

**SUPPORTING STATEMENT  
GROUNDFISH TRAWL CATCHER/PROCESSOR  
ECONOMIC DATA REPORT (EDR)  
OMB CONTROL NO. 0648-0564**

This action requests extension of an existing information collection.

## **INTRODUCTION**

The Secretary of Commerce is responsible for the conservation and management of marine fishery resources within the Exclusive Economic Zone (EEZ) of the United States through National Oceanic and Atmospheric Administration/National Marine Fisheries Service. National Marine Fisheries Service, Alaska Region (NMFS) manages the Gulf of Alaska (GOA) groundfish trawl fisheries in the EEZ off Alaska under the Fishery Management Plan for Groundfish of the Gulf of Alaska. Groundfish in the Bering Sea and Aleutian Islands management area (BSAI) are managed under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. The North Pacific Fishery Management Council (Council) prepared these fishery management plans under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 *et seq.*; Magnuson-Stevens Act). Regulations implementing the fishery management plans appear at [50 CFR part 679](#).

Harvests by trawl catcher/processors in the GOA are limited primarily by two management programs, the [Amendment 80 Program](#) and the [Central GOA Rockfish Program](#). All of the vessels in the trawl catcher/processor sector are subject to management under these NMFS programs.

In 2014, NMFS revised the existing Amendment 80 Economic Data Report, which was used by trawl catcher/processors in the BSAI, by adding GOA groundfish fisheries. NMFS also changed the name of the economic data report (EDR) to Annual Trawl Catcher/Processor EDR. These catcher/processors are now part of the GOA Trawl EDR Program, which includes two additional EDRs that are approved under OMB collection number 0648-0700.

The Annual Trawl Catcher/Processor EDR is submitted by fishing companies, vessel owners, and leaseholders of GOA trawl vessels, shoreside processors, and stationary floating processors receiving deliveries from those trawl vessels, and Amendment 80 catcher/processors harvesting in the BSAI. The type of data collected includes labor information, revenues received, capital and operational expenditures, and other operational or financial data.

### **A. JUSTIFICATION**

The GOA Trawl EDR Program evaluates the economic effects of current and future groundfish and prohibited species catch (PSC) management measures for the GOA trawl fisheries. The program provides the Council and other analysts with baseline information on affected harvesters, crew, processors, and communities in the GOA. The information collected through

the EDRs are used to assess the impacts of major changes in the groundfish management regime, including catch share programs for PSC species and target species.

The Annual Trawl Catcher/Processor EDR was implemented to help evaluate the Amendment 80 Program, and is used to assess the impacts of major changes in the groundfish management regime, including programs for PSC species and target species.

Regulations at 50 CFR 679.94 require any person who held an Amendment 80 quota share (QS) permit or an owner or leaseholder of a vessel that was named on a Limited License Program (LLP) groundfish license that authorizes a catcher/processor using trawl gear to harvest and process LLP groundfish species in the GOA during a calendar year to submit to NMFS an Annual Trawl Catcher/Processor EDR for that calendar year for each permit held by that person.

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

The GOA Trawl EDR Program evaluates the economic effects of current and future groundfish and PSC management measures for the GOA trawl fisheries. The data improves the scientific information that is available to make conservation and management decisions and to better understand the current structure of the GOA trawl fishing industry. These data allow analysts to better understand the impacts of the future changes to management on participants in 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.**

**a. Annual Trawl Catcher/Processor Economic Data Report (EDR) [adjusted]**

Each person who held an Amendment 80 QS permit or owned or leased a vessel named on a catcher/processor trawl-gear designated groundfish LLP license endorsed for the Central or Western GOA during a calendar year must submit this EDR for each calendar year for each permit held, as specified in § 679.94.

The complete EDR must be submitted for each calendar year on or before June 1 of the following year. All information reported must be current and complete as of the date of submission, including post-season adjustments and settlements.

Pacific States Marine Fisheries Commission (Pacific States) has been designated by NMFS to be the Data Collection Agent for the GOA Trawl EDR Program. Pacific States mails EDR announcements and filing instructions to Amendment 80 QS permit holders and owners or leaseholders of vessels named on LLP groundfish licenses.

To receive an EDR by mail, respondents may call 1-877-741-8913, or email their request to [edr@psmfc.org](mailto:edr@psmfc.org).

An EDR may be submitted online or may be downloaded in fillable PDF format and then faxed

or mailed. Submit the completed EDR—

By mail to: Pacific States Marine Fisheries Commission NMFS Economic Data  
Reports  
205 SE Spokane, Suite 100  
Portland, OR 97202

By fax to: 503-595-3450

Online at: <https://survey.psmfc.org>

Depending on a respondent's activity in GOA trawl fisheries in a given calendar year, the respondent for a catcher/processor completes and submits either the entire EDR or the EDR certification pages.

◆ The following must complete and submit the entire EDR:

- A catcher/processor owner, or the holder of the Amendment 80 QS permit, who harvested or processed groundfish in the GOA in that vessel.
- A catcher/processor leaseholder who harvested or processed groundfish in the GOA in that vessel.

◆ The following must complete and submit the EDR certification pages **only**:

- A catcher/processor owner who leased or sold the catcher/processor to another party, and who did not harvest or process groundfish in the GOA in that vessel.
- An owner of a catcher/processor that was lost or rendered permanently inoperable due to accident, and harvested no groundfish in the GOA in that vessel.
- A catcher/processor owner, and no one harvested or processed groundfish in the GOA in that vessel.

To ensure that each permit holder is consistently and accurately completing the EDR, an audit may be performed by a qualified accountant for the purpose of validating the data reported in the EDR. This step ensures that the data can be relied on to produce accurate and reliable information for the Alaska groundfish trawl fisheries.

If selected for validation, auditors will verify the data report by comparing specific elements of the report with the permit holder's records. To make this process as efficient and non-intrusive as possible, NMFS suggests respondents do the following:

- ◆ Keep a copy of the completed EDR or certification pages submitted. Copy and attach extra sheets as needed.

- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Make sure that the EDR aligns with the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as follows:
  - Audited financial statements
  - Reviewed financial statements
  - Compiled financial statements
  - Tax returns

**Annual Trawl Catcher/Processor EDR**

**Certification Page**

- Vessel owner or Amendment 80 QS permit holder information
  - Name of company, partnership, or other business entity
  - Amendment 80 QS permits held
  - Name of catcher/processors owned (if none, enter N/A)
  - Business telephone number, business fax number, and business E-mail address
- Vessel leaseholder information
  - Name of company, partnership, or other business entity
  - Business telephone number, business fax number, and business E-mail address
- Person Completing this EDR (check one)
  - QS permit holder or vessel owner - If same as above, do not repeat
  - Designated Representative
    - Name and title
    - Business telephone number, business fax number, and business E-mail address
- Buyer/Leaseholder information (if applicable)
  - Buyer/Leaseholder name
  - Business address
  - Telephone number
  - Date of Sale or Lease
- Vessel Owner/Operator Certification
  - Certify that all information is true, correct, and complete to the best of his/her knowledge and belief
  - Printed name and signature of Vessel Owner or Designated Representative
  - Date signed

**Economic data report**

**Vessel Identification**

- Amendment 80 QS Permit Number
- Vessel Name
- USCG Documentation Number
- ADF&G Vessel Registration Number
- ADF&G processor code
- Amendment 80 License Limitation Program (LLP) Number(s)
- Amendment 80 limited access fishery permit Number
- Name of Amendment 80 cooperative (if applicable)
- Home port
- U.S. gross registered tonnage, net tonnage, and length overall
- Beam, shaft horsepower, and fuel capacity (U.S. gal)
- Year Built

**Vessel characteristics: survey value**

- Most recent survey value of vessel and equipment (nearest 100 dollars)
- Indicate whether this is the approximate replacement value

Date of vessel's last value survey  
Indicate if survey value includes values of permits associated with vessel  
Indicate if survey value includes processing equipment

Vessel characteristics: fuel consumption

Vessel's annual and average fuel consumption per hour Fishing and/or processing  
Steaming (not fishing or processing) – fully loaded with product  
Steaming (not fishing or processing) – empty (transiting)

Vessel characteristics: freezer space

Amount of freezer space available at the beginning of the calendar year  
Maximum freezing capacity in pounds per hour

Vessel characteristics: processing capacity

Total number of processing lines on the vessel  
For each type of product processed on the line  
Species code  
Product code  
Number of processing lines  
Maximum throughput in pounds per hour for that product

Vessel characteristics: vessel activity

Record the total number of days the vessel was engaged in each of the following activities  
Number of days fishing  
A80 fishery  
Central and Western GOA  
All other fisheries  
Number of days processing  
A80 fishery  
Central and Western GOA  
All other fisheries  
Number of days traveling or offloading  
Number of days inactive

Revenues

Report the total amount of revenue received from all sources for each of the following:

Total fishery product sales  
Volume (metric tons)  
FOB Alaska revenue (US dollars)  
All other income derived from vessel operations  
Income from sale of LLP licenses associated with this vessel  
LLP number  
Revenue (US dollars)  
QS leased by other vessels  
quantity by species  
royalty revenue by species

Capital expenditures and materials usage

Report capital Expenditures associated with the following  
Fishing gear (nets, net electronics)  
Processing equipment, including freezing and cold storage  
Vessel and onboard equipment (other than fishing, processing, or storage equipment)  
Other capital expenditures related to vessel operations  
Purchase LLP license(s) for use on vessel  
LLP Number  
Cost

Expenses

Report total expenses associated with the following operating cost categories  
Fishing (deck crew) labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)  
Processing labor expenses (including bonuses and payroll taxes, but excluding benefits and insurance)

- Labor expenses for all other employees aboard the vessel
- Food and provisions (not paid by crew)
- Recruitment, travel, benefits, and other employee related costs
- Lease expense for this vessel and onboard equipment
- Fishing gear leases, repairs, and purchases (nets, doors, cables, etc.)
- Repair and maintenance expenses for vessel and processing equipment
- Freight, storage, and other sales costs for non-FOB sales
- Freight and storage costs other than for products (e.g., gear, supplies, etc.)
- Product and packaging materials
- Fuel and lubrication
- Observer fees and other fishery monitoring and reporting costs
- Cooperative costs including lawyer and accountant costs, association fees, and other fees charged by harvest cooperative
- General administrative costs including professional services and management fees
- Insurance (vessel insurance, P&I, and other insurance associated with the operation of this vessel)
- Fisheries landing taxes (including shared fisheries business tax and fishery resource landing tax)
- Total raw fish purchases from other vessels (all fisheries and species)
  - Metric tons
  - Cost
- Quantity and royalty costs for QS leased from other vessels by species
  - Quantity of QS (mt)
  - Cost

Labor

- Average and total number of individuals employed on board
  - Fishing (deck crew)
  - Processing
  - All other employees onboard the vessel
- Average hours per day a typical processing line employee worked
- Indicate if the vessel used a crew or revenue share system to pay crew
  - To pay some processing crew
  - To pay all processing crew
  - To pay some non-processing crew
  - To pay all non-processing crew

Crew licenses and CFEC permits

- For each individual who worked as a captain or harvest crew member, record either
  - Alaska Commercial Crew license 7-digit number or
  - CFEC gear operator permit number.
- Do not record more than one license or permit number for any individual.

The burden hours are estimated to be 22 hours per response, including time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The estimated 22 hours includes the submittal of the entire EDR, the submittal of the certification pages only, and submittal of response to questions from an auditor.

An adjustment was made to reflect the increased number of respondents and the current postage cost (0.49 instead of 0.45).

<b>Groundfish Trawl Catcher/Processor EDR, Respondents</b>	
<b>Number of respondents</b>	<b>30</b>
<b>Total annual responses</b>	<b>30</b>
Frequency of response = 1	
<b>Total burden hours</b>	<b>660 hr</b>
Time per response = 22 hr	
<b>Total personnel cost</b> (\$37/hr x 660)	<b>\$24,420</b>
<b>Total miscellaneous costs</b> (\$34.95)	<b>\$35</b>
Photocopying (\$0.05 x 14 pp x 30= \$21)	
Online (0.05 x 21 = \$1.05)	
Mail (0.49 x 2 = \$0.98)	
Fax (\$6 x 2 = \$12)	

Approximately \$85,000 was spent to maintain the program in 2016, including working with vessel owners, maintaining the database, staff to oversee the data collection, and hardware to store the data.

The EDR must be sent to Pacific States, which removes all of the Federal Government costs and burden for handling the EDR.

<b>Groundfish Trawl Catcher/Processor EDR, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel cost</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>
<b>Maintenance costs</b>	<b>\$85,000</b>

**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.**

All EDR instructions and online submission is available on the internet (<http://www.psmfc.org/goatrawl/index.html>) and additionally, applications can be emailed, faxed, or mailed to applicants if requested. The intent of the online submission system is to provide a user-friendly and efficient format to submit the EDR.

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

No duplication exists for this information collection. In 2014, the Amendment 80 program EDR was rolled into this collection to reduce duplicative information collection.

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

This information collection does not impose a significant impact on small entities.

There are approximately 14 entities that submit EDRs on behalf of vessels owners and leaseholders and only 1 catcher/processor is considered a small entity.

In addition, the Western Alaska Community Development Quota Program owns harvesting and processing vessels that operate in the GOA. Up to two Western Alaska Community Development Quota groups are considered small entities for purposes of the Regulatory Flexibility Act and would fall under this information collection depending on their annual fishing operations.

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

This data collection provides the Council and analysts with relevant baseline information that can be used to assess the impacts of management decisions on affected harvesters, processors, and communities in the GOA. The Council expressed the need to better understand the potential economic and employment impacts actions would have on specific job categories of persons in fishing, processing, or administration of fishing operations. Additional data are needed prior to the implementation of a GOA trawl bycatch catch share program to augment data that are currently available. The Council and NMFS agrees that baseline information collected by this EDR will provide a better understanding of the crew members that participate in the GOA trawl fishery, processing workers that work in plants processing trawl caught groundfish from the GOA, and these worker's compensation in the time period before additional catch share programs are established in the GOA.

**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.**

A *Federal Register* Notice was published on July 6, 2017 (82 FR 31304), to solicit public comment. The comment period ended on September 5, 2017. No comments were received.

Comments were also solicited through a questionnaire emailed to stakeholders that filed an EDR in 2015, the most recent year that was completed. The responses to the questionnaires were sent to stakeholders that operate and represent catcher/processors that harvest and process groundfish.

Two comments were received. One stakeholder expressed satisfaction with the overall data collection. A second stakeholder had no comment.

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



No payment or gift will be provided under the GOA Trawl EDR Program.

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

The information collected is confidential under section 402(b) of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801, *et seq.*). It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. Storage for the information includes a computerized data base that is password protected and to which access is limited. Paper records are filed in folders in locked cabinets in areas that are accessible only to authorized personnel. Buildings where the records are maintained employ security systems with locks and access limits. Only those that have the need to know, to carry out the official duties of their job, have access to the information. The personnel of NMFS Alaska Region and its contractors (Pacific States) are instructed on the confidential nature of this information.

**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 involve information of a sensitive nature.

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

Total estimated unique respondents: 30, increased from 25. Total estimated responses: 30, increased from 25. Total estimated time burden: 660 hr, increased from 550 hr. Total estimated personnel cost: \$24,420, increased from \$20,350.

**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).**

Total estimated miscellaneous costs: \$35, increased from \$31, due to minor postage increases and other supply costs.

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

Total responses: 0. Total estimated time burden: 0 hr. Total personnel cost: \$0. Total miscellaneous costs: \$85,000, increased from \$70,000.

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

Adjustments are made due to revisions in miscellaneous costs and increased number of respondents. The change of annualized costs to the Government increased to account for actual costs, instead of projected costs before the program was in place.

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

**publication.**

The information collected will not be published. It is anticipated that the information collected will be disseminated in aggregated and non-confidential form to the public or used to support publicly disseminated information.

**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.