

**SUPPORTING STATEMENT
COMMERCIAL FISHERIES SEAFOOD PROCESSING SURVEY
OMB CONTROL NO. 0648-0018**

A. JUSTIFICATION

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

This request is for a revision to a current information collection.

NOAA Form 88-13 (under OMB Control No. 0648-0018) is used to collect annual information annually on seafood and industrial fishery processing plants. These data are required by the Secretary of Commerce in carrying out provisions of the Magnuson-Stevens Fishery Conservation and Management Act (Section 101-627 of 16 U.S.C. 1801). Each Fishery Management Plan established under the Magnuson-Stevens Act must determine the estimated capacity by United States seafood processors for the managed fishery. Data from this survey are used in economic analyses to estimate the capacity and extent to which U.S. fish processors, on an annual basis, will process that portion of the optimum yield harvested by domestic fishing vessels. Employment data are used in socioeconomic analyses for determining the potential impacts on processing employment, due in part to management measures (16 U.S.C. Section 303(a)(4)(C)).

The current form gathers information on production and revenue from seafood fishery processors. This request is for a one-time add-on to NOAA Form 88-13. Currently Form 88-13 requests information about revenue from seafood products and the add-on requests information on product costs. The data collected will be used to update regional fishery economic models. The information collection is necessary in that it has been more than two decades since the model to produce commercial fishery economic impacts and value added for commercial marine products has been updated.

2. 1Explain how, by whom, how frequently, and for what purpose the information will be used. 1If 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 add-on requests information on fishery quantity and costs by species name. The respondent will have to list all species, the quantity that was not paid for, the quantity that was paid for and the cost for that species. The add-on also requests information on the revenue received for custom processing of fish owned by another processor, the revenue from offloading fees. This information is needed to estimate the mark-up value for each of the species processed at the facility. The mark-up value is estimated as the difference between the revenue from the sale of species (collected from NOAA Form 88-13 under OMB Control No. 0648-0018) and the amount paid for these species (requested information from add-on survey).

The data from the add-on survey on costs will be used to update the model that produces various economic analyses. These economic analyses include the Value Added for Commercial Marine Products published in Fisheries of the United States, commercial fishing economic impacts

published in Fisheries Economics of the United States and in regional impact models to support Fishery Management Plans. Section 303 of 16 U.S.C 1853 requires Fishery Management Plans to assess and specify the capacity and extent to which United States fish processors, on an annual basis, will process that portion of such optimum yield that will be harvested by fishing vessels of the United States. Fishery Management Plans are also required to estimate the processing capacity utilized by fish processors. Plans are also required to include a fishery impact statement which assesses, specifies and analyzes the likely effects of management measures for the participants in the fisheries and fishing communities affected by the plan or amendment.

The data collected currently under NOAA Form 88-13 are used by NOAA Fisheries and Regional Council economists to complete the analyses on estimating processing capacity and measuring economic impacts of fishery management regulations, required by the Magnuson-Stevens Act to support Fishery Management Plans or Amendments. Employment data will be analyzed to determine the seasonality of specific fisheries.

NOAA Form 88-13c is used to collect monthly production of fish meal and oil. These data are needed by the Department of Commerce to report market and supply conditions and are used by the industry to procure sufficient inputs to produce such products as animal feeds, paint, and lubricants (13 U.S.C. 61 et seq.). There is no change to this information collection as part of this revision.

The information collected will be disseminated to the public or used to support publicly disseminated information. NOAA Fisheries 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 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.

The data will be collected via a voluntary mail survey, and thus the use of automated, electronic, mechanical or other technological techniques is minimal. The Survey of Fishery Processors (OMB Control No. 0648-0018) provides each processor with a unique pre-printed form that includes the products produced in the previous year. On this form, respondents only need to fill in quantities and value, and any new products. The add-on for this information collection does not use any additional automated technology, with the exception of a mail merge to create personalized cover letters and mailing labels. The cover letter will involve the merging of the sampling database with prepared cover letters to create a personalized introduction to the survey.

4. Describe efforts to identify duplication.

Currently under OMB Control No. 0648-0018, federally licensed processors are contacted. This add-on augments that survey frame and includes participants in NOAA Fisheries' Seafood Inspection Program, state licensed dealers and processors compiled by the Atlantic Cooperative

Coastal Cooperative Statistics Program, and those who applied for first receiver site licenses from the Pacific States Marine Fisheries Commission. All of these sources were combined to form the frame for this add-on survey. The final frame was examined to remove duplicate entries, those entries with the same owner name for multiple locations or the same business name for multiple locations. Also duplicates from the multiple sources were removed as well.

Processors and dealers in the State of Alaska will be exempted from this survey because the State of Alaska collects this information in a separate information collection; therefore, this survey excludes those processors to reduce burden. Also, all participants of the West Coast Groundfish Trawl Fishery must complete an annual Economic Data Collection form (OMB Control No. 0648-0618) as noted in regulation 50 CFR 660.114. The data in this information collection are similar to those collected under OMB Control No. 0648-0618 and as a result, the processors in the West Coast Groundfish Trawl Fishery will be excluded as well to avoid duplication.

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

The vast majority of the respondents are considered small businesses; separate requirements based on size of business have not been developed. Only the minimal data are requested. Furthermore, this survey will be conducted as an add-on to an existing survey. The reasoning behind this approach is to minimize burden to the respondents. Respondents already are sent NOAA Form 88-13 annually and this survey requires a few additional questions. In order to minimize the burden to respondents, the surveys are being sent jointly.

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

This is a one-time add-on survey. The regional economic models that produce estimates of impacts from regulatory decisions have not been updated in more than two decades. The information collection will update the model that produces national and regional commercial fishery impacts. If the survey is not conducted, the data necessary to complete our regulatory requirements will be severely out of date.

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

The collection will be conducted in a manner 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 November 7, 2013 (78 FR 66899) solicited public comment.

An e-mail was received from Shannon Davis of The Research Group, LLC. He requested further information about the sampling frame and sampling procedure. The frame was not available at that time, but we agreed to send him the frame at a later date. Once the frame was available, we sent him an electronic copy.

Paul MacGregor, representing the At-sea Seafood processing sector in Alaska, phoned and e-mailed about the survey and proposed information collection. He requested a copy of the survey, which was not available at the time; however, we sent him a copy of the survey used for the West Coast Groundfish Economic Data Collection Program, OMB 0648-0618. The West Coast Groundfish First Receiver and Shore-based Processor survey form was the basis for this information collection. Once a draft survey for this information collection was completed, a copy was sent to Mr. MacGregor on 12/18/2013.

No further comments were received.

We attended Seafood Expo North America in March 2014 to meet with members of the seafood processing industry to elicit their comments on the draft survey. The constituents (three from Alaska and one from Virginia) provided valuable input on the survey and sampling procedure; these comments were incorporated into the final draft survey.

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

No payments or gifts are made.

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, the data collected will be kept confidential as required by section 402(b) of the Magnuson-Stevens and NOAA Administrative Order 216-100, Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form without identification as to its source. Respondents are assured on the survey form of confidentiality and that their responses will not be tied to them individually; data will be aggregated.

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.

Not Applicable.

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

Under the current OMB 0648-0018, the number of responses and burden hours are 963 and 455 respectively. The proposed collection will require approximately 587 burden hours (1,174 estimated respondents, and responses, at 30 minutes per response). New total responses and hours for the first year (in which the add-on survey is conducted) are 2,137 responses and 1,042 hours (see Table 1). **Annualizing the add-on survey responses and hours to 391 and 196,**

brings the new annualized responses and burden to 1,354 and 651.

Table 1. Calculation of reporting burden hours.

Form	No. entities	Items/Entities	Tot no. of responses	Response time	Tot. hours
NOAA Form 88-13	855	1	855	30 minutes	427.5 (428)
NOAA Form 88-13c	9	12	108	15 minutes	27
Add-on	1,174	1	1,174	30 minutes	587
Total	2,038		2,137		1,042

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

There are no start-up, capital, or maintenance costs associated with this collection. No new or specialized equipment is needed to respond to this collection. The forms are provided with postage-paid envelopes.

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

The estimated cost to the government is \$14,568 (Table 2). Staff (port agents) will contact the potential respondents.

Table 2. Estimated cost to the Federal government.

	Quantity	Unit cost	Subtotal
Forms	2,319	0.05	116
Postage	2,319	0.85	1,971
Hours			
Staff Support	220	20.50	4,510
Ayeisha Brinson	160	49.82	7,971
	Total		14,568

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

This one-time survey adds questions about fishery quantity and costs by species name. One-time addition of responses and hours: 1,174 and 587, annualized to 391 and 196.

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

All results will be entered in a database using standard QA/QC procedures in survey research. Economists from NOAA Fisheries will analyze the data using standard software (e.g. SAS) and standard statistical procedures that are appropriate for survey data. Results from this collection

may be used in scientific, management, technical or general informational publications, and would follow prescribed statistical tabulations and summary table formats. Data will be available to the general public on request in summary form only.

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.