic fisheries.

Viking Marine Group support more than 2,000 employees, and HMS fisheries are foundational to our business, our customers, and our workforce. A substantial portion of our vessels are designed specifically for HMS fishing and tournament participation. HMS tournaments drive vessel demand, innovation, utilization, and long-term service support throughout the marine supply chain. Additionally, HMS tournaments generate significant economic activity on their own. Accordingly, the quality, credibility, and workability of HMS fisheries management and the data used to drive it directly affect our company.

At the outset, Viking strongly supports mandatory HMS tournament reporting and recognizes HMS tournaments as one of the most valuable sources of high-quality recreational fisheries data available to NOAA Fisheries. In many cases, particularly for billfish species, the overwhelming majority of recreational landings and verified releases originate from organized tournaments. Tournament data are uniquely robust because weights and lengths of landed fish are verified by trained staff, and releases are increasingly verified through video documentation and review.

This high level of verification necessarily places a substantial responsibility and time burden on tournament directors and staff. However, it also produces a level of data quality that is difficult to replicate through other recreational data collection programs. The challenge, therefore, is not whether HMS tournament data should be collected, but how to ensure that reporting requirements remain focused, efficient, limited to species that fall under HMS jurisdiction, and consistent with the Paperwork Reduction Act.



Viking submits the following comments to the proposed modifications to the tournament registration and reporting forms.

1) Scope of Species Included in HMS Tournament Reporting

Viking Marine Group urges caution with respect to expanding the list of species required to be reported through HMS tournament reports. Currently, tournament directors are already required to report catch information for several non-HMS species, such as king mackerel, dolphin (mahi-mahi), wahoo, blackfin tuna, and others, that are not managed under the Consolidated HMS Fishery Management Plan or by ICCAT.

Under the Paperwork Reduction Act, agencies are required to demonstrate that each element of an information collection is necessary for the proper performance of agency functions and has practical utility (44 U.S.C. § 3506(c)(1)(A)). While we appreciate NOAA Fisheries' interest in comprehensive fisheries data, expanding HMS tournament reporting to additional non-HMS species increases the burden on tournament directors and raises questions about whether such information is necessary to achieve HMS management objectives.

HMS tournament reporting is a specialized program designed to support HMS science and management. As such, continued expansion beyond HMS species risks diluting the program's focus, increasing preparation time, and undermining compliance without a clear demonstration of added practical utility. Viking therefore recommends that NOAA Fisheries refrain from adding additional non-HMS species to HMS tournament reporting requirements.

2) Bluefin Tuna Catch and Size Class Reporting

With respect to the reporting of Atlantic bluefin tuna, Viking supports requesting tournament participants to identify size-class information for released fish, which could then be summarized by tournament directors in HMS tournament reports. It is important for NOAA to recognize that this data would be qualitative in nature, but it would provide some in terms of abundance relative to size. This approach may provide useful information for understanding catch size composition for fish that don't make it to the dock while remaining consistent with PRA principles.

When bluefin tuna are landed in tournaments, those fish are already subject to weight and length measurements that are submitted as part of existing reporting requirements. Requiring tournament directors to also report landed bluefin tuna by size class school, large school, small medium, medium, large, giant, for example, would be duplicative, less precise than actual measurements and inconsistent with the PRA directive to avoid unnecessary or redundant data collection (44 U.S.C. § 3506(c)(3)(B)). Any additional reporting requirements should be narrowly tailored to address demonstrated data gaps and should avoid duplication of information already being collected.



3) Species-Specific Length Reporting Requirements

Viking Marine Group recommends that mandatory length reporting requirements be limited to species managed under the Consolidated HMS Fishery Management Plan. HMS tournament reporting exists because HMS species require specialized management, and the reporting framework should remain aligned with that purpose.

While lengths and weights can be informative for many species, expanding mandatory length reporting to non-HMS species increases the time required to prepare reports and complicates verification responsibilities for tournament directors. Under the Paperwork Reduction Act, NOAA Fisheries must ensure that reporting requirements impose the least burden practicable on respondents (44 U.S.C. § 3506(c)(1)(C)). Expanding length reporting beyond HMS species exceeds that standard. If there is interest in without a commensurate management benefit.

4) Reporting Shark Depredation and Other Encounters

Viking supports the inclusion of a reporting field that allows tournament directors to document shark depredation and other depredation encounters with HMS fish caught during HMS events. We recommend that reporting options allow identification of whether a fish was depredated by a shark, a marine mammal, an unknown source, or another cause.

Shark depredation has become a critical issue in HMS tournaments, affecting both harvested fish, fish intended to be reported as releases, and the payouts given that shark bitten fish are disqualified. From a data-quality perspective, HMS tournaments are well positioned to document this source of mortality in a reliable manner. Through the video verification process, tournament directors are watching hours of footage to confirm releases, thus, they are able to empirically authenticate depredation. At the scales, fish with evidence of shark depredation are also disqualified.

Viking asserts that it is essential that NOAA Fisheries provide clear, explicit, and affirmative assurances that fish depredated by sharks during HMS tournaments **shall not be considered a "take" nor counted toward any landing limits, including the 250 combined billfish landing limit when those fish are not brought to the dock and landed.** Shark depredation represents a source of natural mortality and should be treated as such for released fish that are not landed.

Absent clear regulatory assurances in regard to use of the this informatin, tournament directors may rightfully be reluctant to report depredation given the uncertain management implications. This stands the risk of undermining both compliance and data quality. Providing clarity in advance is essential to ensure that the information collected has practical utility, as required under the PRA (44 U.S.C. § 3506(c)(1)(A)).



Paperwork Reduction Act Considerations and Reporting Burden

Viking Marine Group recognizes that the Paperwork Reduction Act is intended to ensure that federal information collections are necessary, efficient, and not unduly burdensome. HMS tournament reporting largely satisfies these objectives because of the exceptional value of the data collected. Nevertheless, HMS tournament directors already incur significant time and labor costs associated with report preparation, verification, and submission, often under tight post-tournament deadlines. This is particularly noteworthy when most HMS tournaments are managed by a handful of people and fall under the definition of small businesses, whether structured as a non-profit or for-profit entity.

Unlike many recreational reporting programs, HMS tournament reporting relies on a relatively small number of individuals from the industry who shoulder extensive compliance responsibilities on behalf of NOAA Fisheries. Incremental additions to reporting requirements, while seeming modest, can cumulatively result in a burden that exceeds what is necessary to achieve agency objectives. Again, tournament directors provide some of the highest quality data yet are not employees or contractors of a federal or state agency. Under the PRA, NOAA Fisheries must evaluate the total burden imposed, not merely individual data elements (44 U.S.C. § 3506(c)(1)(B)). Viking therefore encourages NOAA Fisheries and OMB to be mindful of proposed additions carefully, acknowledge that these are private citizens gathering this data, and to ensure that any expanded reporting requirements demonstrate clear necessity and practical utility.

Aside from the specific prompts for comments, Viking submits additional comments on ways to further spur improvements and efficiency with HMS tournament reporting.

Use of Technology to Reduce PRA Burden While Preserving Data Quality

The Paperwork Reduction Act explicitly directs agencies to use **automated and electronic collection techniques** to reduce respondent burden where practicable (44 U.S.C. § 3506(c)(3)(C)). HMS tournament reporting presents a clear opportunity to advance this objective.

Most HMS tournaments currently rely on tournament management applications that capture and share detailed activity and other data in real time, including vessel information, catch data, weights, lengths, release verification, and timestamps. In many cases, these applications already collect more detailed information than what is ultimately required in HMS tournament post-event reports. Requiring tournament directors to manually re-enter this information into separate federal reporting systems constitutes a duplicative burden that is inconsistent with PRA principles. NOAA Fisheries should prioritize development of mechanisms such as standardized data exports or application programming interfaces (APIs) that allow tournament application data to populate HMS tournament reports directly. There are only a handful of tournament apps that account for the overwhelming majority of fishing tournaments, HMS and non-HMS. Bridging this gap and allowing seamless uploading of app data



represents a huge time-saver for tournament directors and an opportunity for managers to capture more and higher quality data.

This approach would reduce burden hours per response, minimize transcription errors, improve data quality, and increase compliance, while still fully meeting NOAA Fisheries' data needs. Viking has had conversation with NOAA staff on this idea and we encourage the agency to continue working towards this goal.

Economic Contributions of HMS Tournaments

Viking Marine Group also believes there is a significant opportunity to expand and make more current the economic contributions of recreational HMS fisheries, which appear to be consistently undervalued. HMS tournaments drive substantial expenditures related to vessel purchases, marina services, fuel, lodging, travel, equipment, electronics, and tourism.

While the specific economic data elements warrant further discussion, HMS tournaments may represent an efficient platform for gathering such information, particularly given that a large share of recreational HMS expenditures are concentrated around tournament participation. Any effort to collect economic data should be carefully designed to avoid adding unnecessary burden, consistent with PRA standards, but the potential management value, both domestica and international, of improved economic information is significant.

Closing

Viking continues to support HMS tournament reporting and recognizes it as a cornerstone of recreational HMS data collection. Tournament directors provide exceptionally high-quality data that are critical to fisheries science and management, often at significant personal and organizational cost.

We respectfully urge NOAA Fisheries and OMB to ensure that HMS tournament reporting requirements remain fully consistent with the Paperwork Reduction Act by demonstrating necessity, practical utility, and the least burdensome means of collection. By maintaining the HMS focus of the program, avoiding unnecessary expansion, providing regulatory clarity on depredation, and leveraging modern tournament technologies, NOAA Fisheries can strengthen the HMS tournament reporting program while honoring both the letter and spirit of the PRA.

Sincerely,



John DePersenaire
Director of Government Affairs & Sustainability
Viking Marine Group

