

**SUPPORTING STATEMENT
WEST COAST REGION
ELECTRONIC FISH TICKET PROGRAM
OMB CONTROL NO.: 0648-XXXX**

INTRODUCTION

This request is for a temporary new information collection, in conjunction with **[Proposed Rule 0648-BE42]**, for approval of a new West Coast Region Groundfish Electronic Fish Ticket Program. Once approved, it will be merged into OMB Control No. 0648-0619, or the electronic fish ticket information in that collection will be merged into this collection.

The Pacific Coast Groundfish Fishery Management Plan (FMP), created under the authorization of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 USC 1801 et seq., was approved by the U.S. Secretary of Commerce (Secretary) on January 4, 1982, and implemented on October 5, 1982. Throughout the next two decades, there were several amendments to the FMP. Amendment 9 modified the limited entry (LE) program by establishing a sablefish endorsement for longline and pot permits. Amendment 14, implemented in 2002, built on Amendment 9 to further refine the LE permit system for the economically important fixed gear sablefish fishery. It allowed a vessel owner to “stack” up to three LE permits on one vessel along with associated sablefish catch limits. This, in combinations with a concurrent action to extend the season length, in effect established a limited tradable quota system for participants in the primary sablefish fishery.

Since implementation of the permit stacking program in 2002, inseason management of the primary and daily trip limit (DTL) sablefish fixed gear fisheries has been based on two types of information: (1) paper landing receipts that typically have a two to four month time lag between the date of landing and when the landing data is available in the Pacific Fishery Information Network (PacFIN), and (2) the QSM Best Estimate Report, which fills in the three month time lag based on estimates from the previous years’ landings. Both of these data sources estimate which landings are attributed to the primary (tier) fishery and which are attributed to the DTL fishery. Thus, the current catch accounting system is subject to inaccuracy and time delays, and is incapable of distinguishing between landings in the primary (tier) and DTL fisheries for management or enforcement purposes.

Additionally, at the time of implementation of Amendment 14, no Federal regulations existed requiring fish ticket documentation of the groundfish permit number associated with sablefish landings in the primary (tier) sablefish fishery. Documentation of catch against tier limits and documentation of permit numbers was left to the states to implement. Currently, Federal permit numbers are not being recorded consistently on state landing receipts associated with sablefish landings.

Since the start of the Shorebased Individual Fishing Quota (IFQ) Program in 2011, electronic fish tickets have been required for landing IFQ species. Electronic fish tickets have allowed vessel owners/operators, buyers and dealers, and fishery managers timely access to catch

information for IFQ species. Many of the proposed regulations that expand the required use of electronic fish tickets to the limited entry fixed gear and open access fisheries are similar to those put in place for the Shorebased IFQ Program. Electronic fish ticket requirements for the Shorebased IFQ Program have been described in detail in proposed (75 FR 32994, June 10, 2010; 75 FR 53380, August 31, 2010) and final rules (75 FR 60868, October 1, 2010; 75 FR 78344, December 15, 2010) for that program.

JUSTIFICATION

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

The sablefish fishery, including the primary (tier) fishery, DTL fishery, and open access fishery need to have an electronic fish ticket program in place to: 1) adequately track the landings of sablefish, 2) be able to assign landings of sablefish to a tier permit if fishing in the primary fishery, and 3) enhance the ability of enforcement to deal with issues more effectively and efficiently. Electronic fish tickets will provide real time data to enforcement and managers, to address issues that arise within the fishery.

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.

Shoreside-first receivers, defined as persons who receives, purchases, or takes custody, control, or possession of catch onshore directly from a vessel, will be required to use a web-based, NMFS-approved electronic fish ticket program to send catch reports within 24 hours from the date of the landing. The electronic fish tickets are based on information currently required in state fish receiving tickets or landing receipts. The required information includes the following:

- date of landing,
- vessel that made the delivery,
- vessel identification number,
- limited entry permit number(s),
- name of the vessel operator,
- gear type used,
- receiver,
- actual weights of species landed by species or species group, including those species with no value,
- condition landed,
- number of salmon by species,
- number of Pacific halibut,
- ex-vessel value of the landing by species,
- fish caught inside/outside 3 miles or both, and
- any other information deemed necessary by the Regional Administrator as specified on the appropriate electronic fish ticket form.

The information gathered from fish tickets has great utility and will be used to track catch allocations, bycatch limits and prohibited species catch during the season. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (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 electronic fish tickets are based on information currently required by the states on paper fish receiving tickets or landing receipts (fish tickets). Under the new electronic fish ticket program, fish receivers will use a web-based system to provide all information required (see Question 2 for a list of information included). First receivers will be required to have a personal computer system, which could include a tablet or mobile device, with an internet browser (Chrome, Firefox, Internet Explorer, Safari, etc.). The internet browser must be set to allow cookies and JavaScript, and the default security settings must be used.

4. Describe efforts to identify duplication.

Measures were taken to minimize duplication of the catch accounting requirements by generating an electronic fish ticket program that is based on the existing state systems and does not require additional data gathering. When state law allows, the electronic fish ticket can be used to print a paper copy for submission to the state. In Oregon and Washington, specified information may be submitted either on a paper fish ticket provided by the state or on a computer generated ticket provided specified data fields are included. However, in California standard paper forms provided by the states must be used.

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

Measures were taken to minimize the costs of the catch accounting requirements by providing: 1) a web-based program so no additional software is needed and the program is accessible wherever there is an internet connection 2) an electronic fish ticket program that is compatible with the existing fish ticket requirements in each of the three states; and, 3) a program that can be used to print a paper copy for submission to the state, when state law allows.

NMFS assumes that all first receivers have access to a personal computer and/or a tablet where they can access the web-based program. Additionally, because the information is already being gathered by the states, there is no requirement that additional data be gathered. Some applicants are individuals or small companies and as such are considered small businesses. Given the relatively small numbers of applicants, separate requirements based on size of business have not

been developed. Only the minimum data required to meet the permit objectives are requested from all applicants.

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

Without the electronic fish tickets, states would continue to collect their paper and electronic tickets which do not include a Federal permit number. The agency's ability to adequately and efficiently track landings, incidental catch of prohibited species, as well as other groundfish species, would continue to be hindered.

Indirect biological impacts could result if catch data were inaccurate or delayed so that fishery specifications, including: bycatch limits, species allocations, optimum yield (OY), and biological opinion thresholds could not be adequately monitored. If bycatch limits of the most constraining overfished species were greatly exceeded due to delayed catch reporting, the risk of exceeding rebuilding based OYs is increased.

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

Not Applicable.

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 proposed rule, RIN 0648-BE42, will be published for public comment, coincident with this request.

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

No payments or gifts are provided under this program at this time.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

Electronic fish ticket data will be submitted to Pacific States Marine Fish Commission (PSMFC). The data is considered confidential under [NOAA Administrative Order 216-100](#), Protection of Confidential Fisheries Statistics. The PSMFC currently receives and stores fish ticket data from the states. These data are maintained on the PacFin data base.

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.

This information collection does not require the submission of information of a sensitive nature.

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

Electronic Fish Tickets	Total No. of Respondents	No. of Annual Sablefish Landings	Average Time per Ticket ¹ (mins)	Total Annual Time Burden (hours)	Average Annual Time Burden per Respondent (hours)
Washington	16	520	10	87	5.5
Oregon	19	1072	2	36	2
California	65	3258	10	543	8.5
TOTAL	100	4850	X	666	7

Because Oregon already has electronic tickets and the requirements for the federal program will be the same, the time needed to send the electronic ticket is the only new time burden/cost burden. For Washington, electronic and paper tickets are currently filled out, which averages about 10 minutes per submission. In California, only paper tickets are currently collected. First receivers in California, like Washington, would be required to fill out their paper and electronic forms, which would take about 10 minutes per landing.

There is a chance that some first receivers would need to fill out more than one ticket per landing. This could happen when a vessel fishes the end of their primary (tier) quota and switches over to the DTL fishery. This would only happen once for each vessel, if at all, and wouldn't substantially increase the burden on first receivers. The possibility of this occurring was taken into account when determining the time average.

First receivers in the trawl program reported an hourly wage of \$33.68 for non-production employees in 2012 (Economic Data Collection Program First Receiver and Shorebased Processor Report (2009-2012)). Assuming non-IFQ receivers pay a similar wage to non-production employees, and using the hours estimated in Table 6 below, the new requirement would cost the sector \$20,000 or about an additional \$4 per fish ticket based on the time burden.

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).

Electronic tickets may result in some expenses as a result of new reporting requirements. It is assumed that all the small businesses already have access to a technically suitable computer to submit the electronic fish tickets; if they did not currently own a computer there would be an additional initial investment as well as small monthly fee for an internet connection.

¹ This assumes that each landing produces 1 electronic ticket. However, there may be a few instances where a first receiver would need to issue more than one ticket (i.e. if a vessel lands DTL and primary sablefish at the same time). NMFS believes the instances of multiple tickets issued would be relatively few and wouldn't significantly alter the average.

Otherwise, there are no recordkeeping/reporting costs,

Because this information is already collected and analyzed by the states, either through paper tickets or electronic tickets, there will not be an added burden on the state or enforcement agencies.

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

There will be no additional Federal staff costs incurred as a result of implementation of electronic fish tickets on the West Coast sablefish fisheries. Analysts already receive this data through State requirements. The proposed change would improve the current system, by making it full electronic, and allow for less expensive and more efficient tracking of sablefish landings.

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

This is a new collection. After the information collection request is approved, NMFS may consider combining this collection with OMB Collection 0648-0619, or NMFS may decide to move the electronic ticket information out of OMB Collection 0648-0619 and into this new collection.

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

There are no plans for publishing.

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 identified.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.