

**SUPPORTING STATEMENT
PROFILES OF FISH PROCESSING
PLANTS IN ALASKA
OMB CONTROL NO. 0648-xxxx**

A. JUSTIFICATION

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

This is a request for a new information collection.

Workers come from many places inside and outside Alaska to work seasonally in its fish processing facilities. In 2008, 23,047 people were employed in processing jobs in Alaska and “seventy-four percent of Alaska’s seafood processing workers were nonresidents” (Warren and Hadland 2009: 6-7). Thus, the population of an Alaska community with a fish processing plant can increase significantly during peak processing seasons from an influx of seasonal workers. In addition, shore-based fish processing plants rely on the community for many types of public infrastructure. In many cases, processing plants also provide a variety of services to their workers and to the community’s fishing sector, including the fishing vessels and fishermen that deliver landings to their plant. However, very limited information is available in a consolidated location or format about these fish processing facilities. This type of information is important when attempting to forecast the possible social impacts of fishing regulations on communities which have a shore-based fish processing facility.

The National Marine Fisheries Service’s (NMFS) Alaska Fisheries Science Center (AFSC) will obtain basic information about shore-based processing plants, including: 1) the location of the fishing plant in relation to the community, 2) reliance on public infrastructure, 3) plant-supplied services and facilities for fishing vessels, 4) plant-supplied services and facilities for processing plant employees, 5) history of fish processing by plant, 6) number of individuals employed at each processing facility during the months of operation, 7) number of workers that stay in company-provided living accommodations, and 8) the number of workers that receive meals provided from a company galley.

In 2005, AFSC social scientists produced NOAA Technical Memorandum NMFS-AFSC-160 [*Community Profiles for North Pacific Fisheries – Alaska*](#), which provides short descriptions of 136 communities in Alaska that are involved in commercial, recreational, and subsistence fishing. These profiles have served as a consolidated source of baseline information for assessing community impacts in Alaska; however, they include very limited information on the fish processors present in each community due to the lack of availability of this type of data. A small number of the community profiles include information on the number of processing employees at a certain processing plant only if this information was readily available on the internet; however, for the most part, the community profiles include only the total number of processing plants in each community and the species they are capable of processing. This limited information does not allow for a detailed picture of the social role of fish processors in the profiled communities.

These community profiles will be updated when the 2010 U.S. Census data is released in 2011-2012 and a separate effort is being undertaken to update these profiles including a community survey which will gather community level information from government entities.

The processor survey is a part of this larger project and this survey will produce “processor profiles” which will be included in the updated community profiles. These “processor profiles” will be comprised of short narrative descriptions of all shore-based fish processing plants in the state of Alaska. These descriptions will add important information to the community profiles and will help to demonstrate the processing sector’s contribution to the community in terms of jobs and services.

The data collected from this survey and resulting processor profiles will show how intricately connected many processing plants are with their communities such that effects of management actions on the processing sector can be linked to communities. Since the community profiles are often the starting point for social impact analysis of North Pacific Fishery Management Council (NPFMC) actions, increasing the information available about processing plants will increase the ability of impact assessments to take into account the effects of management actions on shore-based processing plants and processing workers at the community level.

The processor profiles will also support several legal requirements (see below for description) for future management actions.

MSA

National Standard 8 of the [Magnuson-Stevens Act](#) (MSA) gives a statutory mandate for utilizing economic and social data to provide for the sustained participation of communities in fisheries and minimize adverse economic impacts on those communities. The following sections of the MSA pertain specifically to the requirements needing social and cultural data. Data collected in this effort will support current and future requirements of the MSA.

1) National Standard 8 Sec 301(a)(8) states:

Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

2) Requirements for Limited Access Privileges Sec.303A(c)(1)(C) states:

*... any limited access privilege program (LAPP) to harvest fish submitted by a Council or approved by the Secretary under this section shall promote:
... (iii) Social and economic benefits.*

3) Sec. 303A(B) PARTICIPATION CRITERIA:

In developing participation criteria for eligible communities under this paragraph, a Council shall consider -

- (i) Traditional fishing or processing practices in, and dependence on, the fishery;*
- (ii) The cultural and social framework relevant to the fishery;*
- ...(iv) The existence and severity of projected economic and social impacts associated with implementation of limited access privilege programs on harvesters, captains, crew, processors, and other businesses substantially dependent upon the fishery in the region or subregion*

4) Sec. 404(a) refers to:

.....acquire knowledge and information including statistics, on fishery conservation and management and on the economic and social characteristics of the fishery.

The act clarifies this in Sec 404(c)(3) indicating

Research on fisheries, including the social, cultural, and economic relationships among fishing vessel owners, crew, United States fish processors, associated shoreside labor, seafood markets and fishing communities.

NEPA

The [National Environmental Protection Act](#) (NEPA) requires Federal agencies to consider the interactions of natural and human environments, and the impacts on both systems of any changes due to governmental activities or policies. This consideration is to be done through the use of ‘...a systematic, interdisciplinary approach that will insure the integrated use of the natural and social sciences...in planning and decision-making which may have an impact on man’s environment;’ (NEPA Section 102 (2) (A)). Under NEPA, an Environmental Impact Statement (EIS) or Environmental Assessment (EA) is required to assess the impacts on the human environment of any Federal activity. NEPA specifies that the term ‘human environment’ shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment’ [NEPA Section 102 (C)].

Regulatory Flexibility Act

The Regulatory Flexibility (RegFlex) Act requires Federal agencies to prepare an initial and final regulatory flexibility analysis which ‘...shall describe the impact of the proposed rule on small entities...’... The initial regulatory flexibility analysis ‘...shall also contain a description of any significant alternatives to the proposed rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the proposed rule on small entities. [RegFlex Section 603 (b) (5) (c)]. In addition, each final regulatory flexibility analysis shall contain ‘...a description of the steps the agency has taken to minimize the significant economic impact on small entities....’ [RegFlex Section 604 (a) (5)].

Executive Order 12898

The [Executive Order 12898](#) of February 11, 1994 on Environmental Justice requires Federal agencies to consider the impacts of any action on disadvantaged, at risk and minority populations. To evaluate these impacts, information about the vulnerability of certain stakeholders must be better understood. Indicators of vulnerability can include but are not

limited to income, race/ethnicity, household structure, education levels and age. Although some general information related to this issue is available through census and other quantitative data, these sources do not disaggregate those individuals or groups that are affected by changes in marine resource management or the quality of the resource itself. Therefore, other types of data collection tools, such as that proposed here, must be utilized to gather information related to this executive order.

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.

Information from this collection will be used by NMFS social scientists at the AFSC and Alaska Regional Office, and by the staff at the NPFMC, to meet the requirements of the regulations discussed in Part A, Question 1 above. The information sought will be of practical use, as NMFS social scientists will utilize the information for descriptive and analytical purposes. The principal form of the results of this collection will be to provide “processor profiles”, short narrative descriptions of all the shore-based fish processing plants in the state of Alaska as part of a broader effort that is currently underway to update the Alaska community profiles, *Community Profiles for North Pacific Fisheries – Alaska* (Sepez et al. 2005). The profiles are produced for the purpose of providing baseline information on communities involved in fishing and will be utilized by NMFS and NPFMC in their role in fisheries management. In addition to direct fisheries management utility, this research and the resultant data may be utilized in increased and future ecosystem management efforts. These efforts include the development of various ecosystem models which incorporate various socio-economic indicators and other social information. The results of this research will increase the availability of social data to the extent that it may significantly benefit new research efforts in ecosystem modeling. The updated profiles, including the processor profiles, will also be available for public use to support community development, other research concepts and future research design.

The data will be collected once in order to be included in the updated community profiles, which are based in large part on information gathered from the U.S. Census; however it is likely that this data will be collected again in about nine years, in 2020, to accompany the decennial Census information.

The primary data collection tool is a questionnaire administered by telephone. The questionnaire will collect social information about fish processing plants at the plant level, which is currently unavailable. This information will be collected from plant managers at each shore-based fish processing plant in Alaska. The questionnaire was designed after conducting secondary research to determine what needed data are not already available, consulting with experts in survey research design, and partnering extensively with members of industry to test the survey instrument and to ensure that all of the questions are clear and can be answered easily by the respondents. The questions are designed to provide processing plant-specific and community-specific information by calling each individual processing plant, inserting the processing plant’s name in the telephone script in order to verify the name, and by inserting the community name of where the plant is located into the relevant questions (which makes it clear to the respondent

about which community they are being asked). The following is a discussion of how individual questions in the survey instrument will be used:

- Q1 collects information about where the processing plant is located in relation to the community and how the plant can be accessed from the community. The data collected in this question will facilitate an understanding of how intricately tied into the community the specific processing plant is and whether workers from the plant are accessing and using community-provided services (i.e., if the plant is located outside the community and can only be accessed by plane, workers are likely not interacting with the community on a regular basis).
- Q2 collects information on the types of public infrastructure that the plant relies on. This information is necessary to determine the level of linkage and dependence on the community by the specific processing plant and the importance of municipal budgets in creating and maintaining the infrastructure conditions that support shore-based processing. Some plants have built most of their own private infrastructure, while others rely to varying degrees on public infrastructure. The relationship between fisheries' infrastructure and resilient fishing communities has been well documented on the East Coast (Hall-Arber et al. 2001); however, prior to this survey, adequate data has not been available to assess these relationships in Alaska.
- Q3 requests information about the types of facilities and services that plants offer to fishing vessels and fishermen that deliver landings to their plants. The data collected with this question will facilitate an understanding of which facilities and services the plant provides to vessels and individuals that deliver fish to the community and will be used to provide insight into how each processing plant contributes to fishing locally through the services that they provide as a facility. Understanding the source of these services to fishing vessels is important to assessing the effects of management decisions that could effect shore-side processing. For example, if fishing seasons are reorganized so that a plant closes for a portion of the year, the impact of the reorganization would effect the fishing fleet through the unavailability of these services as much as it would effect the processors and the community.
- Q4 requests information about the services and facilities that plants offer for their processing plant employees. The information gathered in this question will facilitate an understanding of whether services and facilities are available at individual plants for their employees and give insight into how tied workers are to the community in which the processor is located and how dependent these workers are on community services. For example, if a plant provides services and facilities to its workers, it's likely that the workers are not depending directly on the community for such services.
- Q5 collects information on the date the fish processing plant first began operations. This provides information on the length of time that a given fish processing facility has been contributing to the community's economy and provides otherwise unavailable information on how long a fishing community has been involved in fisheries through the processing sector.

- Q6 collects information on whether the fish processing plant has operated continuously or has not operated during certain years since it opened. Some plants will show a high level of stability over time, while others will show a high degree of variability indicating extreme sensitivity to external conditions such as ecological sustainability, global market forces, and/or fishery management regimes. The information gathered in this question will help facilitate an understanding of the pattern of operation of fish processing facilities and their contribution to their host community's economy.
- Q7 asks whether or not the participant is able to answer the remaining questions without reviewing his/her records and requests a time to call back to ask the remaining questions if the information is not readily available. This information will be used to conduct a follow-up phone call to gather information for Q8 through Q10.
- Q8 collects information on the range of the number of workers (including processing line workers, supervisors, mechanics, quality control, office, and food service) employed at the fish processing plant by month. This question and the other questions in this section ask for a range because there are some months in which the processing plant may go from having a skeleton crew of less than ten for part of the month to a complete processing workforce in the hundreds. Reporting on this range was determined to be easier for processing plants than stating a single number for the month, based on consultations with the Pacific Seafood Processors Association. The information gathered in this question will provide an understanding of the extent to which the processing plant contributes to the host community's economy in terms of employment and also an understanding of the burden to the community and its services in terms of the number of workers (who are in many cases transient workers as opposed to permanent residents) in the community that might utilize or depend on the community's services.
- Q9 collects information on the range of the number of workers employed at the fish processing plant that stay in company-provided living accommodations (such as dormitories or onsite apartments) by month. The information gathered in this question will provide an understanding of the extent to which processing plant workers interact with other community members (e.g., if they are living at the fish processing plant, it's likely that they are not interacting with the community as much as those workers who live in offsite housing) and the extent to which they are contributing to the community's economy in terms of paying for housing in the community.
- Q10 collects information on the range of the number of workers employed at the fish processing plant that receive meals provided from a company galley by month. The information gathered in this question will provide an understanding similar to Q9 including the extent to which processing plant workers interact with other community members and the extent to which they are contributing to the community's economy in terms of purchasing food for meals or frequenting community restaurants.

It is anticipated that the information collected will be used by the NPFMC to inform decision making, disseminated to the public or used to support publicly disseminated information. 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 NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on anonymity, 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 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.

The survey data collection does not utilize any specialized information technology.

4. Describe efforts to identify duplication.

AFSC social scientists have been in contact with other NMFS social scientists and other agencies to ensure that if duplication is occurring, it is only because of confidentiality issues and an inability to share the confidential information.

A large effort has also been made to ensure that no duplication is occurring with the community data collection survey mentioned above (in Part A, Question 1) as being an integral part of the community profile update process. The community data collection survey is being conducted by AFSC social scientist, Amber Himes-Cornell. This survey asks questions of government organizations including city governments and tribal governments. The survey does not ask fish processors for information and does not duplicate the information asked as part of the processor profiles survey described in this supporting statement.

Some relevant data are already collected on employment in fish processing facilities in Alaska; however, these data are insufficient for the following reasons:

1) **Data are not reported at the appropriate level.** The Alaska Department of Labor collects a monthly count of processing jobs, but this information is reported at the regional rather than community level or processing plant level and gives a count of jobs rather than a count of employees. The decennial U.S. Census also collects sample data on employment by industry; however, does include a separate category for fish processing;

2) **Workers are omitted because of the time of year the information is collected.** The decennial U.S. Census counts people based on where they were living on April 1st of the census year and workers can be excluded from the total count of the community's population if the processing facility is not in operation at that time; or

3) **The data does not cover all types of fish processing employees and facilities.** NOAA/AFSC's Crab Economic Data Reporting program collects detailed information on the residence, number of processing positions, total man-hours, and total labor earnings only for

those individuals and plants engaged in crab processing, but no information is collected on workers engaged in processing activities for other species.

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

This request includes the collection of data from fish processing businesses, including small fish processing businesses. Prior to contacting these respondents, researchers will have gathered any publicly available data relevant to this study. In addition, participation in the proposed data collection will be voluntary. This data collection will not require any reporting or equipment cost burdens. The burden will be limited to the time required to complete the survey and the time that might be required to review records in order to answer the questions pertaining to the number of employees by month (Q8-Q10). Arrangements to collect data from research participants will be at the convenience of the participant, and as flexible as possible to minimize the burden on all parties.

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

In the absence of basic information on processing facilities, NMFS and NPFMC will be unable to adequately understand impacts of fisheries policy and management decisions on Alaskan communities and on shore-based fish processing facilities that are a part of these communities.

The Federal mandates and Executive Order described in Part A, Question 1 above require the analysis of the impacts that government actions have on the communities involved in fishing and require a program to conduct fisheries research on social, cultural, and economic relationships, including United States fish processors, associated shoreside labor, and fishing communities in order to assess those impacts. Socio-economic impact assessments, analysis of the affected human environment, cumulative impacts, as well as the distribution of impacts with a special emphasis on vulnerable or at risk communities, are all examples of these requirements. The ability of NOAA Social Scientists to adequately respond to this charge relies on access to timely and relevant information about the stakeholders involved.

A significant concern related to the quality of these analyses is the risk of being vulnerable to litigation for not fulfilling these mandates and executive order. Therefore, not collecting this information may lead to incomplete representation of the communities affected by fisheries policies and management decisions in Alaska. This could impact the decision making process and negatively impact the communities subject to the decisions.

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

This information collection is consistent with OMB guidelines.

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 published on April 21, 2010 (75 FR 20811) solicited public comments.

Two comments were received, from representatives from Pacific Seafood Processors Association (PSPA) and Petersburg Fisheries, a division of Icicle Seafoods, Inc.

The following is a summary of comments received on four points requested by the Federal Register Notice.

- A. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

Comments included concern over:

1. Whether collecting this data is related to a current specific fishery management plan or whether collecting this data is related to an amendment that is authorized by the MSA;
2. Whether these data support agency functions;
3. Whether the project seeks to obtain information from processing plants managers on topics that they are not knowledgeable about;
4. Whether the data request includes information that processors are mandated to provide to other agencies;
5. The appropriateness of specific topics of the survey; and
6. The use of questions dealing with ethnicity and country to origin of workers, types of lodging and other accommodations and activities available for processing workers, whether or not the company provides meals for the processing workforce in a company galley, and the interactions between seasonal processing workers and permanent residents of the community.

Agency Response

(1 and 2) The collection of these data is related to National Standard 8 of the MSA, which requires the utilization of social data in order to take into account the importance of fishery resources to fishing communities to provide for their sustained participation and minimize adverse economic impacts (as explained above in section, Part A, Question 1). Although these data are not being collected for a specific NPFMC or fishery management plan, these data are being collected for the purpose of being included in AFSC's updated community profiles, which are utilized in analyzing the impacts of such plans. The

collection of these data at this time will allow access to the information in the future for impact assessments so that the information necessary for each specific social impact assessment (SIA) does not have to be gathered for each individual analysis. Since the original version (Sepez et al. 2005) has frequently served as a consolidated source of baseline information for assessing community impacts in Alaska, there is no danger that the information will not be utilized. These data are fulfilling a data gap necessary for the requirements of National Standard 8 of MSA and will be utilized in future SIAs. No changes were made on the basis of these concerns.

(3, 5 and 6) Several questions were omitted because of concerns expressed by industry members through their public comments and through conversations with industry aimed at receiving feedback and addressing their concerns. Questions that were originally desired for inclusion in the survey were deleted in response to concerns expressed by industry representatives, including ethnicity and the country of origin of workers, interactions between seasonal processing workers and permanent residents, what percentage of workers living offsite reside with their families, what social activities and social services are available in the community, and the history of plants that are no longer in operation. These questions were omitted because further conversations with the entities that submitted public comment indicated that plant managers wouldn't be able to answer the questions with any reasonable certainty. While information on race/ethnicity and national origin are important pieces of information for us to gather, we believe that this survey might not be the best mechanism by which to gather the information.

(6) Questions dealing with the types of lodging and other accommodations and activities available for processing workers (at the plant) and whether or not the company provides meals for the processing workers in a company galley were refined with the help of a representative of PSPA and remain in the questionnaire. These questions are important in understanding the social role of a fish processing plant (as explained above in Section A, Question 2 for Q4, Q9, and Q10). The public comments from Icycle Seafoods mention that the information about lodging accommodations and meals is readily available on their company's website; however, information about these services is not available for every company. An extensive background search has been completed by AFSC social scientists to gather information from fish processing company websites and if this information was available from the company's public website at the plant level, the question will not be asked during the survey.

(4) We have not been able to identify any other agencies that currently mandate collection of the information requested in the present survey.

Regarding the information on the number of employees (mentioned by Icycle Seafoods in their public comments as being available at the plant level by month and by quarter from the Alaska Department of Labor), this information is confidential and is not available to AFSC at the plant level. A representative of the Alaska Department of Labor advised AFSC social scientists that the information can only be provided in an aggregate form and is confidential at the plant level.

- B. The accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information.

Comments included concern that:

1. the stated annual cost to the public in the Federal Register Notice was zero, but that the cost of conducting the survey including AFSC salaries and the cost of travel required for the site-visits was not included;
2. the stated annual cost to the public did not include the cost of time for interviewees to participate in the survey;
3. since many processing operations in Petersburg, Cordova, and Kenai are small, family-owned operations, conducting the survey in person in those locations would represent a burden and would also even be difficult for those plants which are larger in size in the site-visit communities because of the time-constraints of fish processing; and
4. after experiences with AFSC's Economic Data Reporting (EDR) program associated with the Bering Sea and Aleutian Island Crab Rationalization Program, that the estimated times and associated costs of AFSC are not credible or reliable.

Agency Response

There is no annual cost to the public in the form of what the processing facilities would be required to pay for the project; however the amount listed in the Federal Register Notice did not include AFSC's budget for the project (per instructions for the Federal Register Notice, only recordkeeping and reporting costs were to be included in the notice.) The total budget for the project is \$44,000 (including \$28K for a contractor and overhead to conduct the survey and \$16K for travel to the site-visit communities). This funding was awarded for the most part to AFSC through fiscal year 2010 National Standard 8 competitive NMFS funding.

The annual cost to the public in the Federal Register Notice did not include the time required for interviewees to participate in the study; however, it is estimated that this survey will require approximately 30 minutes to complete (including 20 minutes for answering the bulk of the questions and a 10 minute call if necessary to answer the questions that will require consultation of records). Participation in the survey is voluntary.

In regard to the burden on small fish processors in the proposed site-visit communities of Petersburg, Cordova, and Kenai, the survey will only be completed in person at each facility if the specific plant manager is willing to take part in the survey in person. As stated above, participation in the survey either over the phone or in person is voluntary. This also applies to larger facilities in the site-visit communities and if a facility is not able or willing to complete the survey in person, interviewers will attempt to administer the questionnaire over the phone.

In regard to the estimated times and associated costs not being reliable or credible because of past experiences with the Economic Data Reporting program associated with

the Bering Sea and Aleutian Island Crab Rationalization Program, this data collection is significantly smaller in size in terms of the number of questions being asked and time it will take to complete the survey and is also voluntary; whereas the Economic Data Reporting program (referred to by public comments) is a mandatory data collection.

C. Ways to enhance the quality, utility, and clarity of the information to be collected.

Comments included concern that:

1. The proposal's description did not clearly outline the purpose and need for the project and concern was expressed over the utility of data collection in relation to fisheries management,
2. Some of the information gathered will be anecdotal or ballpark in nature because the language of the draft survey included the words "rough estimate" and "rough percentage" and concern over this anecdotal information being used to forecast social impacts of fishing regulations on communities which have an shore-based fish processing facility, and
3. Some of the questions on the draft survey (particularly any question about the social services available to workers in a community) should be asked of someone with a greater area of expertise in the subject.

Agency Response

Significant detail on the utility of this data collection, need for this project, and description of the purpose was not included in the Federal Register Notice given its brief nature; however this has been described above in detail in Section A, 1 and 2.

In regard to the concern expressed over information which might be anecdotal or ballpark because of the use of the words "rough estimate" and "rough percentage", these terms have been omitted from the questionnaire; however, the questionnaire does still include instructions for the questions pertaining to the number of workers (Q8-Q10), which state "If you do not have exact numbers, it is fine for you to provide me with your best educated guess." Although this could still be considered ballpark in nature, plant managers are considered the experts in this subject and it is reasonable to believe that they will be able to give a very close estimate. Also, plant managers will be given the opportunity to consult their records before answering these questions about the number of employees.

In regard to the appropriateness of asking some of the questions (that were contained in the draft survey instrument) of processing plant managers, particularly the question about the social services available to workers in the community, this question was deleted from the survey in response to concerns by industry representatives.

D. Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Comments included concern that:

1. Much of the information desired by AFSC is already collected by other entities (including: State of Alaska Commercial Operator's Annual Report (COAR), Crab Rationalization Program EDR, the Alaska Department of Fish and Game annual processing capacity survey, and reports by the Alaska Department of Labor including the annual seafood employment report) and asking for this information from processors is duplicative and burdensome;
2. AFSC should make every effort to ensure they are using data that is already available before requesting any additional information from the public;
3. A request that AFSC approach the Alaska Department of Labor (ADOL) to see what data might already be available; and
4. Questions for processors should be limited to the nature of their business (and not about social services available in a community or who employees reside with offsite).

Agency Response

Regarding the issue of duplication, AFSC social scientists have been in contact with other NMFS social scientists and other agencies to ensure that any duplication is a result of confidentiality issues and an inability for the collecting agency to share the confidential information (as described above in Part A, Question 4). AFSC social scientists have reviewed the suggested data sources and have engaged in correspondence with representatives from the ADOL. All of the sources suggested through public comments were suggested with the purpose of providing employment information; however, the sources suggested either do not include data at the proper level of aggregation (the community and processing plant level) or do not include information for all processing employees (e.g., includes only information for the crab fishery). These data sources are described in detail below.

ADOL data on the number of processing workers is not available at the community or fish processing plant level because of confidentiality issues. The annual seafood employment report (mentioned in public comments) includes the total number of fish harvesting employees by month for the entire state of Alaska, but does not break out the number of employees by community or plant. Other reports by ADOL, including "Current Employment Statistics" (employment information by state or region), "Quarterly Census of Employment and Wages" (employment and wages information by state, borough, and by census areas including communities; but does not include an individual category for fish processing at any level other than that of the state), and the "State of Alaska Seafood Employment Estimates" (information on employment by month and region) do not break out the number of fish processing employees by community or plant.

NOAA/AFSC's Crab Economic Data Reporting (EDR) program collects detailed information on the residence, number of processing positions, total man-hours, and total labor earnings only for those individuals and plants engaged in crab processing, but no information is collected on workers engaged in processing activities for other species.

The State of Alaska COAR collects species, gear, area, processing type, and price information on fish purchased by fish processors; however, it does not include any information on employment at fish processing facilities.

Alaska Department of Fish and Game (ADFG) annual processing capacity survey only covers the Bristol Bay salmon fishery and gathers information about the processing capacity of fish processors including the processing capability in terms of pounds per day, the amount of days this processing capacity can be sustained at, whether the company provides tenders, and whether the company intends to purchase salmon. This survey does not include information on the number of employees at fish processing plants.

Regarding the issue of questions being limited to the nature of a processor's business, all of the questions contained in the draft survey which focused on issues outside of the nature of a processor's business, including social services available, have been omitted from the final version of the questionnaire.

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

There are no plans to provide any payment or gift to respondents.

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

An assurance of the confidentiality of the data gathered will not be provided to respondents, given that the information gathered will be reported in the form of individual processor profiles which will be included in the updated community profiles and published at a NOAA Technical Memorandum. This is clearly stated in the telephone script, which reads:

“The information we collect in this survey will be compiled into processor profiles, which are short narrative descriptions of each shore-based fish processing plant. The profile we draft for your plant will be included in the profile for the community of [COMMUNITY NAME]. These community profiles are important sources of information for fisheries managers and are designed to provide background information on communities involved in fishing”.

When the information is reported in the profiles, it will list the plant manager, generically, as the source of the information; however, names of individual respondents will not be reported. Respondents will be provided the opportunity to review their processing plant's profile prior to publication in the community profiles. The original information gathered will not be available for public viewing; however the processor profiles will be included in a publicly available document.

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.

The survey does not include questions that are of a sensitive nature or include other matters that are commonly considered private.

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

A total of approximately 95 burden hours will be accumulated from the survey implementation. The census of 186 shore-based fish processing plants (plant managers) will be contacted. The survey will be completed over the phone with the majority of the shore-based fish processing plants (N = 162, expected response: 113). The remaining processors, located in Kenai, Petersburg, and Cordova (N = 24, expected response: 17), will have the survey administered during in person site visits. These plants in Kenai, Petersburg, and Cordova will not complete the survey over the phone unless they are not willing to conduct the survey in person. The total number of surveys which could be completed is 186 (including the whole universe of shore-based processing facilities); however, a maximum response rate of 70% is estimated: 113 telephone surveys and 17 site surveys.

The burden hours have been calculated using the maximum time burden and maximum respondents for each portion of the survey implementation process; however, most respondents will not need to be contacted multiple times. It is expected that in many cases a respondent will only need to be contacted one time (listed in the table below as the 2nd Telephone Call and Administration of Telephone Questionnaire). Given this, the actual burden should be less than the maximum value of 95 burden hours.

The total burden hours are calculated based on an estimate of how long each phase of survey implementation is expected to take.

Phone survey: the 1st Telephone Recruitment Call, Refusal will be the first contact with the respondent and if the respondent is not available to answer the questions at the time of the initial call, another call will be scheduled with the respondent (referred to below as 2nd Telephone Call and Administration of Survey Instrument). If the respondent is available to conduct the survey at the time of first contact, it will not be necessary to include the time given below for the 1st Telephone Call, Refusal; but rather the call will consist of conducting the survey at the time of first contact in what is referred to below as 2nd Telephone Call and Administration of Survey Instrument. The respondent is also able to elect to refuse to take part in the study at the time of first contact. The 3rd Telephone Call will only be necessary if a respondent finds it necessary to consult his/her records in order to answer the questions on the survey which refer to the number of processing plant employees by month (Q8-Q10). The 4th Telephone Call will only be necessary if something was missed or remains unclear after the survey administration phone call. It is believed that this call will only be necessary in a very small number of cases. Each recruitment call, and the follow-up call, are expected to last 6 minutes and the call where the survey is administered is expected to last 20 minutes, with an additional ten minutes if records

consultation is needed. A breakdown of the estimated number of responses and the estimated burden to respondents is provided in the table below.

Site-visit survey: site visits will be conducted with shore-based fish processing plants in three communities in Alaska: Cordova, Kenai, and Petersburg where the survey will be completed in person at those facilities. These communities were selected for site visits because they have not received a site visit as part of any previous community-related survey, and they have the largest number of fish processing facilities in their sub-regions. The Recruitment Call (for site-visit survey) will only be conducted with those fish processing plants located in the three site-visit communities and will be used to schedule a time for the interviewer to visit the plant and conduct the survey in person. This will be done with a total of 24 possible plants and is expected to require 30 minutes of the respondent's time for a total of 12 total burden hours. If these plants elect to take part in the survey in person, the In- Person Surveys in Site-Visit Communities will be conducted with these 24 plants. If respondents at these locations elect to take part in the survey over the telephone and not in person, the survey will be administered over the phone (and not in person) and will require the same time burden as each individual telephone survey outlined in the table below.

Description	Estimated No. of Respondents	Estimated No. of Responses	Estimated Time per Respondent (minutes)	Estimated Burden Annual Burden Hours (hours)
1st Telephone Recruitment Call for Scheduling, Refusal	162	162	6	16.2
2 nd Telephone Call (if first call resulted in scheduling survey), but in some cases first call - and Administration of Telephone Questionnaire	113*	113	20	37.6
3 rd Telephone Call (for questions that require consultation of records)	113	113**	10	19
4 th Telephone Call (for follow-up)	113	113	6	11
Recruitment Call (for site-visit surveys)	24	24	6	2.4
In-Person Surveys in Site-Visit Communities	17*	17	30	8.5
Total Burden	186 (unduplicated)	429		94.7(95)

*70% of respondents initially contacted.

** Not counted as additional response.

NOTE: numbers not rounded off, so that total burden in this document and in ROCIS will agree.

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 will be no recordkeeping/reporting costs to the respondents.

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

Total estimated cost to the Federal government is \$44,000 and includes:

- \$28K for a contractor and overhead to conduct background research and administer the survey, and
- \$16K for travel to the site-visit communities.

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

This is a new collection.

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

This project will produce “processor profiles,” short narrative descriptions of all shore-based fish processing plants in the state of Alaska, which will be included in the updated community profiles. The data gathered through this questionnaire will be entered into a database and then compiled in a narrative format with data about each processing plant from existing publicly available sources. These processor profiles will be included in AFSC’s updated community profiles which will be drafted in 2011 and 2012. The profiles will be published as a NOAA Technical Memorandum after they have been reviewed and edited by AFSC. It is estimated that the publication process will be completed in 2013. In addition, as individual profiles are completed, they will be posted in draft form on the AFSC website.

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.

Since the survey will be conducted by phone and there will not be a printed version that is distributed to participants, the expiration date will not be displayed. However, the OMB Control Number and expiration date will be on the telephone and interview scripts, and will be read to the respondents, the first time they are contacted.

18. Explain each exception to the certification statement.

Not Applicable.