

# Groundfish Forum

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NOAA Fisheries  
Submitted via: NOAA.PRA@noaa.gov

**Subj: Groundfish Trawl Catcher Processor Economic Data Report (OMB Control No. 0648-0564)**

Dear Ms. Thomas,

On behalf of Groundfish Forum (GFF), thank you for the opportunity to provide public comment on the Groundfish Trawl Catcher Processor Economic Data Report (EDR) (OMB Control No. 0648-0564). GFF's five member companies represent 100% of the fishery participants that are required to submit these reports and since 2008, our companies have dedicated significant administrative resources and staff time to meeting these annual reporting requirements. Our fleet of 14 U.S.-flagged, catcher-processor vessels, collectively known as the Amendment 80 sector (A80), operate in the Bering Sea and Aleutian Islands (BSAI) and Gulf of Alaska (GOA). These vessels and crews sustainably produce hundreds of millions of high-quality seafood meals annually for consumers in the United States and across the globe. These fisheries are among the largest in the Nation and support thousands of American jobs both on our vessels and within Alaska and the Pacific Northwest's maritime support sector, including U.S. shipyards, fuel and provision suppliers, and maritime labor.

As a major contributor to U.S. fisheries in general, and as the industry sector directly impacted by the subject report, we hope our comments are given sufficient weight as we address each of the four categories (a) – (d) provided in section IV of Federal Register Notice 90 FR 30883.

**(a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility.**

1. The proposed information collection is not necessary for proper fisheries management and an action to remove the EDR requirement is under active consideration by the North Pacific Fisheries Management Council (NPFMC). The original purpose of this EDR report in 2008 was to evaluate the performance of the newly established A80 limited access privilege program (A80 Program). However, the information collected under the EDR is no longer required for the effective evaluation of the A80 Program. The information collected is not used in a timely and useful fashion for establishing fishing quotas, managing fishery openings and closings on a timely basis, or for any of the other annual regulatory management actions undertaken by NOAA Fisheries for the A80 Program. This lack of management necessity was clearly stated by the NOAA Alaska Region in a May 2025 discussion paper to assist the NPFMC with implementing Executive Order 14276, *Restoring American Seafood Competitiveness*:

*...the Council has indicated that given the substantial cost recovery fees for submitting and maintaining EDRs, their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.<sup>1</sup>*

Following the development of a purpose and need statement by the NPFMC in April 2025 and publication of this discussion paper, the NPFMC is scheduled to take final action and recommend whether to remove the EDR requirements (including the requirement for the A80 Program) at its October 2025 meeting. The NPFMC's purpose and need statement for the proposed action succinctly summarizes the need to remove the EDR requirement:

*The Council has successfully analyzed the economic performance of numerous fisheries without the use of Economic Data Reports (EDRs). The Council has reviewed and modified EDRs in the past to improve their usability, efficiency, and consistency and sought to minimize costs to industry and the Federal government. In response, the Council has removed EDR requirements for one program and streamlined others. EDRs are currently required for only three limited access privilege programs (LAPPs): the BSAI Amendment 91, the Crab Rationalization and Amendment 80 Programs. These LAPPs pay fees for administering their EDRs through cost recovery programs. Given the substantial cost recovery fees for submitting and maintaining EDRs, their inconsistent application across LAPPs, and the lack of a clear overriding management need, the cost of EDRs to fishery participants and the agency outweighs the value of EDRs to management.<sup>2</sup>*

The public comment period on this proposed collection will close before the Council's anticipated October action will occur. Approving this information collection that is anticipated for removal is inconsistent with the mandate of the Paperwork Collection Act that requires the Director of the Office of Management and Budget (OMB) to "minimize the Federal information collection burden, with particular emphasis on those individuals and entities most adversely affected." (44 U.S.C. 3504(c)(3)). Maintaining and approving an information collection that is anticipated for removal does not "minimize" the burden, it does the opposite, it imposes additional and unnecessary costs.

2. The requirements to submit an EDR is inequitably and inconsistently applied to fishery participants and does not have practical utility. NOAA Fisheries has a long history of successfully managing hundreds of fisheries throughout the Nation without the public bearing the additional cost and burden of an EDR. There is no EDR requirement in 6 of the 8 fishery management Council regions for any of the hundreds of other fisheries in these regions. Outside of the NPFMC region, only one other fishery on the West Coast is subject to a similar economic data collection.

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<sup>1</sup> National Marine Fisheries Service Alaska Regional Office (2025) Discussion Paper, "Review of Regulations under Executive Order 14276 Restoring American Seafood Competitiveness, p.13.

<sup>2</sup> Council motion from April 2025, <https://meetings.npfmc.org/CommentReview/DownloadFile?p=ae4f0bd3-0590-45fc-8962-6331cd525278.pdf&fileName=D1%20MOTION%20%20EDRs%20FINAL.pdf>

Within the NPFMC region, the requirement to submit an EDR is inconsistently applied to fisheries managed under the provisions of a limited access privilege program. For example, NOAA Fisheries has successfully managed and reviewed the economic performance of the Halibut and Sablefish Individual Fishing Quota Program for nearly 30 years without requiring the submission of an EDR. Similarly, the NPFMC recommended and NOAA Fisheries recently removed a requirement for participants in specific GOA groundfish fisheries because such an EDR was not necessary for management. Against both a national and regional backdrop, NOAA Fisheries can and does effectively manage and review the performance of almost all of its fisheries without the additional burden of an EDR.

Furthermore, the inconsistent, inequitable, and costly requirement to submit an EDR is inconsistent with the mandate for the Director of OMB to “maximize the practical utility of and public benefit from information collected by or for the Federal Government.” (44 U.S.C. 3504(c)(4)). Specifically, the EDR does not maximize the practical utility of information because it is not used in a timely and useful fashion for establishing fishing quotas, managing fishery openings and closings on a timely basis, or for any of the other annual regulatory management actions undertaken by NOAA Fisheries for the A80 program. The information collected by the only by the EDR was not necessary to review the performance of the A80 fishery in 2014 or in 2025.

3. The EDR requirement does not align with Executive Order 14276. Executive Order 14276 directs federal agencies to reduce unnecessary regulatory burdens on U.S. fisheries and promote domestic seafood production. The Order explicitly calls on the Secretary of Commerce and the Regional Fishery Management Councils to identify overregulated fisheries and eliminate requirements that unnecessarily constrain American fishermen. The EDR program exemplifies such a burden. It consumes resources that could be redirected toward productive fishing activities, job support, and operational efficiency. Moreover, continuing to mandate EDR submissions undermines the intent of EO 14276 to “unburden our commercial fishermen from costly and inefficient regulation” and to “increase production.”<sup>3</sup>

To summarize subparagraphs 1 - 3, the proposed EDR information collection is not necessary for the proper functions of the Department of Commerce, and does not have practical utility.

**(b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.**

1. The estimates for the amount of time required to prepare the EDR are inaccurate. NOAA Fisheries estimates each annual report requires 20 hours per respondent, across 22 quota holding entities, equating to hundreds of cumulative hours and thousands of dollars in compliance costs annually. This estimate is inaccurate. Collecting and maintaining information on economic indicators (catch revenue / value, labor expenses, fuel use, and 15 other expenditure categories) requires constant tracking throughout the year. Entities often require the use of tracking software by multiple personnel to ensure the required information can be summarized and submitted. Based on these factors, and a recent review of time spent by GFF participants, 40 hours per

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<sup>3</sup> [Executive Order 14276, Restoring American Seafood Competitiveness, April, 17, 2025](#)

respondent better reflects the actual time to accurately file these reports.<sup>4</sup>

2. The cost estimate used by NOAA Fisheries grossly underestimates costs. The cost estimate provided in the Federal Register notice (\$110.00) ignores costs that are incurred annually for issuing, maintaining, and reviewing EDR data under cost recovery provisions. NOAA Fisheries relies on the Pacific States Marine Fisheries Commission (PSMFC) to administer the EDR, and there are additional costs associated with reviewing the EDR data by NOAA Fisheries' Alaska Fisheries Science Center (AFSC). These costs are directly and solely due to the EDR submission requirement and must be included in the estimate of the cost burden. Over the last five years, PSMFC expenses associated with the EDRs averages over \$90,000 annually, with the most recent year (2024) exceeding \$126,865.<sup>5</sup> While the agency does not provide a detailed breakdown of how much AFSC is charging to review EDR data, some considerable portion of the AFSC costs are also a direct cost burden borne by the public for this information collection.<sup>6</sup>

Given the limited information available to the public on actual costs, we provide two estimates of total EDR cost burden based on an assumption that either 10% or 50% of AFSC cost recovery costs are associated with the EDR report.

	PSMFC	AFSC	Industry costs independent of cost recovery	Total
2024 EDR Expenses (Assuming 10% of AFSC costs)	\$ 126,865	\$39,500	\$50,000	~ \$215,000
2024 EDR Expenses (Assuming 50% of AFSC costs)	\$ 126,865	\$197,500	\$50,000	~ \$374,000

Regardless of the estimate used, these exorbitantly high annual costs are not warranted given the lack of practical utility of the EDR data in the necessary management of the fishery, the inconsistent application of EDR requirements by NOAA Fisheries, and the clear and ongoing initiative to remove the regulatory requirement for EDRs.

**(c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected**

As noted previously in our comments under paragraph (a), the EDR requirement has been reviewed numerous times, and the clearest way to enhance its quality and utility is simply to stop collecting the information because it is not necessary for the function of the Department of

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<sup>4</sup> Assumes respondent is paid commensurate with a GS-13 (Step 5)

<sup>5</sup> [National Marine Fisheries Service \(2025\), 2024 Cost Recovery Report for Alaska p. 31](#)

<sup>6</sup> The costs borne by the Amendment 80 sector under the MSA cost recovery program clearly fall within the definition of "burden" as defined under the Paperwork Reduction Act because they represent a "financial resource expended" by the directly regulated public to "generate, maintain, or provide information" and are required for "utilizing technology and systems", "completing and reviewing the collection of information" and "transmitting, or otherwise disclosing the information". See definition of "burden" at 44 U.S.C. 3502(2).

Commerce, or for fishery management functions. As noted earlier, the EDR requirement is inconsistently applied to only a handful of fisheries in the U.S. and the annual cost borne by the public is at least \$215,000 annually for only 14 vessels participating in only one fishery. The vast discrepancy between the costs of submittal and the lack of any necessary function is best resolved by disapproving this information collection.

**(d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.**

The most effective way to minimize the reporting burden is to disapprove this collection of EDR information which is not necessary for management of the fishery. The additional cost burden borne by the directly regulated public under MSA requirements to pay for the administration of the information collection and the review of the information collected is exorbitant and unjustifiable given the lack of any clearly identified necessity. These costs have been borne for over a decade without any clear necessity and must be eliminated as quickly as possible.

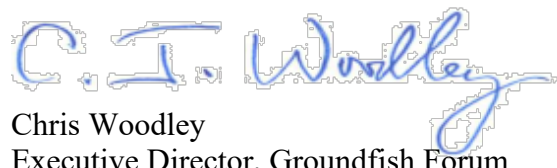
**Recommendations**

For all of the reasons detailed in this letter, we recommend that NOAA Fisheries and OMB:

1. Suspend the requirement to submit an EDR, and rescind the existing approval of information collection (OMB No. 0648-0564);
2. Suspend the submittal of a request to extend the approval of the collection of information for OMB No. 0648-0564); and
3. If the request for approval for collection of information for OMB No. 0648-0564 is submitted by NOAA Fisheries, that OMB disapprove the collection of information.

In summary, Groundfish Forum members are committed to transparent reporting and sustainable fishing practices. However, continuing the EDR program after its original analytical purpose has been fulfilled is not necessary for the functions of the Department of Commerce, and is inefficient, inequitable, and inconsistent with the mandates of the Paperwork Reduction Act. Continuing or approving this collection of information runs directly counter to clearly stated National policy to strengthen American seafood competitiveness. Eliminating this requirement will reduce regulatory costs, support maritime jobs, and help ensure that U.S. fisheries remain globally competitive.

Thank you for considering our comments.



Chris Woodley  
Executive Director, Groundfish Forum

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