

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Highly Migratory Species Dealer Reporting Family of Forms
OMB Control No. 0648-0040

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The universe of respondents for this collection is identified in Table B1, and includes the following: all U.S. dealers importing or exporting BFT, frozen BET, SWO, or SBT (International Fisheries Trade Permit holders); U.S. Atlantic dealers that purchase Atlantic SWO, BAYS tuna, or sharks; all dealers purchasing BFT; and non-government institutions requesting validation authorization. Information on the number of respondents was obtained from the NMFS Atlantic HMS Management Division, and NMFS Trade Monitoring Program. Finally, an estimated number of international dealers is provided, because burden hours must be calculated for international respondents as well as domestic respondents. International dealers impacted by this collection include exporters that must obtain validation for SDs, CDs, and RXCs prior to exporting a shipment to the United States. The number of international dealer respondents was calculated by identifying the number of countries exporting frozen BET (3), Atlantic, Pacific and Southern BFT (14), or SWO (34) to the United States during 2017, and assuming that there were approximately 10 active exporters per country. This information was obtained from: <https://www.fisheries.noaa.gov/national/commercial-fishing/foreign-trade/raw-data/raw-data-by-date>.

The number of non-government institutions authorized for validation is estimated at two, since the most authorizations ever issued in a year was two. The total number of respondents is likely overestimated and ensures burden and costs are not underestimated because some individuals may hold more than one type of permit. The proposed changes associated with this revision will have no impact on the number of respondents associated with this information collection.

No statistical methods are employed in this data collection as all the reporting described in Part A of this supporting statement involves mandatory census based reporting. The one voluntary form included in this information collection, the Voluntary Fishing Vessel and Catch Forms, are not collected by the agency, but are provided to Atlantic HMS domestic dealers to distribute to fishing vessels for completion, if they so desire. The purpose of the voluntary forms is to help insure the dealers have all the relevant information required to submit their mandatory electronic dealer landings reports. These forms were developed when the agency adopted an electronic HMS domestic dealer reporting system to help facilitate the switch to electronic reporting, and educate both fishermen and dealers about the data elements required for domestic dealer reporting. At no time are the voluntary forms collected by the agency, and the information provided within them is not used for management outside of what information is subsequently reported by the dealers themselves through their electronic dealer reports.

Table B1. Estimated total number of respondents for this collection.

Respondent Type	Number*
International Fisheries Trade Permits*	348
Shark Dealer Permits	104
Swordfish Dealer Permits	200
Tuna Dealer Permits (BFT, BAYS or both), includes:	65
BAYS only dealers	97
BFT only dealers	328
BAYS and BFT dealers	
International Dealers**	510
HMS commercially permitted fishermen (completing voluntary fishing vessel and catch form for dealers)	6,405
Non-government Institutions for Validation	2
TOTAL	7,957

Shark, Swordfish, and Tuna Dealer permits, and HMS commercial fishing permits, are based upon 2018 data from the *2019 Atlantic HMS SAFE Report*.

* Number of International Fisheries Trade Permits as of December 31, 2017.

** Total number of international dealers = Number of countries exporting frozen BET, Atlantic, Pacific and Southern BFT, or SWO to the U.S. $(3+14+34) \times 10$ active exports per country = 510

2. Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,
- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

As stated above, all reports collected by the agency are mandatory and no statistical methodology or sample selection is involved. Degree of accuracy needed is not relevant since this is a mandatory reporting program which strives for 100 percent compliance. No specialized sampling procedures and no use of periodic data collection is involved since this collection is 100 percent mandatory.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

NMFS invests significant resources to insure maximal compliance with commercial landings and trade

reporting requirements. NMFS port agents conduct regular outreach to federally-permitted dealers about reporting requirements, and the importance of submitting their landings reports in a timely and complete manner. Atlantic HMS dealers are required to submit their weekly landings or negative reports by each Tuesday, and NMFS conducts weekly compliance checks each week. Automated emails are sent to all dealers that are determined to be non-compliant, and a non-compliance letter is sent if it is their first time on the non-compliant list. Continued late reporting will result in NMFS staff reaching out to a dealer by phone to discuss their non-compliance, and provide compliance assistance. NMFS will use commercial vessel logbook and weigh out data to identify if dealers are missing reports; however, not all fishermen are required to submit federal logbooks as a condition of their fishing permits. Logbook data can be used to estimate amounts of landings of tunas, swordfish, and/or sharks due to missing dealer reports. Dealers that continue to be habitually late in their reporting, or fail to report HMS landings, will be referred to the NMFS Office of Law Enforcement for either compliance assistance or summary settlement. Enforcement of trade reporting is further monitored by the NMFS Office of International Affairs and the Seafood Inspection and Monitoring Program, as well as port agents that inspect international shipments of seafood for proper paperwork and tags.

4. Describe any tests or procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Landings data from Atlantic HMS dealer reports are regularly compared against available logbook reports and weigh out sheets of federally-permitted HMS fishing vessels as a form of corroborating dealer data and to assess the accuracy and completeness of data collected by both reporting methods. However, these checks do not employ the use of statistical tests or analysis and only involve Agency staff. No tests are conducted with the participation of the public. Logbook data and weigh out sheets are approved in a separate collection of information.

5. Provide the name and telephone number of individuals consulted on 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.

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