

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**West Coast Region Groundfish Electronic Fish Ticket Program**  
**OMB Control No. 0648-0738**

## **INTRODUCTION**

This request is for extension of the information collection known as the West Coast Region Groundfish Electronic Fish Ticket Program. Electronic fish tickets are submissions of landings data from the first receiver to the Pacific States Marine Fisheries Commission (PSMFC), which subsequently transmits data to the states of Washington, Oregon, California, and the National Marine Fisheries Service (NMFS). Electronic fish tickets are required in all of the shorebased commercial groundfish fisheries, including the shorebased Individual Fishing Quota (IFQ) program, the limited entry fixed gear fishery, the open access fixed gear fishery, and all sablefish landings (IFQ or otherwise).

The Pacific Coast Groundfish Fishery Management Plan (FMP), created under the authorization of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 USC 1801 *et seq.*, was approved by the U.S. Secretary of Commerce on January 4, 1982, and implemented on October 5, 1982. Throughout the next two decades, there were several amendments to the FMP. Amendment 9 modified the limited entry (LE) program by establishing a sablefish endorsement for longline and pot permits. Amendment 14, implemented in 2002, built on Amendment 9 to further refine the LE permit system for the economically important fixed gear sablefish fishery. It allowed a vessel owner to “stack” up to three LE permits on one vessel, along with associated sablefish catch limits. This, in combination with a concurrent action to extend the season length, in effect established a limited tradable quota system for participants in the primary sablefish fishery.

Since implementation of the permit stacking program in 2002, in-season management of the primary and daily trip limit (DTL) sablefish fixed gear fisheries has been based on two types of information: (1) paper landing receipts that typically have a two- to four-month time lag between the date of landing and when the landing data is available in the Pacific Fishery Information Network (PacFIN), and (2) the QSM Best Estimate Report, which fills in the three-month time lag based on estimates from the previous years’ landings. Both of these data sources estimate which landings are attributed to the primary (tier) fishery and which are attributed to the DTL fishery. Thus, the current catch accounting system is subject to inaccuracy and time delays, and is incapable of distinguishing between landings in the primary (tier) and DTL fisheries for management or enforcement purposes.

Additionally, at the time of implementation of Amendment 14, no Federal regulations existed requiring fish ticket documentation of the groundfish permit number associated with sablefish landings in the primary (tier) sablefish fishery. Documentation of catch against tier limits and documentation of permit numbers was left to the states to implement. Currently, with the E-Tix portal managed by PSMFC, Federal LE permit numbers, IFQ vessel account numbers, management areas, and sablefish tiers are now being recorded consistently on state landing

receipts associated with sablefish landings.

Since the start of the shorebased IFQ Program in 2011, electronic fish tickets have been required for landing IFQ species. Electronic fish tickets have allowed vessel owners/operators, buyers and dealers, and fishery managers timely access to catch information for IFQ species. Many of the proposed regulations that expand the required use of electronic fish tickets to the limited entry fixed gear and open access fisheries are similar to those put in place for the Shorebased IFQ Program. Electronic fish ticket requirements for the Shorebased IFQ Program have been described in detail in proposed (75 FR 32994, June 10, 2010; 75 FR 53380, August 31, 2010) and final rules (75 FR 60868, October 1, 2010; 75 FR 78344, December 15, 2010) for that program.

## **JUSTIFICATION**

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

Electronic fish tickets are required for landings in all of the IFQ shorebased commercial groundfish fisheries, and all sablefish landings which includes IFQ fishery, the limited entry fixed gear fishery, and the open access fixed gear fishery. The electronic fish ticket program is vital to: 1) adequately track the landings of commercially caught groundfish; 2) be able to assign landings of sablefish to a tier permit if fishing in the primary fishery; and 3) enhance the ability of enforcement to deal with issues more effectively and efficiently. Electronic fish tickets will provide real time data to enforcement and managers, to address issues that arise within 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.**

Shoreside first receivers, defined as persons who receives, purchases, or takes custody, control, or possession of catch onshore directly from a vessel, are required to use a web-based, NMFS-approved electronic fish ticket program to send catch reports within 24 hours from the date of the landing. The information required by NMFS piggybacks on the information collected on electronic fish tickets that are currently required in state fish receiving tickets or landing receipts. The required information includes the following (the additional federally required information is shown in bold and appears at the top of the E-Tix form):

- **IFQ Landing? (Y/N)**
- **IFQ Vessel Account #**
- **IFQ Management Areas**
- **Sablefish Tier**
- **Federal LE Permit #**
- Date of Landing,
- Dealer # (Name)
- State Permit #

- Fisherman I.D. (Last, First)
- Port of 1st Landing
- Inside/Outside (*i.e.*, fish caught inside/outside 3 mile EEZ or both)
- Vessel I.D. (Name)
- Coast Guard Vessel #
- Primary Gear
- Fishing Block
- Transportation #
- Fish Code (Description) – actual species or species groups of fish caught
- Gross Lbs
- Price Per Lb
- Amount
- # of Fish
- Condition
- Grade
- Gear
- Use
- GF #

The information gathered from fish tickets has great utility and will be used by NMFS to track catch allocations, bycatch limits, and prohibited species catch during the season. NMFS will safeguard the information from improper access, modification, and destruction, consistent with National Oceanic and Atmospheric Administration (NOAA) standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The electronic fish tickets are based on information currently required by the states on paper fish receiving tickets or landing receipts (*i.e.*, dock tickets, fish tickets). Under the electronic fish ticket program, first receivers will use a web-based system to provide all information required (see Question 2 for a list of information included). First receivers will be required to have a personal computer system, which could include a tablet or mobile device, with an internet browser (*e.g.*, Chrome, Firefox, Internet Explorer, Safari). The internet browser must be set to allow cookies and JavaScript, and the default security settings must be used.

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

Measures were taken to minimize duplication of catch accounting requirements by piggybacking onto the electronic fish ticket program required by the states and only requires a minimum of additional data gathering. When state law allows, the electronic fish ticket can be printed and used as a paper copy for submission to the state. In California, standard paper forms (dock tickets) provided by the state are sometimes used in the interim, to record landing data prior to electronic submission using E-Tix, and can also serve as proof of landing in cases where enforcement requires it. In Oregon and Washington, specified information may be submitted either on a paper fish ticket provided by the state or on a computer generated ticket, provided specified data fields are included.

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

Measures were taken to minimize the costs of the catch accounting requirements by providing: 1) a web-based program so that no additional software is needed and the program is accessible wherever there is an internet connection; 2) an electronic fish ticket program that is compatible with the existing fish ticket requirements in each of the three states; and, 3) a program that can be used to print a paper copy for submission to the state, when state law allows.

NMFS assumes that all first receivers have access to a personal computer and/or a tablet where they can access the web-based program. Additionally, because the information is already being gathered by the states, the additional federal data is gathered through the same system. Some applicants are individuals or small companies and as such are considered small businesses. Given the relatively small numbers of applicants, separate requirements based on size of business have not been developed. Only the minimum data required to meet the permit objectives are requested from all applicants.

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

Without the electronic fish tickets, states would continue to collect electronic submissions (E-Tix) and paper tickets, which do not include a Federal permit number or other IFQ data requests. Without E-Tix submissions, NMFS' ability to adequately and efficiently track landings, incidental catch of prohibited species, as well as other groundfish species, would be severely hindered.

Indirect biological impacts could result if catch data were inaccurate or delayed so that fishery specifications, including: bycatch limits, species allocations, optimum yield (OY), and biological opinion thresholds could not be adequately monitored. If bycatch limits of the most constraining overfished species were greatly exceeded due to delayed catch reporting, the risk of exceeding rebuilding based OYs is increased.

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

This collection will be conducted in a manner consistent with OMB 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 published September 25, 2019 (84 FR 50408) solicited public comment. A response was received from the California Department of Fish and Wildlife (CDFW).

**Comment:** The California Department of Fish and Wildlife (CDFW) submitted a letter clarifying their state requirements for reporting commercial fisheries landings, including the shorebased commercial groundfish fisheries and the flow of data from the use of the electronic fish ticket system. In addition, they requested additional information describing how the burden estimates were obtained. Finally, they suggested that implementing methods to collect and route digital signatures on electronic copies of electronic fish tickets would help minimize the burden.

**Response:** NOAA appreciates the clarification of the CDFW's process. NOAA believes this Supporting Statement accurately reflects the information collection process with regard to all parties. Additionally, NOAA will provide information describing the calculation of burden estimates to CDFW. Finally, the suggestion to implement methods to collect and route digital signatures on electronic copies of electronic fish tickets will be taken under advisement for further study.

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

No payments or gifts are provided under this program at this time.

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

Electronic fish ticket data will be submitted to PSMFC. The data is considered confidential under [NOAA Administrative Order 216-100](#), Protection of Confidential Fisheries Statistics. The PSMFC currently receives and stores fish ticket data. These data are maintained on the PacFIN database.

**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 require the submission of information of a sensitive nature.

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

Information Collection	Type of Respondent (e.g., Profession)	# of Respondents <sup>1</sup>	Annual # of Responses / Respondent	Total # of Annual Responses <sup>2</sup>	Burden Hrs / Response <sup>3</sup>	Total Annual Burden Hrs	Hourly Wage Rate (for Type of Respondent)	Total Annual Wage Burden Costs
Electronic fish tickets (WA fish ticket reporting)	Buyer & Purchasing Agent	15	15	218	2 min	7.27	\$ 34.61	\$ 252
Electronic fish tickets (OR fish ticket reporting)	Buyer & Purchasing Agent	17	7	113	2 min	3.77	\$ 30.02	\$ 113
Electronic fish tickets (CA fish ticket reporting)	Buyer & Purchasing Agent	109	19	2,063	2 min	68.77	\$ 34.20	\$ 2,352
Electronic fish tickets/IFQ First Receiver submissions	Buyer & Purchasing Agent	41	295	12,109	10 min	2018	\$ 34.61 (WA) \$ 30.02 (OR) \$ 34.20 (CA)	\$ 63,882
Electronic fish tickets/IFQ First Receiver Pacific whiting disposition recordkeeping	Buyer & Purchasing Agent	9 (of the above 41, none additional)	26	234	1 min	3.9	\$ 30.02	\$ 117
<b>Totals</b>		<b>182</b>		<b>14,737</b>		<b>2,102</b>		<b>\$ 66,716</b>

There is a chance that some first receivers would need to fill out more than one ticket per landing. This could happen when a vessel fishes the end of their primary (tier) quota and switches over to the DTL fishery. This would only happen once for each vessel, if at all, and would not substantially increase the burden on first receivers. The possibility of this occurring was taken into account when determining the time average.

<sup>1</sup> The number of respondents by state are based on landing data provided by the Pacific States Marine Fisheries Commission (PSMFC). They represent the average number of dealers with non-IFQ sablefish landings for 2018-2019 (2019 data through 11/18/2019). The number of respondents for IFQ first receivers (the last two rows) are the number of NMFS-approved buyers with current First Receiver Site Licenses (FRSL) in the NOAA Pacific Coast Fisheries Permit System and accessible at [Public Permits Data](#).

<sup>2</sup> The number of total annual responses are based on commercial fish tickets in landing data provided by PSMFC. They represent the average number of commercial fish tickets of non-IFQ sablefish landings (state fish tickets) and IFQ groundfish landing for 2018-2019 (2019 data through 11/18/2019).

<sup>3</sup> This assumes that each landing produces one electronic ticket. However, there may be instances where a first receiver would need to issue more than one ticket (i.e., if a vessel lands DTL and primary sablefish at the same time). NMFS believes the instances of multiple tickets issued would be relatively few and would not significantly alter the average.

**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).**

It is assumed that all the small businesses already have access to a technically suitable computer and internet connection to submit the electronic fish tickets. The value of all of the burden hours are captured in the calculations in the table for Question 12.

Information Collection	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Cost Burden / Respondent	Total Annual Cost Burden
Electronic fish tickets (WA fish ticket reporting)	15	15	218	\$ -	\$ -
Electronic fish tickets (OR fish ticket reporting)	17	7	113	\$ -	\$ -
Electronic fish tickets (CA fish ticket reporting)	109	19	2,063	\$ -	\$ -
Electronic fish tickets/IFQ First Receiver submissions	41	295	12,109	\$ -	\$ -
Electronic fish tickets/IFQ First Receiver Pacific whiting disposition recordkeeping	9 (of the above 41, none additional)	26	234	\$ -	\$ -
<b>TOTALS</b>	<b>182</b>		<b>14,737</b>		<b>\$ -</b>

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

There are no Federal staff costs incurred as a result of continued implementation of electronic fish tickets on the West Coast sablefish fisheries. Analysts already receive this data through both Federal and State requirements, allowing for efficient tracking of groundfish landings.

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

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Electronic fish tickets (WA fish ticket reporting)	15	16	218	520	7.27h	87h	Current PSFMC data (2018-2019) shows the annual # of commercial landings with sablefish coming into non-IFQ buyers is lower than was previously estimated. PSMFC made E-Tix mandatory for non-IFQ first receivers in WA and CA, reducing the average time per submission from 10 minutes to 2 minutes.
Electronic fish tickets (OR fish ticket reporting)	17	19	113	1072	3.77h	36h	
Electronic fish tickets (CA fish ticket reporting)	109	65	2,063	3258	68.77h	543h	
Electronic fish tickets/IFQ First Receiver submissions	41	45	12,109	2,400	2018h	400h	



							coming into IFQ First Receivers is higher than was previously estimated.
Electronic fish tickets/IFQ First Receiver Pacific whiting disposition recordkeeping	9 (of the above 41, none additional)	9 (of the above 45, none additional)	234	234	3.9h	4h	No change
<b>Total for Collection</b>	<b>182</b>	<b>145</b>	<b>14,737</b>	<b>7,484</b>	<b>2,102</b>	<b>1070</b>	

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

There are no plans for publishing.

**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.**

The paper and electronic forms in this collection are requirements of the states of Washington, Oregon, and California and as such, there are no requirements to display expiration dates for OMB approval.

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

There are no exceptions for compliance with provisions in the certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.