

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Groundfish Tagging Program
OMB Control No. 0648-0276

Abstract

Beginning with the passage of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), 16 U.S.C. 1801 *et seq.* (MSA) in 1976, the Secretary of Commerce (Secretary) has undertaken a set of objectives for the conservation and management of marine fishery resources. Under this stewardship role of one of the nation's natural resources, the Secretary was given certain regulatory authorities to ensure the most beneficial uses of these resources through regional councils. The North Pacific Fishery Management Council (Council) has prepared groundfish Fishery Management Plans (FMPs) for fisheries in the exclusive economic zone (EEZ) off Alaska. These FMPs are implemented by regulations at 50 CFR part 679. General regulations that also pertain to these fisheries appear in subpart H of 50 CFR part 600.

The National Marine Fisheries Service (NMFS) Groundfish Tagging Program provides scientists with information necessary for effective conservation, management, and scientific understanding of the groundfish fishery resources off Alaska. The collection of information for the Groundfish Tagging Program has been in operation since the early 1970s.

This collection covers the Groundfish Tagging Program along the northeast Pacific coast and Alaska. The groundfish tagging and tag recovery program is part of the fishery resource assessment that NMFS conducts under the MSA authority as codified in 16 U.S.C. 1854 (e) and 1801 (a)(8). The program is under the National Oceanic and Atmospheric Administration (NOAA) Operations, Research, and Facilities Appropriation which is available for necessary expenses of activities authorized by law.

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.

This collection involves the submission of tag recovery information from the public. Each year, thousands of fish are caught during NMFS stock assessment surveys. These fish are weighed and measured, and their sex is determined. Fish that appear healthy and uninjured are tagged before being released back into the wild. Fishermen and seafood processors subsequently find the tagged fish. By returning the tag to NMFS, along with information on when and where the fish was caught and the size and weight of the fish, these fishermen and processors provide extremely valuable information to fishery scientists and managers.

Groundfish tagging programs in the northeastern Pacific Ocean and Alaska waters provide essential research data on groundfish life histories and migration patterns that are necessary for implementing management regimes. To be most cost effective, tagging of sablefish and other groundfish is usually accomplished on board NOAA and NMFS chartered survey vessels as one of many data collection tasks performed during the surveys. Tagging groundfish for subsequent tracking and recovery is an important tool for managing fishery resources and the information gathered has resulted in numerous scientific and management publications by NMFS personnel.

There are two general categories of tags. Simple plastic tags (spaghetti tags) are external tags approximately two inches long printed with code numbers. When a tag is returned the tag number is correlated with databases of released, tagged fish to determine the net movement and growth rate of the tagged fish. Archival tags are microchips with sensors encased in plastic cylinders that record the depth, temperature or other data, which can be downloaded electronically from the recovered tags. See the information flyers posted with this submission for photos of each type of tag. Flyers are distributed to inform fishers and processors of the program and to encourage them to be on the lookout for tagged fish. Tag return information is collected through the use of either of two 4" x 6-1/2" forms sent directly to the fishing vessel's captain, or are made available at the processing plants where fishermen unload their catches. One form is specific to sablefish, the other to all other groundfish species. Sablefish are the predominant species tagged. Approximately three thousand are tagged annually as part of a long term and well-advertised program. Groundfish other than sablefish are generally tagged in fewer numbers. They are usually tagged on a more opportunistic basis and for shorter duration projects. Both types of tags are used with both sablefish and other groundfish; archival tags are quite expensive, so are used less frequently. A significant percentage of the tags are recovered by fishery agency staff and fishery observers, while the remainder are recovered by fishermen and processing workers (all responses are counted in this information collection).

Although the two forms are very similar, it is useful to have distinct forms. The groundfish program and the sablefish program are run from two separate facilities. The tagged fish are caught in distinctly different fisheries. The use of separate forms generally prevents the need to sort out responses in Seattle and forward some to Auke Bay.

The tag recovery information collected from fishermen, observers, port samplers, various state and federal fishery agencies, and fish processors is received by the NMFS Alaska Fisheries Science Center in Seattle, Washington and its Auke Bay Laboratory in Juneau, Alaska. In recent years, as many as 500 to 1000 tag recoveries have been submitted per year. The number of individuals returning tags varies widely. Many fishers and processors associate the tagging programs with the NMFS observer program and utilize observers onboard fishing vessels and in processing plants to collect and return all tags from that particular vessel or plant. The usual number of non-NOAA people participating ranges between 300 and 400 annually.

The standard tag recovery form is attached to a business reply envelope. Individuals use this envelope to submit and record recovery information for each tag. Typical information given by the respondent and collected is: (1) tag number, (2) date of capture, (3) location, (4) size of fish, (5) sex, (6) depth of capture and (7) gear type.

Submitting tag recovery information is voluntary and can be accomplished at any time. Most tag recovery information is submitted directly after a groundfish fishery closure because fishermen are anxious to receive the release information. Respondents receive information only on the tags they have recovered. Recovery information needs to be as accurate as possible, and fishermen are aware of this necessity. Some individuals return recovered tags quickly, while others will accumulate many tags and return them on an annual or seasonal schedule. Less frequent transmittal of data (less than annually) delays processing of the information. Such a delay can make the information less valuable to the fishermen and reduce the temporal significance of the data for prediction of stock abundance by management area.

Existing data sets are used to match recovery and release information for each tag submitted. A letter generated by a series of computer programs and the existing tag release data set provides fishermen with release information for each tag recovery submitted, while providing researchers with information

necessary to manage the groundfish fisheries.

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.

Scientists of NMFS, the Alaska Department of Fish & Game (ADF&G), universities, and from Japan and Canada use the groundfish tag identification number, recovery position, biological data from the tagged fish, (sex, length, weight), and recovery nation, depth, and gear information to study growth rates, mortality, recruitment, migration patterns, and differences by area, sex, size, and depth.

Each year between 15-20-% of the tagged fish are recovered and returned. Data collected from the groundfish tagging program are used in population dynamics models to effectively estimate population size and manage the groundfish resource. Information gathered provides data on the rates of migration between the west coast, British Columbia, and Alaska and among Alaska management areas.

Persons consulted on the information requirements of the groundfish tagging program during research cruises, at fishery meetings, and elsewhere over the years include:

1. Katy Echave, NMFS Alaska Fisheries and Science Center, (907) 789-6006.
2. Susanne McDermott, NMFS Alaska Fisheries Science Center, (206) 526-4417
3. Takashi Sasaki, Far Seas Fisheries Research Laboratory, Japan, 0543-34-0715.
4. Dave Carlile, State of Alaska, Department of Fish & Game, (907) 465-4216.
5. Gordon A. McFarlane, Fisheries and Oceans, Canada, (604) 756-7052.
6. Bob Demory, State of Oregon, Department of Fish and Wildlife, (503) 867-4741.
7. Al Millikan, State of Washington, Department of Fisheries, (206) 545-6597.
8. Jim Hardwick, State of California, Department of Fish and Game, (408) 649-2884.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. NOAA Fisheries 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. 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 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.

Electronic archival tags represent advances in the collection of data, both in the quantity and specificity of the data collected from individual fish. However, the means by which respondents report tag information will not become automated. The necessity of obtaining the actual tag from each fish to verify the data collected makes it impractical to seek electronic or other automated methods of collecting tag information. A tag reporting mobile application is being developed.

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

No other tagging information is available for groundfish in outside waters off California, Oregon, Washington, and Alaska. Scientists from the U.S., Canada, and ADF&G are collaborating to form a joint database of groundfish tag releases and recoveries. Tags can be sent to any of the agencies, because tags will be forwarded to the appropriate agency upon receipt. Duplication of effort and superfluous data collection is avoided through this cooperation. Only the recoverer of the tagged groundfish can supply the information necessary for analysis. There is no other source for these data.

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

Individuals at processing plants, on fishing vessels, and state fishery agencies send tag recovery information as tagged fish are caught in state and federally managed groundfish fisheries. Both tag recovery forms require five minutes to complete and are designed to create minimal burden. Many fishing vessels and processors in the fisheries associated with these tagging programs carry NMFS observers. In the great majority of these instances, tagged fish will simply be handed to the observer for recovery of the tag and recording and forwarding of pertinent information thereby minimizing public burden.

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.

If the information were not collected, management effectiveness of the groundfish resource would be diminished. Tagging has provided estimates of a number of important biological parameters used in stock assessment models, models that are used to recommend harvest levels. Parameters include growth, fishing and natural mortality, and direction and rates of fish movement among management areas. The parameters are incorporated in population dynamics models such as stock reduction analysis, stock synthesis, and more advanced methods incorporating likelihood functions and non-linear optimization functions. The lack of adequate information derived from tagging would result in groundfish stock assessments that are less accurate thereby decreasing the credibility of the fishery management process and increasing costs associated with under and over harvest of groundfish resources.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection will be conducted in a manner that 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 was published on January 20, 2022 (87 FR 3083), soliciting public comments. No substantive comments were received.

Additionally, NMFS reached out to several respondents in an effort 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. No responses were received.

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

The various tagging efforts within the groundfish tagging program offer a variety of rewards and incentives for participation (\$5 cash, a ball cap, etc.). Participants also receive the release information (date, position, depth, size) and data generated from each tag recovered (growth, miles traveled, and days at large). The data associated with the recovered tags is of great interest to fishermen and may be as much of an incentive as the small rewards. For sablefish, there is in addition an annual drawing of the recovered tag numbers; the recoverer of the winning tag number receives \$1,000. The sablefish information is currently more valuable, which is why an additional reward is offered for these tags. Similarly, archival electronic tags earn the participant \$200 for return of an undamaged electronic tag, reflecting the value of the data contained therein.

10. Describe any assurance of confidentiality provided to respondents and the basis for the 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.

The information collected is confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1881a). It is also confidential under NOAA Administrative Order 216-100, which sets forth procedures to protect the confidentiality of fishery statistics. Under guidance of NOAA General Counsel, Alaska Region, changes to Alaska state regulations have been implemented to allow the State access to fishery information collected from the groundfish industry under Federal regulations, consistent with NOAA Administrative Order 216-100.

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.

This information collection does not involve information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The burden associated with a respondent returning a spaghetti tag is five minutes to complete the form. Since a business reply envelope is provided to the participant, no other burden is associated. There are two forms used with this tagging program. The first, the tagged sablefish form, has most recently generated approximately 550 responses per year (about half from the public rather than observers or NMFS staff). The second, the groundfish tagging form, has most recently generated approximately 450 responses per year.

Approximately 15 electronic tags are returned per year, however the vast majority of these are simply handed over to on-site NMFS observers, thereby incurring no burden. It is estimated that approximately 5 respondents per year return these tags themselves. The burden associated with a respondent returning an electronic archival tag is less than twenty minutes to remove the tag and record information

Information Collection	Type of Respondent (e.g., 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)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Simple Tagged Sablefish Form	Fisherperson	275	2	550	5min	46	16.70	768.20
Simple Tagged Groundfish Form	Fisherperson	150	3	450	5min	38	16.70	634.60

Electronic Archival Tag Return	Fisherperson	15	1	15	20min	5	16.70	83.50
Totals				1,015		89		1,486.30

***<https://www.bls.gov/oes/current/oes450000.htm> from BLS's Occupational Outlook Handbook**

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).

Return of spaghetti tags incurs no costs on the part of respondents other than their time, as they are supplied with postage-paid envelopes. Groundfish Tagging Program Respondents who return electronic archival tags incur no costs if they simply hand the tagged fish to a NMFS observer, in which case the observer assumes responsibility for collecting and forwarding information. If a fisherman chooses to return an electronic tag himself he will incur the postage costs of mailing the tag (approximately \$3.00 per tag): **15 x \$3.00 = \$45 in recordkeeping/reporting costs.** In either case, the finder of the tag will receive a \$200 reward.

Information Collection	# of Respondents (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)
Electronic Archival Tag Return	15	1	15	\$3	\$45
TOTALS	15	1	15	\$3	\$45

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 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 costs to the Federal government are unchanged and are about \$16,000 a year in rewards and \$2,000 a year in tags, paper supplies, and tagging equipment. The groundfish tagging program requires an average of one full time employee to maintain the database and return release information to the respondents. Minimal ship time costs are incurred because tagging is piggy-backed onto routine stock assessment survey operations.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	GS 09/step 1	47,097.00	10%		4,710.00
Other Federal Positions					
Contractor Cost					
Travel					

Other Costs:					\$18,000
TOTAL					22,710.00

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

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	
Groundfish Tagging Program - Simple Tags	-	425	-	1000	-	83	Previous IC being split out into two new ICs (groundfish/sablefish) in this renewal for increase administrative transparency
Tagged Sablefish Form	275	NA	550	NA	46	NA	
Tagged Groundfish Form	150	NA	450	NA	38	NA	
Electronic Archival Tag Return	15	15	15	15	5	5	Change of IC title from "Groundfish Tagging Program - Archival Tags" to "Electronic Archival Tag Return"
Total for Collection	440	440	1,015	1,015	89	88	
Difference	0		0		1		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Groundfish Tagging Program - Simple Tags	-	NA	-	0	Previous IC being split out into two new ICs (groundfish/sablefish) in this renewal for increase administrative transparency
Tagged Sablefish Form	2,552.20	NA	-	NA	
Tagged Groundfish Form	2,088.20	NA	-	NA	
Electronic Archival Tag Return	69.60	NA	45	30	Increased postage costs.
Total for Collection	4,710	NA	45	30	
Difference	4,710		15		

16. For collections of information whose results will be published, outline 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.

Results of the tagging program have been published on a regular basis in such publications as the Canadian Journal of Fisheries and Aquatic Sciences, Fishery Bulletin, Fisheries Research, the International Symposium on the Biology and Management of Sablefish in 1993, and the informal annual newsletter, Blackcod Almanac, distributed to members of industry. A summary report of the sablefish tagging program, *Report to Industry on the Alaska Sablefish Tag Program, 1972-2012* is available on-line at

<https://www.afsc.noaa.gov/Publications/AFSC-TM/NOAA-TM-AFSC-254.pdf>.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Although the information on the forms is certain not to change during the length of this study, revised forms, with new OMB approval numbers and expiration dates will be created and handed out. Note: Old forms, with outdated information, may still circulate as fishermen and processors keep the same forms on hand for extended periods of time.

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\(b\)\(3\)](#).