

**SUPPORTING STATEMENT  
PROCESSED PRODUCTS FAMILY OF FORMS  
OMB CONTROL NO. 0648-0018**

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.**

The census of seafood processors is based on known firms that responded in previous years with the addition of newly established firms identified by local port agents, research in industry publications and outreach. Agency personnel review local trade directories and state licensing agencies to develop potential new contacts. New firms are provided a NOAA Form 88-13 survey form and instructions for completing the survey. Lists of firms that are reported to have ceased operation are reviewed to establish certainty that a new company has not opened up in the same location. There have been cases in which a firm ceased operation for a year due to raw supply sourcing only to reopen in a subsequent year. In recent years, no new firms have entered into the fish meal and oil processing sectors, so no additional 88-13c Forms have been required.

For the 2011 sampling year, the response rate to mailed annual survey forms was approximately 57%. However, over 200 companies were added to the survey that year and this estimate includes only companies that supplied figures for quantity and value and does not reflect businesses that did not process that year, went out of business, changed business type or did not fulfill the definition of processor for the purposes of this survey. In 2010, before the addition of new businesses, the response rate was 69% (not including businesses that went out of business or did not process that year). The response rate can be affected by high turnover in the processing sector. We rely on the local port agents to keep us current on what businesses are closed and when new businesses start up. For large-scale operations our response rate should be quite high (80-90 percent). For the very small mom and pop operations it is probably less.

There is complete compliance with the 88-13c form since all entities within the meal and oil processing group are known.

**2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

No statistical stratification is employed in the census.

The seasonality (four-five months) of the fisheries supporting the processing of meal and oil (NOAA Form 88-13c) precludes reducing the reporting time frame to less than monthly.

Companies reduce employment at season closure to primary maintenance needs. If the reporting time frame was reduced to an annual submission, a loss of data for the season would jeopardize the statistics and the ability to publish quarterly meal and oil reports.

**3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.**

Approximately 50 percent of the survey forms are returned within the first three months of the initial mailing conducted in early December. A second mailing to non-respondents is conducted in late February with follow-up calls initiated within two weeks to provide plant managers the option of providing the information over the phone or to ascertain if there is a problem. In many cases the plant may not have been operational due to the seasonality of a fishery.

Federally permitted dealers in the Northeast Region are required to submit a completed survey. See response to Part A, Question 1 of this Supporting Statement for more information on reporting requirements. The regional permit office notifies a firm that fails to respond, that their permit renewal will be held in abeyance or, if necessary, an existing permit may be revoked until a form 88-13 is completed.

Many of the processing facilities have a long-standing relationship with local NMFS port agents conducting the survey. When necessary, local NMFS port agents may visit the plant to review a respondents' completed survey or to assist in completing the survey.

NMFS port agents work closely with national, regional, and state industry trade associations. Periodically, port agents hold discussions with industry leaders to describe the necessity of their members to provide the information. Port agents also meet with industry members at both local and national trade shows to review new types of products that are being developed for inclusion in the survey.

In cases where we still receive no response, we ask our port agents to confirm whether or not the business is still in operation. If the business is in operation and we have no information provided, we impute/estimate the production for that business using the most recent data from that processor.

However, although we expect a 69% response rate overall, because more emphasis is placed on obtaining responses from the larger processors and their activity accounts for most of the overall activity, we do not anticipate non-response bias to be a major issue. The response rate is driven down by the fluidity of the small "mom and pop" businesses. These are the ones where it is hardest to collect data but fortunately their overall contribution to the processing sector, while important, is small.

**4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.**

The census has been conducted in the same manner for the past twenty years. No test has been conducted recently.

**5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Regional agency personnel and port agents conduct the census.

The main NMFS regional contacts are below:

Northeast Region – Victor Vecchio	(631) 324-3569
Southeast Region – Lawrence Beerkircher	(305) 361-4290 x290
Gulf Region – Pamela Brown-Eyo	(305) 361-4565 x565
Southwest Region – Craig D’Angelo	(562) 980-4024
Northwest Region – Carol Barstow (Pacific States Marine Fisheries Commission)	(503) 595-3455
Pacific Islands Region – Walter Ikehara	(808) 944-2275

Personnel at headquarters conduct tabulations of the data:

Office of Science and Technology – Melissa Yencho	(301) 427-8193
Office of Science and Technology - Alan Lowther	(301) 427-8154