

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Groundfish Trawl Economic Data
OMB Control No. 0648-0618

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method used. Provide data on the number of entities (e.g., establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

The survey is a census of the survey population. There is no sampling of the survey population. Submission of a survey response is mandatory for all members of the survey population.

The survey population for catcher vessels is defined as all owners, lessees, and charterers of a catcher vessel registered to a limited entry trawl permit at any time during the survey period for which data are being collected. This definition covers both catcher vessels making shoreside landings and catcher vessels delivering to motherships. The survey population for catcher-processors is defined as all owners, lessees, and charterers of a catcher-processor vessel registered to a catcher/processor-endorsed limited entry trawl permit. The survey population for motherships is all owners, lessees, and charterers of a mothership vessel registered to a mothership permit. The survey population for first receivers/shorebased processors is all owners of a first receiver site license or owners and lessees of a shorebased processor that received round or headed and gutted IFQ groundfish species or Pacific whiting from a first receiver.

Survey Population, Survey Sample, and Response Rates

Table 1 --- Population and Commercial Fish Landings for all West Coast Fishing Engaged Communities (most recent results)

Survey Group (2016)	Population	Number of responses	Response Rate
Catcher Vessels	139	137	99%
Catcher-Processors	9	9	100%
Motherships	7	7	100%
First Receiver/Shoreside Processors	43	43	100%
Totals	198	196	99%

As of January 1, 2020, there will be addition of the Quota Share Permit Owner survey and an estimated 40 quota share permit and account owners that have not previously been sampled will be required to complete EDC forms. This will bring the total estimated annual responses to 384.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

There is no stratification and sample selection in the survey design. All members of the survey population are being surveyed. There are five different forms that are being used based on whether the respondent operates a catcher vessel, catcher-processor, mothership, first receiver/shorebased processing plant or holds a quota share permit.

3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.

While this is a mandatory survey, key measures have been taken to maximize response to the survey and the quality of data provided. First, the survey form has been kept as short as possible while still meeting the needs of NMFS to meet MSA monitoring requirements, provide advice to the NMFS on the economic effects of catch share management, and perform economic research. Second, NMFS economists have held meetings with the owners of catcher vessels, catcher-processors, motherships, and shorebased processors to ensure that questions are understandable and ask for data in a format that is readily available to survey respondents. Discussions were also held with industry groups at regular PFMC meetings to solicit additional feedback on forms in an environment where many survey respondents can simultaneously participate in the discussion. Third, the forms will be mailed to members of the survey population soon after the April 15 federal tax filing date. Discussions with industry participants indicated that they would prefer receiving the form after completing their federal tax filing, when much of the financial information needed to complete the form would already be at hand. Instructions for how to download forms or enter the data through the online web form are included in the survey distribution.

To ensure that all participants understand the requirement to complete an EDC form, at least three letters and two phone calls will be made, as necessary. Finally, the NWFSC, NMFS Office of Law Enforcement (OLE), NMFS General Council, and the West Coast Region Permits Office coordinate to notify participants of the requirement to submit the EDC forms. If necessary, an OLE agent will make an in-person visit and/or issue a warning or penalty for non-compliance.

The penalties for not complying with this mandatory survey are defined in 50 CFR 660.114 as follows:

Who is required to submit an EDC?	Consequence for failure to submit (In addition to consequences listed below, failure to submit an EDC may be a violation of the MSA.)
Limited entry trawl catcher vessels: All owners, lessees, and charterers of a catcher	(A) For permit owner, a limited entry trawl permit application (including MS/CV-endorsed limited entry trawl permit) will not be considered complete until the required EDC for that permit owner associated with that permit is submitted.

vessel registered to a limited entry trawl endorsed permit at any time in 2011 and beyond	(B) For a vessel owner, participation in the groundfish fishery (including, but not limited to, changes in vessel registration, vessel account actions, or if own QS permit, issuance of annual QP or IBQ pounds) will not be authorized until the required EDC for that owner for that vessel is submitted. (C) For a vessel lessee or charterer, participation in the groundfish fishery (including, but not limited to, issuance of annual QP or IBQ pounds if own QS or IBQ) will not be authorized, until the required EDC for their operation of that vessel is submitted.
Mothership and Catcher Processors: All owners, lessees, and charterers of a mothership or catcher processor vessel registered to an MS permit at any time in 2011 and beyond	(A) For permit owner, an MS permit or a C/P-endorsed limited entry trawl permit application will not be considered complete until the required EDC for that permit owner associated with that permit is submitted. (B) For a vessel owner, participation in the groundfish fishery (including, but not limited to, changes in vessel registration) will not be authorized until the required EDC for that owner for that vessel is submitted. (C) For a vessel lessee or charterer, participation in the groundfish fishery will not be authorized, until the required EDC for their operation of that vessel is submitted.
First receivers/shorebased processors: All owners of a first receiver site license in 2011 and beyond	(A) first receiver site license application will not be considered complete until the required EDC for that license owner associated with that license is submitted, as specified at §660.140(f)(3), subpart D. See paragraph (b)(4)(ii)(A) of this table. (B) All owners and lessees of a shore-based processor (as defined under “processor” at §660.11, subpart C, for purposes of EDC) that received round or headed-and-gutted IFQ species groundfish or whiting from a first receiver
(5)Quota Share Permit Owners: All owners of a Quota Share permit and account (as defined under §660.25 (c))	A Quota Share permit application or permit renewal package will not be considered complete until the required EDC for that permit is submitted, as specified at §660.140, subpart D

Since there are mandatory surveys, non-response bias is not expected to be a major issue in data analysis. Nevertheless, those variables which are available for both respondents and non-respondents (such as pounds of landings, revenue from landings, and vessel physical characteristics) will be used to compare respondents and non-respondents in cases where some responses are not available for any reason. Procedures used to test for non-response bias may include two-sample *t*-tests for normally distributed variables and permutation tests for any variables found to have a non-normal distribution. In cases where non-response bias is detected, appropriate procedures will be used to adjust survey responses for the non-response bias.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.

NMFS economists have met with members of the survey populations that will receive the forms. These meetings have included a question-by-question discussion of draft forms to (1) ensure that the question is clearly understandable, and (2) the data requested are readily available to survey respondents. In addition, the forms provided with this filing were distributed to advisory groups at the June 2010 PFMC meeting for discussion. Industry members are consulted anytime a question is redesigned or a new question is implemented.

5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Todd Lee (retired), Ph.D. Manager, Economic and Social Science Research Program
Northwest Fisheries Science Center
Conducted the original focus groups, community meetings, regulatory deeming committee meetings, as well as meetings with industry associations, future participants, the PFMC, and the PFMC advisory meetings.

Erin Steiner, MS
Economist
Northwest Fisheries Science Center
206-860-3202
Manages the EDC program, including form revisions, data quality checks and contacting participants to correct data, report writing, data analysis, presentations to PFMC, advisory bodies, and industry.

Carl Lian (deceased), Ph.D.
Economist
Northwest Fisheries Science Center
Contributed to the design of the original forms using experience from previous seven years of conducting the voluntary cost earnings survey.

Jerry Leonard, MS
Economist
Northwest Fisheries Science Center
206-302-1742
Conducted the original focus groups, community meetings, regulatory deeming committee meetings, as well as meetings with industry associations, future participants, the PFMC, and the PFMC advisory meetings. Developed business rules for automated quality analysis and quality control of first receiver/shorebased processor EDC data. Supervises the EDC program.

Leif Anderson, Ph.D.
Economist
Northwest Fisheries Science Center
206-302-2403
Participated in original EDC form design, meetings with industry and managers, and fielded the first round of surveys.

Abigail Harley (former employee), MS
Contractor
ECS Federal, LLC

Assisted with updates to the forms, communicating with participants, data quality checks and contacting participants to correct data, and report writing, with a specialization in the at-sea processing sector.

Marie Guldin, MS

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Assists with updates to the forms, communicating with participants, data quality checks and contacting participants to correct data, and report writing, with a specialization in the shoreside sector.

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Assists with updates to the forms, communicating with participants, data quality checks and contacting participants to correct data, and report writing, with a specialization in the at-sea processing sector