

**SUPPORTING STATEMENT**  
**Processed Product Family of Forms**  
**OMB CONTROL NO. 0648-0018**

**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. A one-time survey is being removed from this collection.

NOAA Forms 88-13 and 88-13c are used to collect annual (in the case of 88-13) and monthly (in the case of 88-13c) information on seafood and industrial fishery processing plants. These data are required by the Secretary of Commerce in carrying out provisions of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 et seq. as amended). Each Fishery Management Plan (FMP) established under the Act must determine the estimated capacity by United States (U.S.) seafood processors for the managed fishery. Data from these surveys are used in economic analyses to estimate the capacity and extent to which U.S. fish processors, on an annual basis, will process that portion of the optimum yield harvested by domestic fishing vessels. Employment data are used in socioeconomic analyses for determining potential impacts on processing employment, due in part to management measures.

Federally permitted dealers of Atlantic mackerel, squid, butterfish, Atlantic sea scallop, Northeast multispecies, monkfish, summer flounder, scup, black sea bass, Atlantic bluefish, spiny dogfish, Atlantic herring, Atlantic hagfish, Atlantic deep-sea red crab, tilefish, skate, surf clam or ocean quahog in the National Marine Fisheries Service's (NOAA Fisheries) Northeast Region are required under [50 CFR 648.7](#) to complete and submit all sections of NOAA Form 88-13.

NOAA Form 88-13c is used to collect monthly production of fish meal and oil. These data are needed by the Department of Commerce to report market and supply conditions and are used by the industry to procure sufficient inputs to produce such products as animal feeds, paint, lubricants, and fertilizers ([13 U.S.C. 61](#) et seq.).

**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.**

NOAA Fisheries and Regional Council economists use the collected information to estimate processing capacity and to forecast and subsequently measure the economic impact of fishery management regulations on fish and shellfish supplies using the data on volume and value. The employment data are used to analyze the seasonality of a specific fishery. The data are also used for establishing negotiating positions on international trade by determining which seafood industries might be adversely affected by reducing or eliminating established tariffs.

Data from the annual survey are reported in Fisheries of the United States (NOAA Fisheries), Statistical Abstract of the United States (Census Bureau) and Agricultural Statistics (U.S. Department of Agriculture (USDA)). As a member of the United Nations Food and Agriculture Organization and the Organization for Economic Cooperation and Development, NOAA Fisheries supplies aggregate data to these organizations.

In addition to the aforementioned publications, the information collected through the 88-13 family of forms supports activities of other federal agencies. NOAA Fisheries supports the International Trade Commission (ITC) with their various trade investigations by supplying aggregate data on specific processed seafood items. The Office of Management and Budget (OMB) annually requests information on the processing of seafood. The U.S. Customs and Border Protection (CBP), Department of Homeland Security (DHS), establishes the annual tariff-rate quota for tuna fish described in item 1604.14.22 of the Harmonized Tariff Schedule of the United States based on the U.S. canned tuna production for the preceding calendar year (19 U.S.C. 3007). Failure to collect these data would prevent the Secretary of Commerce from meeting the statutory obligations under the Act. It would also prevent the CBP from establishing the annual tariff-rate quota on canned tuna.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy and electronic information. See response to Question10 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.**

In the current annual? Survey of Fishery Processors, NOAA Fisheries provides each processor a unique pre-printed form that includes the products produced by the processor in the previous year. The processor only needs to fill in the quantities and value, and add any new products, before returning the form. Only processors who produce fish meal and fish oil receive and complete the monthly 88-13c form. We are currently exploring the development of an electronic-based reporting tool and fillable .pdf form

**4. Describe efforts to identify duplication.**

NOAA Fisheries continues to work with Bureau of the Census to reduce duplication and unnecessary reporting. Although the Census includes the seafood industry in its five-year descriptive surveys, the level of detail is more aggregated than NOAA Fisheries data and represents a survey of capital investment and value-added. These data are not part of NOAA Fisheries effort.

The Bureau of Labor Statistics (BLS) collects monthly employment data at the six digit North American Industry Classification System (NAICS) code level. Although these data are used to verify NOAA Fisheries-collected data, the information provided by the BLS is too aggregated to utilize at the species specific level and can only be used for general comparisons.

The Operational Guidelines on the Fishery Management Plan (FMP) Process require each FMP to evaluate existing state and Federal laws that govern the fisheries in question, and the findings are made part of each FMP. Therefore, NOAA Fisheries is confident that it is aware of similar collections if they exist.

With the onset of Catch Share Programs, the Office of Science and Technology has been working with port agents in the regional offices to ensure that overlap and duplication of surveys is kept at a minimum. In the case of Catch Share monitoring programs, the data collected are not in the same scope as the data collected in the 88-13 and very little, if any, overlap occurs.

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

Since all of the respondents are considered small businesses, separate requirements based on size of business have not been developed. Only the minimum data are requested.

**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 were not conducted, NOAA Fisheries would lack key economic data for making fishery decisions. The frequency cannot be reduced from the annual submission, which is currently required for dealers, with the 88-13 form. Since dealer entry into and exit from a fishery is common, an annual collection allows NOAA Fisheries to use the most accurate information available to compile employment and processing data.

Various federal and state government, industry and academic entities use the quarterly meal and oil reports made available on the NOAA Fisheries Office of Science and Technology Commercial Fisheries Market News website. Quarterly reports would not be possible without the monthly reporting requirement of the 88-13c.

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

Form 88-13c obtains monthly data on processed production of fish meal, oil and solubles for reporting in the Fishery Market News series. NOAA Fisheries, USDA, state fishery agencies and industry in forecasting market needs utilize these data. Forms are mailed to respondents on a monthly basis during the fishing season. The seasonality (four-five months) of the fisheries supporting the processing of meal and oil precludes reducing the reporting time frame to less than monthly. Companies reduce employment at season closure to primary maintenance needs. If the reporting time frame was reduced to quarterly submission, a loss of data for the season would jeopardize the statistics.

**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 May 26, 2017 (Vol. 82 No. 101 p. 24306) solicited public comments on this information collection. No comments were received.

Direct feedback from respondents is the primary source for changes in the forms. Input from regional port agents is also considered.

We engage extensively with the processors who are in our survey. Our port agents are usually known by the processors and they often interact in various ways, including dropping off duplicate forms to the processor, making calls requesting submission of data, and, in many cases, actually filling in the form at the side of the processor. These port agents report to our office any complaints received about the survey. We seldom get any comments regarding the reporting burden. We do occasionally receive comments from new companies who have not implemented sufficient record keeping procedures necessary to provide the requested information. In these cases we ask the company to provide their best estimate of the fishery products that they process with the hope that they will improve their record keeping for subsequent reporting years. Finally, in the cover letter accompanying the survey form, processors are directed to contact the Office of Science of Technology with any questions or comments about the form and the survey. A great majority of the questions we receive involve the definition of a processor – i.e. companies want to know if they should be completing the survey at all due to the wide variety of processing practices in the industry.

In order to make the instructions for completing the form more straightforward, we have introduced and distributed an example data sheet (attached as Instruction Diagram 2016.docx) that demonstrates how to complete the form.

We have also reached out to our regional contacts and port agents for their assistance in collecting comments from respondents. In addition to a general comment collected by a Northeastern port agent regarding a desire for an electronic form we have received the following specific comments:

- Raven S. Benamor at North Star Seafood, LLC.: I found the survey to be laid out in an easily understandable format and did not take much time to complete it. It posed no burden due to its simplicity. It is easier to fill out surveys like these when the questioning is direct. As busy as North Star can be, we really appreciate that this survey and others formatted like it do not require a large span of time to complete.
- Sarah Nayani at Arctic Storm (Arctic Fjord): I would say it probably took me 15 minutes to complete, and about 15-30 minutes for our accounting staff to research the employees/month & value of surimi & hake block. We had all of the data available, but had to pull it from our various databases (one HR-related database with crew information

and one accounting database). Frequency of collection is fine. Instructions are clear – the only thing I was a bit confused about is whether this was just for hake processing or also for pollock. But I called and got that cleared up. Disclosure is fine – format was fine. Data elements are fine.

- Allison Deasy from Starkist Co. reports the following comments from processing staff in American Samoa: They thought it was a fairly straight forward process. Annually seemed a good length of time for this request and they do like the new format.
- Chang Lee at Great Ocean/Da Yang Seafood Inc.: I feel like we are filling out the same information as NOAA EDC form.
- Sharon Snow at Pacific Seafood/Pacific Surimi-Newport: Your survey is not too bad – took me a couple of hours. The most time consuming part is the payroll data. For the 2017 Survey, you'll need to send it to Trident. They sold us in April 2017 so I no longer have access to the data for January thru April 2017. I wish the EDC survey was as simple as yours.

Although the NMFS Northwest Fisheries Science Center Economic Data Collection (the EDC referenced above by Chang Lee) collects similar information, the processed products annual survey is unique in that it asks for production of all species whereas the EDC focuses primarily on the West Coast groundfish trawl fishery. The EDC is also limited to businesses that have permits tied to the limited entry fishery for groundfish and does not ask the level of product detail that is collected in the processor survey.

The processed products annual form should take, on average, approximately 30 minutes to complete. However, this estimate is based on the assumption that company records have been organized throughout the year. Good record keeping is necessary for the reporting. The information we ask is very basic business information, which should reasonably be expected to be part of what the companies keep track of to assess their own business costs, profitability, hiring records, and tax burden. It would also be expected that companies with a large range of products will take longer to report total production information. In these cases, we allow companies to submit inventory style data and we summarize and process the information in-house.

We have begun working with our computing and technology office to construct an electronic survey tool. In the interim, we are also working to prepare a fillable PDF form for companies to use while an online survey is developed. We are hoping to offer a fillable PDF form for submissions in the FY18 survey cycle. There is a timeline of approximately two years to develop an online survey tool.

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

No payments or gifts are made.

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

As stated on the forms, the data contained in the Processed Products Report, Form 88-13 and Form 88-13c, will be kept confidential as required by section 402(b) of the Magnuson-Stevens Act and [NOAA Administrative Order 216-100](#), Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form without identification as to its source. Any NOAA Fisheries employee or contractor is required to sign and abide by the NOAA Administrative Order 216-100 Non-Disclosure Form before being able to work with, or access, non-aggregated data:

[http://www.corporateservices.noaa.gov/ames/administrative\\_orders/chapter\\_216/216-100-appendix-C.html](http://www.corporateservices.noaa.gov/ames/administrative_orders/chapter_216/216-100-appendix-C.html)

**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 no questions of a sensitive nature.

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

**Table 1.** Calculation of Public and Federal Estimate of Reporting Burden Hours and Costs.

Permit Requirement	Number of Entities	Items/ Entity	Total Number of Items	Response Time (Hours)	Total Burden (Hours)	Cost (\$) to Public
NOAA Form 88-13	747	1	747	30 minutes	374	0
NOAA Form 88-13c	7	12	84	15 minutes	21	0
Totals	747*		831		395	0

\* Excludes duplication

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

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

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

The estimated Cost to Government is \$5,120.30.

Estimated Cost of Printing: 747 forms at 5 cents per copy = \$37.35

Estimated Cost of Mailing: 963 forms at 85 cents total = \$634.95

Estimated Staff Support: 220 hours at GS 7/1 salary (\$20.22/hour) = \$4,448.

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

Program Change: 196 hours from a one-time survey were removed.

Adjustment: The number of burden hours is reduced by 60 from the previous submission due to consolidation in the seafood processing industry and identification of companies that have gone out of business or no longer process fisheries items (i.e. there are fewer companies processing). This calculation of burden was based on the number of forms sent for the 2015 data year as shown above.

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

Results from this collection may be used in scientific, management, technical, or general informational publications such as Fisheries of the United States, which follows prescribed statistical tabulations and summary table formats. Data are available to the general public on request in summary form only; data are available to NOAA Fisheries employees in detailed form on a need-to-know basis only.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

N/A.

**18. Explain each exception to the certification statement.**

There are no exceptions.