

**JUSTIFICATION FOR CHANGE
NORTHEAST REGION PERMIT FAMILY OF FORMS
OMB CONTROL NO. 0648-0202**

Summary: This change is to require vessels that are equipped with a vessel monitoring system to report research fishing (exempted fishing permit and/or research set-aside) activity through their vessel monitoring system rather than through the interactive voice response call-in telephone line as now required. Research reporting requirements are specified by the National Marine Fisheries Service's (NMFS) Regional Administrator through authority provided at 50 CFR 648.725(b)(3)(v)(F) and (G). Currently, research reporting requirements are required to be made via the interactive voice response system.

Any Northeast Region fishery permit holder fishing under an exempted fishing permit (EFP), harvesting research set-aside (RSA) quota, or using RSA days-at-sea (DAS) is currently required to report trip information through the NMFS interactive voice response (IVR) system. An EFP is a permit issued by NMFS that exempts a vessel from specific regulations to conduct research or to conduct research compensation fishing. For quota monitoring purposes, catch under an EFP is treated as commercial landings and, therefore, EFP catch is accounted for under the normal commercial fishery. However, because EFPs exempt vessels from the regulations, these landings need to be tracked separately. This allows NMFS to conduct additional project monitoring and enforcement oversight, ensuring that research is being conducted as proposed, and exemptions from regulations are not being abused.

Similarly, Northeast permit holders participating in an RSA program are currently required to report RSA catch through the IVR system. Typically, a portion of the overall fishery-wide quota is set aside for RSA fishing. Researchers apply to obtain RSA quota through a grant process with NMFS. To monitor RSA catch and to ensure RSA quota grants are not exceeded, catch information is recorded and monitored through the IVR system. The general information collected under this requirement includes: State of landing, pounds of RSA quota by species landed, vessel permit number, and exempted fishing code. In addition, some RSA programs may have different reporting requirements based on management measures specific to that fishery.

This revision removes current reporting redundancies and will improve the quality of data collected.

Removing reporting redundancies: This change would require vessels *that are equipped with a VMS* to complete their existing research reporting requirements for research fishing (EFP and/or RSA) activity through their VMS rather than through IVR. Vessels participating in scientific research may be required to have a VMS unit. Because all research reporting is currently being submitted through the IVR system, vessels that have a VMS currently need to report through both systems: once through VMS to meet standard commercial fishing reporting requirements, and again through IVR to meet research reporting requirements. This revision would require vessels using VMS to report research reporting requirements via VMS, thus, removing the burden of having to use two different devices (VMS and IVR) to submit reports.

In addition, time would be saved by using VMS because IVR is regularly unreliable and often

captains must call numerous times and/or also place an additional call to the backup line. The VMS system is much more reliable.

Improving data quality: Over time, tracking research quotas and catch has become increasingly difficult and complex. In addition, it is becoming apparent that the research reporting requirements that were initially implemented may not be functioning as well as previously intended, and may be presenting some enforcement and monitoring concerns. The Magnuson-Stevens Fishery Conservation and Management Act, in National Standard 1, requires that conservation and management measures must prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery. These measures must be based on the best scientific information available (National Standard 1). The VMS system is considered more reliable than IVR and as a result, data collected through the VMS is typically also considered more reliable. VMS also collects valuable vessel position data; IVR does not. Because vessels equipped with VMS will now be using their VMS rather than IVR to report catches, NMFS expects to receive more accurate data to assist with accounting for experimental fishing and RSA catch, to better support fisheries management, monitor research catch and set-aside quotas, and to facilitate enforcement to ensure the objectives of research programs are not being undermined and quotas are not being exceeded.

Not all Federal permit holders have or are required to have a VMS. A vessel that has a Northeast Federal permit that is required to use a VMS would be required to report via VMS, and all other vessels that do not have a VMS would still be required to report this information through the IVR.

Although this is a new collection of information requirement for the VMS, much of the proposed collection is already accounted for under a previously approved collection under OMB Control Number 0648-0212. **The respondents, responses, burden and cost below are being added to OMB Control No. 0648-0202 and the respondents, responses and burden will subsequently be removed from OMB Control No. 0648-0212.**

Estimated Number of Respondents: 196

Responses per Respondent: 19.8 (20)

Estimated Total Responses: 3,888

Estimated Time Per Response: 5 minutes

Estimated Total Annual Burden Hours: 324 hours

Estimated Total Annual Cost to Public: \$5,480 in recordkeeping/reporting costs (\$1.40 per response).

Although there is no charge for IVR calls, the \$1.40 cost for 20 reports, or an annual cost of \$28 per respondent, should be balanced out by the convenience and time saved by reporting via VMS.