

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Processed Product Family of Forms**  
**OMB CONTROL NO. 0648-0018**

**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 census of seafood processors is based on known firms that responded in previous years with the addition of newly established firms identified by local port agents, research in industry publications, and outreach. Agency personnel review local trade directories and state licensing agencies to develop potential new contacts. New firms are provided a NOAA Form 88-13 survey form and instructions for completing the survey. Lists of firms that are reported to have ceased operation are reviewed to establish certainty that a new company has not opened up in the same location. There have been cases in which a firm ceased operation for a year due to raw supply sourcing only to reopen in a subsequent year. In recent years, no new firms have entered into the fish meal and oil processing sectors, so no additional 88-13c Forms have been required.

For the 2018 sampling year, the response rate to mailed and electronically fillable annual survey forms was approximately 51%. This estimate includes companies that supplied figures for quantity and value and businesses that did not process that year, went out of business, changed business type or did not fulfill the definition of processor for the purposes of this survey. The response rate can be affected by high turnover in the small independent entities in the processing sector. We rely on the local port agents to keep us current on what businesses are closed and when new businesses start up. We also perform research using business publications and permit lists. For large-scale operations our response rate should be quite high (80-90 percent). It is probably less for small independent operations. For form 88-13, our sampling universe includes 628 large and small seafood processing entities. Assuming a 50% response rate, we anticipate 314 responses. For form 88-13c, our sampling universe contains 7 companies that predominantly process fish meal and fish oil. We achieve 100% compliance for each monthly response yielding 84 responses per year.

There is complete compliance with the 88-13c form since all entities within the meal and oil processing group are known.

Table B1. Estimated number of respondents

<b>Form 88-13</b>		
Entities in Survey	628	*This is the number of entities that are classified as

		“active” in our sampling universe. This number includes companies that may have gone out of business or are not processors. It is not a guarantee that these business changes will be reported and surveys with the information will be returned.
2018 Response Rate	51%	
2019 Response Rate	48%	*decrease due to complications from COVID-19.
Expected Response Rate	50%	*average of last two years of responses
Expected Respondents	314	
<b>Form 88-13c</b>		
Entities in survey	7	*There are 7 companies predominantly involved in the production of fish meal and oil or are major producers of one meal/oil from a particular species
2019 Response Rate	100%	*Fish meal and oil companies have historically always responded to these requests
Expected Response Rate	100%	
Expected Respondents	7	

**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.**

This is a census survey and no statistical stratification is employed. We send surveys to processors that are in our existing sample frame and update business status as needed. If it comes to our attention that a business closed, we confirm this and remove them from our sampling frame. If an entity ceases operation but re-opens in another location, we add that new establishment to the sampling frame with updated contact information and location coding. In instances where a processor may have not processed in a year but intend to rejoin the industry, we use database flags to make sure that company stays in an active status but is not included in estimating production from processors that did not respond. We rely on port agents for business

status updates due to their knowledge of the industry in their coverage area. We also perform additional research using industry publications and permit lists when available. Our typical response rate is between 48 and 51% which should yield the needed amount of accuracy. However, efforts are put into place to add to our sampling frame in order to increase accuracy and newer efforts are being undertaken to increase response rates.

When companies that are in an active status do not report and we have no evidence that they stopped production, we estimate production through imputation based on processing trends specific to that company. Imputed data typically include the same species and product type reported in the previous year.

Although form 88-13 is distributed 1 time per year (annual basis), form 88-13c is distributed once a month. The seasonality of the fisheries supporting the processing of meal and oil (NOAA Form 88-13c) precludes less sampling (e.g. collecting pooled quarterly data or annual data). If the reporting time frame was increased to an annual submission, a loss of data for the season would jeopardize the statistics and the ability to publish quarterly meal and oil reports.

Quarterly meal and oil market news reports include data for every month in a given quarter for domestic and trade data. This allows for finer scale tracking of the global meal and oil industry. Additionally, companies reduce employment at season closure to primary maintenance needs. The monthly production data paired with the monthly employment data yield insights into the relationships between production and employment.

- 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.**

Out of the 48-51% of total survey returns, approximately 75 percent are submitted within five months of the initial mailing conducted in early December. The responses include companies that have been identified as being out of business, those that chose not to respond, businesses that no longer process seafood products, or businesses that have not been able to process in the previous year. A second mailing to non-respondents is conducted in late February or March with follow-up calls initiated within two weeks to provide plant managers the option of providing the information over the phone or to ascertain if there is a problem. In some cases the plant may not have been operational due to the seasonality of a fishery.

Federally permitted dealers that perform processing activities within certain sectors in the Greater Atlantic Region are required to submit a completed survey. See response to Part A, Question 1 of this Supporting Statement for more information on reporting requirements. The regional permit office notifies a firm that fails to respond that their permit renewal will be held in abeyance or, if necessary, an existing permit may be revoked until a form 88-13 is completed.

Many of the processing facilities have a long-standing relationship with local NOAA Fisheries port agents conducting the survey. When necessary, local NOAA Fisheries port agents may visit

the plant to review a respondents' completed survey or to assist in completing the survey.

NOAA Fisheries port agents, individuals that provide field support to commercial and recreational fishermen and perform sampling and outreach activities, work closely with national, regional, and state industry trade associations. Periodically, port agents hold discussions with industry leaders to describe the necessity of their members to provide the information. Port agents also meet with industry members at both local and national trade shows to review new types of products that are being developed for inclusion in the survey.

In cases where we still receive no response, we ask our port agents to confirm whether or not the business is still in operation. If the business is in operation and we have no information provided, we impute/estimate the production for that business using the data from the previous year.

**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.**

The census has been conducted in the same manner for the past twenty years. There have been efforts to increase the survey sample frame and move to electronic reporting formats. We have also incorporated more accurate state generated data sets for some species upon guidance from industry professionals.

No test has been conducted recently. However, there are plans to analyze the survey and survey process via the use of Quality Management and Continuous Improvement (QM/CI) methodologies. The results of these exercises will shape survey improvements.

**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.**

Regional agency personnel and port agents conduct the census.

The main NOAA Fisheries regional contacts are below:

Greater Atlantic Region – Pam Thames	(207) 780-3322
Southeast Region – Lawrence Beerkircher	(305) 361-4290 x290
Gulf area of Southeast Region– Pamela Brown-Eyo	(305) 361-4565 x565
Large Tuna Processors - Jessica Short	(562) 980-4040
West Coast Region – Geana Tyler (Pacific States Marine Fisheries Commission)	(503) 595-3100
Pacific Islands Region – Walter Ikehara	(808) 725-5175

Personnel at headquarters conduct tabulations of the data:

Office of Science and Technology – Melissa Yencho	(301) 427-8193
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