

SUPPORTING STATEMENT
WEST COAST REGION VESSEL IDENTIFICATION REQUIREMENTS
OMB CONTROL NO: 0648-0355

A. JUSTIFICATION

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

This submission requests extension of Office of Management and Budget (OMB) approval for a vessel identification requirement in the Pacific Coast Groundfish Fishery. Due to a change of region name, this information collection is now titled West Coast Region Vessel Identification Requirements, rather than Northwest Region Vessel Identification Requirements.

The success of fisheries management programs depends significantly on regulatory compliance. The vessel identification requirement is essential to facilitate enforcement. The ability to link fishing or other activity to the vessel owner or operator is crucial to enforcement of regulations issued under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (including provisions at 16 U.S.C. 1853).

Vessel identification is required by all open access and limited entry commercial vessels over 25 ft. in length in the West Coast region. Vessel identification requirements are set forth in the regulations implementing the Pacific Coast Groundfish Fisheries Management Plan at [50 CFR 660 Subpart C](#).

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 vessel's official number must be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. It identifies each vessel and should be visible from a distance at sea and in the air. The official number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, to ascertain whether the vessel's observed activities are in accordance with those authorized for that vessel. The identifying number is used by the National Marine Fisheries Service (NMFS), the U.S. Coast Guard (USCG), and other marine agencies in issuing violations, prosecutions, and other enforcement actions. Law enforcement personnel rely on this information to assure compliance with fisheries management regulations. Vessels that qualify for particular fisheries are readily identified and gear violations are more readily prosecuted, allowing for more cost-effective enforcement. Cooperating fishermen also use the number to report suspicious activities. Regulation-compliant fishermen ultimately benefit as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

The information collected will not be disseminated to the public; as it consists solely of marking vessels with the appropriate vessel number. This information is not submitted to NMFS.

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 requirement that each vessel display an identification number on its deckhouse or hull, and its weather deck, does not lend itself to technology. Vessel monitoring system (VMS) units are currently required on all groundfish vessels consistent with regulations at 50 CFR 660.14. Although VMS signals, which are transmitted hourly, can be used to identify a vessel's fishing location, it is difficult for enforcement personnel aboard vessels and aircraft to use to identify specific vessels. Therefore a vessel identification number requirement continues to be useful for basic enforcement.

4. Describe efforts to identify duplication.

Existing Federal and State reporting requirements have been reviewed to ascertain that no duplication of information collection results from this action. There is no duplication with other collections. The USCG requires the name of the vessel and hailing port to be marked on its stern for documented vessels (46 CFR 67) and state-issued block numbers on the forward half of the vessel for undocumented vessels (i.e., small boats that are registered with the state) (33 CFR 173); however vessel names, ports, and block numbers may be changed, making tracking and identification of the vessel more difficult and complex. The USCG also requires documented vessels to have their official identification number permanently marked on the vessel. However, this is usually done on an interior structural beam in the engine room. For efficient enforcement and accurate reporting, an identifying number is required on the outside of the vessel in large numbers by the NMFS because a vessel's identification number does not change.

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

Although nearly all vessels in the respective fisheries are categorized as small businesses, the collection of information will not have a significant economic impact or burden on small businesses in terms of time and resources. Therefore, no special modifications of the requirements were considered necessary.

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

The NMFS and the USCG could not enforce the fisheries management measures if this collection were conducted less frequently. The numbers must periodically be maintained to remain legible.

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

This collection is consistent with the guidelines.

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 Federal Register Notice was published on December 4, 2017 (82 FR 57224). No comments were received.

Comments were also sought from respondents. A comment was received from a fisherman regarding the marking of vessels, longline and longline pot fishing gear. The commenter was in favor of using Automatic Identification System (AIS) transmitters to mark gear and vessels, instead of radar reflectors on each end of longline hook and pot gear, and a physical day shape in the rigging identifying the fact that a vessel is engaged in fishing. The commenter felt these requirements are antiquated and obsolete and should be removed from the regulations. The commenter stated that at present time, AIS is not officially recognized for the purpose of marking gear, although vessels are using it anyway because it is effective in identifying and locating gear. AIS saves thousands of dollars by lowering the chance of losing gear, which is why vessels are willing to work in a grey area by adopting it. With the change to AIS technology the fishery would be able to unify the regulations concerning pots and hook gear, which at present time is different for each gear type and confusing.

NMFS response:

The Pacific Fishery Management Council (PFMC) develops proposed regulations for the Pacific Coast Groundfish fishery, including the marking of vessels and gear, for consideration by the Secretary of Commerce. Over the past several years, the PFMC has been considering and evaluating various electronic monitoring systems and their potential uses, including Automatic Identification System (AIS). NMFS will forward the comment to the PFMC for consideration in their evaluations of vessel and gear identification.

Consultation outside the agency is assured by the Pacific Coast Groundfish regulatory process, set forth in the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations (Pacific Coast Groundfish Fishery Management Plan and 50 CFR 660, Subpart G). There are no issues that have not already been resolved.

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

No confidentiality is promised. The information is on public display.

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 sensitive questions.

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

The estimated total number of vessels affected is 1,201 vessels - 421 limited entry vessels and 780 open access vessels (Table 1). This number is an overestimate because it includes vessels under 25 feet, and limited entry permits that may be stacked on the same vessel. The identifying number must be displayed on the vessel in three locations and maintained in good condition. Given the adverse weather conditions and salt water, previous estimates assumed that each number would need to be repainted or repaired annually. However, SFD staff previously consulted with various groundfish vessel captains participating in various groundfish pot, longline, midwater trawl, bottom trawl fisheries, and determined that gear markings have a five-year life span. The estimated time to display or otherwise affix the number at each location is 15 minutes. Estimated burden of total annual response time: 1,201 vessels x 3 marking locations (one response per vessel) = 1,201 responses x 45 minutes = 901 hours, **with responses annualized to 240 responses and hours annualized to 180 hours.**

Labor costs in the fishing industry are estimated at \$21.00 per hour utilizing labor estimates provided via Washington State Employment Security Department reports for occupation title “Painters, Construction, and Maintenance.”

Total fleet labor cost: \$18,946, **annualized over 5 years is \$3,789.**

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).

The cost to fishermen is minimal. Materials needed are paint and paintbrush, and possibly a stencil. Material costs are estimated as follows: 1 quart of exterior paint = \$14.95, 1 paintbrush = \$2.00, 1 small container of mineral spirits (cleaning) = \$4.45 (total \$21.40). A paint-on number stencil is optional, and optional custom printed stick-on numbers = \$120 (set of 3). Given the higher cost for the stick-on option, these vessel marking estimates provided assume that vessel captains would not choose the stick-on marking option. For 1,201 vessels, the material cost would be \$25,701, and **annualized over 5 years, would be \$5,140.**

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

None.

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

Adjustment: Based on current permit numbers and estimates of 2016 participation and vessel landings, respondents increased from 1,125 to 1,201. Estimated materials costs per vessel are the same at \$21.40. Just as in the previous NMFS estimate based on consultation with fishing vessel captains representing various gear types (pot, longline, bottom trawl, midwater trawl, at-sea processors), we assumed vessel markings to have a five-year lifespan, resulting in an annualized burden of 180 hours, at a materials cost of \$5,149.

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

No results are published.

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.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

Table 1	Limited Entry				Open Access	Fleet Totals
	Trawl	Mother-ship	Fixed Gear	Pot		
Total number of vessels	183	4	202	32	780	1201
Number of markings per vessel	3 markings					
Total number of markings	549	12	606	96	2340	3603
Estimated time per vessel to display or affix the number at each location	15 minutes					
Estimated time per vessel to display or affix all required markings	45 minutes (1 response per vessel)					1201

Total burden hours all vessels	137.25	3	151.5	24	585	901, annualized to 180
Cost per vessel for materials	\$21.40 per vessel *					
Total annual cost for materials	\$3,916	\$85.60	\$4,322.80	\$684.80	\$16,692	\$25,701, annualized to \$5,140
Cost per hour for labor, cost per marking	\$21.00 per hour **					
Total annual cost for labor	\$2,882	\$63	\$3,181	\$504	\$12,285	\$18,916

* Material costs are estimated as follows: 1 quart of exterior pain = \$14.95, 1 paintbrush = \$2.00, 1 small container of mineral spirits (cleaning) = \$4.45 (total = \$21.40).

**Labor estimate of \$21/hour provided via Washington State Employment Security Department reports for occupation title "Painter, construction, and maintenance"