



4241 21st Ave W • Suite #302 • Seattle, WA • 98199
Ph: 206-462-7690 • Fax: 206-213-5272 • www.alaskaseafoodcooperative.org

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Adrienne Thomas
NOAA PRA Officer

Electronic Submission

Subj: Public comment on information collection requirements for Cooperative Annual reports to National Marine Fisheries Service (NMFS) and North Pacific Fisheries Management Council (NPFMC) [OMB Control Number 0648–0678]

Dear Ms. Thomas,

Thank you for the opportunity to comment on the collection requirements for Annual Cooperative reports to National Marine Fisheries Service (NMFS) and the North Pacific Fishery Management Council (NPFMC), [OMB Control Number 0648–0678]. Please find below the Alaska Seafood Cooperative's (ASC) comments regarding the Amendment 80 (A80) Cooperative Annual Reports and the A80 Halibut Prohibited Species Catch (PSC) Management Plan. Since 2018, all vessels eligible to participate in Amendment 80 have been members of the ASC. The ASC consists of five member companies operating 14 trawl catcher-processor vessels.

ASC does not support continuing the collection requirements for the A80 Annual Reports or the A80 Halibut PSC Management Plan.

A80 Annual Report to NMFS

ASC is required by regulation¹ to submit an annual report to NMFS by March 1 each year. The NMFS report includes vessel-, area-, and species-specific information, as well as overall cooperative management details. This information is already submitted through existing reporting systems, including eLandings, eFish, and the Cooperative Quota (CQ) application process, which includes all cooperative bylaws and membership agreements. As a result, the Annual Report is duplicative, redundant, and lacks practical utility.

A80 Annual Report to NPFMC

The report to NPFMC is voluntary and, in recent years, has been a written summary. Since 2018, Amendment 80 has operated as a single cooperative, and there have been no substantial changes in program management. While past reports have included information on the Northern Bristol Bay Trawl Area, fleet catch capacity trends, intertemporal harvest, and bycatch reductions, NPFMC retains the authority to request such information as needed. Given the stability of the program and the availability of over 18 years of cooperative reports for reference, the annual submission no longer provides meaningful additional value.

¹ 50 CFR 679.5(s)(6): [https://www.ecfr.gov/current/title-50/chapter-VI/part-679#p-679.5\(s\)\(6\)](https://www.ecfr.gov/current/title-50/chapter-VI/part-679#p-679.5(s)(6))



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A80 Halibut PSC Management Plan

The A80 Halibut PSC Management Plan was voluntary and was last presented at the December 2021 NPFMC meeting. Prior versions are available in NPFMC archives. The report has not provided practical utility in recent years and therefore has not been submitted.

The estimated time and cost burden for preparing the A80 Annual Report to NMFS is approximately 10 hours and report to NPFMC is approximately 2 hours. The estimated time and cost burden for the A80 Halibut PSC Management Plan should be reduced to zero hours. If reporting requirements continue for the NMFS annual report, maintaining the ability to submit confidential information electronically through eFish or secure platforms such as Kiteworks would help minimize time and cost burdens.

Thank you for allowing us the opportunity to comment.

Beth Concepcion

Beth Concepcion, ASC Manager