

**SUPPORTING STATEMENT
WEST COAST REGION GROUND FISH TRAWL FISHERY MONITORING
AND CATCH ACCOUNTING PROGRAM
OMB CONTROL NO. 0648-0619**

INTRODUCTION

This request is for revision and extension of the current collection for the West Coast Region Groundfish Trawl Fishery Monitoring and Catch Accounting Program.

In January 2011, the National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) implemented a trawl rationalization program, a catch share program, for the Pacific coast groundfish fishery's trawl fleet. The program was developed through Amendment 20 to the Groundfish Fishery Management Plan (FMP), under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 *et seq.*) and consists of an individual fishing quota (IFQ) program for the shorebased trawl fleet (including whiting and non-whiting fisheries); and cooperative (coop) programs for the at-sea mothership (MS) and catcher/processor (C/P) trawl fleets (whiting only). Fixed allocations to the limited entry trawl fleet were developed through a parallel process with Amendment 21 to the FMP. The regulations implementing the program were effective January 1, 2011; all of the necessary tracking systems to make the program operational became active on January 11, 2011, the date fishing began under the new program. Since that time, the Council and NMFS have been addressing implementation issues as they arise. To achieve individual accountability for catch and bycatch and track total catch, the shorebased IFQ Program is subject to 100 percent monitoring both at-sea and dockside. In addition to 100 percent monitoring at-sea, motherships and catcher/processors are subject to flow scale requirements that include daily testing, reporting, and an annual inspection.

A. JUSTIFICATION

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

In order to ensure the individual accountability for catch and bycatch under the trawl rationalization program, a combination of at-sea and dockside monitoring as well as the use of flow scales are required for participants in the Shorebased IFQ Program and the coop programs for the at-sea sector.

For catch monitor service providers

- The preparation and submission of an application to be a certified catch monitor provider.
- Appeals submissions by businesses not issued certifications or decertified.
- The submission of qualifications for catch monitors.

For catch monitors

- The preparation and submission of an application to be a certified catch monitor (submitted to the service provider only and not counted as a burden for this information collection).
- Appeals submissions by individuals not issued certifications or decertified.

For at-sea processors (MS and C/P)

- The requirement to have an approved scale for weighing catch at sea, a printed record of catch weight and cumulative weights, and a printed record of daily scale tests.

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 catch monitor service provider application is a narrative application submitted to NMFS by businesses interested in being certified to provide catch monitor services. This is a one-time application process. NMFS uses the application to determine if a business can provide adequate services to support the catch monitor needs and that there is no apparent conflict of interest. Information provided includes contact and business information, prior related experience and description of ability to carry out a catch monitor provider's responsibilities.
- A catch monitor provider appeal is a narrative that NMFS may receive from businesses that were not issued catch monitor provider certifications or businesses that have been decertified. The purpose of an appeals submission is to provide NMFS with information that may result in the business receiving a certification or not being decertified. Fewer than two letters are expected to be submitted annually.
- Catch monitor qualifications are copies of application materials submitted by the catch monitor applicants to catch monitor service providers. The catch monitor service provider then submits the qualifications to NMFS when an individual is initially hired to be a catch monitor. Each applicant must submit their qualifications prior to their initial training session and certification as a catch monitor. NMFS will use the documents to verify that candidates are qualified and do not have an apparent conflict of interest or obvious past experiences that may impair their objectivity as a catch monitor.
- A catch monitor appeal is a narrative that NMFS may receive from individuals that were denied a catch monitor certification or that have been decertified. The purpose of an appeals submission is to provide NMFS with information that may result in the individual receiving a certification or not being decertified.

At-sea scales for mothership and catcher/processor vessels that weigh catch at-sea.

The At-Sea Scale Program is dependent on two types of motion-compensated electronic scales.

- A platform scale with a capacity between 50 and 60 kg is used by NMFS-certified observers as part of their sampling duties and to verify the accuracy of the flow scale.
- A flow scale, or self-contained belt scale, is capable of continuously weighing up to 100 metric tons (mt) of fish per hour and is used by the vessel to weigh either total catch or quota species.

Annual inspection. Once a scale is installed on a vessel and approved by NMFS for use to weigh fish at-sea, it must be re-inspected every 12 months to ensure the scale meets all of the applicable performance and technical requirements. The Alaska Region conducts the inspections for the affected vessels. Therefore, the burden hours associated with the inspections are covered by the Alaska collection OMB control no. 0648-0330.

Daily scale testing. Flow (belt) and platform scales used to weigh fish at-sea must be tested daily. The test information is reported on a scale test report form which is used by NMFS to ensure scale accuracy. This is the only test that ensures the scale accuracy while the scale is in motion.

Printed reports

- *Daily catch weight and cumulative weight.* Scale printouts must be produced at least daily and before any information stored in the scale's memory is replaced. Scale printouts show: the vessel name and permit number; the date and time the information was printed; the haul number; the total weight of the haul; and, the total cumulative weight of all fish and other material weighed on the scale since the last annual inspection. The printed output of scale weights is used by NMFS staff, observers, and enforcement personnel to maintain accurate records of catch and to ensure compliance with quotas. The scale printout also forms the basis of an audit trail for each haul that can be used to resolve inconsistencies in catch reports submitted by the observer and the vessel or processor. These printouts are not submitted to NMFS. The printed report must be provided to the authorized scale inspector at each scale inspection and must also be printed at any time during the fishing year upon request of the observer, the scale inspector, NMFS staff, or an authorized officer. The printed reports must be retained by the vessel owner for three years after the test occurred.
- *Audit trail.* Adjustments to the scale must be recorded in the form of an audit trail that can only be cleared by NMFS or other authorized personnel. Although scales may be recalibrated or tested at any time during the day, the audit trail is designed to record information that will be used to determine whether a scale had been incorrectly adjusted and then readjusted just prior to the scale test. An audit trail in the form of an event logger must be provided to document changes made using adjustable components and cannot be changed or erased by the scale operator, can be printed at any time, and can be cleared by the scale manufacturer's representative upon direction by NMFS or by an authorized scale inspector.

Calibration log. The vessel operator must print the calibration log on request by NMFS staff or an authorized officer, or person authorized by NMFS. Because of improvements made to scale electronics, it is now possible to record the magnitude and direction of a calibration relative to the previous calibration. It is also possible to record the time a calibration occurred. Requiring the retention and reporting of calibration data could be used to detect purposeful mis-calibration, thereby reducing the likelihood of underreporting of catch. NMFS would require vessel operators to print and retain a calibration log that records the last 1,000 calibrations or all calibrations since the scale electronics were first put into service, whichever is less. The limit of 1,000 faults and 1,000 calibrations would be expected to accommodate the total number of calibrations likely to occur between annual scale inspections. The calibration log must be printed and retained by the vessel owner before any information stored in the scale computer memory is replaced. NMFS would not require submission of the printed record of the scale calibration log but would collect and review those data at the time of the annual scale inspection. Those data must also be available to OLE in cases where scale tampering is suspected. The calibration log must be printed on request by NMFS staff or NMFS authorized personnel and must also be printed and retained by the vessel owner before any information stored in the scale computer memory is replaced.

- *Fault log.* The operator must ensure that each scale is tested as specified in regulation and that the information from all scale tests, including failed tests, is reported. The reporting of failed tests will result in less bias in overall test results and will improve the ability to monitor scale results. In addition, better consistency in reporting through time will result.

Notify Observer of flow scale test. Each vessel operator must notify the observer at least 15 minutes before the time that a scale test will be conducted and must conduct the test while the observer is present. No form exists for this notice; vessel personnel verbally inform the observer that a scale test is scheduled.

Video monitoring of flow scale area. Vessels required to weigh catch at-sea must provide video monitoring of fish entering, moving across, and leaving the weighing platform of the scale. Vessels are also required to provide video monitoring of all access panels allowing adjustments to the scale, and of crew activities in these areas. The scale display head and the light showing when the scale is in fault mode would need to be within the camera view. The video allows NMFS to verify that all catch is being weighed, that no one is tampering with the scale, and that the scale is operating correctly.

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.

Printed reports of groundfish catch weight, audit trail, calibration log, fault log and video monitoring of flow scale area are all automated.

Fish tickets must be submitted electronically. NMFS is removing the electronic fish ticket elements of this information collection and placing them in OMB Control Number 0738.

4. Describe efforts to identify duplication.

This use of at-sea motion compensating scales and video monitoring is part of a specialized and technical program designed for the Alaska groundfish fishery. All the affected vessels fish in the Alaska groundfish fishery where they already meet the scale and video requirements. Maintaining similar equipment and performance requirements and using a single annual scale inspection for both fisheries reduces duplication.

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

The companies that provide observers and catch monitors are generally small businesses. Given the relatively small numbers of these respondents, separate requirements based on size of business have not been developed. Only the minimum data required to meet the objectives of the overall monitoring program are requested from all applicants. For the at-sea vessels, in addition to revenue in the Pacific Coast groundfish fishery, when considering the revenue from Alaska, none of the motherships or catcher/processors would be considered small businesses (79 FR 54590; September 12, 2014).

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

Data collected by certified observers and catch monitors as well as from at-sea flow scales are necessary for the conservation and management of the Pacific Coast groundfish fishery. Maintaining the integrity of the data collections is an important aspect of the trawl rationalization program and assuring that individual catch accountability is maintained. The trawl fishery is a multispecies fishery in which the allowable harvest levels for some stocks (potentially including overfished species) constrain access to harvest of the full allocations of many targeted stocks. If the integrity of the monitoring program is not maintained, the elimination of individual accountability could generate an incentive to alter fishing behavior such that vessels targeted stocks that are more difficult to catch without encountering high levels of constraining species. The high level of quality monitoring under the trawl rationalization program has helped the fleet make tremendous bycatch reductions.

The intent of provider permits is to allow only qualified business to provide catch monitor and observer services so the integrity of the data collections are maintained. In addition, assuring that the businesses are qualified to provide aids in ensuring the wellbeing of individuals deployed as observers and catch monitors. The application and renewal process for new providers and the annual renewal would be used to verify that providers are free of conflict of interests, or state or federal criminal convictions that

could undermine the integrity of data or affect the wellbeing of observers or catch monitors.

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 published on November 9, 2017 (82 FR 52040) solicited public comments. We received one comment on the information collection requirements. A fishing industry compliance director commented: “The collection estimates for time and cost look accurate as described under 0648-0619 (West Coast Region Groundfish Trawl Fishery Monitoring and Catch Accounting Program), based on my knowledge of the 3 sectors of the catch share program, and the required reporting burdens therein.”

In addition, we solicited comments from staff at NMFS and the Pacific States Marine Fisheries Commission who regularly manage and process these information collections. We revised estimates slightly based upon their feedback (see Table 1 and the paragraph under A15).

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

No payments or gifts are provided.

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

As stated on the forms, section 402(b) of the Magnuson-Stevens Act sets forth procedures for confidentiality of fisheries statistics, including statistics collected by observers and NMFS staff. [NOAA Administrative Order 216-100](#), Protection of Confidential Fisheries Statistics, further establishes procedures for confidentiality of collected and submitted data.

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 being asked.

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

The total number of unduplicated respondents is 153. Total annual responses decreased from the 2016 application amount of 7,449 to 2,169 responses, and hours decreased from 1,826 to 447 hours. These reductions resulted from: 1) the maturity of the trawl rationalization program, which now has a history of established providers of observers and catch monitors, and expects very few new applicants, and 2) the removal of some elements of this package to group them with similar requirements in other information collections (see A15 below). The resulting change in labor cost (based on \$25/hour) is a reduction from \$44,425 to \$11,175.

See the burden tables on page 9 (Tables A and B).

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

Annualized capital costs for computer hardware are \$3,510. Annualized reporting/recordkeeping costs are \$168.

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

The total annualized cost to the Federal government costs from this revision increases from \$14,571 to \$14,853.

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

Program Changes: As part of this revision/extension, NMFS is removing 4 elements of this information collection and placing them in another existing collecting, **OMB Control Number 0648- 0620**, so that they are grouped with similar requirements. These elements are: the preparation and submission of catch monitoring plans by first receivers, the inspections that are required as part of the catch monitoring plans, the in-season testing of shorebased scales for first receivers, and the printed reports that occur as part of the in-season testing for first receivers. *The burden estimates in this package have been removed: 2,640 responses, 960 hours and \$360. However, only burden and cost based on the actual 45 first receivers in OMB Control Number 0648-0620, have been transferred: since the inception of -0619 and -0620, when there was an initial estimate of 80 first receivers, the actual number has stayed in the low 40s, but had not been corrected in 0619.*

Table of burden and cost added in OMB Control Number 0648- 0620 change request.

	Number of respondents	Frequency of annual responses per entity	Previous total annual responses	Total annual responses	Estimated hours per response	Total annual burden hours	Total labor cost (\$25/hr)
Catch monitoring plans/ First receivers Preparation and Submission	45	1	80	45	4	180	\$4,500
Catch monitoring plans/ First receivers Inspection	45	1	80	45	2	90	\$2,250
Shorebased Scales/ First receivers/ Inspection	45	Variable	80	45	1	45	\$1,125
Shorebased scales/ First receivers/ Reports	45	Variable	2400	1,350	10 min	225	\$5,625
TOTALS	45		2,640	1,485		540	\$13,500

Table B. Total Annual Miscellaneous Costs

	Total Annual Responses	Misc. costs per response	Total Misc. costs for all respondents
Catch monitoring plans Mail	45	\$3	\$135
Shorebased scale reports Printing	1,350	\$0.05	\$67.50 (\$68)
TOTAL			\$203

Adding 1,485 responses, 540 hours and \$203 to the currently approved totals in OMB Control No. 0648-0620, increases responses from 3, 344 to 4,829, hours from 405 to 945, and recordkeeping/reporting costs from \$8,985 to \$9,188.

Additionally, NMFS is removing 2 elements of this information collection and placing them in OMB Control Number 0648-0738, so that information collections for electronic fish ticket reporting for West Coast Region groundfish fisheries are grouped together. *Therefore, 2,632 responses and 404 hours have been added to OMB Control Number 0648-0738. No recordkeeping/reporting costs were moved to OMB Control Number 0648-0738, as the efish ticket submissions that are already part of this collection do not have a cost beyond the usual business requirements (use of a computer and the internet).*

Table of burden and cost added in OMB Control Number 0648- 0738 change request.

	Number of respondents	Frequency of annual responses per entity	Total annual responses	Estimated hours per response	Total annual burden hours	Total recordkeeping/reporting costs
Electronic fish tickets/ First receivers submissions	45	Variable	2400	10 min.	400 hrs	\$0*
Electronic fish tickets/ First receivers Pacific whiting disposition recordkeeping	9 of 45	26	232	1 min.	4 hrs	\$0
TOTALS			2632		404 hrs.	\$0

***Previously, the cost per efish ticket and recordkeeping was \$5.36, totaling \$14,100. This would have been removed due to the transfer, but is also not being applied in OMB Control No. 0648-0738, making such submissions in line with the \$0 costs in OMB Control No. 0648-0738 and other such collections.**

Adjustments: There are now fewer new provider applications – now only one new and five renewal applications. Previously there were nine new applications, at 10 hours each, and now only one new one and five renewals. **This removes 30 hours.**

There are five fewer sets of catch monitor applications, **removing 5 hours.**

Times for calibration logs and fault logs have been adjusted upward, changing the total burden for the former from 6 to 13 and the latter, from 6 to 19. **This adds a total of 20 hours.**

Thus, there is a net decrease of 15 hours in adjustments.

There was also a decrease of \$3,510 in first receiver computer costs that had been annualized over 3 years, in the 2015 ICR. This cost no longer applies. It had also not been applied to any of the ICs, so does not show as a decrease in ROCIS.

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

No formal scientific publications based on these collections are planned at this time. The data will be used for management reports and fishery management plan amendments and evaluations by the NMFS and the Council.

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are employed.

Table A - Total Annual Burden Hours, Labor, and Related Costs

	Number of respondents ^{1/}	Frequency of annual responses per entity	Total annual responses	Estimated hours per response	Total annual burden hours	Total labor cost (\$25/hr)
Observer provider permits						
Application preparation & submission *	1	1	1	10	10	\$250
Annual Renewal*	5	1	5	2	10	\$250
Appeals – written response & submission	1	1	1	4	4	\$100
Catch monitors						
Qualifications	45	1	45	1	45	\$1,125
Appeals- written response & submission	5	1	5	4	20	\$500
At-sea scales (MS, C/P)						
Daily testing reports	16	30	480	30 min.	240	\$6,000
Daily catch and cumulative weight reports	16	30	480	10 min.	80	\$2,000
Audit trail	16	24	384	1 min.	6	\$150
Calibration log	16	24	384	2 min.	13	\$325
Fault log	16	24	384	3 min.	19	\$475
Video monitoring	16	0	0	0	0	0
Total for collection	153		2,169		447	\$11,175

Table B - Total Annual Miscellaneous Costs

	Total Annual Responses	Misc. costs per response	Total Misc. costs for all respondents
Observer providers permits			
Mail applications and renewals	6	\$5	\$30
Appeals- fax or mail written response & submission	1	\$3	\$3
Catch monitors			
Appeals- mail written response & submission	5	\$3	\$15
At-sea scales daily test reports - printing	480	\$0.05	\$24
At-sea daily catch and cumulative weight reports – printing	480	\$0.05	\$24
At-sea audit trail	384	\$0.05	\$19
At-sea calibration log	384	\$0.05	\$19
At-sea fault log	384	\$0.05	\$19
At-sea video monitoring	0	0	0
Total for collection	2,124		\$153

a - Assumes that a third of the first receivers (45 are in the permit system as of 1/11/2018) purchase a new computer in a given year.