

SUPPORTING STATEMENT
PROFILE OF SMALL-SCALE COMMERCIAL FISHERIES IN THE U.S. CARIBBEAN
OMB CONTROL NO. 0648-xxxx

A. JUSTIFICATION

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

This request is for a new information collection.

The National Marine Fisheries Service (NMFS) proposes to collect socio-economic data on small-scale fishermen operating in the U.S. Caribbean. The survey intends to collect information on demographics, fishing practices, costs and earnings (revenues, variable and fixed costs), capital investment, and attitudes and perceptions about the performance of selected management actions.

The data gathered will be used to describe U.S. Caribbean small-scale fleets, assess their economic performance, develop models to investigate the socio-economic impact of regulatory proposals, and examine fishermen's perceptions about the effectiveness of management measures, especially area and seasonal closures. The paucity of socio-economic data is a significant hurdle in evaluation of regulatory proposals in the region. The only continuous fishery data collection (i.e., local trip-tickets) mainly gathers landings and fishing effort data. Therefore, periodic socio-economic data collections are required to assemble current cultural, economic and social information. Up-to-date socio-economic data is needed to support the Agency's conservation and management goals, to strengthen and improve fishery management decision-making, and to satisfy legal mandates under the Reauthorization of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA), the [Regulatory Flexibility Act](#) (RFA), the [Endangered Species Act](#), and the [National Environmental Policy Act](#) (NEPA), [Executive Order 12866](#) (EO 12866), and other pertinent statutes.

The MSA mandates that conservation and management measures prevent over-fishing and obtain an optimum yield (OY) on a sustained basis. It also established new requirements to end and prevent overfishing with the use of annual catch limits (ACLs) and accountability measures (AMs). Moreover, MSA requires that conservation and management measures take into account the importance of fishery resources to fishing communities 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.

The need and the authorization to collect these socioeconomic data are found in the MSA, 16 U.S.C. 1801 *et seq.*, the RFA, 5 U.S.C. 601 *et seq.*, the NEPA, 42 U.S.C. 4372 *et seq.*, and EO 12866. The MSA states that the collection of reliable data is essential to the effective conservation, management, and scientific understanding of the fishery resources of the United States. The nation's fisheries should be "conserved and maintained so as to provide OYs on a continuing basis". Furthermore, eight of the ten National Standards under the MSA, which provide guidance to the regional fishery management councils, have implications for economic

analyses. For example, under section 303 (a) (9) of the MSA, a fishery management plan must include a Fishery Impact Statement (FIS), which assesses, specifies, and describes the likely effects of the conservation and management measures on participants in the fisheries being managed, fishing communities dependent on these fisheries, and participants in fisheries in adjacent areas.

Under the RFA, the Small Business Administration needs a determination of whether a proposed rule has a significant impact on a substantial number of small entities that are to be directly regulated. For RFA purposes, one of the criteria to determine significant economic impact involves an assessment of the change in short-term accounting profits for small entities. The NEPA requires a determination of whether Federal actions significantly affect the human environment. This requires a number of economic analyses including the impact on entities that are directly regulated and those that are indirectly affected. Lastly, EO 12866 mandates an economic analysis of the benefits and costs to society of each regulatory alternative considered by the fishery management councils, and a determination of whether the rule is significant.

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.

One-time, voluntary surveys will be used to collect information on costs and earnings of small-scale fishing operations and on fishermen's perceptions about the effectiveness of regulations in Puerto Rico and the U.S. Virgin Islands. The interviews will be mainly conducted in-person; however, some interviews may be conducted over the telephone as needed to minimize any burden on the fishermen. Ms. Flavia Tonioli from the University of Miami's Cooperative Institute for Marine and Atmospheric Studies (UM-CIMAS) has been hired to conduct these interviews, create a database, and assist in the analysis of the data. NMFS staff will provide names, addresses, and phone numbers from a stratified random sample of commercial fishermen. We estimate that 971 surveys will be conducted.

The data collected in combination with existing trip ticket data will be used for descriptive and analytical purposes. The data collected will be used to describe U.S. Caribbean small-scale fleets, assess their economic performance, develop models to investigate the socio-economic impact of regulatory proposals, and examine fishermen's views about the effectiveness of management measures, especially area and seasonal closures. This information is required for the development of amendments to U.S. Caribbean fishery management plans.

Two separate survey instruments have been developed. The first instrument will collect information on costs and earnings and the second instrument will collect information on fishermen's perceptions about the effectiveness of regulations. The instruments have been translated into Spanish to minimize the burden on non-English speaking respondents.

We intend to draw two separate samples for each survey instrument. Hence, it is likely that some respondents may be selected to complete both surveys, particularly in the U.S. Virgin

Islands, which has a smaller population. If a respondent is selected to answer both surveys, then we plan to interview him/her with at least a one-month interval to minimize any burden.

The costs and earnings survey form has the following sections: 1) demographic background, 2) fishing practices and capital investment in vessels and fishing equipment. 3) trip earnings and costs, and 4) fixed costs.

The ‘demographic information’ section elicits information about fisherman’s demographic characteristics. It elicits information about the fisherman’s age, marital status, number of dependents, participation level (i.e., full-time vs. part-time), percentage income derived from fishing and non-fishing activities, and level of satisfaction with their occupation. This section provides valuable data to contextualize the demographic background of the fishermen.

The ‘fishing practices and capital investment’ section inquires about the average number of trips taken per week, main characteristics of the primary fishing vessel and fishing gears used (including market value) and annual expenditures devoted to the repair and maintenance of the primary fishing vessel and gear. The information collected in this section will be used to estimate the opportunity cost of capital and economic depreciation.

The ‘earnings and variable costs’ section solicits information about trip level revenues and costs. Variable costs vary with the level of harvesting activity. Variable costs are broken into operating expenses (i.e., fuel and oil, bait, ice, food, and supplies) and into labor expenses. Generally, crew remuneration is paid as a share of the trip’s net revenue. The ‘fixed costs’ section inquires about those costs that fishermen incur regardless whether the vessel operates or stays idle. They are independent of the level of fishing activity. Fixed costs include mooring fees, hull, engine, and fishing gear maintenance and repair expenses, fishing permit and vessel registration fees, vessel and gear mortgage payments, and insurance payments. The information collected in these two last sections is necessary for the development of economic models to estimate profits levels.

The regulatory performance perceptions survey form has the following sections: 1) demographic background, and 2) perceptions about the efficacy of federal area closures, 3) perceptions about the efficacy of federal seasonal closures, and 4) perceptions about the efficacy of territorial area closures.

The ‘demographic information’ section elicits information about fisherman’s demographic characteristics. It elicits information about the fisherman’s age, marital status, number of dependents, participation level (i.e., full-time vs. part-time), percentage income derived from fishing and non-fishing activities, and level of satisfaction with their occupation. This section provides valuable data to contextualize the demographic background of the fishermen. The remaining three perception sections inquire about the perceived biological and socio-economic performance of federal and territorial area and seasonal closures. It also inquires about ways to improve to the efficacy of this fishery management tool.

The information sought will be of practical use since NMFS social scientists will utilize for descriptive and analytical purposes. In addition, the information collected will be used for the

development of amendments to fishery management plans. The survey will collect demographic, economic and social information, which otherwise would be unavailable.

The information collected will be disseminated to the public and used to support publicly disseminated information. NOAA Fisheries Service 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. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subject 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.

The data needed will be primarily collected using in-person interviews (or telephone interviews in cases where it is easier for respondents) because they are more versatile and less burdensome than mail surveys. We do not anticipate using online questionnaires because of the limited access to internet in some parts of the U.S. Caribbean. In addition, in-person interviews may be preferable because many of the answers do not lend themselves to simple ‘yes/no’ answers and because of the presence of open-ended questions, which are burdensome to complete in written form (inadvertently leading to higher non-response rates). Moreover, in-person surveys allow the interviewer to explore the logic and/or reasoning behind the ranking of ‘Lickert scale’ answers.

The contractor does not anticipate using laptops or other electronic devices to record the answers since some of the questions are open ended. Typing verbatim could extend the length of the interview, which would further burden the interviewees and result in incomplete surveys.

The data collected will not be available to the public over the internet given its confidential nature. However, a report summarizing the salient, aggregated results will be available online once the data collection and analysis is completed.

4. Describe efforts to identify duplication.

We contacted the Caribbean Fishery Management Council (CFMC), the U.S. Virgin Islands Division of Fish and Wildlife (DFW) and Puerto Rico’s Department of Natural and Environmental Resources (DNER) to inform them about our intention to collect socio-economic data and to inquire about other on-going or prospective data collections in the area. These agencies noted that they were not planning nor they were aware of any current or planned data collections that targeted commercial fishermen.

However, the DFW noted that they were aware of two upcoming data collections that focused on recreational fishermen (i.e., shore-based and boat-based recreational fishing studies) on the island of St. Croix, U.S. Virgin Islands. Since these studies will be interviewing recreational fishermen, we do not expect any duplication. Nevertheless, we contacted both Principal

Investigators (PIs), (Dr. Theresa Goedeke from the National Ocean Service and Dr. James Berkson from NMFS), to discuss mechanisms to better coordinate our research efforts in the area. We agreed that to minimize the burden on the inhabitants of St. Croix, we would start our proposed data collection in Puerto Rico and then move it to the U.S. Virgin Islands.

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

Most commercial fishing operations in the U.S. Caribbean are owner or family-operated small businesses.¹ We have taken several steps to minimize the burden on these small businesses. First, we designed the survey instrument so that only the minimum data requirements for present and future management needs are collected. Surveys will be available in English and Spanish to reduce any burden to non-English speaking fishermen. Second, responses to the in-person survey will be voluntary. Fishermen who do not wish to participate in the interviews, can choose not to partake. Third, the interviews will be conducted at times and places that are convenient to fishermen. This will minimize any potential disruption to their fishing practices. Last, the wording of the surveys will be modified slightly to account for regional differences.

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

If the proposed information were not collected (or collected less frequently), then NOAA and the CFMC would not be able to adequately satisfy the legal requirements put forth by the MSA, NEPA, and EO 12898. These mandates require regional fishery management councils to establish conservation and management measures, which take into account the importance of fishery resources to fishing communities in order to provide sustained fishing community participation and to minimize, to the extent possible, adverse economic impacts on such communities. Furthermore, these requirements also mandate that regional fishery management councils to establish conservation and management measures using the best available information.

The absence of up-to-date socio-economic information would limit the Agency's ability to estimate the economic impacts of management proposals and examine the performance of existing regulations. Hence, the merits of management proposals would continue to be debated without sound information. In addition, the availability of current information would minimize the likelihood of unforeseen impacts of existing regulations and court challenges on the grounds of deficient analysis. Last, the collection of detailed socioeconomic data will allow fishery managers to make timely and better-informed decisions by having the best scientific information available.

¹ Barbara L. Kojis y Norman J. Quinn, *Census of the Marine Commercial Fishers of the U.S. Virgin Islands*, 2011.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on Thursday, November 15, 2012 (77 FR 68104-68105) solicited public comments. We received no public comments.

We consulted with CFMC, DNER and DFW staff about the availability of socio-economic 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. Staff from these agencies indicated that their agencies lacked up-to-date, detailed socio-economic data on the economics of small-scale fleets and perceptions about management effectiveness. Secondly, they stated that the proposed data collection would help fill a void in their knowledge of these fisheries. Thirdly, they stated that the data collection was timely because last costs and earnings data collection took place over 4 years ago. These agencies also offered several suggestions to improve the wording of the questions and proposed minor changes to the data elements (i.e., variables) to be collected. Lastly, staff also suggested placing the technical report online to make the findings widely available.

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

No payments 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.

As stated on the survey instruments, information provided will be considered private and will be treated as confidential in accordance with [NOAA Administrative Order 216-100](#), Confidential Fisheries Statistics and section 402(b) of the MSA (16 U.S.C. 1881, *et seq.*).

In addition, NMFS' data confidentiality policy does not allow its employees to release confidential data, other than in aggregate form, as the MSA protects (in perpetuity) the confidentiality of those who submitted data. Whenever data are requested, the Agency will ensure that information identifying the pecuniary business activity of a particular individual is

not identified. Only group averages or group totals will be presented in any reports, publications, or oral presentations of the study's results.

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 inquire about sexual behavior and attitudes, religious beliefs, or other similar matters of a personal and sensitive nature.

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

We estimated that the number of respondents will be 973, possibly with some duplication for the two surveys (see Part B, Question 1 for sample sizes; we estimate an 80% response rate) and the time per response will be about 1 hour. Hence, we are requesting 973 burden hours. The one hour per response burden includes the time for reading the instructions, reviewing the questions, and completing the survey instrument. This estimate is based on the type of questions asked, length of the survey instrument, and contractor's experience conducting similar surveys.

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 financial cost to the public to participate in this study.

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

We anticipate that the contractor's cost for the data collection and analysis will be \$210,000. This cost covers the expenditures related to the following activities: development of survey instrument, training interviewers, printing of forms, travel, data collection and processing, data entry and quality control, and report writing. In addition to the above contractor expenses, federal costs include NMFS staff time. The NMFS staff will be responsible for developing and administering the contract, collaborating with the development of the survey, monitoring performance and reviewing final report. We estimate that the cost NFMS supervision will be approximately \$10,000/year. Thus, the total annualized (for one year) cost to the federal government would be \$220,000.

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

The program change is for the collection of new socioeconomic data.

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

We anticipate completing the data collection in Puerto Rico by the end of 2013 and in the U.S. Virgin Islands by mid to late 2014. We expect to complete the analysis of the Puerto Rico data

by May 2014 and of the U.S. Virgin Islands data by October 2014. We plan to publish two technical reports describing the salient results of these studies. These reports should be available online by January 2015.

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.

The OMB control number and expiration date will be displayed.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.