

**SUPPORTING STATEMENT
PERMITTING, VESSEL IDENTIFICATION AND REPORTING REQUIREMENTS
FOR THE PELAGIC SQUID JIG FISHERY IN THE WESTERN PACIFIC REGION
OMB CONTROL NO. 0648-0589**

This request is for revision and extension of OMB Control No. 0648-0589.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The [Magnuson-Stevens Fishery Conservation and Management Act](#) (Magnuson Act) established regional fishery management councils, including the Western Pacific Fishery Management Council (Council), to develop fishery management (ecosystem) plans for fisheries in the U.S. exclusive economic zone (EEZ). These plans, if approved by the Secretary of Commerce, are implemented by Federal regulations, which are enforced by the National Oceanic and Atmospheric Administration (NOAA) Fisheries Office for Law Enforcement (OLE) and the United States Coast Guard (USCG), in cooperation with State agencies to the extent possible. The Fishery Ecosystem Plan for Pacific Pelagic Fisheries of the Western Pacific Region is intended to regulate fishing to ensure sustained productivity and achievement of optimum yield from the resources for the benefit of the United States. Applicable regulations are at [50 CFR 665](#).

Owners of squid jig fishing vessels greater than 50 ft (15.4 m) in length that fish for pelagic squid management unit species in Federal waters, or land pelagic squid management unit species in ports, of the western Pacific region must register their vessels to a valid Federal squid fishing permit issued by the National Marine Fisheries Service (NMFS). After the completion of each fishing trip, vessel operators must submit a NMFS squid fishing log report to NMFS, or an equivalent state report, for fishing in Federal waters, and a NMFS squid fishing log report for fishing on the high seas. These vessels must also carry a scientific observer if requested to do so by NMFS.

The information collected is used to document fishing activities and landings, to determine the condition of the stocks, to assess the effectiveness of management measures, to evaluate the benefits and costs of changes in management measures, and to monitor and respond to accidental takes of endangered and threatened species, including seabirds, sea turtles, and marine mammals.

Vessel owners are required to comply with Federal vessel identification requirements, at 50 CFR 665.16, intended to assist in aerial and at-sea enforcement of fishing regulations.

Revision: A \$32 fee is now required when applying for a squid jig permit.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Permits

Information is collected via a NMFS permit application process. Permits are valid for one calendar year and may be renewed annually. Information from the permit application form will allow NMFS to confirm the identity of the permit holder and applicant, and to determine whether the applicant qualifies for the permit. Vessel-related information such as vessel documentation or registration, ownership, managing ownership, etc., are used by NMFS to determine whether the applicant is an owner of a U.S. documented/registered vessel. The information may also be used by OLE, USCG, and the Council. Private information will not be disseminated to the public, and will be reported only in non-confidential or aggregate form.

Confidential or proprietary information is not disseminated to the public.

Logbooks

Vessel operators must submit completed logbook forms to NMFS within 72 hours after the end of each fishing trip. The logbooks provide the information needed by NMFS and the Council to regulate and monitor the fisheries managed under the FMP and to evaluate the effectiveness of management by assessing the status of stocks and the status of the fisheries. The information provides a basis for determining whether changes in management are needed to sustain the productivity of the stocks. The information is also used to provide the basis for evaluating the magnitude and distribution of impacts resulting from changes to the regulations.

The information will not be disseminated to the public except in non-confidential or aggregate form in summary and analytical reports. Any of the information that might be used to support publicly disseminated information would first be aggregated and/or summarized to maintain the confidentiality of the information pertaining to the individual vessels.

Vessel Identification

In the domestic western Pacific region fisheries regulated under 50 CFR Part 665, the vessel's official number is required to be displayed on the port and starboard sides of the deckhouse or hull, and on an appropriate weather deck. The markings identify the vessel and should be visible at distances at sea and in the air. Regulations in 50 CFR Part 665.16 specify the requirements for the vessel identification.

The identification number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, to ascertain whether the vessel's observed activities are in accordance with those authorized for that vessel.

Although the information collected (vessel identification number) is not confidential, it will not be disseminated to the public. The information is strictly for enforcement purpose or use by NMFS internally in situations involving damage, loss, and civil proceedings.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with Federal law and regulations, and NOAA policies for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Permits

At this time, the information will be collected on fillable Adobe Acrobat forms (downloadable from http://www.fpir.noaa.gov/SFD/SFD_permits_index.html) and does not require any knowledge of automated, electronic, mechanical or other forms of information technology. Applications may be mailed or faxed. Fee payment checks must be mailed.

Logbooks

At this time, the information will be collected on paper forms and does not require any knowledge of automated, electronic, mechanical or other forms of information technology.

Vessel Identification

Vessel identification is done manually.

4. Describe efforts to identify duplication.

Permits

There is no similar Pelagics FMP squid permit requirement for U.S. vessels greater than 50 ft. in length overall that participate in the commercial Pacific pelagic squid fishery.

Logbooks

There is no similar comprehensive catch and effort reporting program for U.S. vessels greater than 50 ft. in length overall that participate in the Pacific pelagic squid fishery. There is an overlap between the reporting requirements (50 CFR 665.14) and those under the HSFCA (50 CFR 300.17). However, the duplication is eliminated by the provisions at 50 CFR 300.17(b)(3), which provides the necessary regulatory authority for NMFS to require squid jig fishermen to use Federal pelagic squid fishing logbooks to meet the reporting requirements of the HSFCA.

NMFS carefully considered whether there were collections by other Federal agencies or state or territorial agencies that might meet the information needs presented above. It was concluded that no other collections, besides the requested information, would meet these reporting requirements.

Vessel Identification

The information is not duplicative; it is a unique requirement for vessels registered to a Federal squid jig fishing permit in the western Pacific region.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Most of the permittees in this information collection are small businesses.

Federal pelagic squid jig permit applications are available online to reduce the burden of time spent applying or ordering by mail. Applications may be downloaded, printed, and then mailed or faxed to NMFS. Permits will be issued by NMFS and delivered via U.S. mail.

Logbook and instructions are provided by NMFS via U.S. mail with issued Federal squid jig permits to reduce time spent obtaining forms via an office visit. A representative at the Pacific Islands Fisheries Science Center in Honolulu may be contacted in writing by email, fax, or mail to answer questions about filling out the logsheets.

Vessel identification instructions provided by NMFS are straightforward and the task of applying the identification marks is simple to minimize the burden of meeting the requirements.

The minimum information is collected to comply with the regulations and to administer the program effectively.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Permits

Without this collection or if it is collected less frequently, NMFS would be unable to properly evaluate activity, participation, and reporting compliance in the Pacific pelagic commercial squid fishery. It would be difficult to monitor the fisheries and their participants, determine entry and exit patterns, and provide information needed to ensure full impact analysis for fisheries management programs. Without this information enforcement agents would not be able to identify current fishery participants for compliance monitoring purposes and NMFS would be unable to consult with permit holders on regulatory changes.

Logbooks

Without the logbook information, NMFS and the Council would be unable to determine whether management is achieving the objectives of the FMP and the Magnuson-Stevens Act. Information from the logbooks is used by fishery and enforcement officials of NMFS and USCG to monitor compliance with fishing regulations and reporting requirements.

Vessel Identification

Vessel identification and verification of activity via air and surface patrol would be difficult for enforcement agencies.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

None.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice (77 FR 16209), published on March 20, 2012, solicited public comments on this submission. No substantive comments relating to the collection of information were received.

Outreach to members of Hawaii State agencies and Western Pacific Fishery Management Council members yielded two comments:

From Paul Dalzell, Fishery Council member: I have no issues with any of the data forms.

From Reginald Kokubun,

Just a few remarks on the NMFS trans log for Coral Reef Ecosystem management unit system (CREMUS). Place off loading vessel information header info as column heading in the spread sheet and make it into a landscape format. In the present format a separate log needs to be prepared by the receiving vessel for each offloading vessel.

Will the federal log information collection be added to the CREMUS assessment and used for the MSA ACT and ACL requirements?

NOAA response: The layout is a matter of style and process, and this is our style and process for now. It is a suggestion we could consider, but for the next time. It may have some effect on the reporting, but it would not change the data we collect. Each form would be treated as one transshipment, and that would make it easier to track each transshipment.

In reality, we have never had anyone submit a transshipment log for CREMUS. And, it would be unlikely that a receiving vessel would get a transshipment from more than one vessel. Not so often that it would make sense to redesign the form to accommodate multiple vessel transshipments. If we start getting a lot of activity in this sector, it might be worth revisiting the layout.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided

10. Describe any assurance or confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

As stated on the forms, under Section 402(b) of the Magnuson-Stevens Act, amended in 2006, and [NOAA Administrative Order 216-100](#), information submitted in accordance with regulatory requirements under the Act is confidential. This includes personal and proprietary information contained in the permits and logbooks.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No questions are asked of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Permits

NMFS expects to receive and process up to 30 applications for pelagic squid jig permits each year. Applicants are expected to spend 30 minutes completing or renewing the application. Thus, the total collection-of-information burden to fishermen for permit applications is estimated at 15 hours per year. A permit appeal is estimated to take two hours (one appeal is expected per year).

Logbooks

NMFS estimates that the time requirement for completing the NMFS pelagic squid jig logbook reports to be approximately 15 minutes per vessel per fishing day. Assuming that 30 vessels make 30 trips per year, the program would generate up to 900 daily fishing logbooks per year. Thus, the total burden estimate for fishing data reporting is estimated at 225 hours per year.

Total number of logbook reports: 30 vessels x 30 trips = 900 per year

Total logbook hours: 900 logbooks x 15 min per logbook = 225 hours per year

Vessel Identification

For the vessel identification requirements, the burden is estimated at 45 minutes to paint each vessel. Assuming 30 vessels are active, the total collection-of-information burden estimate is 22.5 (23) hours.

Summary of Responses and Burden

Total Responses: 30 applications + 1 appeal + 900 logbook forms + 30 markings = 961 responses

Total Burden Hours: 15 + 2 + 225 + 23 = 265 hours

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Permits, Appeals and Logbooks

The maximum estimated cost to respondents for postage, faxes, copies, etc., related to this collection is \$447 per year, or about \$.48 per response.

For permits, there is also a \$32 fee, for a total of 30 x \$32, or \$960.

Vessel Identification

For the vessel identification requirements, the burden is estimated at about \$10 for paint and supplies to paint each vessel. Assuming 30 large squid jig fishing vessels are active, the total burden estimate is \$300.

Total cost: \$447 + \$960 + \$300 = \$1,707.

14. Provide estimates of annualized cost to the Federal government.

Permits and Logbooks

The estimated annual cost to the Federal government to administer this collection of information is \$4,980. This includes the cost to process permit applications and issue permits **at \$300 per year** (30 permits x 30 min/permit x \$20/hr), printing daily catch and effort logsheet forms **at \$180 per year** (900 logsheets x \$0.20 per sheet), and processing of log forms **at \$4,500 per year**, which is calculated by the cost of staff time for receiving and entering logsheet form data (900 logsheets x 15 min/logsheet x \$20/hr).

Appeals

These are very rare and there is no current estimate for processing and review time.

Vessel Identification

No cost.

15. Explain the reasons for any program changes or adjustments.

Program change: A \$32 permit application fee was added since the last request for this information collection. This adds \$958.

Adjustments: The permits and appeals IC increased by 1 response and two hours. Estimated number of trips and logbook responses was reduced from 3,000 to 900, and related burden hours, from 500 to 225, based on current information. There was a total net reduction of 2,099 responses and 273 hours.

The estimated costs for logbook copying and submission were reduced from \$1,653 to \$432. This was the only adjusted cost, a decrease of \$1,221.

16. For collections whose results will be published, outline the plans for tabulation and publication.

No formal scientific publications based on these collections are planned at this time. NMFS and the Council will use the data (primarily in an aggregated, non-confidential format) for developing management reports and fishery management plan amendments and evaluations. However, subsequent use of the data collected over a series of years may include scientific papers and publications.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not Applicable.

18. Explain each exception to the certification.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are employed.