

**SUPPORTING STATEMENT**  
**1 ATLANTIC HIGHLY MIGRATORY SPECIES (HMS)**  
**RECREATIONAL LANDINGS AND BLUEFIN TUNA CATCH REPORTS**  
**OMB CONTROL NO. 0648-0328**

**A. JUSTIFICATION**

This request is for a revision of a currently approved collection.

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

The U.S. Secretary of Commerce is authorized to regulate fisheries for Atlantic HMS under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA; 16 U.S.C. 1801 *et. seq.*) and the [Atlantic Tunas Convention Act of 1975](#) (ATCA; 16 U.S.C. 971 *et. seq.*), as amended.

Under ATCA, the Secretary of Commerce is required to promulgate regulations as may be necessary and appropriate to implement binding recommendations adopted by the International Commission on the Conservation of Atlantic Tunas (ICCAT). ICCAT requires the United States to collect biological statistics for research purposes and establishes annual quotas that limit the overall U.S. bluefin tuna and swordfish catches and U.S. recreational marlin landings. ICCAT also requires that data be collected on all sources of fishing mortality. ATCA specifically provides the Secretary of Commerce with the authority to “require any commercial or recreational fisherman to obtain a permit from the Secretary and report the quantity of catch of a regulated species” [16 U.S.C. 971(d)(c)(3)(I)]. Domestically, under the authority of the MSA, the 2006 Consolidated Atlantic HMS Fishery Management Plan (FMP) was developed and implemented to manage Atlantic HMS fisheries and establish the framework for managing the U.S. quotas.

Timely access to recreational bluefin tuna catch data (e.g., landings and dead discards) and swordfish and marlin landings is vital to effectively monitor and manage the U.S. quotas. This collection provides such access so that managers can implement appropriate measures to limit catch or landings as necessary. For example, fishing seasons may be closed when a designated limit is reached. This collection also allows the National Marine Fisheries Service (NMFS) to report the total catch of bluefin tuna and total landings of swordfish and billfishes annually to ICCAT, consistent with international obligations. Quota overages may require adjustments in future years under domestic regulations or result in penalties including reductions in future annual quota allocations through ICCAT.

This collection also includes mandatory reporting of bluefin tuna that are landed or discarded dead by recreational Angling category and commercial Atlantic tunas General, Atlantic tunas Harpoon, or HMS Charter/Headboat vessel permit holders. NMFS implemented catch reporting under Amendment 7 to the 2006 Consolidated Atlantic HMS FMP (HMS FMP) to better account for all sources of bluefin tuna fishing mortality as required by ICCAT. Catch data includes information about bluefin tuna that are caught and discarded dead as well as those that are landed.

Under this collection, fishermen in states other than North Carolina and Maryland have the option of using a phone-in system, internet website, or a smartphone app, to report their recreational landings of Atlantic swordfish, white marlin, blue marlin, or sailfish or their commercial or recreational catch of bluefin tuna. Additionally, if a fisherman reports recreationally landing a bluefin tuna greater than or equal to 73" in length, NMFS staff calls to verify reported information. These data collection systems are in place for states along the Atlantic and Gulf of Mexico and the U.S. territories in the Caribbean. However, when a fish is landed in either Maryland or North Carolina, state reporting stations are used to submit a state landings report (catch card) and obtain a fish tag. The states report these landings to NMFS on a weekly (NC; year-round) or bi-weekly (MD; during the bluefin tuna season, June-October) basis, and submit final, complete, annual summary reports at the end of the year. The State of Maryland also requires landings of sharks to be reported on a landing card; this aspect of the collection is voluntary under Federal regulations.

**2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 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.**

This information collection applies to all recreational fishermen that land billfishes or swordfish along the U.S. Atlantic, Gulf of Mexico, and Caribbean; recreational fishermen that land sharks in the State of Maryland; and commercial or recreational fishermen who catch bluefin tuna with hand gear. NMFS requires a report for each individual landing of billfish or swordfish from recreational fishermen, and a report for each bluefin tuna caught and landed or discarded dead by Angling category (recreational), General category, Harpoon category, and Charter/headboat category permitted fishermen.

NMFS uses the information collected to monitor and manage domestic fisheries for swordfish, bluefin tuna, sharks, and billfishes in order to comply with ICCAT limits and annual reporting requirements, and domestic law. NMFS also uses the information in stock assessments or in scientific studies as appropriate. Other states and agencies, including fishery management councils and interstate fishery management commissions, may use the data to coordinate with other fishery management programs. The information is also valuable for determining the geographic distribution of the catch and recreational landings of these species, which is an element of NMFS' domestic fishery management.

In lieu of the federal collection above, for recreational landings of swordfish, billfishes, and bluefin tuna in the States of Maryland or North Carolina, and for sharks in the State of Maryland, the angler must instead meet state requirements. These state requirements require the angler to complete a catch card at a state reporting station and affix a state tag to the landed fish. The catch card requests the information identified below. The States of Maryland and North Carolina then summarize this information and report it to NMFS on a weekly (NC) or bi-weekly (MD, June-October) basis. A complete summary report is presented annually to NMFS by each State.

The following information is collected on the Maryland and North Carolina catch cards:

Date is necessary for verification of landings information and for use in scientific studies of

stock movements and domestic policy development. Species is necessary to categorize and account for the landing appropriately. Vessel name, registration # (state ID), permit holder's name, and Atlantic HMS Permit number are necessary to verify that the angler has valid permits (state fishing license and HMS vessel permit), and to identify any fraudulent reporting. The permit holder's name, phone number, vessel name, and vessel identification number are collected with purchase and renewal of HMS vessel permits (OMB 0648-0327), and can be compared to the information entered on the catch card. Type of trip (private, charter, or headboat) is necessary to characterize the fishery for the development and analysis of regulatory actions. Was this fish caught during a tournament? and Tournament name are necessary to identify fish that would/should have already been reported through the tournament reporting collection (OMB 0648-0323) and avoid double counting. Fish size (length and/or weight) and, for sharks, Gender, is necessary for use in scientific studies of stock life history (e.g., reproductive potential).

Recreational fishermen that land swordfish or billfish in a State other than Maryland or North Carolina, including the U.S. Virgin Islands and Puerto Rico, or recreational fishermen or commercial General or Harpoon category or HMS Charter/Headboat category fishermen that catch bluefin tuna in any state or federal waters must report their catch/landing via phone, internet, or smart phone app. To report bluefin tuna catch or landings, fishermen may call (toll-free) 1-888-872-8862, and will be led through an interactive voice reporting (IVR) system. Fishermen answer automated questions by keying in responses. If a recreationally-caught bluefin tuna greater than or equal to 73" is landed and reported, a follow-up call may be made by NMFS staff to the respondent to verify the submitted data. Swordfish and billfish may also be reported by calling a separate toll-free number. When reporting swordfish and billfish on this system, anglers will be prompted to leave a voicemail detailing permit, landings, and contact information and will receive a follow-up call from NMFS staff to verify the report and give a report confirmation number.

In addition to the same information collected by the Maryland and North Carolina catch cards that is itemized above, the following information is also collected for bluefin tuna, swordfish, and billfish through the phone, online reporting, and phone app systems: trip departure date and time; port and state of departure; trip end date and time; port and state of landing; fishing technique (deep drop, drift, troll, kite, or other); bait type (live, dead, lure, combination, or other); hook type ("J" hook or circle hook); approximate time hooked; approximate fight time; and number of releases for each species. Responses to each of these items provide trip and fishery-specific information for social, economic, and biological analyses, thereby enhancing NMFS' ability to gauge the impacts of regulations and demonstrate compliance with international requirements.

The information collected is disseminated to the public or used to support publicly disseminated information. Please see Question 16 for more information on data dissemination and use. NMFS will retain control over personal information such as the angler's name and address and safeguard it from improper access, modification, and destruction, consistent with legal requirements and NOAA policy 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.**

1This information collection is highly automated. Fishermen reporting recreational bluefin tuna, swordfish, or billfish in States other than Maryland or North Carolina, including the U.S. Virgin Islands and Puerto Rico, or reporting commercial bluefin tuna catch have the choice of reporting online, with a smart-phone app, or via the telephone using either an interactive voice response (IVR) telephone system (bluefin tuna only), or a standard telephone voice recording system (swordfish and billfish only). North Carolina and Maryland recreational catch cards are submitted in hard copy, but the data are transferred to an electronic database by the State. The summary reports are electronically transmitted from the States to NMFS. Further, the IVR data are already digitized when accessed by NMFS for summary or analysis.

The landings report website ([www.hmspermits.noaa.gov](http://www.hmspermits.noaa.gov)) is also used by NMFS to disseminate important regulatory information to fishermen, such as in-season fishery actions (e.g., fishery closures, etc.).

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

This collection minimizes duplication or overlap with any other information collection. 1NMFS is the Federal agency responsible for marine fisheries data collection and the management of Atlantic HMS fisheries. See Question 1 above for a detailed description on how NMFS coordinates with the Maryland and North Carolina catch card programs. Further, as described in Question 2 of this Supporting Statement, reports ask if the fish were caught in a fishing tournament and, if so, what tournament. These questions are included to allow NMFS to identify fish that may have already been reported by a tournament operator through HMS tournament reporting (OMB 0648-0323).

NMFS exercises a high degree of internal coordination between this collection and two other long-term information collections from recreational fishermen: the Marine Recreational Information Program (MRIP fishing effort survey, OMB 0648-0652, and MRIP Access Point Intercept Survey, OMB 0648-0659) and the Large Pelagics Survey (OMB 0648-0380). MRIP is a general (dockside, telephone, and mail) survey of anglers fishing for all species, including HMS (tuna, billfish, swordfish, and sharks). MRIP sample sizes are typically too small to provide the catch estimate precision needed to manage many HMS fisheries. HMS anglers are specifically targeted by the Large Pelagics Survey, which produces more precise estimates of HMS catch than the general MRIP survey, but not precise enough to replace the exact counts of the targeted HMS species, nor could it do so within 24 hours of landing. The HMS recreational reporting program overlaps with these surveys only minimally on the small percent of surveyed trips that resulted in bluefin tuna, billfish, or swordfish being landed. To the extent that overlap occurs (e.g., a person reporting via catch card or directly to NMFS is also selected for a dockside, mail, or telephone interview), the information is useful to assess compliance with the mandatory reporting requirement.

Bluefin tuna survey data and HMS recreational landings data are used for different purposes by fishery managers and stock assessment scientists. For billfish landings, several data sources are

combined (MRIP, Large Pelagics Survey, catch cards, tournament reports, and recreational (non-catch card) landings reports) but protocols are in place to identify double counting across programs. Therefore, data collected from other recreational programs are mostly used in a complementary manner along with HMS catch card and recreational reporting data. The collection of bluefin tuna catch data from commercial fishermen does not duplicate any other collection and is the only mechanism to collect this data.

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

All of the respondents are considered small entities. The collection is not expected to have a significant impact on them. Minimizing reporting burden on the public was one of the primary reasons for use of automation in this program. All reporting options (voice recording, IVR, internet, smart phone app) are available 24 hours a day, seven days a week. Since the phone numbers are toll-free, there are no associated costs. Similarly, no costs are associated with reporting on the internet or using the smart phone app. Reporting requires a minimal investment of time, is cost-free for the public, and can be performed at any public phone or internet access site. The Maryland and North Carolina catch card programs have reporting stations conveniently located in areas where these species are landed.

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

If the bluefin tuna catch portion of this collection were not conducted, NMFS would not be able to effectively monitor the amount of bluefin tuna landings and interactions, which are essential to keeping catch within the specified quotas. It is also essential for achieving domestic management objectives, including the HMS FMP's goal of better accounting for all sources of bluefin tuna fishing mortality.

If this entire information collection were not conducted, or were conducted less frequently, the United States could exceed quotas and be subject to ICCAT penalties, including reduction of the nation's allocated catch quota, the potential imposition of trade restrictions, and other sanctions.

The stock assessments for these species, which provide the basis for domestic and international management decisions, would be less accurate without this information, since approximately 50 percent of the western Atlantic bluefin tuna quota and 30 percent of North Atlantic swordfish quota is allocated to the U.S. Without close monitoring of these fisheries, the conservation and management objectives of MSA and ATCA with respect to the rebuilding programs for these species could be jeopardized. Furthermore, it would be difficult for the United States to formulate domestic policy consistent with the MSA, which must be based on the best available scientific and socio-economic data. The information gathered in this collection is essential for NMFS in its preparation of documents such as Regulatory Impact Reviews and Environmental Impact Statements, as required under the MSA, National Environmental Protection Act, and other applicable laws during the formulation of domestic policy. Please also see the Question 7 of this Supporting Statement.

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

OMB guidelines state that respondents should not be required to report information more often than quarterly. 1States report weekly (NC) or bi-weekly (MD) rather than quarterly. This frequency is a necessary component of a responsive management program. Each individual catch and/or landing must be reported, and if reports are not immediately accounted for, enforcement of this requirement would be difficult. Moreover, reports are needed on a per-trip basis to reduce the potential for recall bias and to prevent a build-up of back-logged reports. Frequent reports of state data are required in order to implement a responsive management program. Without frequent landings reports, NMFS would not be able to monitor seasonal harvest in a timely manner, and might be required to close seasons early to avoid excess harvest, or risk overharvesting ICCAT quotas, both of which could unnecessarily penalize U.S. fishermen.

**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 (84 FR 15189, April 15, 2019) was published soliciting public comment on these information collection requirements. NMFS did not receive any comments on this notice.

Public comment was also solicited from the HMS Advisory Panel (AP). The HMS AP is a Federal advisory committee that consists of representatives from the recreational and commercial fishery industries, environmental organizations, academia, state fishery management agencies, and federal fishery management councils. One concern that multiple HMS AP members and permit holders have risen is duplicate reporting as the fisheries management councils of the Atlantic and Gulf of Mexico have been adopting mandatory electronic reporting requirements in various non-HMS commercial and for-hire fisheries. For example, vessels possessing federal Mid-Atlantic council party/charter permits are now required to submit electronic vessel trip reports for all for-hire trips with 48 hours (OMB 0648-0212). Similar electronic logbook requirements are in the process of being implemented for South Atlantic (OMB 0648-0016) and Gulf of Mexico (OMB 0648-0770) council for-hire permit holders. An analysis of HMS Charter/Headboat permit holders found over half of them possessed at least one of the council for-hire permits that would require some form of electronic logbook reporting, and these programs require permit holders to report all for-hire trips taken whether they are targeting council managed species or HMS. To address these concerns, Atlantic HMS staff have been working with NMFS regional staff and the Atlantic Coastal Cooperative Statistics Program (ACCSP), which coordinates a number of these electronic reporting programs, to eliminate the need for duplicate catch reporting. This effort is incorporating needed HMS data elements into council electronic reporting systems, and arranging for the data to be automatically forwarded to the HMS reporting system. Once completed in the near future, individuals possessing both HMS

permits and council permits requiring electronic reporting will only need to report their HMS catch via their council electronic reporting system to meet HMS reporting requirements.

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

1No payments or gifts will be provided to respondents.

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

As stated in the Paperwork Reduction Act statements available for review on all electronic reporting venues and forms for this collection, it is NOAA policy to preserve the confidentiality of information submitted under this reporting requirement, except that NMFS may release such information in aggregate or summary form, such that individual identifiers are not disclosed ([NAO 216-100](#)). Information such as the number of registered tournaments, the species that they targeted, and the states in which they occurred is provided in the annual Stock Assessment and Fishery Evaluation (SAFE) Report, in FMP regulatory amendments, and in supporting documents made available to the public upon request. All other information submitted under this reporting requirement remains confidential, or is released only in aggregate or summary form such that individual identifiers (e.g., tournament operator’s name, phone number, postal address, and e-mail address) are not disclosed.

**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.**

1This collection does not include questions of a sensitive nature.

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

**COMMERCIAL CATCH (bluefin tuna only)**

All commercial bluefin tuna caught (e.g., landed or discarded dead) with hand-gear must be reported to NMFS. Potential respondents include the universe of individuals with HMS permits in the General category, Harpoon category, or Charter/Headboat category (Table 1).

**Table 1.** Universe of HMS permit holders that would be required to report if they caught a bluefin tuna.

<b>Permit Category</b>	<b>Number of Permit holders in 2018</b>
General	2,942
Harpoon	21
Charter/Headboat	3,635
<b>TOTAL</b>	<b>6,598</b>

NMFS has accurate data for commercial landings, but had to estimate discards for each permit category based on data gathered under this collection in a previous year (2018). Table 2 compares dealer landings data, which is an accurate census of total commercial bluefin tuna landings, with vessel reported landings data obtained under this information collection. Charter/headboat and General category permit holder data were combined since landings are attributed to the same subquota. The requirement to report commercially landed bluefin tuna only went into effect in 2015, and at the time of the previous renewal compliance among the General category fishery was very low at only around 14 percent. In the last three years, compliance has increased another 50 percent to over 65 percent (Table 2).

**Table 2.** Compliance with reporting requirements for landed fish during 2015.

Quota Category	Dealer Reports		Vessel Reports		% Compliance	
	No. of Bluefin Reported	No. of Fishermen	No. of Bluefin Reported	No. of Fishermen	% Fish Reported	% Fishermen Reporting
General	4,287	949	2,805	585	65.4	61.6
Harpoon	153	14	138	12	90.2	85.7
<b>TOTAL</b>	<b>4,440</b>	<b>916</b>	<b>2,943</b>	<b>597</b>	<b>66.3</b>	<b>65.2</b>

NMFS assumes that the reporting compliance for landed fish was the same for discarded fish, and estimated the number of reports for discarded fish by adding a 35% increase to the number of General category reports and 10% to the number of Harpoon category reports for discarded fish (Table 3).

**Table 3.** Estimated number of discarded fish estimated to be reported for each category. General and Charter/Headboat reported numbers were increased by 85% and Harpoon category reports were increased by 10% to calculate the estimates for each category.

Permit Category	Dead Discards	
	Reported	Estimated
General & Charter/Headboat	33	45
Harpoon	3	3
<b>TOTAL</b>	<b>36</b>	<b>48</b>

Table 4 includes landings and estimated discards for each category for 2018. The number of landings and number of dead discards are added for each category to give the total number of responses. Reporting of most bluefin tuna caught by commercial hand-gear is expected to take approximately 5 minutes per report, whether completed via phone, internet, or phone app. Catch for each category was added and multiplied by the 5 minutes it takes to complete a report for each fish, for an estimated total reporting burden of **4,488 responses and 374 hours**, affecting a total of potentially **6,598 permit holders** (Table 1).



**Table 4.** Calculation of number of responses and reporting burden (hrs) based on actual number of bluefin tuna landings and estimated numbers of dead discards.

Permit Category	Number of Bluefin Tuna Landed in 2018	Estimated Number of Bluefin Discarded Dead 2015	Projected Total Annual Catch (Number of Fish Landed + Number Discarded Dead) = Total Responses	Total Amount of Time (hrs) (5 mins. Per response / 60 mins/ hour)
General & Charter/Headboat	4,287	45	4,332	361
Harpoon	153	3	156	13
<b>TOTAL</b>	<b>4,440</b>	<b>48</b>	<b>4,488</b>	<b>374</b>

### **RECREATIONAL CATCH**

1Reporting of most recreationally caught (e.g., landed or discarded dead) bluefin tuna and/or landed swordfish and billfish is expected to take approximately 5 minutes per report, whether completed via phone, internet, or phone app. In the States of Maryland or North Carolina, filling out a landing card and affixing a tag to each fish landed is expected to take approximately 10 minutes. Call-back verification for bluefin tuna greater than or equal to 73" is also expected to take approximately 5 minutes per landing. The number of respondents is calculated separately for bluefin tuna and billfish/swordfish. Numbers of respondents for all species landings in Maryland and North Carolina are calculated separately from all other states.

#### **Bluefin Tuna**

Recreational landings of bluefin tuna from 2000-2018 for the States of Maryland and North Carolina are given in Table 1. Each landing represents a single response as recorded via each State's tag and report program. The year with the greatest number of landings (responses) in total for these states was 2001, and landings have been much lower since 2009. NMFS used the data from 2001 as a proxy to provide a reasonable margin, which gives an estimated total of **4,576 potential responses**. This margin should account for any additional changes in future years.

$$(4,576 \text{ responses} \times 10 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{763 \text{ hours}}$$

**Table 5.** Annual recreational landings of bluefin tuna in Maryland and North Carolina catch card program (2000 – 2018).

YEAR	MD Landings (Number of Fish)	NC Landings (Number of Fish)	TOTAL
2000	1,247	274	1,521
2001	4,240	336	4,576
2002	2,329	176	2,505
2003	2,246	0	2,246
2004	3,549	50	3,599
2005	2,308	30	2,338
2006	1,163	31	1,194
2007	1,629	175	1,804
2008	1,271	133	1,404
2009	572	135	707
2010	423	573	996
2011	430	324	754
2012	190	179	369
2013	416	201	617
2014	372	69	441
2015	208	44	252
2016	584	74	658
2017	366	39	405
2018	807	34	841

The total number of bluefin tuna that could be landed or discarded dead based on the U.S. ICCAT quota is estimated to be 10,104 fish. This estimate is based upon weights of fish within the various bluefin tuna size classes using previous years' landings data. Subtracting the adjusted total potential responses for the States of North Carolina and Maryland (4,576) from the U.S. ICCAT quota, the total number of bluefin tuna that could be landed or discarded dead in other states is estimated to be 5,528 fish.

$$\text{Total Quota} - (\text{MD} + \text{NC landings}) = \text{Catch (landings + dead discards) for all other states}$$

$$10,104 - 4,576 = 5,528$$

The total number of bluefin tuna expected to be landed or discarded dead in all other states is equal to **5,528 responses**.

The number of respondents is estimated to equal the number of fish landed or discarded dead.

$$(5,528 \text{ respondents} \times 5 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{461 \text{ hours}}$$

During the last three years, approximately 20 respondents have been called annually to verify information for bluefin tuna landed that exceed 73" in length. Verification takes approximately five minutes per response.

$$(20 \text{ respondents} \times 5 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{2 \text{ hours}}$$

### Swordfish and Billfish

Pursuant to ICCAT recommendation, the United States may recreationally harvest up to 250 blue and white marlin (combined) on an annual basis. In the past few years, the reported number of these fish landed has been significantly less than the 250 limit (**Table 6**); however, to allow for the full 250 marlin landing limit to be reported through this collection, NMFS is calculating burden based on a maximum of 250 marlin landings. Roundscale spearfish are included in the white marlin estimates because they are hard to distinguish from white marlin and landings data are likely a mix of the two species. Sailfish landings data must be reported to ICCAT annually.

**Table 6.** Total and non-tournament recreational landings of billfish by year.

Year	Species									
	Blue Marlin		White Marlin		Roundscale Spearfish		Sailfish		Swordfish	
	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.
2009	44	5	53	6	5	0	140	140	474	389
2010	28	3	72	5	19	0	192	185	331	285
2011	43	3	56	6	7	0	173	166	347	318
2012	63	18	30	7	4	0	184	163	415	386
2013	55	11	49	15	1	0	173	171	279	263
2014	54	5	42	6	2	0	118	113	304	281
2015	63	23	66	20	10	0	114	113	332	315
2016	80	17	60	14	22	1	114	114	500	458
2017	62	17	61	11	6	0	105	104	568	518

Based on the recent fishing years that presented the greatest number of non-tournament landings, NMFS anticipates up to 703 swordfish and sailfish landings [518 swordfish (2017) + 185 sailfish (2010) = 703]. In order to ensure that our estimate is slightly higher to allow for a greater number of landings, 10 percent is added, giving an adjusted total of 773 potential responses (703 x 1.1 = 773). Therefore, NMFS estimates that a maximum of **1,023 responses** [(250 blue marlin + white marlin) + (773 swordfish + sailfish) = 1,023] could be required to report non-tournament recreational landings of swordfish and billfish.

**Table 7.** Total catch of billfish and swordfish recorded by each State catch card program per year.

Year	NC	MD	TOTAL
2009	13	82	95
2010	17	59	76
2011	12	40	52
2012	18	28	46
2013	13	40	53
2014	17	44	61
2015	25	51	76
2016	32	55	87
2017	27	62	89

The greatest number of swordfish and billfish landings reported through Maryland and North Carolina’s catch card programs came in 2009, with a total of 95 landings (Table 7). Adding 10% to this number equals about 105 potential reports of swordfish and billfish from these States’ catch card programs. 105 reports are subtracted from the total number of reports based on Table 6 to perform the separate burden hour estimate for the reports through the State catch cards:

$$(1,023 - 105 \text{ respondents (all states – MD \& NC)} \times 5 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{77 \text{ hrs}}$$

$$(105 \text{ respondents (MD \& NC catch cards)} \times 10 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{18 \text{ hrs}}$$

$$77 \text{ hours (all states, excluding MD \& NC)} + 18 \text{ hours (MD \& NC catch cards)} = \mathbf{95 \text{ hrs}}$$

### Sharks

The State of Maryland’s catch card program for sharks has been in place for several years now, and NMFS used those data to estimate the number of responses (Table 8).

**Table 8.** The number of sharks reported in Maryland’s catch card survey since it was implemented in 2013.

Year	Number of Sharks
2013	69
2014	87
2015	80
2016	97
2017	116

Adding 10% to the largest number of sharks landed (2017) will account for potential future increases in numbers, and gives a total of **128 responses**.

$$1.10 \times 116 = 128 \text{ responses}$$

The Maryland catch cards for sharks will take the same amount of time to fill out as catch cards for billfish and bluefin tuna (less than 10 minutes).

$$(128 \text{ responses} \times 10 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{21 \text{ hrs}}$$

### State Summary Reports of Recreational Landings

In addition to the reporting burden on the part of anglers, it is expected that 62 weekly (NC) or bi-weekly (MD) reports (1 hour each) and two annual reports (4 hours each) will be submitted by Maryland and North Carolina fishery management agencies each for a total of **64 responses** and **70 hours**.

### Total Calculations

*Responses:* 4,488 (commercial bluefin tuna) + 4,576 (recreational bluefin tuna from MD/NC) + 5,528 (recreational bluefin tuna from other states) + 20 (bluefin tuna verification calls) + 1,023 (swordfish and billfish landings) + 128 (MD shark catch cards) + 64 (state reports to NMFS) = **15,827 responses**.

*Burden Hours:* 374 (commercial bluefin tuna) + 763 (bluefin tuna from MD/NC) + 461 (bluefin tuna from other states) + 2 (bluefin tuna verification calls) + 77 (swordfish and billfish landings excluding MD & NC) + 18 (swordfish and billfish landings for MD&NC) + 70 (state reports to NMFS) + 21 (MD shark catch cards) = **1,786 burden hours**.

*Respondents:* The number of respondents is estimated to be the number of responses (15,827) minus the difference between the number of confirmation calls (20), the number of state reports (64), and the number of states reporting (2) which equals  $15,827 - (20+64+2) = \mathbf{15,741}$  **respondents**. Some respondents may submit more than one response, so this estimate may be higher than the actual number of respondents.

Based on a comparison of Maryland catch cards, telephone reports, and dockside intercept sampling, compliance with the catch card program appears to be quite high. The high compliance with the catch card program may be due to a number of factors including better awareness of the program, increased visibility of state personnel at docks, a greater sense of participation or buy-in from fishermen, a combination of all of these, or some other unknown factor(s). Thus, NMFS encourages other states to consider implementing catch card programs in order to improve the compliance with self-reported landings programs. NMFS conducted a catch card pilot study in Puerto Rico in 2010, the results of which are being reviewed for implementation. NMFS will continue to work cooperatively with individual states to select the program that best suits the needs of state and Federal fishery managers on a case-by-case basis. NMFS will submit a non-substantive change request to OMB to correct burden estimates, if and

when such changes take place for each state. If other states opt to use catch card programs, their report burden would double (10 minutes per response for catch cards versus 5 minutes per landing for telephone or internet reports), and there would be an increase of 34 hours per state due to the drafting of weekly and annual reports.

**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).**

1There are no costs in supplies or materials other than the time burden. Costs to states to distribute weekly and annual summary reports are covered in the grants to the states as indicated in Question 14.

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

Annual maintenance costs for the recreational reporting automated program are reimbursed by an administrative cost recovery fee included in Atlantic HMS permit fees, which are collected via the same system, and there will be no cost to the Federal government.

The North Carolina catch card program is carried out by the NC Division of Marine Fisheries in cooperation with NMFS at a cost to the Federal government of **\$37,000 per year**. The Federal share of the Maryland program is funded at a level of **\$47,000 per year**. It should be noted, however, that ancillary data may be collected by dockside staff in conjunction with catch cards (e.g., biological sample materials or dockside intercepts approved under 0648-0380); thus, these costs are not entirely attributable to the landings reports. Similar costs are anticipated for future cooperative catch card programs and the Federal share will depend on the amount and type of services contributed by the states.

The average hourly wage for Federal employees that verify landings is \$25/hour:  
2 hours (bluefin tuna verification) + 50 hours (half of the burden hours for swordfish and billfish landings; if verification is needed) = 52 hours × 25 dollars/hour = **\$1,300 in Federal wages**

Adding up the costs:

\$84,000 (federal funding for state programs) + \$1,300 (federal employee wages) = **\$85,300 total cost to Federal government.**

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

Program changes:

There are no program changes.

Program adjustments

The number of fish caught and number of permitted fishermen during recent years is used to estimate future responses and burden. Landings and catch varies from year to year.

Additionally, reporting compliance has increased. For this renewal, these changes in landings and permit-holders resulted in an adjustment of: + **200 hours**.

	Total # of Respondents		Total # of Responses/Yr		Response Time (hrs)		Total Annual Response Time (hrs)	
	Current	Previous	Current	Previous	Current	Previous	Current	Previous
Bluefin Tuna Landing Cards for MD & NC	4576	4576	4576	4576	0.16666	0.16666	763	763
Other States Reporting Bluefin Tuna Landings & Callbacks for fish over 73"	5528	3903	5548	3923	0.08333	0.08333	463	327
Swordfish & Billfish - Internet & VM Reporting	918	776	918	776	0.08333	0.08333	77	65
MD & NC Weekly/Biweekly & Annual Reports	2	2	64	64	1.09375	1.09375	70	70
MD Shark Landings	128	96	128	96	0.16666	0.16666	21	16
Catch Reporting for General, Harpoon, and Charter Headboats	6598	6742	4488	3922	0.08333	0.08333	374	327
MD & NC Swordfish & Billfish Landings	105	105	105	105	0.16666	0.16666	18	18
<b>Totals</b>	17855	16200	15827	13462			1786	1586
<b>Difference</b>				2365				200

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

1Collected information is published in stock assessments, environmental impact statements, environmental assessments, reports to ICCAT, the annual HMS SAFE Report, and regulatory impact reviews. The data are presented in aggregate form, which cannot lead to the identification of individuals.

**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.**

11For the IVR and Billfish/Swordfish scripts, the operator reads the OMB Control No., expiration date and PRA statement on request. This is to avoid incurring costs of script changes when the expiration date changes.

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

1Not Applicable.