

Justification for Change
NORTHEAST REGION PERMIT FAMILY OF FORMS
OMB CONTROL NO. 0648-0202

As part of Final Rule 0648-BA79, NOAA's National Marine Fisheries Services (NMFS) proposes to increase catch reporting in the herring fishery through the submission of daily catch reports using vessel monitoring systems (VMS). The MSA (402(a)(2)), in conjunction with regulations at 50 CFR Part 648.7, provide NMFS with the authority to revise fishery reporting requirements as necessary to monitor an Fishery Management Plan. Recognizing the importance of timely catch information to better monitor herring catch against the stock-wide herring annual catch limit (ACL) and management areas sub-ACLs, as well as helping prevent sub-ACL overages, NMFS proposes increasing the frequency of catch reporting in the herring fishery.

To ensure timely catch data are available to better inform management decisions, **NMFS proposes that owner/operators of vessels issued limited access herring permits (Categories A-C) be required to report herring catch, retained and discarded, daily via VMS.** Daily catch reports would include the following information: Vessel name, vessel trip report (VTR) serial number, date, and the amounts of herring retained and discarded from each management area. This requirement is consistent with daily reporting requirements for owner/operators of vessels issued Northeast multispecies permits engaged in fishing in U.S./Canada management areas and special access programs. The proposed catch reporting changes will increase information vessel owner/operators must report through their VMS units. As all herring limited access permit holders are already required to own and maintain VMS units according to the regulations at §648.10(b)(8), the burden to the limited access herring fishery will be minimal.

The burden table below shows the additional burden to the public from the proposed catch reporting requirements. This requirement will affect 97 vessel owner/operators (the number of permitted limited access herring vessels in 2010), which would be required to submit a total of 3,871 daily catch reports annually. Each submission of the herring catch report will take 5 minutes, and an additional 2 minutes if the vessel is also reporting all fish kept, for a total of 429 hours. Because of differences in fishing behavior, vessels in each herring permit category are estimated to submit different numbers of catch reports each year. Each Category A herring vessel is estimated to submit 76 catch reports per vessel annually; each Category B vessel is estimated to submit 4 catch reports; and each Category C vessel is estimated to submit 13 catch reports annually. In addition, an estimated 42 vessels out of the 97 Category A, B, and C vessels will have to fill out the 'kept all' field on each catch report which will add an additional \$0.05 per report for those vessels.

The average number of daily catch reports (items per entity) that will be required as a result of this amendment was estimated by multiplying the average number of VMS declarations per herring permit times the average trip length. This was separated by herring permit category as different permit categories have different fishing behavior and therefore different average trip lengths. In addition, some portion of these reports will be required to include all fish kept, if the vessel fished with midwater trawl gear in certain areas. The number of daily catch reports that would include this additional information was estimated based on historic participation in the

midwater trawl fishery (only Category A vessels have reported fishing with midwater trawl gear). This is a conservative estimate of the number of limited access vessels that may be required to report all fish kept, because not all Category A vessels may fish with midwater trawl gear on all trips.

Each daily catch report submission will cost the public \$0.60 (\$0.30 per message + \$0.003 per character (100 characters maximum in each catch report)). The combined changes to the reporting requirements will result in a total public cost burden of \$2,323. An average of 3 hours, 2 minutes' burden will be added per entity. Note: through a related request for OMB Control No. 0648-0212, each entity will have 52 fewer 4-minute weekly catch report responses through interactive voice response system (IVR). Although VMS daily items per entity are only for days on which vessels are on a declared herring trip, the weekly IVR requirement applied whether or not fish were caught.

Final burden table for proposed catch reporting requirements:

Information Collection	Vessel Permit Categories	# of Entities	Items per Entity	Total # of Items	Response Time (Min)	Total Burden (Hr)	Public Cost Per Item	Cost to Public
VMS Catch Reporting								
VMS Catch Reporting	A	42	76	3,192	5	266	\$0.60	\$1,915
VMS Catch Reporting	B	4	4	16	5	1	\$0.60	\$10
VMS Catch Reporting	C	51	13	663	5	55	\$0.60	\$398
Total*		97	-	3,871	-	322	-	\$2,323