

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Trip Level Economic Surveys of American Samoa, Guam, and the Commonwealth of the**  
**Northern Mariana Islands (CNMI) Small Boat-Based Fisheries**  
**OMB Control No. 0648-0635**

**Abstract**

The National Marine Fisheries Service (NMFS) collects information about fishing trip expenses in the American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands (CNMI) small-boat-based reef fish, bottomfish, and pelagics fisheries with which to conduct analyses on economic performance of fisheries that will improve fishery management in those fisheries and satisfy NMFS' legal mandates. An example of these economic performance measures is the fishing cost trend as one of the economic performance indicators reported in Annual Stock Assessment and Fishery Evaluation Reports of each Fishery Ecosystem Plan. In addition, the economic data collected will allow quantitative assessment of the fisheries sector's social and economic contribution, linkages and impacts of the fisheries sector to the overall economy through Input-output (I-O) models analyses. These trip-level economic surveys collecting the main trip expenditure items (highlighted in yellow in the survey forms) are an add-on to the existing creel survey for the three areas, respectively. The creel survey program implemented by local fishery management agents is one of the major data collection systems to monitor fisheries (such as catch and effort) in these three geographic areas. Interviews are conducted with returning fishermen at the most active launching ramps/docks during selected time periods on the islands. Participation in the economic data collection is voluntary.

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) needs the economic data included in this information collection to be capable of more than a cursory effort to comply with or support the following laws, Executive Orders (EOs) and NOAA Fisheries strategies and policies, which require economic analyses<sup>1</sup>.

1. The Magnuson-Stevens Fishery Conservation and Management Act (MSA)
2. The Marine Mammal Protection Act (MMPA)
3. The Endangered Species Act (ESA)
4. The National Environmental Policy Act (NEPA)
5. The Regulatory Flexibility Act (RFA)
6. EO 12866 (Regulatory Planning and Review)
7. EO 13771 (Reducing Regulation and Controlling Regulatory Costs)

---

<sup>1</sup> Appendix A discusses their requirements for economic data and analyses.

8. EO 13840 (Ocean Policy to Advance the Economic, Security, and Environmental Interests of the United States).
9. The NOAA Fisheries Guidelines for Economic Reviews of Regulatory Actions
10. The NOAA Fisheries Strategic Plan 2019-2022 (Strategic Plan)
11. The NOAA Fisheries Ecosystem-Based Fishery Management (EBFM) Road Map
12. The NOAA Fisheries National Bycatch Reduction Strategy
13. NOAA's Catch Share Policy.

The Magnuson-Stevens Conservation and Management Act (MSA) mandates that conservation and management measures prevent over-fishing and obtain an optimum yield on a sustained basis and the measures shall be based upon the best scientific information available. The MSA also requires that conservation and management measures take into account the importance of fishery resources to fishing communities in order to: (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities. To promote better utilization and management of fishery resources in American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands (CNMI), the NMFS proposes the collection of fishing trip expenses data in these three island areas' small-boat-based reef fish, bottomfish, and pelagic fisheries.

The chief domestic fishery activity in these three island areas uses a small boat and a 1 to 2-day fishing trip that targets a variety of pelagic and near shore species. The fisheries are important to the local community in terms of a source of fresh local protein and have deep roots in the island culture. The fisheries land approximately 13 pounds of fresh fish per capita in CNMI and 4 pounds of fresh fish per capita in Guam and American Samoa<sup>2</sup> annually. Fishing activities are usually a mix of quasi-commercial and non-commercial fishing, with slightly more than half of the fish landed being commercial landings and the rest are non-commercial landings (mostly for subsistence use). Given the importance of the small-boat fisheries to these island areas' communities and economies, it is critical to monitor changes among key economic indicators through economic data collection.

Fisheries in these areas are managed under the Western Pacific Region Fishery Management Council (WPRFMC). The paucity of economic data has been a significant hurdle in evaluation of economic impact and regulatory proposals in American Samoa, Guam, and the CNMI. Two recent related recommendations were stated in the WPRFMC five-year research priorities under the reauthorized Magnuson-Stevens Fishery Conservation and Management Act (MSRA) 2020-2014 (November 2019) focusing specifically on addressing socioeconomic characterization of regional fisheries, markets, and fishing communities:

HC1.1.7 Explore the feasibility of establishing a regional long-term socioeconomic monitoring program;

HC1.1.9 Design and implement socioeconomic surveys with consideration for how results could support regional comparisons and understanding of trends in fishery and ecosystem knowledge, attitude, and perceptions.

---

<sup>2</sup> Fresh fish per capita in American Samoa was based on data in 1994 before the large longline fishery was developed.

To fulfill the data needs for the fisheries management, these trip-level economic surveys were established since 2011 to collect economic data on continuous basis for the three areas respectively<sup>3</sup>. These trip-level economic surveys become an important data source for monitoring and reporting indicators of economic performance for small boat fisheries in American Samoa, Guam, and the CNMI from 2011 to 2017. Prior to this trip-level economic surveys, only periodical cost-earnings studies were available. The periodical cost-earnings studies focused on a snap shot for vessel level fisheries economic performance. The most recent update on the periodical cost-earnings study in Guam and the CNMI small boat fleets (under the OMB Control No: 0648-0755) was conducted in 2018/2019 based on 2017/2018 operations (report not out yet). And the most recent publications for the small boat fisheries in Guam and the CNMI were documented in Hospital and Beavers (2012<sup>4</sup>, 2014<sup>5</sup>).

This proposed project is to carry on the trip-level economic surveys established in 2011 for long-term socioeconomic monitoring. This program is unique and important to these three island areas due to the following reasons:

- 1) The small boat fisheries in American Samoa, Guam and the CNMI are under the jurisdiction of the WPRFMC, and the WPRFMC recommends the need to establish a long-term socioeconomic monitoring program to better understand the dynamic and status of the fisheries and incorporate economic and social science into fisheries management. No other data collection programs are available to serve such a purpose.
- 2) This trip-level data collection program (the OMB Control No: 0648-0635) only collects trip cost data, in conjunction with the trip-level fisheries creel survey, so that the trip cost collected can be linked with the efforts, catch, and revenue for the same trip surveyed in the creel survey. This allows detailed economic analysis (e.g. fishing trip net revenue) to be done at the trip level.
- 3) On the other hand, the periodical cost-earning studies, conducted in a particular year every 5 to 8 years (under the OMB Control No:0648-0755), are inadequate to the WPRFMC's recommendation to conduct long-term socioeconomic monitoring whereas the trip costs under this data collection program are collected throughout the year on a continuous basis. This allows dynamic analysis and regional comparisons among areas.
- 4) The periodical cost-earning studies in Guam and CNMI (under the OMB Control No: 0648-0755) focus on collecting fixed costs and other socioeconomic characteristics of the small boat fisheries in the two island areas, in addition to collecting average trip costs for the survey year. The periodical cost-earning studies cover a full-range of understandings on social and economic status of the fisheries. The two types of economic data collection efforts do not overlap each other.
- 5) The trends of the trip-cost data generated from this program have been presented in the annual SAFE (Stock Assessment and Fishery Evaluation) reports for the fisheries

---

3 Chan, H.L., and M. Pan. 2019. Tracking economic performance indicators for small boat fisheries in American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands. NOAA Tech. Memo. NMFS-PIFSC -79, 76 p.

4 Hospital, J., and C. Beavers. 2012. *Economic and Social Characteristics of Guam's Small Boat Fisheries*. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Serv., NOAA, Honolulu, HI 96822-2396. Pacific Islands Fish. Sci. Cent. Admin. Rep. H-12-06, 60 p. + Appendices.

5 Hospital, J., and C. Beavers. 2014. *Economic and Social Characteristics of Small Boat Fishing in the Commonwealth of the Northern Marina Islands*. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Serv., NOAA, Honolulu, HI 96818-5007. Pacific Islands Fish. Sci. Cent. Admin. Rep. H-14-02, 58 p. + Appendices.

management Council (WPRFMC): <http://www.wpcouncil.org/the-2018-stock-assessment-and-fishery-evaluation-safe-reports-are-now-available/>.

In summary, the goal of these trip-based economic surveys is to continue to collect economic information on small boats on a continuous basis, which was established since 2011 in American Samoa, Guam, and the CNMI to support economic performance measures and improve fishery management of small boat fisheries in these areas. This trip-level continuous economic data collection program will provide fundamental economic information, particular the trends of fishing trip costs, for the fisheries management of these three areas. The information collected will be used to: 1) satisfy regulatory objectives and analytical requirements through the collection of economic data for these fleets and 2) assist the WPRFMC in selecting policies that meet conservation and management goals and minimize to the extent possible any adverse economic impacts to fishery participants.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The proposed economic data collection intends to collect fishing expenses data including the actual fishing trip expenses, input usage, and input prices in boat-based reef fish, bottomfish, and pelagic fisheries in American Samoa, Guam, and CNMI. NMFS and the WPRFMC will use this information to monitor, explain and predict changes in the economic performance and impacts of small boat fishing in American Samoa, Guam, and the CNMI. The details on the trip-level economic surveys and trend data are presented in Chan and Pan (2019). This will increase their ability to meet the requirements for economic analyses and to allow better-informed conservation and management decisions on the use of living marine resources and marine habitat in federally managed fisheries. Specifically, the surveys intend to collect information on: gallons of fuel used for the fishing trip, price per gallon of fuel, cost of ice used, cost of bait & chum used, cost of fishing gear lost, and the engine type of the boat. These economic data are collected through an add-on to the boat-based creel survey initiated by the local fisheries agencies in American Samoa, Guam, and CNMI to collect fisheries-dependent data. These agencies partner with the Western Pacific Fisheries Information Network (WPacFIN), a NMFS program for technical support. The boat-based creel survey utilizes a systematic random sampling protocol around the islands and at their major boat ramp/port areas. The local staff conducts in-person boat-based surveys on randomly chosen days (usually eight days) a month. The boat-based creel survey mainly collects fishing effort, catch information, and species composition of the catch for the trip about which the fisherman is interviewed as he returns to the boat ramp/port areas.

The economic add-on provides valuable longitudinal fishing expenses data as opposed to previous one-time data collections. The information sought is used by the NMFS economists and WPRFMC staff to perform economic analysis of fisheries in the three island areas. So far, from the current information collection, one NOAA technical memorandum (Chan and Pan 2019) was published summarizing the trip costs data in the three island areas up to 2017<sup>6</sup> and provided to the WPRFMC. The economic data were also used in the annual Stock Assessment

---

<sup>6</sup> Pan, M. 2018. Tracking Changes on Fishery Economic Performance. NOAA Tech. Memo. NMFS-PIFSC-73, 48 p. <https://doi.org/10.25923/hqhf-d906>.

and Fishery Evaluation (SAFE) reports. The most updated ones include WPRFMC (2019a)<sup>7</sup> and WPRFMC (2019b)<sup>8</sup>. The reports included the descriptive statistics and analysis of fishing expenses by gear type for each of the island areas. The descriptive statistics and analysis of fishing expenses showed an increase in the fishing costs due to the increase of fuel prices. Also, the data collected showed that different gears showed significantly different fishing costs. These reports provide valuable information to the council for management purposes, in the case of a future specific policy affecting a particular fishing gear, e.g. banning of scuba spearfishing.

The reports also estimated the net trip revenue, because the trip revenue can be derived given catch data collected by creel survey and pricing information collected by WPacFIN. For the commercial fishery, fishing trips are made as long as the net trip revenue is expected to be positive, as the trip will generate additional revenue to cover part of the long run costs like loan payment and boat insurance. The net trip revenue affects fishing effort; therefore, it is a very important indicator of the dynamic of the fishing effort in short run and fishing industry development in long run. It can also be used to examine any significant short-term economic impact from conservation and management measures.

Although this has not yet been done, the expenditure data collected can be used to develop regional economic models for fisheries in these three areas, such as Input-Output (I-O) models (theoretical framework of I-O model was developed by Wassily Leontief).<sup>9</sup> The economic data collected can be applied to the I-O model so that the fishery sector's economic contribution, linkages, and impacts to the overall economy can be assessed. I-O model analyses can also assess how fishery sector and local economy will be impacted by any conservation and management measures. Results from I-O analyses will not only provide indicators of social-economic benefits of the marine ecosystem, a performance measure in the NMFS Strategic Operating Plans, but also be used to assess how fishermen and the economy will be impacted by and respond to regulations likely to be considered by fishery managers. Two studies about the impacts of Hawaii's longline fishing regulations using the I-O model, by Cai, Leung, Pan, and Pooley (2005)<sup>10,11</sup> are good examples of the use of economic data to quantify the impacts of regulations to the fishery sector and the rest of economy.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction. See response to Question 10 of this Supporting Statement on information confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not

---

<sup>7</sup> WPRFMC, 2019a. *Annual Stock Assessment and Fishery Evaluation Report Pacific Island Pelagic Fishery Ecosystem Plan 2018*. Remington, T., Fitchett, M., Ishizaki, A., (Eds.) Western Pacific Regional Fishery Management Council. Honolulu, Hawaii 96813 USA. 375 pp. + Appendices.

<sup>8</sup> WPRFMC. 2019b. *Annual Stock Assessment and Fishery Evaluation Report for the American Samoa Archipelago Fishery Ecosystem Plan 2018*. Remington, T., Sabater, M., Ishizaki, A. (Eds.) Western Pacific Regional Fishery Management Council. Honolulu, Hawaii 96813 USA. 157 pp. + Appendices.

<sup>9</sup> Leontief, W. *Input-Output Economics*. 2<sup>nd</sup> ed. New York: Oxford University Press, 1986.

<sup>10</sup> Cai, J., P.S. Leung, M. Pan, and S. Pooley. 2005. *Economic Linkage Impacts of Hawaii's Longline Fishing Regulations*. Fisheries Research, 74(1-3) 232-242.

<sup>11</sup> Cai, J., P.S. Leung, M. Pan, and S. Pooley. 2005. *Linkage of Fisheries Sectors to Hawaii's Economy and Economic Impacts of Longline Fishing Regulations*. SOEST 05-01, JIMAR Contribution 05-355.

expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Summary of the collected data will be published on the PIFSC website to show the trends of fishing expenses, on an annual basis. We also contribute the economic data every year to the Stock Assessment and Fishery Evaluation (SAFE) reports for the WPRFMC. We plan to publish a NOAA technical report summarizing the longitudinal results in 2024 and it will be available on PIFSC website. Prior to dissemination, the information will be subject 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 collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The proposed data collection of fishing expenses data is conducted through a voluntary, in-person intercept interview methodology, the same method that is used by the boat-based interview of the creel survey. The data are collected in conjunction with the catch and effort data that are already being collected in the **Boat-based Creel Survey** in the three island areas. The Boat-based Creel Survey includes two sub-surveys (more details at <https://inport.nmfs.noaa.gov/inport/item/5612>): 1) a Boat-based Participation Count to collect participation data around the island, and 2) a Boat-based Access Point Survey. The Boat-based Access Point Survey collects two types of data during a randomly selected survey date at the selected port, including a **Boat-based Boat Log** that logs all the boats going out and coming back and a **Boat-based Interview** that intercepts fishermen after their fishing trip about the catch and effort information, the species composition, the percentage of catch that is sold. The data collected are then expanded to estimate total landings by gear type for these three areas. The boat-based interview (Access Point Survey) is voluntary and in-person. Our trip-level economic survey is an add-on to the Boat-based Interview Form for the Access Point Survey. Given the long history of the creel survey program, the collection of the trip expenses data is also voluntary and in-person. The data collection does not involve any use of automated, electronic, mechanical, or other technological techniques or other forms of information technology. The economic data collection is an add-on to the boat-based in-person interviews and the data are recorded manually on the paper survey. As the fishing expenses data is for that particular fishing trip, it is effective (better economic scale) to obtain the fishing expenses at the same time with the boat-based in-person interview. Interviewers will not use laptops or other computers to directly enter the answers being provided because the interview location is usually near the water.

We do plan to make copies of the OMB approved survey instrument available online for outreach and information purposes.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

We contacted the local agencies that support the Boat-based Creel Survey programs in American Samoa, Guam, and CNMI to inquire about their upcoming data collection efforts; none of them planned any new data collection initiatives dealing with trip-level fishing expenses of boat-based fisheries in the upcoming years. The Boat-based Creel Survey programs are organized by the local agencies in partnership with the WPacFIN, which is housed within the PIFSC. The participating agencies include: American Samoa Department of Marine and Wildlife Resources (DMWR), Guam Department of Agriculture's Division of Aquatic and Wildlife Resources (DAWR), and CNMI government Department of Lands and Natural Resources' Division of Fish & Wildlife (DFW).

The periodical cost-earnings survey on the same population is scheduled in 2024 based on 2023 operation (OMB control #0648-0755). As discussed in Part A, Question 1, the cost-earnings study is intended to have a snapshot on the vessel level economic performance for the small boat fisheries, instead to track the dynamic trend of key economic indicators.

Compared with the one-time cost-earnings study described above, the trip-level continuous data collection program is unique because it is 1) an on-going, long-term and trip-based data collection project, 2) focused only on a few major trip expense items, 3) concurrent with the data collected from the creel survey, 4) cost saving since it is done by adding on an existing continuous data collection program. If we were to start a new trip-level continuous economic survey program independently from the creel survey, the cost to administrate two separate surveys is much higher than the proposed survey/project (see response in Question 14 for cost). In addition to the cost saving, additional economics of scale can be achieved when collecting trip cost data in conjunction with the creel survey as this allows the linkage of trip cost data with trip efforts and trip revenues data collected in the creel survey and therefore enhances the use of information and economic analyses as mentioned in Question 2.

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

Fishermen censuses suggest that most commercial fishing operations are owner or family operated small businesses. Steps to minimize the burden to these small businesses include: 1) following the same sampling method as the Boat-based Interview portion of the creel survey, interviews are conducted only on the randomly selected sample dates when fishermen finish their fishing trip, 2) the participation in the survey is completely voluntary. Interviewers are trained to request permission to do a survey. If a fisherman refuses to do the survey or if the interviewers sense a fisherman does not want to provide data, the interviewers will terminate the interview immediately and thank the fisherman for his/her time, 3) only five major trip expense items and one question about engine type are asked, with the actual time to complete the questions be between 5 to 10 minutes.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Not conducting this collection or conducting it less frequently would have the following adverse cascading effects. It would decrease the ability of NMFS and the WPRFMC to effectively monitor, explain and predict changes in the economic performance and impacts of federally managed commercial fisheries. That would prevent more than cursory efforts to comply with or support a variety of laws, Executive Orders and NOAA Fisheries strategies and policies, which require economic analyses. That would limit their use of a well-informed, science-based approach to the conservation and management of living marine resources and marine habitat in federally managed fisheries. There are no technical or legal obstacles to reducing the information collection burden.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection is voluntary. Therefore, it does not require respondents to: 1) report information to the agency; 2) prepare a written response; 3) submit any document; 4) retain any records; or 5) submit proprietary trade secret, or other confidential information. The agency has demonstrated that it has instituted procedures to protect the information's confidentiality to the extent permitted by law. This information collection is in connection with a statistical survey that is designed to produce valid and reliable results that can be generalized to the universe of study. This information collection uses statistical data classifications that have been reviewed and approved by OMB. This information collection includes a pledge of confidentiality that is supported by disclosure and data security policies, which are consistent with the pledge and which do not unnecessarily impede sharing of data with other agencies for compatible confidential use. This information collection is consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publications 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.**

A Federal Register Notice published on March 16, 2020 (85FR 14924) solicited public comment. No comments were received.

We consulted with the three creel survey data managers in each of the island areas, to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, on the data elements to be recorded and on the accuracy of the burden estimates. All managers gave very positive responses to the current on-going program.

For CNMI, the fishery data specialist Jude Lizama was contacted by email and he replied on March 5, 2020. For American Samoa, the boat-based creel survey manager Tepora Toliniu Lavata'i was contacted by email and she replied on April 3, 2020. For Guam, the offshore biologist Thomas Flores, Jr. was contacted by email and he replied on March 30, 2020. The table below records their specific responses.

	Jude Lizama (CNMI)	Tepora Toliniu Lavata'i (American Samoa)	Thomas Flores (Guam)
Q1. Do you think the economic data in the survey are readily available?	Yes, fishermen were able to answer all economic information requested.	Yes, economic information is readily available when we conduct our program surveys.	Yes, the fishermen are able to answer the economic information requested.
Q2. For the frequency of collection, do you think it is adequate?	Yes, collection frequency is adequate since they are almost always collected during boat-based creel surveys.	Yes, the information provided by fishermen is adequate.	When I work a creel survey, the frequency of collection is low because most fishermen I interview are in a hurry once our creel questions are asked.
Q3. Do you think the fishermen had clear instructions to answer the survey?	Yes, fishermen understood what they were being asked.	We have trained data collectors that ask fishermen the questions on the survey. The fishermen clearly understand the meaning of these questions. Further explanation is provided if fishermen do not understand.	Yes.
Q4. The estimated interviewing time per respondent is 10 minutes.	Collecting all data (e.g. catch, economic, and FAD) takes	The time allocated for economic information for every fishing trip is	Ten minutes is not reasonable. 1-2 minutes (are sufficient).

Do you think it is reasonable? If not, what do you think is the actual interviewing time per respondent?	approximately 10 minutes depending on the amount of catch. The time it takes to collect economic data takes less than two minutes since straightforward questions are being asked. I think these are reasonable.	enough to gather all the information needed.	
Q5. What do you think on the data elements to be recorded?	I believe they sufficiently fulfill the objectives of economic data collection since they are brief and clear enough for fishermen to provide and for staff to record and enter.	I think the information gathered paints a holistic picture of the fishing trips and how much the fishermen invest in every trip.	The fishermen expenditure data we collect is just descriptive of what they spend to go on a fishing trip. Because the data is for NOAA, I'm assuming the data elements are OK since this is what NOAA requested for.

To address the comment that the estimated interviewing time per respondent (ten minutes) is “not reasonable”, we contacted Thomas Flores about this and he clarified that usually the interviews took much less than 10 minutes because the survey only has a few trip cost items, some interviews took only 1-2 minutes to complete the questions while a few cases took longer, depending on the fishermen.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No 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. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

Survey respondents are being advised that any information provided will be considered private. The information collected will be kept as confidential in accordance with NOAA Administrative Order 216-100, and Confidential Fisheries Statistics and section 402(b) of the MSA (16 U.S.C. 1801, et seq.). It is the Agency’s policy not to release personally and business identifiable data, other than in aggregate form, as the NMFS protects such data. Whenever data are requested by other users, the Agency will ensure that information identifying the pecuniary business activity of a particular individual is not identified. Only group averages or group totals will be presented in any reports, publications, or oral presentations of the study's results.

The information collected is covered by COMMERCE/NOAA Privacy Act System of Records 6, Fishermen’ Statistical Information.

We will follow PIFCS’s policy of data aggregation: Any fishery-wide aggregations of data shall include information from three or more individual vessels. Effort information, including just the presence of fishing, can be just as sensitive as the actual catch itself. All data analysis programs should include a procedure for calculating the number of vessels within the aggregate. Wherever possible, aggregations should be large enough to include more, rather than fewer, vessels.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No sensitive questions will be asked.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

As discussed in Part B, we estimate the annual number of respondents, number of responses per respondent, and total responses in each area, based on the average number of responses to the economic surveys in Guam (2013-2019), CNMI (2011-2019), and American Samoa (2011-2019). The number of respondents in each area is estimated based on the average number of unique boats interviewed in economic surveys in each island areas. The number of responses per participant is derived from the average number of interviews conducted at different trips during different times of the year. Table 6 in Part B shows the average number of respondents (boats) and the average number of responses (trips) to the economic surveys in the three island areas. We anticipate 480 economic surveys annually and each survey takes about 10 minutes. The total burden hours are estimated to be 80. Table 1 below shows the details.

Table 1. Burden Hours Per Year

	Guam	CNMI	American Samoa	Total
Number of respondents (boats)	127	55	18	200
Number of responses per respondent (number of trips per boat)	1.5	2.0	10.0	2.4
Total responses (trips)	190	110	180	480
Average response time per response (hours)	0.167	0.167	0.167	
Total Burden (hours)	31.73	18.37	30.06	80

Using the average hourly wage for ‘Farming, Fishing, and Forestry Occupation’ in Guam in May 2019 (\$13.21, hourly wage in CNMI and American Samoa is not available),<sup>12</sup> the estimated annualized labor cost to respondents for the hour burden for the collection is \$1,059. Table 2 below shows the details.

Table 2. Annual Wage Burden Costs Per Year

Information Collection	Type of Respondent (Occupational Title)	# of Respondents/year (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)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands Small Boat-based Fisheries	Farming, Fishing, and Forestry Occupation	200	2.4	480	0.167	80	\$13.21	\$1,059
Totals				480		80		\$1,059

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

There are no costs excluding the value of the burden hours in question A12 (Table 3). This voluntary, in-person survey will be conducted at times and places that are convenient to fishermen.

Table 3. Annual Cost Burden to Respondents

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands Small Boat-based Fisheries	200	2.4	480	0	0
TOTALS	200		480		0

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of**

<sup>12</sup> See [https://www.bls.gov/oes/current/oes\\_gu.htm#45-0000](https://www.bls.gov/oes/current/oes_gu.htm#45-0000)

**hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The cost to the federal government for implementing this survey includes project oversight by a NMFS economist, which is estimated to take 20 hours per year (0.96% of annual effort) from a ZP-4 NOAA economist. Although the NMFS economist will be employed full time by the federal government with or without this project, these hours would be diverted to other valuable tasks in the absence of this data collection. Assuming annual salaries of \$140,146 and a 50% benefit load, these hours amount to \$2,021 annually for salary and benefits related to this data collection. Additional cost is the labor cost of one economist from the joint research institute in the amount to \$22,788 per year (loaded salary \$158,000 for 200 hours (i.e. 9.62% annual effort)) for data processing, quality control, and report writing. Therefore, the total estimated annual cost incurred by the federal government as a result of implementing this survey is \$17,214. Table 4 shows a detailed breakdown of the annualized costs to the Federal government.

If we were to start a new economic survey program without adding on the economic data collection to the creel survey, it would cost at least \$10,000 more per year per area because of the new hire of part-time personnel and administrative cost. The add-on economic surveys would be a cost savings of at least \$30,000 annually.

Table 4. Annualized Cost to the Federal Government

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4 (x1)	\$210,219	0.96%		\$2,021
<b>Contractor Cost</b>					
Economist from joint research institute	-	\$158,000	9.62%	-	\$15,192
Travel					\$0
Other Costs:					\$0
<b>TOTAL</b>					<b>\$17,214</b>

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

Burden hours are dropped due to lower number of respondents. Table 5 below shows the details.

Table 5. Program Changes or Adjustment

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	
American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands Small Boat-based Fisheries	200	245	480	600	80	100	Adjustment - the number of fishers decreased in recent years and therefore lower responses and burden hours
<b>Total for Collection</b>	200	245	480	600	80	100	
<b>Difference</b>	-45		-120		-20		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands Small Boat-based Fisheries	\$1,059	\$1,324	\$0	\$0	Adjustment - the number of fishers decreased in recent years and therefore lower responses and burden hours
<b>Total for Collection</b>	\$1,059	\$1,324	\$0	\$0	
<b>Difference</b>	-265		0		

**16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Summary of the collected data will be published on the PIFSC website to show the trends of fishing expenses, on an annual basis. We will also contribute the economic data every year to the Stock Assessment and Fishery Evaluation (SAFE) reports for the WPRFMC. We plan to publish a NOAA technical report summarizing the longitudinal results in 2024 and it will be available on PIFSC website.

**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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

*The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#)*