

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

A. JUSTIFICATION

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

This request is for revision and extension of a currently approved information collection.

The 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) Highly Migratory Species (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 is currently in the testing stage of an online registration portal for tournament operators. The questions on the online form match those of the paper form. NMFS expects to make the portal available to all tournament operators by early 2016, and to then begin development on online tournament reporting.*

Atlantic HMS tournament registration is important for the management of swordfish, billfishes, 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 (e.g., 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 (e.g., 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).

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. The completed reporting form must be submitted 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 registered 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 collect catch/effort data and 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 plan amendments, 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 Atlantic Tunas General Category permit and the Swordfish General Commercial permit are commercial permits, but authorize permit holders to recreationally fish for other HMS only when participating in a registered HMS tournament; therefore, it is important for permit holders to be able to check the registration status of tournaments before participating. 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 tournament reporting form (electronic or paper), photocopying or scanning, and mailing, e-mailing, or faxing 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.

Minor adjustments have been made to the forms to improve their clarity and brevity. The HMS Tournament Registration Form has been consolidated to one page, instructions have been simplified, and the ability to select how the operator would like to receive confirmation (via e-mail, mail, or fax) has been added. The layout of the form has been modified slightly to improve readability without changing the questions and topics that many tournament operators have grown used to. Further, due to confusion expressed by tournament operators, NMFS has included a list of shark species that fall under each management group, including a shark species that is expected to be federally managed for the first time in 2016.

The HMS Tournament Summary Report form has been slightly modified in this revision/extension to remove text that proved confusing for tournament reporters (i.e., instructions under the shark species that said to write in shark species that were not included made it seem, incorrectly so, as though the write-in section was only for shark species, and not for other fishes, such as wahoo and dolphin). Additionally, the submission address has been updated, as there is now only one point of contact collecting the summary report, rather than two in the previous renewals.

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/compliance/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 the majority of the tournament operators that register with NMFS. In collaboration with the HMS Management Division, the SEFSC has created an online portal through which tournament operators will have the option to register their tournament and receive an emailed confirmation once the registration application is reviewed by NMFS staff for completeness. The portal is currently being beta tested by volunteer tournament operators (we will collect the feedback of no more than 8 volunteers). Once made available to all operators, use of the online registration will lessen the burdens associated with hard copy printing, scanning, copying, mailing, and faxing. NMFS is further developing a plan to create a registration App for mobile devices, and to thenceforth extend these technologies to tournament reporting.

NMFS provides access, through the [HMS tournaments web site](#), 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, which may affect some fishery regulations for anglers.

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; 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 Pelagics Survey (LPS; 0648-0380) and the Marine Recreational Information Program (MRIP; 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 does 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, and the development of online tournament registration and reporting, 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 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 August 06, 2015, (80 FR 46960).

No comments were received as a result of the Notice.

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.

There were no comments received on the accuracy of the burden estimates for this collection.

A survey was conducted throughout 2013 (OMB Control No. 0648-0342) that asked tournament operators for their registration and reporting preferences, including modes of submission. One respondent stated that the ability to receive reminders and forms to register is very important, and that the respondent would prefer to have all modes of communication available (i.e., e-mail, mail, and fax). In response to this request, and due to a recent registrant requesting that confirmation be faxed to his place of business, rather than e-mailed, the mode of confirmation transmission is now an option on the registration form.

A tournament operator recently volunteered to test and give feedback on the beta site for online

tournament registration. One of the reviewer's comments was regarding the confusion many people experience when deciding which shark group to select (e.g., ridgebacks, non-ridgebacks, small coastal sharks, or pelagic sharks). Due to this comment, a list of species has been included on the form to inform the respondent on the shark group they should select. This insertion will likely improve the quality of the data collected, as the selections will henceforth be more accurate.

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 registered tournament information (tournament name, date(s), city, state, & target species) is to be posted online at <http://www.nmfs.noaa.gov/sfa/hms/compliance/tournaments> as a service to publicize tournaments and to inform potential tournament anglers of upcoming events that are in compliance with HMS regulations. Participation in an unregistered tournament is in violation of some Atlantic HMS permit types, so it is imperative that permit holders have access to a list of registered HMS tournaments. 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 Responses (reporting and registration): 300 + 300 = 600

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 (\$0.49 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 \$54.

Mode of Submission	Number of Respondents	Cost (\$)	Total (\$)
E-mail	150	0.01	1.50 (2)
Mail	75	0.49	36.75 (37)
FAX	75	0.20	15
Total Cost of Registration			54

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 (\$0.49 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 \$54.

Mode of Submission	Number of Respondents	Cost (\$)	Total (\$)
E-mail	150	0.01	1.50 (2)
Mail	75	0.49	36.75 (37)
FAX	75	0.20	15
Total Cost of Reporting			54

In summary, the total annual cost burden to the respondents associated with this collection is expected to be approximately \$108 (\$54 for registration + \$54 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 \$0.49/postage, and \$0.01/two sheets of paper, it is estimated that the annual cost to the Federal government will be approximately \$150.00.

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 \$0.49/postage, and \$0.01/two sheets of paper, it is estimated that the annual cost to the Federal government will be approximately \$75.00.

The cost to the Federal government to mail registration and reporting forms to tournaments is expected to be approximately \$225.00 (\$150.00 + \$75.00).

The total cost to the Federal government, including staff wages for time spent on tournament form distribution and collection, is therefore \$225 + \$2,202 = \$2,427.

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

The adjustment of the annual cost burden from \$102 to \$108 is due to the increase in postage associated with mailing forms.

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 in order to aid tournament and anglers with regulatory compliance.

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.