

SUPPORTING STATEMENT
U.S. West Coast Swordfish Fishery
Cost and Earnings Survey
OMB CONTROL NO. 0648-XXXX

A. JUSTIFICATION

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

Commercial fisheries economic data collection programs implemented by the National Marine Fisheries Service (NMFS) address statutory and regulatory mandates to determine the quantity and distribution of net benefits derived from living marine resources as well as predict the economic impacts from proposed management options on commercial harvesters, shore side industries, and fishing communities. In particular, these economic data collection programs contribute to legally mandated analyses required under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MFCMS), the [National Environmental Policy Act](#) (NEPA), the [Regulatory Flexibility Act](#) (RFA), and [Executive Order 12866](#) (E.O. 12866).

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.

NMFS Southwest Fisheries Science Center (SWFSC) proposes a one-time, fleet-wide survey of the current and former west-coast based commercial swordfish fleet including their state permitted fish spotter pilots, and commercial fish processors. The survey is to collect annual earnings and industry related expenditures for tax reporting years of 2015 and 2016. The project is being conducted by Hanan & Associates, Inc., a California-based consultant with targeted experience in several commercial and sport fisheries including the Drift Gillnet, Harpoon, and charter boat fisheries, as well as collecting human informant data. The proposed survey targets fixed and variable economic cost data, including labor and crew compensation methods; aerial spotter pilot support; fish processing; and hard costs such as gear, operations, and maintenance; and soft costs such as financing, insurance, and regulatory compliance. Earnings data to be collected includes sales by customer type and earnings by location. The survey is designed to also capture qualitative information on other fisheries in which these commercial fishermen participate.

Given the absence of mandatory cost reporting requirements, the survey is intended to inform economic analyses in technical reports such as Regulatory Impact Review and Regulatory Flexibility Analysis. Survey results are intended to assist policy makers in efforts to design and improve policy to positively affect outcomes in the commercial fishing industry and increase public benefits.

The survey is also intended to assist NMFS in developing a more comprehensive understanding of the economics of the U.S. commercial fishing industry by informing the Input-Output Model for Pacific Coast Fisheries (IO-PAC) and is also intended to provide more accurate information and inform future IO-PAC model revisions.

The initial section of the survey (**Section 1: Vessel Information for Drift Gillnet, Harpoon, Longline, or Deep-Set Buoy Gear**) requests only vessel identification information and basic characteristics which are not available in the NMFS or Coast Guard Fishing Permit database, or have implications for the scope

of fishing methods and cost of fishing effort. Most of the questions in Section 1 can be readily addressed. For example, based on previous experience, fishermen are keenly aware of the insured replacement value of their vessels and the remaining time on their loans, so these questions are not especially time consuming. We realize that some fishermen may need to refer to their tax documents to provide information such as remaining time on their loans or vessel depreciation and amortization; however, this information is important to characterizing the cost of participation in the fishery. The next four sections (**Section 2: Drift Gillnet Fishery (DGN) Participants Only, Section 3: Harpoon Fishery (HPN) Participants Only, Section 4: Longline Participants Only, and Section 5: Deep Set Buoy Gear Participants Only**) ask for basic information for fisheries in which the vessel participated. Each section requests information on fixed costs of participating in commercial fishing activities followed by successive sections for the respondent to enter variable costs and ex vessel revenue data. The breakdown of cost information in our survey format is designed to facilitate the use of cost information collected to parameterize an IO-PAC model of the fishery which can be used to estimate regional economic impacts.

Section 6: Spotter Plane Pilot Only is designed to reveal costs, earnings, and value of airplane fish spotters to this west coast fishery which has not previously been evaluated. Depending on the year and fish availability this tool can be the difference for profitability or loss in the industry.

Section 7: Commercial Swordfish Processor seeks general data about individual processors and data regarding variable and fixed cost and earnings information for processors active in the swordfish industry.

Section 8: Former Swordfish Participant/Operator was designed to acquire basic data related to why these operators left the fishery and in which fisheries they are currently fishing.

Section 9: Additional West Coast Swordfish Fishery Survey Questions for All Participants the west coast swordfish fisheries are dynamic because of changing fish availability and regulations based on national needs. The fishery management council needs input especially from fishery participants and especially from those who don't or can't attend the meetings. These questions should help fill those gaps to help the council to better manage this fishery.

This survey represents a modification of the 2010 survey which focused on the large mesh drift gillnet (DGN) and harpoon (HPN) fleets operating out of southern and central California. There were four sections to the previous survey instrument: 1) the first was to gather generic vessel information appropriate for both fleets; 2) the second section applied only to DGN regarding net data, fishing trip and operational specifics, catch specifics, and four questions about a time/area closure regulation; 3) the third section sought information pertinent to the HPN fishery including fishing trip and operational specifics, use of spotter planes, and catch specifics; 4) the fourth section gathered general data for those participants who also fished albacore troll and any other fisheries.

The proposed survey broadens the scope to a broader selection of west coast swordfish fishery participants, including non-fishing support industries, and is comprised of nine sections: 1) the first is similar to the 2010 survey to collect generic vessel information and spotter airplane data if used as appropriate for the DGN, HPN, Longline (LL), and deep set buoy gear (DSBG) fleets which target west coast swordfish; 2) the second section is similar to the 2010 survey to collect data specific to the DGN fishery regarding net data, fishing trip and operational specifics, catch specifics; 3) the third section is similar to the 2010 survey to collect information pertinent to the HPN fishery including fishing trip and operational specifics, use of spotter planes, and catch specifics; 4) the fourth section collects information from LL vessels only, which were not covered in the 2010 survey, including fishing trip and operational specifics, gear, and catch specifics; 5) the fifth section collects information from DSBG vessels only, which were not covered in the 2010 survey, including fishing trip and operational specifics, gear, and catch specifics; 6) the sixth section is for spotter planes only, which were not surveyed in the 2010

survey, 7) this section is to collect west coast swordfish processor information which was not collected in 2010; 8) this section is to collect information for fishermen who have dropped out of the west coast swordfish fisheries and was not collected in 2010; Section nine is for all survey participants and was not included in the 2010 survey.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. Because the survey is voluntary, the confidentiality provisions under the MSA 402(b) do not apply to this survey. However, data will not be released for public use except in aggregate statistical form without identification as to its source. NMFS 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.

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.

Because this fleet is relatively small, data will be collected from vessel owners/operators, pilots, and processors during personal interviews by the contractor and then entered manually into an electronic database. The survey was pretested with nine industry participants. If requested and personal interviews are not possible for the full survey, the contractor will perform the interview via telephone, and as a last attempt to obtain data, the contractor will send the survey instrument to respondents via email or parcel post and returned surveys entered manually into the database identified by how it was obtained.

4. Describe efforts to identify duplication.

The last cost earnings survey of the West Coast Drift Gillnet and Harpoon fleet was conducted in 2010 and was administered by Hanan & Associates, Inc. We are not aware of any other surveys currently or planned to collect cost and earnings data at the vessel level in this fishery.

The Pacific Fishery Information Network (PacFIN) compiles a database of individual vessel landings records submitted by the California Department of Fish and Wildlife. PacFIN records represent mandatory landings records (fish tickets) submitted by species measured by weight and ex vessel revenues; however, no cost data is collected.

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

The potential respondent universe for this survey is described in Section 2 above. The burden respondents will be minimized by administering the survey instrument in personal interviews which allows for clear and unambiguous understanding of the questions. Respondents will be notified by post and by email of an upcoming phone call to set up an appointment. They will also be able to set up the appointment by email or post and will be notified of information that will be sought so they can have relevant records available at the interview.

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

Lack of information on vessel operating costs severely limits the ability of economists to assess the impacts that commercial swordfish fishermen face due to changes in regulations, fishing conditions, and market conditions. Without this information, analyses that attempt to assess the economic effects of proposed regulations or policy alternatives on vessels, crew and the fishery as a whole are incomplete and inaccurate.

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

Not Applicable.

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.

Two public comments were received which expressed general disagreement with spending federal tax dollars to administer a swordfish fishery survey. The comments cited unsubstantiated conservation concerns regarding the status of the swordfish population targeted by the U.S. west coast fleet. The latest International Scientific Committee assessment shows that the western and central Pacific swordfish stock targeted by the fleet is not overfished nor subject to overfishing. No further actions have been taken by the agency in response to these comments.

Representatives from the industry were provided the opportunity to review and comment on the survey. While gaining and maintaining support for the survey is an on-going task and component of the project, project managers have received positive and constructive feedback from fishermen and industry leaders of the West Coast Swordfish fishery. Industry feedback was considered in revising the survey form.

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

The project does not include payments or gifts to respondents.

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

Respondents are assured in the introductory language of the survey instrument and by the contractor at the beginning of the interview that data will not be released for public use except in aggregate statistical form without identification as to its source and that no individual names, vessel names, or other identifying information will be included in any reports or publications. Personally identifiable information is requested to enable Hanan & Associates, Inc. to follow up where necessary and clarify or complete individual responses and/or to conduct a spoken survey with respondents who are unable, unwilling or prefer it. As such, the information is provided to boost the completeness, accuracy and response rate of the survey. As required, no fewer than three aggregated or averaged data points from survey response results will be released in any reports or publications.

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.

The survey seeks information on the cost and earnings of commercial Drift Gillnet and Harpoon vessels landing on the West Coast of the U.S. and does not include questions on sexual behavior, attitudes, beliefs, or other private information.

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

The public reporting burden for this voluntary collection of information is estimated to average one (1) hour per respondent. This includes the time required to read the introductory statement and the gathering of business information necessary to complete the survey, set up and meet with the contractor. The response rate is expected to be near 50%, resulting in approximately 67 completed surveys. As a result, the survey is expected to impose a total of 67 burden hours on the U.S. West Coast commercial swordfish industry.

Approximate total number of participants	133
Approximate sample size	133
Approximate expected survey response rate	50%
Approximate expected # survey respondents	67
Average burden hours/survey	1 hour
Total annual burden hours	77 including air spotters & processors

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 recordkeeping or reporting cost is anticipated as the contractor will meet the respondent at their place of choice.

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

Total estimated cost to the Federal Government will be \$60,700 + cost of time to federal employees involved in the survey effort. A private firm, Hanan & Associates, Inc. has been hired to develop, administer and collect the survey, tabulate the survey data, conduct follow up contacts, and enter and validate the data. In addition to survey firm contract costs, there will be additional costs for meetings, project management, and phone and email communication and for supplies. *A table of itemized costs is presented below.*

Description	Estimated Cost
<i>Data Collection</i>	
Survey Development and Review	\$5,000
Outreach to Industry	\$12,500
Administrative support	\$2,500
Administer Personal Survey Interviews	\$15,200
<i>Data Preparation</i>	

Data Verification/Checks	\$2,500
Development of Population Weighing Adjustments	\$2,500
Project Management	\$5,000
Prepare and Write Final Report	\$15,500
Total	\$60,700

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

This is a new collection.

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

Survey results will be reported in SWFSC's administrative or technical report and published on the NMFS web site. Summaries will include descriptive statistics (such as mean and standard deviation) of the various cost and earnings categories.

Survey results will be used to support studies prepared for the Pacific Fisheries Management Council and NMFS management. Results may also be discussed in conference presentations, public meetings, and technical guides. All reporting of survey results will conform to data confidentiality requirements. Qualified researchers with confidentiality agreements will have access to raw data for performing future analyses.

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.