

SUPPORTING STATEMENT
GULF OF ALASKA TRAWL GROUND FISH FISHERY RATIONALIZATION SOCIAL
STUDY – CATCHER PROCESSOR SOCIO-CULTURAL SURVEY
OMB CONTROL NO. 0648-XXXX

A. JUSTIFICATION

The Alaska Fisheries Science Center (AFSC) is requesting approval for a new collection of information on social and cultural impacts to members of the fishing industry who will be involved in a new rationalization program for the Gulf of Alaska trawl groundfish fishery.

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

The North Pacific Fishery Management Council (NPFMC), formed under the authority of the [Magnuson Stevens Fisheries Conservation and Management Act](#) (reauthorized 2007) (MSA) P.I. 109-479, sec. 302.f, has been debating designs of a new rationalization program for the Gulf of Alaska (GOA) trawl groundfish fishery. The expected changes in how these fisheries are managed will result in substantial changes to the people participating in the fishery.

There have been many studies of the impacts that catch share programs have on fishing communities and fishermen (Ecotrust 2004, Lowe and Carothers 2008, McCay 1995, NRC 1999, Palsson and Petursdottir 2006). These studies have shown that there is a high likelihood that fishermen, processors, and other industry participants will experience socio-cultural effects as a result of the implementation of a catch share program. The extent to which these effects percolate throughout a given fishery depend on the fundamental social characteristics of that fishery's participants. Documentation of the social characteristics of fishery participants prior to the implementation of a management change can ultimately be compared to similar studies post-management change in order to explicitly link social changes to changes in the management system. Thus, social data collection efforts both pre- and post-management change are fundamental to any future retrospective analysis focused on the social changes that may have been caused by the management change.

The proposed research will build on a recent data collection conducted by the National Oceanic and Atmospheric Administration's (NOAA) Alaska Fisheries Science Center (AFSC) that collected baseline social data from GOA trawl groundfish fishery participants (OMB Control No. 0648-0685). In this previous study, the research team attempted to interview all relevant participants in the fishery, from vessel owners and crew to fisheries support service business owners. However, during survey implementation, the team discovered that the catcher processor (C/P) fleet was fundamentally different than the rest of the harvesting sector participants, thus requiring revision of the survey instrument in order to capture the unique aspects of the C/P fleet.

Given that the C/P fleet participating in the GOA trawl groundfish fishery also regularly participates in other GOA and Bering Sea and Aleutian Islands (BSAI) commercial fisheries, the proposed C/P social survey will provide information that is relevant to multiple fisheries managed by the NPFMC. The survey will provide a significant amount of information about the fundamental social characteristics of the fleet that has not been previously collected. Ultimately, the data collected will be applicable to multiple fisheries and will be available to inform future

management decisions. In addition, a second data collection will be proposed for implementation on a regular basis after the NPFMC finalizes and implements a catch share program in the GOA trawl fishery in order to test the effect of the program on fishery participants, including those in the C/P fleet.

The proposed research is necessary to fulfill the requirements laid out in a number of federal laws in which the fisheries participants may be affected by management changes. The proposed survey, in combination with the social baseline data collected in 2014 from other participants in the GOA trawl fishery, will support legal requirements for the consideration of impacts of any proposed management change on relevant fishing communities and their residents and the importance of the GOA trawl fishery to fishing communities overall. The following descriptions review each applicable federal law and their requirement for considering the potential impacts of fisheries management changes such as those being developed for the GOA trawl fishery.

MSA

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 (See attachment A).

- 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)].

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 must be utilized to gather information related to this executive order.

Regulatory Flexibility Act

The Regulatory Flexibility 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)].

2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 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.

For current regulatory action and in the event of future regulatory action, the information may be utilized by the National Marine Fisheries Service (NMFS) to meet the legal requirements described above in Question 1. The NPFMC will also have access to the results of the research for use in their capacity as fisheries managers to develop management changes that may affect GOA trawl participants. Furthermore, the results of the proposed research will be useful in the assessment of changes that have occurred in this fishery over time. The intent is to be able to link significant social changes in the fishery to specific management actions as well as to provide answers to specific questions about the social characteristics of the fleet with which fisheries managers may be struggling (e.g., age structure of fishermen, whether fishermen are involved in other fisheries, the extent to which the fleet is connected to shoreside support businesses). The information will also be made available to the public to better understand the social characteristics of the fishery participants and support future research efforts. It is currently unknown as to the expected frequency of use of these data as these types of studies are very rare but because of this should have very high utility to fishery managers and the public.

The proposed data collection consists of survey instruments that were modified from the baseline social data collection instrument used with GOA trawl groundfish fishery participants (OMB Control No. 0648-0685). There are 3 versions of the survey instrument, which are pertinent to respondents in different roles within the fishery. The three versions are: company managers, shipboard management and deck crew, and factory crew and combis¹. The sections for each survey version are described in further detail below.

1) Company managers

From the global company standpoint: Data from this section is intended to provide a better understanding of how companies make, and have historically made, decisions about how engaged to be in this fishery as compared to other fisheries in which they could operate. This section will provide the individual company perspective of why they pursue specific opportunities in fisheries. Information obtained will allow for the understanding of various fisheries that companies are involved in, and the importance of each to the businesses.

Human resources: These data aim to provide a better description of how individual companies operate in terms of overall number of employees, structure of employee pay, and recruitment of employees.

Sales and marketing: Data gathered will help fisheries managers understand the flow of commercial catch from the fisherman to the consumer, and how and where companies market and distribute their product. The measure of these characteristics both pre- and post-management change will create the opportunity to better understand the impact the catch shares program has on the processing sector.

¹ Combis are defined as shipboard crew that work both in the processing factory and on deck in a harvesting capacity.

Fleet management: Data in this section will provide insight into the relationships between participants in the fishery. Questions aim to identify clear components of the fishery, such as important business suppliers and organizations that may be critical to the functioning of the fishery. Changes in the characteristics of the fishery as a result of the management change may alter the connections and relationships in the fishery (McCay 1995, Dunham et al 2013). Data in this section will serve multiple purposes, including insight into the connection among participants and communities as well as the ability to measure social change in the system. This analysis will enable us to estimate the strength and stability of connections between communities to understand how changes in fisheries management indirectly filter through the network. We believe that the severity of impact on a community from fisheries management changes may be partly determined in part by the resilience of community networks. Therefore, the social network analysis work that will be conducted as a result of the questions in this section will be useful to estimate the impacts of policy decisions on participants as well as how these impacts affect their extended networks.

2) Shipboard management and deck crew

Demographic Information: These data aim to obtain a description of individuals that manage the C/P vessels in this fishery (e.g., skippers, head engineers, processing factory managers) and the crew that work in a harvesting capacity on deck. The information collected in this section is comparable to information gathered by the U.S. Census, but on a finer scale. It will provide a more accurate description of the people within that population than has previously been known because this information is not reported specifically for fishermen in the U.S. Census, in which fishermen are grouped with farming and forestry occupations thus making it impossible to describe the demographics of a community related to fishing from U.S. Census data alone. The information collected in this section will help us better understand the individuals and communities that are specifically involved in this fishery.

Your fishing history: Data from this section increases our knowledge of the unique characteristics of the people in the industry beyond demographic information. Data gathered includes individual historical participation in the fishery, an understanding of family participation in the fishery, the roles individuals play in the fishery, and pathways into the industry. Many of these areas may be affected by the management change and may result in social impacts to individuals. The collection of these data will contribute to the identification of these impacts on a person by person basis.

Your work on a catcher-processor: This section will gather data about the employment characteristics of people in this sector of the fishery. Specific data that will be gathered includes whether they engage in other employment, how many years they have been employed in the sector and how much they have moved between jobs within the sector. Additionally, this section will pose questions to participants about their job satisfaction and perceived upward mobility within the sector.

3) Factory crew and combis

Demographic Information: These data aim to obtain a description of the population of factory crew and combis that work in this fishery. The information collected in this section is comparable to information gathered by the U.S. Census, but on a finer scale. It will provide a

more accurate description of the people within that population than has previously been known because this information is not reported specifically for fishermen in the U.S. Census, in which fishermen are grouped with farming and forestry occupations thus making it impossible to describe the demographics of a community related to fishing from U.S. Census data alone. The information collected in this section will help us better understand the individuals and communities that are specifically involved in this fishery. *Note: Question 10 on this version of the survey asks whether the respondent is a U.S. citizen. This question is not expected to deter respondents from participating in the survey or answering any of the questions. Industry representatives (from the parent companies) have indicated that all of these processing workers have a legal work permit. This question is attempting to get at the distribution of how many of these workers are U.S. citizen's compared to those that are here in another legal status.*

Your fishing and processing history: Data from this section increases our knowledge of the unique characteristics of the people in the industry beyond demographic information. Data gathered includes individual historical participation in the fishery, an understanding of family participation in the fishery, the roles individuals play in the fishery, and pathways into the industry. Many of these areas may be affected by the management change and may result in social impacts to individuals. The collection of these data will contribute to the identification of these impacts on a person by person basis.

Your work on a catcher-processor: This section will gather data about the employment characteristics of people in this sector of the fishery. Specific data that will be gathered includes how they may engage in other employment in addition to their employment in this sector as well as how many years they have been employed in the sector and how much they moved between jobs within the sector. Additionally, this section will pose questions to participants about their job satisfaction and perceived upward mobility within the sector.

The combination of data obtained through the use of these three survey instruments will generate an extensive description of the GOA trawl fishery and all other fisheries that the C/P vessels participate in. The description will include the perspectives of various aspects of the industry from company managers to shipboard managers and factory crew. This research will not only inform the development of the catch share program, but will also provide information that supports legal requirements about fishing communities, social impact assessments, and areas of research. This research will also increase the utility and quality of other secondary research, completed and ongoing, by providing more accurate primary data to support secondary data collection efforts.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NOAA AFSC Economics and Social Science Research Program 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 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 three survey versions will be available in hard copy, online or over the phone in order to increase the ability of respondents to participate. However, the primary mode of survey implementation will be done using a hard copy of the survey. Where possible, hard copy surveys will primarily be completed in-person. The survey can thus be completed in the presence of the researcher to facilitate the answering of any questions, the clarification of data being collected, and support any concerns of the research participant. In addition to administering the survey in-person, the researcher can then conduct a brief unstructured or semi-structured interview to collect any other pertinent data from the survey participant. In-person surveys are most likely to occur with individuals targeted for the *Company Manager* survey given that they are located in offices based in Seattle (where the research team is based); however, where an in-person survey is not possible, the survey will be made available as a hard copy, an online survey or a telephone survey.

Respondents targeted for the *Shipboard Managers and Deck Crew* and *Factory Crew and Combis* survey versions are generally on the C/P vessel for most of the year. Therefore, there are two options for implementation of the survey which may vary by each C/P vessel parent company, depending on which method is best for each company. Representatives from the parent companies have indicated that the best mode for distributing the survey will either be at contract signing, which generally takes place at the main office in Seattle, or by sending a packet of surveys to the boat while they are out fishing. In the event of the dissemination of the survey other than in person, directions to access the survey and all support required to return the survey to the research team will be provided.

4. Describe efforts to identify duplication.

NOAA Fisheries social scientists and contractors work closely with regional academia, community based organizations, industry groups and other parties interested in this type of information. Reviews of existing information are common practice when initiating social science studies. A thorough search was conducted to identify similar studies that have been initiated, ensuring that efforts are not duplicated. The principal investigator has briefed and discussed this research to relevant NMFS personnel in headquarters, the Alaska Regional Office, and the AFSC, as well as at the NPFMC, community leadership groups in the Gulf of Alaska, organizations representing the Gulf of Alaska trawl C/P sector, and social science colleagues in academia. The efforts of communication have served multiple functions to include making sure there will be no duplication of effort, to communicate plans for the research effort, and to establish collaborations to complete the research in the most effective manner possible.

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 about/from individuals and those who may be linked to or represent small businesses. Prior to contacting these respondents, researchers have gathered any publicly available answers to the questions. Only those questions that cannot be

reliably answered through this manner and may change with perspective of the respondent will be asked.

In addition, participation in 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. Arrangements to collect data from all research participants will be at the convenience of the participant, and as flexible as possible to minimize 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 current information on the human dimensions of marine resource use in the GOA trawl fishery, the NOAA Fisheries Alaska Regional Office and NPFMC will be unable to adequately understand and predict the potential impacts of potential fisheries management changes on fishing communities and people, particularly those people who do not regularly attend public meetings, but are nonetheless affected by the decisions made for this fishery.

The federal mandates and executive orders, described in Question 1 and related appendices of this document, require the analysis of the impacts that government actions have on the individuals and communities involved in fishing and marine resource related activities. Social 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 rests on access to timely and relevant information about the pertinent stakeholders, such as that proposed to be collected in this data collection.

A significant concern related to the quality of these analyses is the risk of being vulnerable to litigation due to the lack of fulfilling these mandates and executive orders. Therefore not collecting this information may lead to incomplete representation of the science and information. Delays and costs due to litigation compound the issues both in the management context, and the funding context. 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.

Information collections are 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 October 22, 2014 (Vol. 79, No. 204, Page 63087) and did not receive any public comments.

In regards to consultation with persons outside the agency, various phone conferences, and in-person meetings included a discussion of the research and the option to review the draft survey document. Significant input was sought on question wording, survey design and survey implementation from representatives of the C/P vessel parent companies, the Alaska Seafood Cooperative, who represents the majority of the C/P owners, and NPFMC staff. Continued and ongoing status of this study as well as any future data collections will be communicated through the study's website. Communication and collaboration with all interested parties is ongoing and maintained throughout and beyond the data collection and release of the final reporting documents for this research.

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.

For shipboard management, deck crew, factory crew, and combis, survey administration will occur either through in-person survey administration at the time of contract signing or through hard copy surveys provided to each vessel. To ensure confidentiality, secure lock boxes will be provided to each parent company (in the event of survey completion at contract signing) and vessel (in the event of completion while out at sea) so that survey respondents can place their completed surveys in the box. Only the AFSC research team will have keys to access the lock boxes. The shipboard personnel who will be delivering the surveys to potential respondents will be trained on how to introduce the survey to shipboard personnel. They will be instructed to emphasize to respondents that this survey is anonymous and that no one on board will have a key to the lock box. Once the surveys are returned to AFSC, they will be digitized. All electronic versions of survey data will be kept under password or access restricted systems (servers and desktop units), accessible only by study researchers.

In addition, each questionnaire will have a number of references to the confidential nature of the survey. The statement "All responses are confidential" will appear on the front page of the questionnaire. Page i provides answers to some anticipated questions about the project, including:

"ARE MY ANSWERS CONFIDENTIAL?" This is a confidential survey. If you have placed your survey in a locked box, only NOAA researchers will have a key to access the box. Your survey cannot be accessed by anyone on the boat. Analysis of the survey results will be anonymous. All of the information will be aggregated as well. Information in this survey will be subject to the confidentiality requirements of the National Marine Fisheries Service per MSA Sec. 402(b) and the [NOAA Administrative Order NAO 216-100](#), and will not be provided or presented in any way as to identify individual respondents."

In the survey instructions, the respondent is instructed not to write his/her name anywhere on the survey. The respondent is also provided an explanation of confidentiality that describes the steps that we are taking to preserve the confidentiality of respondents and provides citations for our legal ability to keep the information confidential:

“The information you provide will be kept confidential to the extent possible per the Magnuson-Stevens Fishery Conservation and Management Act (as amended) Sec 402(b) and NOAA Administrative Order NAO 216-100, Protection of Confidential Fisheries Statistics. In addition, in the event of a Freedom of Information Act (FOIA) request, we will protect the confidentiality to the extent possible under the Exemption 4 of the FOIA. To support the confidentiality of this research the following processes are in place:

- Your name will not be included on the survey document. It will be tracked in an alternate document to reduce duplication, to account for your participation in the survey, and code your name as needed for the data analysis. Access to this document will be limited to researchers working on this study and protected via confidentiality agreements.
- All personal names provided on the survey document as answers to questions, will be viewed only by the study researchers. The names will either be coded with a descriptor such as ‘X Community Fisherman’ or assigned a code such as ‘A1’ as an identifier. The type of code that will be applied to the data for each applicable question may vary based on the question itself or the associated analysis of question.
- As researchers write final reports and publish the findings of this research, your responses will be combined with responses from other participants so that no single individual may be identified.”

The information provided will be kept confidential to the extent possible per MSA Sec. 402(b) and the NOAA Administrative Order NAO 216-100, Protection of Confidential Fisheries Statistics. In addition, in the event of a Freedom of Information Act (FOIA) request, we will protect the confidentiality to the extent possible under the Exemption 4 of the FOIA.

To support the confidentiality of this research, no participant names will be included on the survey document. Participant names will be tracked in a separate document in order to 1) code participants for protection during data analysis, 2) confirm receipt of a survey from each individual, 3) avoid duplication of responses, 4) ensure the distribution of final reports back to research participants, and 5) track the individuals in the future for the post-rationalization impacts portion of the research.

When writing final reports and publishing the findings of this research, individual responses will be aggregated with responses from other participants so that no single individual may be identified. This aggregation of the data will follow the rule of 3, where summaries representing only three or more responses will be reported to protect confidentiality. All personal names provided will be coded by the researchers with a descriptor such as ‘X Community Fisherman’ or assigned a code such as ‘A1’ as an identifier. The type of code that will be applied to each data set may vary based on the question or the analysis required of that question. Every method to protect the confidentiality of all responses will be applied in any and all contexts of this research.

In addition to the confidentiality protection measures, survey participants are provided the option to skip questions of concern and stop their participation in the survey at any time with no consequence to themselves.

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.

There are a few different areas where issues of a potentially sensitive nature will be explored. These are listed and discussed below:

1. **Relationship Information:** Survey questions inquire about the relationships between individuals in the fishery and the quality of those relationships. Scientific literature suggests that under a rationalized fishery the relationships between people change (McCay,1995; Dunham et al 2013). In addition, the MSA requires knowledge of these relationships. Questions have been designed to access this information in a manner to protect the responses of the participants. In addition, questions of this nature have all been provided with options *not* to answer the question, in the event a survey participant is uncomfortable. These data are important to show social changes in the fishery driven directly by the characteristics of the new management system.
2. **Connectivity/Network Information:** Survey questions inquire about the connections between industry members. Who gets information from whom, who works with whom for what purposes. Scientific literature confirms rationalization of fisheries results in consolidation and the removal of some fishermen and related industries from the fishery. The collection of data on connectivity and networks will utilize the Social Network Analysis methodology to identify those networks and visually represent them. The ability to do so will provide the opportunity to study how a system may change when people within the system are removed or change. The flow of information about management may change, the flow of product in the industry, etc. may change. The ability to map these changes pre and post-rationalization will provide the ability to show how the fishery has changed and what impacts may result from those changes. Questions of this nature will be coded as described in Question 10 of this document. In addition, questions of this nature have all been provided with options not to answer the question, in the event a survey participant is uncomfortable. These data are important to show social changes in the fishery driven directly by the characteristics of the new management system.

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

A census will be attempted of all respondent populations for which AFSC has names and contact information. This includes all catcher processor company owners, which are the target of the *Company Manager* survey version. For all other respondent populations, the number of people in the population can only be estimated (see table below). As such, we will attempt to complete a census of all potential respondents that we can identify, including shipboard management, deck crew and processing crew. In 2014, there were 8 parent companies that collectively owned 20 C/P vessels participating in the GOA trawl fishery. Based on conversations with representatives of the parent companies, there are on average 5 shipboard managers and 87 crewmembers on a vessel at a time. The total number of potential respondents across all respondent categories is estimated to be 826. For an explanation of how the number of estimated respondents per respondent category was determined, please refer to Question B.1. In order to calculate labor costs to the public associated with responding to this survey, a standard value of \$25 per burden hour per respondent was used.

Description	Estimated target respondents	Estimated response (60% response rate)	Response time per respondent	Total burden (hours)	Labor Cost – average of \$25 per respondent
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					per burden hour
Catcher-Processor Company Management*	24	14	1 hour	14	\$350
Catcher-Processor Shipboard Management	100	60	30 minutes	30	\$750
Catcher-Processor Deck and Processing Crew	702	421	30 minutes	210.5 (211)	\$5,275
Total	826	495		255 hours	\$6,376

*There are 8 companies that own vessels participating in the GOA trawl fishery. We assume that between one and three people from each corporate office will collaborate on completing the *Company Manager* survey.

A minimum of a 60% response rate (495 completed surveys) is expected for this population based on the literature (Babbie, 2007; Salant and Dillman, 1994). This response rate is also based on our experience with implementing other surveys in Alaska and conversations we have had with representatives of six of the eight parent companies regarding their willingness to participate and assist in the distribution of the surveys to their employees. Given that a census of each respondent population will be attempted, the results are expected to sufficiently represent the study population. Analysis of the results will be conducted to include the response rate for each question as well as an analysis of item non-response. This is an important aspect of the research as the option to skip questions is being provided as an additional layer of confidentiality. The strength and accuracy of each piece of data will therefore be represented through the response rate of the question, in addition to the overall response rates.

Data collection is expected to be conducted only one time in late 2015 and the first half of 2016. Additional OMB clearance will be sought once the rationalization program has been fully designed in order to conduct a post-rationalization survey of the study population. The total burden hours for this baseline survey is expected to be 495 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).

No cost other than labor cost is expected.

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

Total estimated annual cost to the federal government is \$50,000. The survey will be conducted by NMFS staff and contractors. In addition to contractor costs, printing and mailing costs will be incurred. Survey design, data collection and processing, and report development will be conducted by NMFS staff and contractor(s). These estimated costs for the contractor(s) have been included below. Please see the table below for itemized costs.

Description	FY2015 Budget
Contractor rates	\$45,000.00
Printing	\$2,000.00
Postage	\$3,000.00
Total	\$50,000.00

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

This is a new data collection program.

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

Several publications are expected for this research. The most complete publication will be a NMFS technical memorandum, which will have the most complete results. The memorandum will be the baseline description of the C/P sector from the results of the survey. This technical memorandum will be posted on the Economics and Social Science Research Program website, under publications. In addition, several journal publications are expected. The exact number of publications and the journals where the results will be published are yet to be determined. The goal is to make sure the information is widely available for all those interested in the research.

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.