

**SUPPORTING STATEMENT
NORTHWEST REGION LOGBOOK FAMILY OF FORMS
OMB CONTROL NO. 0648-0271**

INTRODUCTION

This collection is authorized by the Pacific Coast Groundfish Fishery Management Plan (FMP) which was developed by the Pacific Fisheries Management Council (Council) under the Magnuson-Stevens Fisheries Conservation and Management Act (Magnuson Act), 16 U.S.C. 1801 et seq. The FMP governs the groundfish fishery off Washington, Oregon, and California.

This information collection takes the form of a comprehensive Federal Fisheries data collection program which includes recordkeeping and reporting requirements for fish processing vessels over 125 feet in length (at-sea processors which includes catcher/processors and motherships) and catcher vessels that deliver to motherships operating in the waters off Washington, Oregon and California (WOC). This information would be used by the observers at sea to obtain fishing effort information and would also be used to estimate catch if observer data were not available (i.e. illness or injury of the observer) or to verify observer data.

This data collection statement was originally submitted for review in 1991. The proposed rule for implementation of the collection was not published in the Federal Register until November 19, 1992 (57 FR 54552). For a number of reasons, mainly changes in priorities, the final rule has not yet been filed. However, the at-sea processing industry has recognized the importance of these data requirements and continues to submit voluntarily most of the information covered by this information collection. To date, the cooperation has been exceptional. The industry has voluntarily recorded this information because they understand that more accurate data allows managers to be less conservative in estimating the closure and thus provide an increased likelihood of achieving the Pacific whiting allocations (if data are lacking, managers are more conservative and a fishery may be closed prematurely).

At its April 2009 meeting, the Pacific Fishery Management Council (Council) recommended that National Marine Fisheries Service (NMFS) implement a trawl rationalization program. As part of the implementing regulations for a trawl rationalization program, we anticipate that there will be regulatory requirements for electronic logbooks from vessels in the at-sea processing sectors. NMFS expects to complete the rulemaking process to support the Council recommendations for logbooks by 2011. We are requesting continued approval of this information collection until logbook provisions for the trawl rationalization program are implemented.

This collection of information asks that: (1) all processing vessels that process their own catch maintain Daily Fishing and Cumulative Production Logs (DFCPL) and Transfer/Offloading Logs; (2) all processing vessels (motherships) that receive fish from fishing vessels must maintain the Daily Report of Fish Received and Cumulative Production Logbooks (DRCPL) and Transfer/Offloading Logbooks; (3) all fishing vessels delivering unprocessed groundfish to a processing vessel must maintain the daily fishing part of the DFCPL; (4) all processing vessels must notify the Northwest Region, NMFS 24 hours before the initiation of fishing, receiving or processing, and 24 hours prior to leaving the WOC fishing area; and (5) all processing vessels

submit, on at least a weekly basis, catch information that would summarize daily production by species and product form.

This request is for renewal of this information collection.

A. JUSTIFICATION

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

This reporting requirement is designed to apply to large processing vessels, and catcher vessels that deliver to them. After several weeks of fishing, processing vessels in the Pacific whiting at-sea sectors offload processed products. Many vessels offload to cargo ships that are bound for foreign ports; the others land processed products on shore in the states of WOC. We believe that the information being requested from these vessels is particularly important because NMFS needs to understand the impacts of the fishery on the Pacific whiting resource, as well as other biological and socio-economic resources in the management area. In general terms, this information includes the following: 1) fishing effort; 2) retained Pacific groundfish catch; 3) discard amounts including prohibited species; 4) production information; and 5) employment.

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 applicable NOAA Information Quality Guidelines.

This section summarizes the types of information that would be recorded and reported by the operators of vessels subject to these regulations and some of the more important uses of the information collected.

DAILY FISHING AND CUMULATIVE PRODUCTION LOG (DFCPL); DAILY REPORT OF FISH RECEIVED AND CUMULATIVE PRODUCTION LOG (DRCPL).

Processing vessels that process their own catch would be asked to maintain a DFCPL. Motherships (processing vessels that only receive fish from harvesting vessels) would be asked to maintain a DRCPL. The DFCPL and DRCPL are identical except that the DFCPL combines the production log with a fishing log and the DRCPL combines the production log with a record of fish received from other vessels. Harvesting vessels delivering to a processing vessel would be asked to maintain the fishing log section of the DFCPL. The DFCPL and DRCPL logs record daily catch or catch receipt information, along with daily and cumulative production information.

The daily fishing portion of the DFCPL includes: 1) vessel and gear specifications; 2) haul-by-haul information; 3) daily information on discards; and 4) information on daily vessel activity. The haul by haul information includes the date, time, location, sea depth, trawl depth, haul weight, duration of haul. The crew size information is broken out by fishing and processing crews where appropriate. The discard information is for Pacific whiting, other groundfish, and for prohibited species. The estimated daily discards of halibut, crab, and salmon are recorded in numbers. All other species discard estimates are recorded by weight. The effort information is

used for inseason enforcement and for biological and economic evaluations of existing and proposed fishery management measures.

Original copies of the logs would remain on the vessels until the end of the fishing year (or longer if product remains on board from the WOC fishery) and would be made available to NMFS observers and to enforcement officers. Processing vessels would be asked to make the daily fishing log information for its catcher vessels available to the observer on board the vessel. Observers would collect the effort data and use other information in the logs to assist in meeting their data collection responsibilities.

Information relating to estimated haul weight or catch receipt weight would be recorded in the DFCPL or DRCPL within two hours of catch or catch receipt time. Timely recording of this information is necessary: to minimize the possibility of mixing information from different hauls; so enforcement officers may account for unrecorded product inventory during at-sea inspections of the vessel; and so observers can provide managers with real-time data necessary for total whiting catch estimates. Other entries in the DFCPL and DRCPL would be updated within 12 hours of the end of the day on which the haul, receipt, or production occurred.

The DFCPL and DRCPL also record daily discards by the processor. This information, along with discard information provided to processors by catcher vessel operators, would be used by the observers to obtain information relating to total fishing mortality resulting from fishing operations. Data collected under the observer program provides Pacific whiting, other groundfish, and prohibited species discard information from a significant portion of the industry. Observers need access to discard information recorded in the logs to help assess their estimates of discard amounts, particularly of prohibited species. Furthermore, all catcher vessels and processors must record discard information to provide at least a minimum estimate of discard mortality in the event of inadequate observer coverage.

Specific information on catcher vessels (vessel name, vessel permit number, and receipt time), together with the cumulative production information recorded in DRCPLs. Product transfer information recorded in the product transfer/offload log (transfer log) would be subtracted from the verified cumulative production information in the DFCPL or DRCPL to obtain the amount of product that should be present on a processor vessel.

The logs would remain onboard the vessels during the fishing year and would be made available to observers and enforcement officers. Duplicate copies of the logbooks would be submitted to NMFS within 14 days after a processing vessel checks out of the fishery, the harvest guideline is reached, or the fishery is closed (or quarterly if the vessel remains in the fishery), to allow for timely data entry and analyses by fishery managers (A catcher vessel that delivers to a processing vessel would submit its duplicate copy only quarterly because its catch information already has been recorded in the processing vessel log. Quarterly submission of the vessel's effort data is adequate for management of the fishery.).

WEEKLY PRODUCTION REPORT.

A weekly production report would be requested from all processing vessels. It would summarize the following information by area and gear: (1) total estimated catch or receipt weight of

groundfish, and numbers of prohibited species; (2) weekly production by species and product form; and (3) product recovery rates by species and product form.

Product weights are already maintained for business purposes. Vessels will also be asked to report product recovery rates along with the conversion to round weight. This information will help NMFS compare vessel reported data with observer data and may be used to assess recovery rates and types of products produced at different times during the season.

PRODUCT TRANSFER/OFFLOADING LOGBOOKS (PTOL).

Processing vessels would be asked to maintain a transfer log. This log would record all shipments or transfers of product by species and product type, product weight (or units) and value, the name of the company or person transporting the product, the date of shipment, and the destination of the product within twelve hours of the completion of the transfer or offloading.

Each processing vessel asked to maintain a transfer/offloading log would need to submit copies of their transfer log to NMFS within fourteen days after the vessel leaves the fishery or the fishery is closed. This information assists enforcement officers in verifying reported catch, and will be compared with the original of the transfer/offloading log onboard the vessel and with DFCPLs and DRCPLs.

Product weight, product types and values for each species harvested in the WOC currently are recorded on State fish tickets for vessels landing in ports in WOC. The same information is needed from processing vessels for economic analyses. However, the most immediate need is to enable enforcement personnel to compare product inventories with production and transfer logbooks.

START AND STOP NOTIFICATIONS.

Before the initial start and upon completion of fishing, receiving fish, or processing groundfish from the fishery management area, a processing vessel must submit the following information: 1) vessel's name and WOC Federal permit number; 2) date and time when fishing, receipt of fish, processing will begin or the vessel will leave the area; and 3) the reporting area and vessel's position.

The purpose of start and stop notifications is to better track the fishing effort of the processing fleet, to know which vessels should be submitting weekly reports, and to help locate individual vessels in enforcement and emergency situations. The messages will be sent to the Northwest Regional Office of NMFS when appropriate and will be received within 24 hours before the start or within 24 hours after leaving the fishery management area off WOC.

The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. Should NMFS decide to disseminate the

information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information.

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.

The Northwest Region sends the logbooks in paper form to the respondents, and will accept data by fax, computer, mail, or in person. Land-line or satellite communication may be used. Methods to facilitate industry submission of weekly (or daily) reporting requirements have been encouraged by NMFS. Many vessels now use a computer to scan the report and email it to NMFS; the others use the fax.

In anticipation of a trawl rationalization program, NMFS is in the process of analyzing the data needs of such a program; reviewing electronic logbooks used to support other NMFS fisheries, including the Alaska fisheries where these vessels also operate; and under an exempted fishing permit, supporting the field testing of communications equipment that could be used to transmit logbook data from sea. Following consideration of the data needs relative to a trawl rationalization program, we expect to fund the development or adaptation of an electronic logbook specific to the need of the at-sea Pacific whiting fishery.

4. Describe efforts to identify duplication.

The Magnuson Act's operational guidelines require each FMP to evaluate existing State and Federal laws that govern the fisheries in question, and the findings are made part of each FMP. For the most part, vessels that process catch at sea are not subject to state fishery reporting requirements. The states of Washington, Oregon, and California do require reporting for vessels that offload product in port; however, not all products are off loaded in United States (U.S.) ports. Beyond state requirements for product offloading record and the VMS fishing position reports, there are no alternate sources of this information or duplicative requirements.

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

There are 9 catcher/processors and 6 mothership processors licensed to participate in the fishery and who are affected by this information collection. The Small Business Administration (SBA) guidelines for fishing firms use a \$3,000,000 gross revenue threshold to separate small from large operations. In the application to any one firm, the \$3,000,000 threshold considers income to all affiliated operations. NMFS records indicate that the gross annual revenue for each of the catcher/processor and mothership operations operating in the WOC exceeds \$3,000,000 and they are therefore not considered small businesses. There are 30 catcher vessels licensed to participate in the mothership fishery. These companies are all assumed to be small businesses.

NMFS will provide logbook and report forms to the vessel operators. To lessen the cost to the industry of meeting the recordkeeping and reporting requirements, logbooks have been designed so that each sector of the industry receives a logbook form tailored to meet its specific needs.

The logbook and reporting programs developed for the Pacific whiting industry have been designed to complement reporting requirements and would consolidate, to the extent practicable, other recordkeeping requirements to lessen the paperwork burden on operators of catcher vessels and at-sea processors. The NMFS has consulted with vessel operators to answer questions on maintenance of the NMFS logs and submission of associated reports. We will continue to seek industry guidance.

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

The DFCPLs and DRCPLs will be submitted by processors within 14 days after the vessel leaves the fishery, the fishery is closed or the harvest guideline is reached (or quarterly if the vessel remains in the area). Submission of DFCPLs and DRCPLs by catcher/processors and motherships may be combined with submission of transfer logs, and so 3 submissions per at-sea processing vessel per year are estimated. Catcher vessels will submit their effort information (DFCPL) quarterly. This will allow timely input of logbook information into a central database that may be accessed by fishery managers to gauge fishery performance against existing or proposed management measures. This also will allow NMFS to monitor inseason compliance with logbook requirements and to interface with individual vessel operators if logbook entries are being recorded inappropriately (catcher vessels may submit their logs less frequently than the processors because their harvest is recorded in the processors' logs and fishing effort data is not needed more frequently than quarterly). Also, catcher vessels are most likely to be local vessels that do not leave the WOC area. A less frequent submission of logbooks could undermine the availability of timely fishery information upon which NMFS and the Council base their management decisions. The absence of adequate biological, effort, and economic information from the domestic industry increases the risk of error associated with any given management decision, and can result in ineffective decision-making.

Transfer log information assists enforcement officers in verifying reported catch, and will be compared with onboard transfer/offloading logs, DFCPLs, DRCPLs, and product inventory to verify the amount of retained product. The fishery may be conducted in as little as 3-15 weeks (an estimate of 72 days was used throughout this statement). If transfer logs were not submitted during the fishing season, the ability to verify catch and production amounts while the vessel is on the grounds would be jeopardized.

Start/Stop notifications must be submitted within 24 hours of the vessel entering or leaving the fishery. This is necessary to accurately estimate processing effort, to schedule enforcement boardings at the beginning and end of the vessel's operation in WOC.

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

The collection is consistent with Office of Management and Budget (OMB) guidelines except that DFCPL or DRCPL must be completed within two hours of catch or catch receipt time. For the reasons given above in this statement, logbook data must be available for observers so that real-time management of the fishery can occur. The data must be recorded and the observers must have access to the information. Product transfer logs must be submitted following each offload to allow for effective enforcement of the fishery. As the normal whiting season is less

than 72 days, quarterly submissions are not adequate to monitor the fishery, protect the resource, or assure that harvest guidelines and allocations are not exceeded.

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 was published on May 19, 2009 (74 FR 23390) soliciting public comment on this submission. No comments were received.

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

Not applicable.

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

As stated on the forms, the information collected is confidential under section 402(b) of the Magnuson Act (16 U.S.C. 1801 et seq.). All data submitted are treated in accordance with NOAA Administrative Order 216-100, Protection of Confidential Fisheries Statistics.

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 of a sensitive nature are asked.

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

Effort and production information are normally maintained by harvesting vessel operators and at-sea processing vessel owners for their own business purposes. The labor costs associated with the information collection pertain to the additional burden assumed by the vessel operators to transfer this information to the correct logbook or report and to submit this information to NMFS. See Table 1 for the estimated burden hours and the changes from the previous statement.

The following calculations of cost and burden hours assume that the processing and catcher vessels operate 72 days of the year. Processing capacity is such that 15 vessels could process the entire Pacific whiting quota in 72 days or less. Consequently, the DFCPLs and DRCPLs are estimated to be kept for a maximum of 72 days a year and submitted no more than 3 times a year per vessel (with no activity in the first quarter due to the season start in the spring. However, the estimated 72-day season may be spread across the rest of the year in several openings, or a vessel may depart and re-enter the fishery, so three submissions are possible.) Stop/start logs are

estimated to be submitted no more than 4 times a year per vessel, and product transfer logs are estimated to be submitted no more than 3 times a year per vessel.

Processing vessels will be asked to maintain Product Transfer/Offloading Logbooks. Because the information in the Transfer logs would be summarized in the DFCPL or DRCPL, little additional time would be required to fill them out. Three transfer logs, requiring 20 minutes to complete, would take 1 hour per year per vessel. The 4 stop/start messages expected per vessel are expected to take only 5 minutes per vessel per year.

Individual vessels may incur a greater or lesser cost burden depending on actual annual participation in the Pacific whiting fishery. A vessel that both fishes and processes its catch would have the maximum recordkeeping burden, about 31 minutes/day (37 hours, 12 minutes annually based on a 72 days of operation). The other vessels have a lesser burden, approximately 18 minutes/day (21 hours, 54 minutes annually) for a mothership (a vessel that only processes), and approximately 13 minutes/day (15 hours, 36 minutes annually) for a vessel that only fishes. These burdens are the same per vessel as in the last submission. The total annual burden incurred by the industry to comply with the proposed information collection program would be approximately 937 hours.

TABLE 1. BURDEN HOURS

Record Type	A Number of records per year per vessel	B Minutes per Record	C (A*B) Hours per vessel per year	D Number of Vessels	E (A*D) Total responses for fleet	F (C*D) Total hrs for fleet
DFCPL(catchers)	72	13 min	15.6 hrs	30	2,160	468
DFCPL (catcher-processors)	72	26 min	31.2 hrs	9	648	281
DRCPL (motherships)	72	13 min	15.6 hrs	6	432	93.6 (94)
Weekly/Daily Production Report (catcher-processors and motherships only)	21	14.8 min`	5.2 hrs	15	315	78
PTOL	3	20 min	1.0 hrs	15	45	15
Start/Stop	4	1.25 min	.08 hrs	15	60	1.2(1)
TOTAL	--	--	--	45	3,660	937

CHANGE IN BURDEN HOURS: Hours in the previous submission were 1,374. The reduction of 437 hours, to 937 hours, is due to a license limitation program for the Pacific whiting fishery implemented under Amendment 15, which reduced the total number of vessels that can participate in the fishery

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 Question 12 above).

There are no capital or startup costs. Logbook data may be sent by fax, email, mail or in person. Land-line or satellite communications may be used. This statement and the calculation of submission costs assumes the submission of DFCPLs and DRCPLs by mail and PTOLs and Start/Stop reports by fax. However, PTOLs and stop/start notifications are also expected to be submitted by email via satellite communication.

TABLE 2. LABOR COSTS ASSOCIATED WITH THE SUBMISSION OF DATA

Record Type	A Hours per vessel per Yr	B # Vessels	C Total hrs for Fleet	Annual Labor Cost (\$)*	
				D (A* wage) Per Vessel	E (C*wage) or (D*B) Fleet
DFCPL(catchers)	15.6 hrs	30	468	284	8,508
DFCPL (catcher- processors)	31.2 hrs	9	281	567	5,105
DRCPL (motherships)	15.6 hrs	6	94	284	1,702
Weekly/Daily Production Report (processors only)	5.2 hrs	15	78	95	1,418
PTOL	1.0 hrs	15	15	18	273
Start/Stop	.08 hrs	15	1.2	1.5	22
TOTAL	--	45	936.8		\$17,028

* assumes the wage is equivalent to the 2009 GS-7 step 5 wage or \$18.18/hour

TABLE 3. OTHER SUBMISSION COSTS

Record Type	A Submission Method	B \$ Cost per Submission	C Number of Submissions per Year (Frequency)	D Number of Vessels	Annual Cost of Submission (\$)	
					E (B*C) Vessel	F (D*E) for total Fleet
DFCPL (catchers + catcher-proc)	mail	8.00	3	39	\$24	\$936
DRCPL	mail	8.00	3	6	\$24	\$144
PTOL	FAX	11.00	3	15	\$33	\$495
Start/Stop	FAX	11.00	4	15	\$44	\$660
TOTAL				45	\$125	\$2,235

TABLE 4. CHANGE IN COSTS

	Previous statement	This statement	Reason for Change
Labor costs	\$23,548	\$17,028	Change primarily due to the decreased number of vessels qualified to participate in the fishery due to a license limitation program implemented under Amendment 15, plus minor change in the hourly wage.
Record Submission Costs	\$2,652	\$2,235	Change primarily due to the decreased number of vessels qualified to participate in the fishery due to a license limitation program implemented under Amendment 15.
Total costs to fleet	\$26,200	\$19,263	

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

Enforcement and administrative costs: certain costs would be incurred by management agencies in administering and enforcing the proposed recordkeeping and reporting requirements. Current enforcement costs include salaries of enforcement personnel and costs associated with utilizing support platforms, e.g., U.S. Coast Guard vessels. No additional enforcement personnel or U.S. Coast Guard vessels are needed because (1) enforcement personnel are already hired to support the conservation and management role of NMFS, and (2) U.S. Coast Guard vessels are already in

place to carry out search-and-rescue and fisheries enforcement missions off of WOC. NMFS estimates that the amount of time to inspect a catcher/processor or mothership vessel, including auditing DFCPLs, DRCPLs and Product Transfer/Offloading Logbooks, would average about 4 hours. If each processor were inspected quarterly then about 180 hours would be required to inspect 15 at-sea Pacific whiting processors..

The most significant additional cost to the Federal government would be the input of data recorded in the DFCPL and DRCPL logbooks into a fisheries information database, the analyses of the data, and maintenance of the database. This would require the time of one full-time employee (GS-9 step 5) for 180 hours. At \$23.55/hr the annual cost would be about \$8,478.

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

Even though the number of participating vessels has fluctuated over recent years, the total number of vessels participating in the Pacific whiting fishery has become more stable since May 11, 2009. Amendment 15, RIN 0648–AW08, to the FMP requires vessels that wish to participate in the non-tribal whiting fishery to qualify for an additional whiting entry limitation program within the overall groundfish limited entry program. Vessels must have qualified for a Pacific whiting vessels license during the one time application period that ended on May 11, 2009. Table 1 shows the number of vessels that are qualified to participate in each sector of the fishery. The changes from the previous submission are due to the reduction in the number of vessels that can qualify to participate in the fishery under the newly implemented license limitation program, and because there is no longer a need for production data to be transmitted from the vessel by fax – because the reductions in burden and cost are directly related to the new license limitation program, they would be considered program changes.

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

Results for this collection are not planned for publication.

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 statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.