

**SUPPORTING STATEMENT
HIGHLY MIGRATORY SPECIES TOURNAMENT REGISTRATION AND
REPORTING
OMB CONTROL NO. 0648-0323**

A. JUSTIFICATION

This request is for revision and extension of the information collection.

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

The United States (U.S.) Secretary of Commerce is authorized to regulate fisheries for Atlantic Highly Migratory Species (HMS) under the [Magnuson-Stevens Fishery Conservation and Management Act](#) and the [Atlantic Tunas Convention Act](#), as amended.

For all tournaments that are conducted from a port in an Atlantic coastal state, including the U.S. Virgin Islands and Puerto Rico, a tournament operator must register with the National Marine Fisheries Service's (NMFS) HMS Management Division, at least 4 weeks prior to commencement of the tournament, by submitting information on the purpose, dates, and location of the tournament to NMFS. A tournament is not registered unless the tournament operator has received a confirmation number from the NMFS' HMS Management Division. NMFS will notify the tournament operator in writing when a tournament has been selected for reporting. Tournament operators that are selected to report must maintain and submit to NMFS a record of catch and effort on forms available from NMFS. Tournament operators must submit the completed forms to NMFS, at an address designated by NMFS, postmarked no later than the 7th day after the conclusion of the tournament, and must attach a copy of the tournament rules." ([50 CFR 635.5\(d\)](#)).

NMFS proposes to extend tournament registration and reporting requirements for Atlantic HMS. Atlantic HMS tournament registration is important for the management of swordfish, billfish, tunas, and sharks, because it characterizes a portion of the recreational fishing effort on these species, including location and targeted species. HMS tournament registration enables the collection of contact information for the operators of tournaments that target HMS so that NMFS may collect reports of fishing catch and effort following the event. The information allows NMFS, in the course of developing fishery management plans, to evaluate the social (i.e., effect of tournaments on number of HMS-permitted anglers, the number of individuals to whom HMS educational outreach materials are distributed, or the regulatory impacts on fishing culture of the communities in which HMS tournaments are held) and economic impact of tournament angling in relation to other types of HMS angling (i.e., commercial, non-tournament recreational), potential impacts on tournament operations, and the relative effect of tournament angling on populations of various regulated HMS. Further, registration by HMS tournament operators opens an avenue for NMFS educational outreach specific to HMS tournament fishing activities and participants.

HMS tournament reporting is necessary for the collection of catch and effort data to calculate total annual catch for stock assessments and to meet international reporting obligations, such as

those mandated under the Atlantic Tunas Convention Act for NMFS to report annually to the International Commission for the Conservation of Atlantic Tunas (ICCAT).

This request is also for revision, as changes have been made to the forms, as described in Question 2.

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 tournament registration and reporting procedures involve: (1) mandatory registration of Atlantic HMS tournaments; and, (2) for tournaments selected by NMFS, mandatory reporting of tournament results, including the documentation of all instances of landing an Atlantic HMS during a tournament. These processes are carried out as follows:

- (1) NMFS requires that the tournament operator (the person or entity responsible for maintaining records of participants and results) register the tournament, including the date, location, and target species of the tournament, at least four weeks prior to the commencement of the tournament.
- (2) The tournament operator collects the following data on all HMS encountered from all boats: whether the fish were kept, released, or lost; condition of the fish when released (alive or dead); and the weight and length of all boated fish. This information is already routinely collected during tournament operations, which makes the reporting burden solely one of transcribing existing information onto a single form, provided by NMFS. For reporting of tournament results, NMFS is submitting a form to be used for tournaments targeting any HMS, including sharks, tunas, billfish, and swordfish. The completed reporting form is to be returned to NMFS no later than 7 days after the conclusion of the tournament.

The information obtained from each tournament operator on the HMS Tournament Registration Form includes:

- a. The name, date(s), and location(s) of the tournament;
- b. The Director/Operator's name, address, phone number, fax number, e-mail address, and signature;
- c. Whether the tournament has operated in previous years, and the most recent year;
- d. Identification of HMS for which points or prizes will be awarded, and the option to list additional target species; and
- e. The option to request a specified number of HMS outreach materials.

NMFS uses this registration information to plan for the assignment of tournament observers to assist in catch/effort data compilation and to obtain biological data and samples from landed fish (length/weight, stomach contents, injuries, parasites, hard and soft tissue samples for age determination, genetic analysis, spawning condition, fecundity, etc.). The registration information also allows NMFS, in the course of developing fishery management plans, to evaluate potential impacts of FMP requirements (e.g., quotas, permitting, catch reporting, and gear requirements) on tournament operations. Additionally, NMFS is able to use the tournament

information for angler educational outreach efforts including distribution of written informational materials, notification of public hearings, and explanation of HMS regulations. The HMS Tunas General Category permit is a commercial permit, but permit holders may recreationally fish for other HMS only when participating in a registered HMS tournament; therefore, it is important for permit holder to be able to access a list of the registration status of tournaments. A list of tournaments registered with HMS (including tournament names, date(s), location(s), and target species) is posted on the internet from this information collection every week, assisting potential tournament anglers in determining participation in upcoming events.

The reporting information obtained from each tournament operator on the HMS Tournament Summary Report includes:

- a. The name, location, and fishing club affiliation (if applicable) of the tournament;
- b. The total number of registered boats and whether the tournament is catch and release only;
- c. The daily fishing effort, including dates and hours fished, and number of boats fishing each of those days;
- d. The recorder's name, phone number, and e-mail address;
- e. The numbers of fish kept and released and their disposition when released (alive or dead) for each HMS;
- f. The size (weight and length) of each of the fish kept; and
- g. The option (empty space) to report additional non-HMS that were kept or released in the tournament.

The information requested on the reporting forms is collected during normal tournament operations by the tournament operator to determine awards of points or prizes to tournament participants. Thus, the only additional time or cost burden is encountered during transcription of reporting information on to the HMS reporting form, photocopying or scanning, and mailing the form. As mentioned above, the information is used by NMFS to assess total annual tournament catch and the relative effect of tournament angling on regulated HMS.

Several adjustments and a few changes have been made to the forms. The HMS Tournament Registration Form has been rearranged in a way that is clearer and more appropriate, separating tournament and tournament operator information, but keeping the location of these sections consistent with the layout of the HMS Tournament Reporting Form. An option has been added to select blackfin tuna and list other species for which the tournament will award points or prizes. This change was added due to a request from the data collection team, who find a broader scope of target species to be beneficial in characterizing tournament catch and effort as a whole, including which tournament target species overlap with other (non-HMS) tournaments. It is noted on the form that registration is optional for these species, so this change is not expected to propagate any growth in the number of responses due to this information request. An option for the operator to receive confirmation via e-mail has also been added, which is expected to further reduce the printing and postage burden for the Federal government and illustrate (for decisions regarding future program alterations and regulatory communications) the number of tournament operators to whom e-mail communication is most effective. Lastly, a tournament regulations summary has been added to the second page of the form. This summary has been added to provide a brief, stand-alone reference to HMS tournament regulations on the whole, as well as provide a direct link to the HMS Tournament Reporting form.

In October 2010, a change request was submitted to OMB to add roundscale spearfish to the registration and reporting forms. This change was requested due to the addition of roundscale spearfish as a separate species from white marlin in HMS regulations. Because this addition is still new, and in some cases unknown, to tournament operators and anglers, a separate category has been added to the HMS Tournament Registration and HMS Tournament Summary Report forms that includes both white marlin and roundscale spearfish. This category is available for tournament operators to select/enter data if the tournament will/did not distinguish between these two species when recording their disposition. It is important to know if the data collected reflects the true number of white marlin and roundscale spearfish that were caught and/or landed, and making this option available is the first step toward correcting previously identified areas of inaccurate data. Further, instructional materials will be made available to tournament operators wishing to distinguish between these two species. A link to the informational materials is available on the tournament reporting form, and will be fully functional by October 2012 (POC Arietta Venizelos, SEFSC, Miami, FL).

The HMS Tournament Summary Report form in this renewal is a consolidation of the previous two forms: Billfish Summary Report and the HMS Summary Report. The previous forms were very similar in structure and content, but one included all HMS (i.e., billfishes, swordfish, tunas, and sharks) and the other included only billfishes and tunas. The two forms have been merged into one form to prevent confusion about reporting requirements among tournament operators. The forms have been simplified in two ways: (1) the requested data for each species (as a whole) have been narrowed down to include the number kept, released alive, and released dead, removing the number released with and without tags; and (2) the individual fish measurements have been removed from page 1 and are now requested in a separate table on page 2. Previous versions of the form have received criticism from tournament operators for being too confusing regarding individual vs. group measurements, and this change is intended to make the form more user-friendly by separating them into two tables.

A section has been added to the form that requests the exact fishing dates, times, and number of vessels. This information was requested in previous versions of the form, but in a format that was not as clear as it is in this modification. Further, an area in which other species data may be written has been included for the additional species that were listed on the HMS Tournament Registration form. Two submission addresses have been added to the instructions; one for tournaments held in the Gulf of Mexico and one for tournaments held in the Atlantic Ocean and Caribbean. These two addresses have been accurate during the lifespan of this data collection, but only one was printed on the form in previous versions. Correcting this error now will facilitate the most efficient data collection, as the single addressee will not be responsible for distributing forms to the additional addressee.

Finally, the instructions have been edited as appropriate to explain the sections.

The information that will be collected from HMS tournaments will be disseminated to the public or used to support publicly disseminated information. See responses to Questions 10 and 16 of this Supporting Statement for more information on data dissemination and use. NMFS will retain control over the personal information such as the tournament operator's name and address and safeguard it from improper access, modification, and destruction, consistent with legal standards and NOAA policy for confidentiality, privacy, and electronic information. See

response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

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

Tournament operators are required to register tournaments and to report tournament results on a NMFS form in order to standardize the data collected. Electronically-fillable (PDF) tournament registration and reporting forms are available for public printing from the HMS tournaments Web site at <http://www.nmfs.noaa.gov/sfa/hms/Tournaments/index.htm>. The forms are also available via e-mail, mail, or fax upon request. The completed registration form may be e-mailed, faxed, or mailed back to NMFS. Many tournament operators have chosen in recent years to scan and submit their completed tournament registration forms by e-mail. In the past year, this number has grown to include over half of the tournament operators that register with NMFS. NMFS continues to consider the possibility of making the tournament registration and reporting data systems available on the Internet for direct data entry by tournament operators.

NMFS provides access, through the HMS tournaments Web site linked above, to general tournament registration information (tournament name, date(s), city, state, & target species) as a service to publicize tournaments and to inform potential tournament anglers of upcoming events and their registration status.

4. Describe efforts to identify duplication.

This collection does not duplicate or overlap with any other collection of information. The list of registered HMS tournaments is searched prior to registration to avoid duplicate submissions. Mandatory reporting of recreational non-tournament Atlantic billfish and swordfish landings and recreational Atlantic bluefin tuna landings occurs under a separately approved collection (Atlantic Highly Migratory Species Recreational Landings Reports; OMB Control No. 0648-0328). Although these collections could document similar activities, NMFS is cognizant of possible duplication and actively makes efforts to avoid it. For example, tournament landings are exempt from the Atlantic billfish and swordfish recreational reporting requirement, and the non-tournament recreational reporting system requests that the angler indicate if he is reporting tournament catch, as a safeguard. In addition, two other separate approved information collections including the Large Pelagic Fishing Survey (LPS; OMB Control No. 0648-0380) and the Marine Recreational Information Program (MRIP; OMB Control No. 0648-0052) complement tournament registration and reporting. The LPS and MRIP include telephone surveys and dockside interviews with recreational anglers. These surveys actively identify and attempt to segregate tournament landings from other non-tournament recreational landings.

The Marine Recreational Information Program (MRIP) has used HMS tournament reporting forms for special projects, such as the 2009 report, *Evaluation of the Sampling Distribution of Tournament Versus non-Tournament Trips in the Large Pelagics Survey*, but do not select tournaments for reporting as a regular part of MRIP. MRIP data collectors coordinate with RBS

data collectors who share billfish catch reports to ensure that no tournament is selected twice during these projects.

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

Three options are available for submission of the HMS Tournament Registration and Reporting forms; FAX, mail, and e-mail. The options are available to minimize the burden of submitting forms to NMFS, assuming that the operator would select the least cumbersome of the choices, based on personal preference. The forms are available online or, if the internet is not available, via telephone request and FAX or postal mail. Based on the availability of these options, this information collection will not have a significant impact on small entities because both the registration and reporting requirements require minimal time and effort to complete.

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

If the collection of tournament information were not conducted, NMFS would have difficulty complying with international obligations, such as ICCAT landings limits and reporting requirements. NMFS must have tournament information to evaluate the relative impact of various types of angling on HMS. If NMFS is unable to obtain this information, then the agency would be unable to fully assess the costs, benefits and likely impacts of subsequent regulations and rules regarding either HMS or HMS tournament angling, as required by the Magnuson-Stevens Act. Also, fishing tournaments provide a unique opportunity for biologists to obtain an abundance of fishery information in a relatively short time period. It is both efficient and essential to gather this information, as it is already being collected by operators of HMS angling tournaments (catch and effort data, landings, etc.), so that it can be incorporated into the formulation of HMS fishery management policies. Likewise, fishing tournaments provide a unique opportunity for NMFS to distribute HMS educational and regulatory outreach materials to a large number of anglers. The frequency of this information collection directly coincides with the frequency of the tournament activities, making the most efficient and timely fisheries information available, and would therefore be inappropriate at different or less frequent times.

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

OMB guidelines state that an information collection should not require respondents to prepare a written response in fewer than thirty days after they receive the request. Since tournament operators are required to register at least four weeks in advance of the tournament, selection of tournaments for reporting (request for catch report) occurs shortly thereafter, and reporting is required within 7 days after the tournament has ended, this requirement should be met. In the event that an operator does not register with HMS at least four weeks prior to the start of the tournament, the written response may be requested with fewer than 30 days until it is due. The 7-day reporting time frame is due to international obligations of NMFS to monitor the catch of certain HMS species according to agreed-upon international quotas or agreed-upon reductions in landings, established to ensure the sustainability of such species.

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 soliciting public comment on this proposed collection of information was published on May 7, 2012 (77 FR 26743).

One comment was received, stating that HMS tournaments should be banned because HMS are overfished. The agency has not taken any action in response to this comment because this action is a renewal of a data collection requirement and it is not within the scope of this renewal to consider whether or not HMS tournaments may operate. That issue is more appropriately addressed in the context of fishery management measures. The information collected from HMS tournaments is important to the United States to meet international ICCAT reporting obligations and to aid in evaluating the biological, social, and economic impact of tournament angling, including the assessment of the fishing impact on and health of HMS stocks.

NMFS routinely consults with outside parties to obtain the public's view on the availability of fishery data, frequency of data collection, clarity of instructions and recordkeeping requests, disclosure of information, reporting format, and the data elements to be recorded, disclosed, or reported. These consultations occur in the context of HMS Advisory Panel meetings, public hearings, written correspondence, telephone conversations, and conversations with tournament anglers and tournament operators. Further, an HMS tournament operator survey (under the generic collection OMB Control No. 0648-0342) is currently being distributed to all tournament operators in 2012, the results of which will be analyzed at the end of the calendar year. This survey will collect the opinions of tournament operators, including which modes of transmission they prefer and what suggestions they have to improve the HMS tournament registration and reporting program. The survey has been composed, in part, to reduce the burden of future registration and reporting requirements on tournament operators/reporters.

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

No payment or gifts will be provided to respondents.

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

There is a Paperwork Reduction Act (PRA) statement, addressing confidentiality, printed on public notification materials, including the tournament registration and reporting forms. It is NOAA policy to preserve the confidentiality of information submitted under this reporting requirement, except that NMFS may release such information in aggregate or summary form, such that individual identifiers are not disclosed ([NAO 216-100](#)). Information such as the number of registered tournaments, the species that they targeted, and the states in which they occurred is provided in the annual Stock Assessment and Fishery Evaluation (SAFE) Report, in Fishery Management Plan (FMP) regulatory amendments, and in supporting documents made

available to the public upon request. A statement is included on the tournament registration form, informing operators that tournament information (tournament name, date(s), city, state, & target species) will be posted online at <http://www.nmfs.noaa.gov/sfa/hms/Tournaments> as a service to publicize tournaments and to inform potential tournament anglers of upcoming events that are in compliance with HMS regulations. All other information submitted under this reporting requirement remains confidential, or is released only in aggregate or summary form such that individual identifiers (e.g., tournament operator's name, phone number, postal address, and e-mail address) are not disclosed.

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, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private are included in this information collection.

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

Approximately 300 tournament operators are expected to respond to the tournament registration form. With this number of respondents, and an approximate response time of 2 minutes per tournament registration form, we expect a total of 10 burden hours.

Tournament Registration: 300 respondents x 2 minutes = 10 hours

Up to 300 tournaments may be selected for reporting. Since this information is collected as a regular part of tournament operations, the time for each response is calculated based on the time it should take to transcribe the data onto HMS tournament reporting forms. With this approximate response time of 20 minutes for each of the 300 respondents, we expect a total of 100 burden hours for tournament reporting.

Tournament Reporting: 300 respondents x 20 minutes = 100 hours

Total Burden for Registration *and* Reporting: 10 hours + 100 hours = 110 hours.

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).

The only costs associated with this collection would be for mailing or faxing the forms to NMFS. For registration, given an estimated 300 respondents and assuming that half will e-mail (\$0.01 for the cost of two sheets of paper printed to sign and scan), a quarter will mail (\$0.45 postage), and a quarter will fax (\$0.20/ minute × 1 minute) the registration forms, it is estimated that the total annual cost to the respondents for registration will be approximately \$51.

Mode of Submission	Number of Respondents	Cost (\$)	Total (\$)
E-mail	150	0.01	1.50 (2)
Mail	75	0.45	33.75 (34)
FAX	75	0.20	15
Total Cost of Registration			51

Similarly, for tournament reporting, given 300 respondents (rounding up) and assuming that half will e-mail (\$0.01 for the cost of two sheets of paper printed to sign and scan), a quarter will mail (\$0.45 postage), and a quarter will fax (\$0.20/ minute × 1 minute) the reporting forms, it is estimated that the total annual cost to the respondents for registration will be approximately \$51.

Mode of Submission	Number of Respondents	Cost (\$)	Total (\$)
E-mail	150	0.01	1.50 (2)
Mail	75	0.45	33.75(34)
FAX	75	0.20	15
Total Cost of Reporting			51

In summary, the total annual cost burden to the respondents associated with this collection is expected to be approximately \$102 (\$51 for registration + \$51 for reporting).

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

Costs for printing and supplying the forms are expected to be minimal. A blank HMS tournament registration form is mailed annually to operators who have previously registered tournaments, along with a reminder to register tournaments for the upcoming year. The registration form is also available on the Internet and may be downloaded by respondents. In addition, NMFS provides a FAXed or e-mailed copy to respondents upon request. The registration form could be photocopied by respondents as needed. No new equipment or overhead costs will be incurred by NMFS, because existing equipment and staff will be used to collect and enter the data.

Estimated average hourly wage of staff (\$22/hr) × [time to print and mail form (5 minutes) + time to collect and enter data from form (5 minutes)] = \$3.67/form
 Number of registration and reporting forms (600) × \$3.67/form = \$2,202.

For mailing the registration form to tournament operators who have previously registered tournaments, given 300 tournaments at \$0.45/postage, and \$0.01/two sheets of paper, it is estimated that the annual cost to the Federal government will be approximately \$138.00.

The Atlantic HMS Tournament Summary Report form is e-mailed (to approximately 150 respondents) and mailed (approximately 150 respondents) to tournaments that are selected for reporting and, given 150 tournaments at \$0.45/postage, and \$0.01/two sheets of paper, it is estimated that the annual cost to the Federal government will be approximately \$69.00.

The cost to the Federal government to mail registration and reporting forms to tournaments is expected to be approximately \$207.00 (\$138.00 + \$69.00). The total cost to the Federal government, including staff wages for time spent on tournament form distribution and collection, is therefore \$207 + \$2,202 = \$2,409.

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

The changes to the forms do not affect the burden estimates.

The adjustment of the annual cost burden from \$192 to \$102 is due to the decrease in the use of paper and postage associated with mailing forms and the increase in the use of more cost-effective internet technologies such as e-mail.

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

These data are not being collected for the purpose of publication in raw form. The aggregate information may be publicly distributed in scientific stock assessments for individual species, in the annually published Stock Assessment and Fishery Evaluation (SAFE) Report, in Fishery Management Plan (FMP) amendments, or on NMFS internet sites. This could include information on the aggregate number of registered tournaments, the number of tournaments by state, and total landings by species and state. As a result, tournament information should be considered as one component, among many, factoring into fishery policy and management decisions.

Tournament information (tournament name, date(s), city, state, & target species) is provided by NMFS to the public as a service to publicize tournaments and to inform potential tournament anglers of upcoming events and their registration (compliance) status with NMFS.

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.