

**SUPPORTING STATEMENT
PACIFIC TUNA FISHERIES LOGBOOK
OMB CONTROL NO.: 0648-0148**

A. JUSTIFICATION

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

United States participation in the Inter-American Tropical Tunas Commission (IATTC) results in certain record keeping requirements for U.S. fishermen who fish in the IATTC's area of management responsibility. Under Federal regulations (**50 CFR Part 300 Subpart C**), these fishermen must maintain a log of all operations conducted from the fishing vessel, entering the date, noon position (latitude and longitude or in relation to known physical features), and the tonnage of fish aboard by species. This record keeping requirement may be met by using the bridge log, which is furnished and collected from fishermen by the IATTC. As a practical matter, all U.S. fishermen use the IATTC log rather than having to maintain two logbooks, and there is no separate National Marine Fisheries Service (NMFS) form now in use. The record keeping requirements provide information needed to determine the interests of U.S. fisheries and the impact of fishing on the tuna stocks. The authority to implement Federal rules to meet U.S. responsibilities to the IATTC is set forth in the **Tuna Conventions Act of 1950** (16 U.S.C. 951-962). The purpose of the Convention is to establish a mechanism for U.S. participation in tuna fisheries in the Convention area so that interests of the U.S. can be maintained in the context of management efforts to prevent overfishing of tuna stocks in the area.

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.

The specific record keeping requirements are set forth in the regulations. Among the data entered daily are the date, the amount of fish on board by species, and the noon location of the vessel. The IATTC log form provides this information as well as additional information, which the fisherman may include but is not required to record under the Federal regulations. U.S. fishermen in fact collect and record all the requested information on the IATTC form (English example from the form and instructions which are in both English and Spanish). These data are used with data from other fishing nations to monitor amounts and areas of catch by species and to assess annually the distribution and abundance of different tuna stocks. The information also is used to determine whether changes in management strategies can increase the yield from or productivity of the stocks, e.g., targeting larger fish to increase yield per trip. The time of gear deployment is important so that the impacts of alternate strategies (e.g., time/area closures or time of day fishing restrictions) on the fisheries can be assessed. The type of school is important in determining yield potentials as fishing on certain kinds of schools may result in greater mortality of juvenile fish or fish of certain species. The specification of wells in which fish are placed is important because landings are sampled and catches by species and size or gender can

then be allocated by area and season of fishing to determine key spawning areas or possibly areas in which fishing should be restricted in the future to increase yields and values from the fishery.

Failure to provide the data could result in erroneous stock assessments and cause inappropriate responses in management in the future. The IATTC now sets binding quotas for some species of tuna in the Commission's regulatory area and catch reports are useful in monitoring progress toward quotas. In addition, current and former member nations are continuing to provide data to ensure that the time series of data is not broken. All nations recognize an ongoing interest in maintaining the ability to assess the status of stocks and conditions in the fisheries even in the absence of an active regulatory program.

As explained in the preceding paragraphs, the information gathered has utility. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards for confidentiality, privacy, and electronic information. See response #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.

No new information technology has been identified that would reduce the burden through electronic reporting, though this will likely be considered in the future. The information being submitted is the least necessary to carry out U.S. obligations as party to the Convention and is collected in the least burdensome manner known.

4. Describe efforts to identify duplication.

NMFS has sole Federal authority to obtain these data. NMFS has coordinated with the IATTC and the State of California to eliminate redundancy between the Federally-mandated reports and logbooks or landings reports required by the IATTC and the State respectively. The NMFS also coordinates with other private and public organizations collecting or compiling information on catches and effort in the regulatory area to prevent duplication. This is necessary because a large portion of U.S. vessels' catches are landed in ports outside California. The logbooks are an important component of this coordinated data collection program. There are no other programs that would result in the same information being available to the U.S. and the IATTC on the necessary schedule and which would satisfy U.S. reporting requirements.

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

All practicable steps to minimize the burden on large and small entities have been taken. Record keeping requirements are directly proportional to each firm's level of activity. Thus, occasional,

part-time or local vessels harvesting small amounts of tuna spend less time collecting and reporting data than the larger firms. As a practical matter, the U.S. fleet operating in the eastern tropical Pacific has declined in recent years both overall and through the shift of many participants to the Western Pacific. The remaining vessels are generally of comparable size and are affected in a similar manner.

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

If these data were not collected, there would be a significant gap in the database needed by the IATTC and the U.S. to complete stock assessments, determine U.S. interests in the fishery, and conduct evaluations of fishery management strategies to achieve the maximum economic yield from the fishery. The U.S. would be less able to protect or enhance U.S. benefits from fishing under the Convention. The U.S. also would not meet its commitments under the Tuna Conventions Act. The risk of erroneous stock assessments and inappropriate management also would be increased.

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

The information collection is conducted in a manner consistent with the Office of Management and Budget (OMB) guidelines.

8. Provide a copy of 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice, published June 6, 2007, solicited public comment on this renewal. No comments were received.

Consultations on data collection and reporting (among other matters) take place annually at the meeting of IATTC, the latest meeting having been in June 2007. Feedback from the Commission staff and from industry is the primary means for considering possible changes in the collection. In addition, the Department of State has chartered a General Advisory Committee to advise the U.S. Commissioners to the IATTC and the Department of State on management issues facing the IATTC, including data submission and reporting needs. Among the members are representatives of the U.S. tuna fishing and processing industries and non-governmental organizations.

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

No payments or gifts are made to any respondents.

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

Individual firm data are submitted to the IATTC and are not released to the public; only aggregated data or data with vessel identifiers removed are releasable. These procedures are consistent with NOAA Administrative Order 216-100 governing the management of confidential data. The data also are maintained as confidential by the IATTC as they reveal the business practices of individual firms, and release of the data could be harmful to the firm involved.

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 sensitive questions are asked.

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

The burden estimate for record keeping and reporting is 119 hours per year, derived as follows: Five full time and fifteen part time vessels.

5 vessels x 195 reports (one per day fished per year) = 975 responses x 5 minutes per entry = 81 hours

15 vessels x 30 reports (one per day fished per year) = 450 responses x 5 minutes per entry = 38 hours

Respondents = 5 + 15 = 20.

Responses = 975 + 450 = 1,425.

Hours = 81 + 38 = 119.

Logbook records are maintained on a daily basis. The average vessel makes between three and four trips per year; thus, three or four submissions of logbooks (one per trip, including an entry for each day of that trip) would be made for each vessel if the IATTC form is used. The above estimate incorporates time for assembling and delivering the logbook data.

The estimated annual cost to respondents is estimated at \$2,380, which was derived as follows:

119 hours x \$20.00/hr (including overhead) = \$2,380.

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

There are no start-up or capital costs; forms are provided by the IATTC and no equipment purchases are necessary. Mail costs are estimated \$41.00 per year (100 trips x \$0.41 = \$41.00) (based on 5 trips per vessel per year, although as stated above, 3-4 trips may be all that are made).

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

The estimated cost to the U.S. government is negligible. Logbooks are provided by the IATTC and forms are processed by IATTC. U.S. scientists participate in stock and fishery assessments but rely on IATTC to provide logbook data.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

The adjusted increase in annual cost burden from \$37 to \$41 is due to increase in postage rates. In ROCIS, the current amount shows as zero, as the system had rounded costs to the nearest \$1,000.

Responses appear to have changed in ROCIS, but did not actually change. The 2004 Notice of Action recorded the wrong number of responses, and NOAA did not catch the error.

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

The data are used in the computation of stock assessments and fishery condition reports by NMFS scientists and IATTC scientists. The results are compiled and analyzed IATTC reports, typically in time for the IATTC annual meeting in June each year, but no time frame is set for other publications in scientific journals or government reports.

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.

A request for OMB approval not to display the expiration date is based on the fact that there is no Federal government form used, and therefore there is no form on which to display the expiration date.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

The form used will not provide respondents with information on the purpose of the collection, the estimated burden, etc. Again, this information will not be provided because the logbook to be used is not a NOAA form and will not be obtained from NOAA. The OMB approval number for the regulatory section is displayed in 15 CFR 902.1.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not involve any use of sampling.