

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Highly Migratory Species Tournament Registration and Reporting
OMB Control No. 0648-0323

Abstract

The National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS) requests the approval of the Office of Management and Budget (OMB) for an extension of the existing collection of information under OMB Control Number 0648-0323 for Atlantic Highly Migratory Species (HMS) Tournament Registration and Reporting. Fishing tournaments are defined as any fishing competition in which participants must register or otherwise enter or in which a prize or award is offered for catching or landing fish. Regulations at 50 CFR part 635.5(d) require that all fishing tournaments targeting HMS that are conducted out of ports in Atlantic coastal states, including Puerto Rico and the U.S. Virgin Islands, must register with NMFS at least four weeks prior to the start of the event. These events must also report their catch and fishing effort, as measured by the number of participating vessels per day, by the seventh day following conclusion of the event.

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 Secretary of Commerce is authorized to regulate fisheries for Atlantic Highly Migratory Species (HMS) under the Magnuson-Stevens Fishery Conservation and Management Act and the Atlantic Tunas Convention Act, as amended.

For all Atlantic HMS tournaments that are conducted from a port in an Atlantic coastal state, including the Gulf of Mexico, U.S. Virgin Islands, and Puerto Rico, a tournament operator must register with NOAA's National Marine Fisheries Service (NMFS) HMS Management Division, at least 4 weeks prior to commencement of the tournament. When registering, tournament operators are asked to submit information on the purpose, dates, and location of the tournament, as well as which species of HMS will be targeted. A tournament is not registered unless the tournament operator has received a confirmation number from NMFS. Once registered, tournament operators must maintain and submit to NMFS a record of catch and effort on forms available from NMFS. Tournament operators must submit the completed forms, either online or "at an address designated by NMFS, postmarked no later than the 7th day after the conclusion of the tournament, and must attach a copy of the tournament rules." (50 CFR 635.5(d)). An online registration and reporting portal is available for tournament operators to submit the required forms.

NMFS proposes to renew tournament registration and reporting requirements for Atlantic HMS. Atlantic HMS tournament registration is important for the management of swordfish, billfishes, tunas, and sharks, because it characterizes a portion of the recreational fishing effort on these species, including location and targeted species. HMS tournament registration enables the collection of contact information for the operators of tournaments that target HMS so that NMFS may collect reports of fishing catch and effort following the event. The information allows NMFS, in the course of developing fishery management plans, to evaluate the social and economic impact (e.g., effect of tournaments on number of HMS-permitted anglers, the number of individuals to whom HMS educational outreach materials are distributed, or the regulatory impacts on fishing culture of the communities in which HMS tournaments are held) of tournament angling in relation to other types of HMS angling (e.g., commercial, non-tournament recreational), the potential impacts on tournament operations, and the relative effect of tournament angling on populations of various regulated HMS. Further, registration by HMS tournament operators opens an avenue for NMFS educational outreach specific to HMS tournament fishing activities and participants.

HMS tournament reporting is necessary for the collection of catch and effort data to calculate total annual catch for stock assessments and to meet international reporting obligations, such as those mandated under the Atlantic Tunas Convention Act of 1975 for NMFS to report annually to the International Commission for the Conservation of Atlantic Tunas (ICCAT).

2. 1 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 tournament registration and reporting procedures involve: (1) mandatory registration of Atlantic HMS tournaments; and (2) mandatory reporting of tournament results, including the documentation of all instances of catching an Atlantic HMS during a tournament. These processes are carried out as follows:

- (1) NMFS requires that the tournament operator (the person or entity responsible for maintaining records of participants and results) register the tournament, including the date, location, and target species of the tournament, at least four weeks prior to the commencement of the tournament.
- (2) The tournament operator collects the following data on all HMS encountered from all boats: whether the fish were kept, released, or lost; condition of the fish when released (alive or dead); and the weight and length of all boated fish. This information is already routinely collected during tournament operations, which makes the reporting burden solely one of transcribing existing information onto a single form, provided by NMFS. The completed reporting form must be submitted to NMFS no later than seven days after the conclusion of the tournament.

The information obtained from each tournament operator on the HMS Tournament Registration Form includes:

- a. The name, date(s), and location(s) of the tournament;

- b. The Director/Operator's name, address, phone number, e-mail address, and signature;
- c. Whether the tournament has registered in previous years, and, if so, the most recent year;
- d. Identification of HMS for which points or prizes will be awarded, and the option to list additional target species; and
- e. The option to request a specified number of HMS outreach materials.

NMFS uses this registration information to plan for the assignment of tournament observers to collect catch/effort data and biological data and samples from landed fish (length/weight, stomach contents, injuries, parasites, hard and soft tissue samples for age determination, genetic analysis, spawning condition, fecundity, etc.). The registration information also allows NMFS, in the course of developing fishery management plan amendments, to evaluate potential impacts of FMP requirements (e.g., quotas, permitting, catch reporting, gear requirements) on tournament operations. Additionally, NMFS is able to use the tournament information for angler educational outreach efforts including distribution of written informational materials, notification of public hearings, and explanation of HMS regulations.

The Atlantic Tunas General category permit and the Swordfish General Commercial permit are commercial permits, but authorize permit holders to recreationally fish for other HMS only when participating in a registered Atlantic HMS tournament; therefore, it is important for permit holders to be able to check the registration status of tournaments before participating. A close to real-time list of tournaments registered with HMS (including tournament names, date(s), location(s), and target species) is posted on the internet from this information collection, assisting potential tournament anglers in determining participation in upcoming events.

The reporting information obtained from each tournament operator on the HMS Tournament Summary Report includes:

- a. The name, location, and fishing club affiliation (if applicable) of the tournament;
- b. The total number of registered boats and whether the tournament is catch and release only;
- c. The daily fishing effort, including dates and hours fished, and number of boats fishing each of those days;
- d. The recorder's name, phone number, and e-mail address;
- e. The numbers of fish kept and released and their disposition when released (alive or dead) for each HMS;
- f. The size (weight and length) of each of the fish kept; and
- g. The option (empty space) to report additional non-HMS that were kept or released in the tournament.

The information requested on the reporting forms is collected during normal tournament operations by the tournament operator to determine awards of points or prizes to tournament participants. Thus, the only additional time or cost burden is encountered during transcription of reporting information on to the HMS tournament reporting form (electronic or paper), and if needed, photocopying or scanning, and mailing or e-mailing the form. As mentioned above, the information is used by NMFS to assess total annual tournament catch and the relative effect of

tournament angling on regulated HMS.

NMFS (through collaboration between the HMS Management Division and Southeast Fisheries Science Center) has created an online portal, called the Atlantic Tournament Registration and Reporting (ATR) system, through which tournament operators would have the option to register and report for their tournament and receive an emailed confirmation once the registration application or reporting information is reviewed by NMFS staff for completeness.

Data fields in the ATR system are the same as in the existing paper and PDF tournament registration and reporting forms. Atlantic HMS tournament operators who are returning to the ATR system will have appropriate, previously existing information for their tournament (e.g., tournament name, tournament date and location, operator name, address, phone number, fax number, email address, whether the tournament has registered in the previous years, and the most recent year) auto-filled in the online form to make registration and reporting easier and quicker. Some other data fields will have drop-down menus available.

The ATR system provides another way to submit Atlantic HMS tournament registration information to NMFS in addition to the already existing options of mailing and e-mailing.

The information that will be collected from HMS tournaments will be disseminated to the public or used to support publicly disseminated information. See responses to Questions 10 and 16 of this Supporting Statement for more information on data dissemination and use. NMFS will retain control over the personal information such as the tournament operator's name and address and safeguard it from improper access, modification, and destruction, consistent with legal standards and NOAA policy 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.

Tournament operators are required to register tournaments and to report tournament results on a NMFS form in order to standardize the data collected. The ATR system described above, provides an online option through which tournament operators can register and report their tournament and receive an emailed confirmation once the registration application is reviewed by NMFS staff for completeness. The majority of tournament operators use the ATR system due to its convenience. Additionally, electronically-fillable (PDF) tournament registration and reporting forms are available for public printing from the HMS tournaments web site at <https://www.fisheries.noaa.gov/atlantic-highly-migratory-species/atlantic-highly-migratory-species-tournaments#federal-regulations-for-tournaments>. The forms are also available via e-mail or mail upon request. Completed registration forms may be e-mailed, faxed, or mailed back to NMFS.

NMFS provides access, through the ATR system and Atlantic HMS website to general tournament registration information (tournament name, date(s), city, state, and target species) as a service to publicize tournaments and to inform potential tournament anglers of upcoming events and their registration status, which may affect some fishery regulations for anglers.

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

This collection does not duplicate or overlap with any other collection of information. The list of registered HMS tournaments is searched prior to registration to avoid duplicate submissions. Mandatory reporting of recreational non-tournament Atlantic billfish and swordfish landings and recreational Atlantic bluefin tuna landings occurs under a separately approved collection (Atlantic Highly Migratory Species Recreational Landings Reports; 0648-0328). Although these collections could document similar activities, NMFS is cognizant of possible duplication and actively makes efforts to avoid it. For example, tournament landings are exempt from the Atlantic billfish and swordfish recreational reporting requirement, and the non-tournament recreational reporting system requests that the angler indicate if the reported catch comes from a tournament, as a safeguard. In addition, two other separate approved information collections including the Large Pelagics Survey (LPS; 0648-0380) and the Marine Recreational Information Program (MRIP; 0648-0052) complement tournament registration and reporting. The LPS and MRIP include telephone surveys and dockside interviews with recreational anglers. These surveys actively identify and attempt to segregate tournament landings from other non-tournament recreational landings.

MRIP has used Atlantic HMS tournament reporting forms for special projects, such as the 2009 report, *Evaluation of the Sampling Distribution of Tournament Versus non-Tournament Trips in the Large Pelagics Survey*, but does not select tournaments for reporting as a regular part of MRIP. MRIP data collectors coordinate with Recreational Billfish Survey (RBS) data collectors who share billfish catch reports to ensure that no tournament is selected twice during these projects.

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

Four options are available for submission of the HMS Tournament Registration and Reporting forms: the ATR system (online submission), mail, and e-mail. The options are available to minimize the burden of submitting forms to NMFS, assuming that the operator would select the least cumbersome of the choices, based on personal preference. The forms are available online or, if the internet is not available, via telephone request or postal mail. Based on the availability of these options, this information collection will not have a significant impact on small entities because both the registration and reporting requirements require minimal time and effort to complete.

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 collection of tournament information were not conducted, NMFS would have difficulty complying with international obligations, such as International Commission for the Conservation of Atlantic Tunas (ICCAT) landings limits and reporting requirements. NMFS must have tournament information to evaluate the relative impact of various types of angling on HMS. If NMFS is unable to obtain this information, then the agency would be unable to fully assess the costs, benefits, and likely impacts of subsequent regulations and rules regarding either HMS or HMS tournament angling, as required by the Magnuson-Stevens Act. Also, fishing tournaments provide a unique opportunity for biologists to obtain an abundance of fishery information in a relatively short time period. It is both efficient and essential to gather this information, as it is already being collected by operators of HMS angling tournaments (catch and effort data, landings, etc.), so that it can be incorporated into the formulation of HMS fishery management policies. Likewise, fishing tournaments provide a unique opportunity for NMFS to distribute HMS educational and regulatory outreach materials to a large number of anglers. The frequency of this information collection directly coincides with the frequency of the tournament activities, making the most efficient and timely fisheries information available, and would therefore be inappropriate at different or less frequent times.

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

OMB guidelines state that an information collection should not require respondents to prepare a written response in fewer than 30 days after they receive the request. Since tournament operators are required to register at least four weeks in advance of the tournament, and reporting is required within 7 days after the tournament has ended, this requirement should be met. In the event that an operator does not register with HMS at least four weeks prior to the start of the tournament, the written response may be requested with fewer than 30 days until it is due. The 7-day reporting time frame is due to international obligations of NMFS to monitor the catch of certain HMS according to agreed-upon international quotas or agreed-upon reductions in landings, established to ensure the sustainability of such species.

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 soliciting public comment on this proposed collection of information was published on February 4, 2022, (87 FR 6512). The comment period closed on April 5, 2022. No comments were received during the 60-day comment period.

NMFS routinely consults with outside parties to obtain the public's view on the availability of fishery data, frequency of data collection, clarity of instructions and recordkeeping requests, disclosure of information, reporting format, and the data elements to be recorded, disclosed, or reported. These consultations occur in the context of HMS Advisory Panel meetings, public

hearings, written correspondence, telephone conversations, and conversations with tournament anglers and tournament operators. Over the last three years, tournament operators have expressed great satisfaction with the new online tournament registration and reporting system, and this has been further demonstrated by the fact that over 90 percent of tournament operators now choose to voluntarily register and report via the online system.

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

No payment or gifts will be provided to respondents.

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.

There is a Paperwork Reduction Act (PRA) statement, addressing confidentiality, printed on public notification materials, including the tournament registration and reporting forms and the ATR system online. It is NOAA policy to preserve the confidentiality of information submitted under this reporting requirement, except that NMFS may release such information in aggregate or summary form, such that individual identifiers are not disclosed (NAO 216-100). Information such as the number of registered tournaments, the species that they targeted, and the states in which they occurred is provided in the annual Stock Assessment and Fishery Evaluation (SAFE) Report, in Fishery Management Plan (FMP) regulatory amendments, and in supporting documents made available to the public upon request. A statement is included on the tournament registration form, informing operators that registered tournament information (tournament name, date(s), city, state, and target species) is be posted online at <https://grunt.sefsc.noaa.gov/apex/f?p=127:10:14638539338541> as a service to publicize tournaments and to inform potential tournament anglers of upcoming events that are in compliance with HMS regulations. Participation in an unregistered tournament is in violation of some Atlantic HMS permit types, so it is imperative that permit holders have access to a list of registered Atlantic HMS tournaments. All other information submitted under this reporting requirement remains confidential, or is released only in aggregate or summary form such that individual identifiers (e.g., tournament operator's name, phone number, postal address, and e-mail address) are not disclosed.

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 questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private are included in this information collection.

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

Approximately 300 tournament operators are expected to respond to the tournament registration form. With this number of respondents, and an approximate response time of 2 minutes per tournament registration form, we expect a total of 10 burden hours.

All tournaments are selected for reporting. Since this information is collected as a regular part of tournament operations, the time for each response is calculated based on the time it should take to transcribe the data onto HMS tournament reporting forms. With this approximate response time of 20 minutes for each of the 300 respondents, we expect a total of 100 burden hours for tournament reporting.

Table 1. Estimated number of annual respondents, responses, burden hours, and annual wage costs associated with HMS tournament registration and reporting.

Information Collection	Type of Respondent (e.g., Profession)	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Burden Hrs / Response	Total Annual Burden Hrs	Hourly Wage Rate (for Type of Respondent)	Total Annual Wage Burden Costs
Tournament Registration	Tournament Operator (Event Manager)	300	1	300	2 min	10	\$24.79	\$247.90
Tournament Reporting	Tournament Operator (Event Manager)	300	1	300	20 min	100	\$27.79	\$2,779.00
Totals				600		110		\$3,026.90

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).

In 2021, just over 90 percent of tournament organizers registered their events and completed their tournament reporting online via the ATR system. The remaining 10 percent (approximately 30 tournaments) mailed in their registration and reporting forms. Assuming a first-class postage rate of \$0.58, we estimate the total maximum cost of registering and reporting for that 10 percent of tournaments would be \$34.80.

Table 2. Estimated annual recordkeeping cost burden to respondents for HMS tournament registration and reporting.

Information Collection	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Cost Burden / Respondent	Total Annual Cost Burden
Tournament Registration	30	1	30	\$0.58	\$17.40
Tournament Reporting	30	1	30	\$0.58	\$17.40

TOTALS			60		\$34.80
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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.

Table 3 summarizes the costs to the federal government associated with HMS tournament registration and reporting including federal oversight costs, contractor fees, and limited printed and postage costs for the 10 percent of tournaments that still do not report electronically. Costs for printing and supplying the forms are expected to be minimal. An e-mail message is sent annually to each tournament operator with a reminder to register tournaments for the upcoming year and the message includes electronic links that guide the operator to appropriate online locations where registration and reporting information and forms may be obtained. The registration forms are also available on the internet and may be downloaded by respondents. In addition, NMFS provides an e-mailed copy to respondents upon request. The registration form could be photocopied by respondents as needed. No new equipment or overhead costs will be incurred by NMFS, because existing equipment and staff will be used to collect and enter the data.

The total cost to the Federal government, including staff wages for time spent on tournament form distribution and collection, is estimated to be \$126,153.

Table 3. Estimated costs to the federal government for administration of HMS tournament registration and reporting.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZA-III	\$133,084	80%		\$106,467
Other Federal Positions	ZP-III	\$133,084	5%		\$6,654
Other Federal Positions	ZA-IV	\$194,984	1%		\$1,950
Other Federal Positions	ZA-V	\$226,472	1%		\$2,265
Contractor Cost					\$8,800
Travel					N/A
Other Costs					
Postage					\$16.80
TOTAL					\$126,153

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

The adjustment of the annual cost burden from \$117 to \$34.80 is due to the increase in the number of tournaments registering and reporting via the online ATR system, while the increase in labor costs of \$3,027 was due to estimates not being required in previous renewals. There was no change in the estimated number of respondents, responses, or burden hours.

Table 4. Estimated change or adjustment to annual reporting burden associated with HMS tournament registration and reporting.

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	
Tournament Registration	300	300	300	300	10	10	No change
Tournament Reporting	300	300	300	300	100	100	No change
Total for Collection	600	600	600	600	110	110	
Difference	0		0		0		

Table 5. Estimated change or adjustment to annual reporting costs associated with HMS tournament registration and reporting.

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Tournament Registration	\$247.90	\$0.00	\$17.40	\$58.50	Labor cost not previously estimated, and increase in percent reporting electronically. Costs slightly different in ROCIS due to rounding
Tournament Reporting	\$2,779.00	\$0.00	\$17.40	\$58.50	Labor cost not previously estimated, and increase in percent reporting electronically. Costs slightly different in ROCIS due to rounding
Total for Collection	\$3,027	\$0	\$34	\$118	
Difference	\$3,027		-\$84		

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.

These data are not being collected for the purpose of publication in raw form. The aggregate information may be publicly distributed in scientific stock assessments for individual species, in the annually published SAFE Report, in FMP amendments, or on NMFS internet sites. This could include information on the aggregate number of registered tournaments, the number of tournaments by state, and total landings by species and state. As a result, tournament information

should be considered as one component, among many, factoring into fishery policy and management decisions.

Tournament information (tournament name, date(s), city, state, and target species) is provided by NMFS to the public as a service to publicize tournaments and to inform potential tournament anglers of upcoming events and their registration (compliance) status with NMFS in order to aid tournament and anglers with regulatory compliance.

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.

The OMB expiration date will be displayed on all forms.

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