

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Swordfish Fishery Cost and Earnings Survey
OMB Control No. 0648-0751

A. JUSTIFICATION

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

Commercial fisheries economic data collection programs implemented by the National Marine Fisheries Service (NMFS) address statutory and regulatory mandates to determine the quantity and distribution of net benefits derived from living marine resources as well as predict the economic impacts from proposed management options on commercial harvesters, shore side industries, and fishing communities. In particular, these economic data collection programs contribute to legally mandated analyses required under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA), the [National Environmental Policy Act](#) (NEPA), the [Regulatory Flexibility Act](#) (RFA), and [Executive Order 12866](#) (E.O. 12866).

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.

NMFS Southwest Fisheries Science Center (SWFSC) proposes a fleet-wide survey of the current and former west coast based commercial swordfish fleet including their state permitted fish spotter pilots, and commercial fish processors. The survey is to collect annual earnings and industry related expenditures for tax reporting years of 2018 and 2019. The project is being conducted by Hanan & Associates, Inc., a California-based consultant with experience in several commercial and sport fisheries including the Drift Gillnet and Harpoon fisheries and in collecting human informant data. The survey targets fixed and variable economic cost data, including labor and crew compensation methods; aerial spotter pilot support; fish processing; and hard costs such as gear, operations, and maintenance; and soft costs such as financing, insurance, and regulatory compliance. The survey is designed to capture qualitative information on other fisheries in which these commercial fishermen participate.

Given the absence of mandatory cost reporting requirements, the survey is intended to inform economic analyses in technical reports such as Regulatory Impact Review and Regulatory Flexibility Analysis. Survey results are intended to assist policy makers in efforts to design and improve policy to positively affect outcomes in the commercial fishing industry, and increase public benefits.

The survey is also intended to assist NMFS in developing a more comprehensive understanding of the economics of the U.S. commercial fishing industry by informing the Input-Output Model for Pacific Coast Fisheries (IO-PAC) and is also intended to provide more accurate information and inform future IO-PAC model revisions.

The initial section of the survey (**Section 1: Vessel Information for 2018-19 and 2019-20**) requests only vessel identification information and basic characteristics which are not available in the NMFS or Coast Guard Fishing Permit database and have implications for the scope of fishing methods and cost of fishing effort. The next four sections (**Section 2: Drift Gillnet Fishery (DGN) Participants Only, Section 3: Harpoon Fishery (HPN) Participants Only, Section 4: Longline Participants Only, and Section 5: Deep Set Buoy Gear Participants, Only**) ask for basic information for fisheries in which the vessel participated. Each section requests information on fixed costs of participating in commercial fishing activities followed by successive sections for the respondent to enter variable costs and ex vessel revenue data. The breakdown of cost information in our survey format is designed to facilitate the use of cost information collected to parameterize an IO-PAC model of the fishery which can be used to estimate regional economic impacts.

Section 6: Spotter Plane Pilot or Owner requests information on spotter pilots, including plane information and operating costs.

Section 7: Commercial Swordfish Processor seeks general data about individual processors and data regarding operating costs for processors active in the swordfish industry.

Section 8: Former Swordfish Participants was designed to acquire basic data related to why these operators left the fishery and in which fisheries they are currently fishing.

Section 9: Additional West Coast Swordfish Fishery Survey Questions for All Participants asks a series of questions regarding the future management and structure of the West Coast Swordfish Fishery.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. However, data will not be released for public use except in aggregate statistical form without identification as to its source. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards 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.

Because this fleet is relatively small, data will be collected from vessel owners/operators, pilots, and processors during personal interviews by the contractor and then entered manually into an electronic database. If requested and personal interviews are not possible, the contractor will perform the interview via telephone, and as a last attempt to obtain these data, the contractor will send the survey instrument to the respondent via email or mail with the returned survey entered manually entered into the database identified by how it was obtained.

4. Describe efforts to identify duplication.

The last cost earnings survey of the West Coast Drift Gillnet and Harpoon fleet was conducted in 2010 and was administered by Hanan & Associates, Inc. We are not aware of any other surveys currently or planned to collect cost and earnings data at the vessel level in this fishery.

The Pacific Fishery Information Network (PacFIN) compiles a database of individual vessel landings records submitted by the California Department of Fish and Wildlife. PacFIN records represent mandatory landings records (fish tickets) submitted by species measured by weight and ex vessel revenues; however, no cost data are collected.

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

The potential respondent universe for this survey is the owners or operators of all active West Coast vessels primarily targeting swordfish and tuna in 2018-19 and 2019-20 along with pilots and processors that serve the industry. The burden to vessel owners will be minimized by administering the survey instrument in personal interviews which allows for clear and unambiguous understanding of the questions. Respondents will be notified by mail and by email of an upcoming phone call to set up an appointment. They will also be able to set up the appointment by phone, mail or email and will be notified of information that will be sought so they can have relevant records available at the interview.

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

Lack of information on vessel operating costs severely limits the ability of economists to assess the impacts that commercial swordfish fishermen face due to changes in regulatory, fishing, and market conditions. Without this information, analyses that attempt to assess the economic effects of proposed regulations or policy alternatives on vessels, crew and the fishery as a whole are incomplete and inaccurate.

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe 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 January 7, 2020 (85 FR 670) solicited public comments. No comments were received. DGN-HPN industry leaders provided a review of the survey and the survey was also pretested by commercial swordfish participants.

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

The project does not include payments or gifts to respondents.

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

Respondents are assured in the introductory language of the survey instrument that data responses to this information request are confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect confidentiality of fishery statistics. The information will not be released for public use except in aggregate statistical form without identification as to its source and that no individual names, vessel names, or other identifying information will be included in any reports or publications. Personally identifiable information is requested to enable Hanan & Associates, Inc., to follow up where necessary and clarify or complete individual responses and/or to conduct a spoken survey with respondents who are unable, unwilling, or prefer not to respond in person. As such, the information is provided to boost the completeness, accuracy and response rate of the survey. As stated above, no information linking PacFIN identifiers with survey response results will be released in any reports or publications, or to NMFS or any other individual or organization.

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.

The survey does not include questions on sexual behavior, attitudes, beliefs, or other private information.

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

The public reporting burden for this voluntary collection of information is estimated to average one (1) hour per respondent. This includes the time required to read the introductory statement and the gathering of business information necessary to complete the survey, set up and meet with the contractor. The response rate is expected to be near 57%, resulting in approximately 17 completed surveys. As a result, the survey is expected to impose a total of 17 burden hours on the U.S. West Coast commercial swordfish fishing industry.

Approximate total number of participants	30
Approximate sample size	30

Approximate expected survey response rate 57%
 Approximate expected # survey respondents 17
 Average burden hours/survey 1 hour
 Total annual burden hours 17

Information Collection	Type of Respondent (Occupational Title)	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Mean Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Cost and Earnings Survey	Captain / Operator	30	.57	17	1	17	12.92	220
Totals				17		17		220

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).

No recordkeeping or reporting cost is anticipated as the contractor will meet the respondent at their place of choice. The respondents make purchases of equipment or services as part of customary and usual business or private practices. They will require no additional such purchases to provide the requested information.

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

Total estimated cost to the Federal Government will be \$10,000 plus the cost of time to federal employees involved in the survey effort (estimated cost of \$8,000). A private firm, Hanan & Associates, Inc. has been hired to administer and collect the survey, tabulate the survey data, conduct follow up contacts, and enter and validate the data. In addition to survey firm contract costs, there will be additional costs for meetings, project management, and phone and email communication and for supplies. *A table of itemized costs is presented below.*

Note does not include ECS overhead:

Description	Estimated Cost
<i>Data Collection</i>	
Outreach to Industry	\$3,500
Administrative support	\$834
Administer Personal Survey Interviews	\$4,166
<i>Data Preparation</i>	
Data Entry/Verification/Checks	\$1,500
Total	\$10,000

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP 04 / 03	\$155,366	5%		\$8,000
Contractor Cost					\$10,000
Travel					
Other Costs					
TOTAL					\$18,000

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

This is an extension of an existing collection, with no substantive changes.

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	
Cost and Earnings Survey	30	77	17	77	17	77	Number of respondents updated to reflect annualized number of anticipated respondents, rather than total respondents for a one-time collection. Some previously intended respondents have become unavailable to participate
Total for Collection							
Difference		-47		-60		-60	

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Cost and Earnings Survey	\$18,000	\$64,340	0	0	Number of respondents updated to reflect annualized number of anticipated respondents, rather than total respondents for a one-time collection. Some previously intended respondents have become unavailable to participate
Total for Collection					
Difference		-\$46,340		0	

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

Survey results will be reported in SWFSC’s administrative or technical report and published on the NMFS web site. Summaries will include descriptive statistics (such as mean and standard deviation) of the various cost and earnings categories.

Survey results will be used to support studies prepared for the Pacific Fisheries Management Council and NMFS management. Results may also be discussed in conference presentations, public meetings, and technical guides. All reporting of survey results will conform to data confidentiality requirements. Qualified researchers with confidentiality agreements will have access to raw data for performing future analyses.

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 expiration date will be displayed

18. Explain each exception to the certification statement.

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