

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Region Groundfish Electronic Fish Ticket Program
OMB Control No. 0648-0738

Abstract

This request is for extension of the information collection known as the West Coast Region Groundfish Electronic Fish Ticket Program. Electronic fish tickets are submissions of landings data from the first receiver to the Pacific States Marine Fisheries Commission (PSMFC), which subsequently transmits data to the states of Washington, Oregon, California, and the National Marine Fisheries Service (NMFS). Electronic fish tickets are required in all of the shorebased commercial groundfish fisheries, including the shorebased Individual Fishing Quota (IFQ) program, the limited entry fixed gear fishery, the open access fixed gear fishery, and all sablefish landings (IFQ or otherwise).

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Electronic fish tickets are required for landings in all of the IFQ shorebased commercial groundfish fisheries, and all sablefish landings, which includes IFQ fishery, the limited entry fixed gear fishery, and the open access fixed gear fishery. The electronic fish ticket program is vital to: 1) adequately track the landings of commercially caught groundfish; 2) be able to assign landings of sablefish to a tier permit if fishing in the primary fishery; and 3) enhance the ability of enforcement to deal with issues more effectively and efficiently. Electronic fish tickets will provide real time data to enforcement and managers, to address issues that arise within the fishery.

The Pacific Coast Groundfish Fishery Management Plan (FMP), created under the authorization of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 USC 1801 *et seq.*, was approved by the U.S. Secretary of Commerce on January 4, 1982, and implemented on October 5, 1982. Throughout the next two decades, there were several amendments to the FMP. Amendment 9 modified the limited entry (LE) program by establishing a sablefish endorsement for longline and pot permits. Amendment 14, implemented in 2002, built on Amendment 9 to further refine the LE permit system for the economically important fixed gear sablefish fishery. It allowed a vessel owner to “stack” up to three LE permits on one vessel, along with associated sablefish catch limits. This, in combination with a concurrent action to extend the season length, in effect established a limited tradable quota system for participants in the primary sablefish fishery.

Since implementation of the permit stacking program in 2002, in-season management of the primary and daily trip limit (DTL) sablefish fixed gear fisheries has been based on two types of information: (1) paper landing receipts that typically have a two- to four-month time lag between the date of landing and when the landing data is available in the Pacific Fishery Information Network (PacFIN), and (2) the QSM Best Estimate Report, which fills in the three-month time lag based on estimates from the previous years' landings. Both of these data sources estimate which landings are attributed to the primary (tier) fishery and which are attributed to the DTL fishery. Thus, the current catch accounting system is subject to inaccuracy and time delays, and is incapable of distinguishing between landings in the primary (tier) and DTL fisheries for management or enforcement purposes.

Additionally, at the time of implementation of Amendment 14, no Federal regulations existed requiring fish ticket documentation of the groundfish permit number associated with sablefish landings in the primary (tier) sablefish fishery. Documentation of catch against tier limits and documentation of permit numbers was left to the states to implement. Currently, with the E-Tix portal managed by PSMFC, Federal LE permit numbers, IFQ vessel account numbers, management areas, and sablefish tiers are now being recorded consistently on state landing receipts associated with sablefish landings.

Since the start of the shorebased IFQ Program in 2011, electronic fish tickets have been required for landing IFQ species. Electronic fish tickets have allowed vessel owners/operators, buyers and dealers, and fishery managers timely access to catch information for IFQ species. Many of the proposed regulations that expand the required use of electronic fish tickets to the limited entry fixed gear and open access fisheries are similar to those put in place for the Shorebased IFQ Program. Electronic fish ticket requirements for the Shorebased IFQ Program have been described in detail in proposed (75 FR 32994, June 10, 2010; 75 FR 53380, August 31, 2010) and final rules (75 FR 60868, October 1, 2010; 75 FR 78344, December 15, 2010) for that program.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Shoreside first receivers, defined as persons who receive, purchase, or take custody, control, or possession of catch onshore directly from a vessel, are required to use a web-based, NMFS-approved electronic fish ticket program to send catch reports within 24 hours from the date of the landing. The information required by NMFS piggybacks on the information collected on electronic fish tickets that are currently required in state fish receiving tickets or landing receipts. The required information includes the following (the additional federally required information is shown in bold and appears at the top of the E-Tix form):

- **IFQ Landing? (Y/N)**
- **IFQ Vessel Account #**
- **IFQ Management Areas**

- **Sablefish Tier**
- **Federal LE Permit #**
- Date of Landing
- Dealer # (Name)
- State Permit #
- Fisherman I.D. (Last, First)
- Port of 1st Landing
- Inside/Outside (*i.e.*, fish caught inside/outside 3 mile EEZ or both)
- Vessel I.D. (Name)
- Coast Guard Vessel #
- Primary Gear
- Fishing Block
- Transportation #
- Fish Code (Description) – actual species or species groups of fish caught
- Gross Lbs
- Price Per Lb
- Amount
- # of Fish
- Condition
- Grade
- Gear
- Use
- GF #

The information gathered from fish tickets has great utility and will be used by NMFS to track catch allocations, bycatch limits, and prohibited species catch during the season. NMFS will safeguard the information from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards 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 collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The electronic fish tickets are based on information currently required by the states on paper fish receiving tickets or landing receipts (*i.e.*, dock tickets, fish tickets). Under the electronic fish ticket program, first receivers will use a web-based system to provide all information required (see Question 2 for a list of information included). First receivers will be required to have a personal computer system, which could include a tablet or mobile device, with an internet browser (*e.g.*, Chrome, Firefox, Internet Explorer, Safari). The internet browser must be set to allow cookies and JavaScript, and the default security settings must be used. Electronic fish tickets will provide real time data to enforcement and managers, to address issues that arise within the fishery.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

Measures were taken to minimize duplication of catch accounting requirements by piggybacking onto the electronic fish ticket program required by the states and only requires a minimum of additional data gathering. When state law allows, the electronic fish ticket can be printed and used as a paper copy for submission to the state. In California, standard paper forms (dock tickets) provided by the state are sometimes used in the interim, to record landing data prior to electronic submission using E-Tix, and can also serve as proof of landing in cases where enforcement requires it. In Oregon and Washington, specified information may be submitted either on a paper fish ticket provided by the state or on a computer generated ticket, provided specified data fields are included.

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

Measures were taken to minimize the costs of the catch accounting requirements by providing: 1) a web-based program so that no additional software is needed and the program is accessible wherever there is an internet connection; 2) an electronic fish ticket program that is compatible with the existing fish ticket requirements in each of the three states; and, 3) a program that can be used to print a paper copy for submission to the state, when state law allows.

NMFS assumes that all first receivers have access to a personal computer and/or a tablet where they can access the web-based program. Additionally, because the information is already being gathered by the states, the additional federal data is gathered through the same system. Some applicants are individuals or small companies and as such are considered small businesses. Given the relatively small numbers of applicants, separate requirements based on size of business have not been developed. Only the minimum data required to meet the permit objectives are requested from all applicants.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without the electronic fish tickets, states would continue to collect electronic submissions (E-Tix) and paper tickets, which do not include a Federal permit number or other IFQ data requests. Without E-Tix submissions, NMFS' ability to adequately and efficiently track landings, incidental catch of prohibited species, as well as other groundfish species, would be severely hindered.

Indirect biological impacts could result if catch data were inaccurate or delayed so that fishery specifications, including: bycatch limits, species allocations, optimum yield (OY), and biological opinion thresholds could not be adequately monitored. If bycatch limits of the most constraining overfished species were greatly exceeded due to delayed catch reporting, the risk of exceeding rebuilding based OYs is increased.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

Respondents are required to submit fish tickets as landings occur. Collecting landing receipts concurrently with the end of a fishing trip and transfer of fish to a first receiver is crucial to providing real-time data by which NMFS fisheries biologists and enforcement managers can monitor allocations, quotas, and various fishing limit parameters for the species which we are tasked to manage and protect.

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice published August 9, 2022 (87 FR 48469) solicited public comment. No public comments were received.

Additionally, NMFS reached out to several stakeholders in an effort 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. No responses were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided under this program at this time.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Electronic fish ticket data will be submitted to PSMFC. The data is considered confidential under [NOAA Administrative Order 216-100](#), Protection of Confidential Fisheries Statistics. The PSMFC currently receives and stores fish ticket data. These data are maintained on the PacFIN database.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not require the submission of information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

| Information Collection | Type of Respondent (i.e., Occupation Title) | # of Respondents/year (a) | Annual # of Responses / Respondent (b) | Total # of Annual Responses (c) = (a) x (b) | Burden Hrs / Response (d) | Total Annual Burden Hrs (e) = (c) x (d) | Hourly Wage Rate (for Type of Respondent) (f) | Total Annual Wage Burden Costs (g) = (e) x (f) |
|--|---|---------------------------|--|---|---------------------------|---|---|--|
| Electronic Fish Tickets | | 141 | | 14,503 | | 2,098 | | \$66,599 |
| Electronic fish tickets (WA fish ticket reporting) | Buyer & Purchasing Agent | 15 | 15 | 218 | 2 min | 7.27 | \$ 34.61 | \$ 252 |
| Electronic fish tickets (OR fish ticket reporting) | Buyer & Purchasing Agent | 17 | 7 | 113 | 2 min | 3.77 | \$ 30.02 | \$ 113 |
| Electronic fish tickets (CA fish ticket reporting) | Buyer & Purchasing Agent | 109 | 19 | 2,063 | 2 min | 68.77 | \$ 34.20 | \$ 2,352 |
| Electronic fish tickets/IFQ First Receiver submissions | Buyer & Purchasing Agent | 41 | 295 | 12,109 | 10 min | 2018 | \$ 34.61 (WA) \$ 30.02 (OR) \$ 34.20 (CA) | \$ 63,882 |
| Electronic fish tickets/IFQ First Receiver Pacific whiting disposition recordkeeping | Buyer & Purchasing Agent | 9 | 26 | 234 | 1 min | 3.9 | \$ 30.02 | \$ 117 |
| Totals | | | | 14,737 | | 2,102 | | \$66,716 |

There is a chance that some first receivers would need to fill out more than one ticket per landing. This could happen when a vessel fishes the end of their primary (tier) quota and switches over to the DTL fishery. This would only happen once for each vessel, if at all, and would not substantially increase the burden on first receivers. The possibility of this occurring was taken into account when determining the time average.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

It is assumed that all the small businesses already have access to a technically suitable computer and internet connection to submit the electronic fish tickets. There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

There are no Federal staff costs incurred as a result of continued implementation of electronic fish tickets on the West Coast sablefish fisheries. Analysts already receive this data through both Federal and State requirements, allowing for efficient tracking of groundfish landings. Federal staff costs included here include only the preparation of the PRA request.

| Cost Descriptions | Grade/Step | Loaded Salary /Cost | % of Effort | Fringe (if Applicable) | Total Cost to Government |
|-------------------------|---------------|---------------------|-------------|------------------------|--------------------------|
| Federal Oversight | ZP III/Step 1 | \$87,922 | 0.5% | | \$422.70 |
| Other Federal Positions | | | | | |
| Contractor Cost | | | | | |
| Travel | | | | | |
| Other Costs: | | | | | |
| TOTAL | | | | | \$422.70 |

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

There are no changes to the information collection since the last OMB approval.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans for publishing.

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

The agency is seeking continued approval to not display the OMB expiration date on the (forms/surveys/questionnaires) associated with this information collection. The paper and electronic forms in this collection are requirements of the states of Washington, Oregon, and California and, as such, there are no requirements to display expiration dates for OMB approval. NOAA has requested on multiple occasions that the OMB Control Number and Expiration Date be added to the E-Tix sites, but the states have not included this information to date.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).