

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Atlantic Highly Migratory Species Recreational Landings and Bluefin Tuna Catch Reports
OMB Control No. 0648-0328

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 0648-0328 for Atlantic Highly Migratory Species (HMS) Recreational Landings and Bluefin Tuna Catch Reports. Under the Atlantic Tunas Convention Act (ATCA) of 1975, the Secretary of Commerce is required to promulgate regulations as may be necessary and appropriate to implement binding recommendations adopted by the International Commission on the Conservation of Atlantic Tunas (ICCAT). ICCAT requires the United States to collect biological statistics for research purposes and establishes annual quotas that limit the overall U.S. bluefin tuna and swordfish catches and U.S. recreational marlin landings. Timely access to recreational bluefin tuna catch data (e.g., landings and dead discards) and swordfish and marlin landings is vital to effectively monitor and manage the U.S. quotas. This collection provides such access so that managers can implement appropriate measures to limit catch or landings as necessary. This renewal request updates the burden estimates based on 1) changes in the number of HMS permit holders, 2) adjustments to the number of expected HMS landings of bluefin tuna based on an increased quota from ICCAT and observed changes in frequency of catches of other species, and 3) the addition of electronic logbook platforms like the Standard Atlantic Fisheries Information System (SAFIS) eTrips reporting system as an alternative platform for HMS catch reporting. This request also proposes to extend the collection name to “Atlantic Highly Migratory Species Recreational Landings and Bluefin Tuna Catch Reports” from the current “Atlantic Highly Migratory Species Recreational Landings Reports.”

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 U.S. Secretary of Commerce is authorized to regulate fisheries for Atlantic HMS under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MSA; 16 U.S.C. 1801 *et. seq.*) and [ATCA](#) (16 U.S.C. 971 *et. seq.*), as amended.

Under ATCA, the Secretary of Commerce is required to promulgate regulations as may be necessary and appropriate to implement binding recommendations adopted by ICCAT. ICCAT requires the United States to collect biological statistics for research purposes for all HMS (including tunas, swordfish, billfish, and sharks) and establishes annual quotas that limit the

overall U.S. bluefin tuna, swordfish, and shortfin mako shark catches, and U.S. recreational marlin landings. ICCAT also requires that data be collected on all sources of fishing mortality. ATCA specifically provides the Secretary of Commerce with the authority to “require any commercial or recreational fisherman to obtain a permit from the Secretary and report the quantity of catch of a regulated species” [16 U.S.C. 971(d)(c)(3)(I)]. Domestically, under the authority of the MSA, the 2006 Consolidated Atlantic HMS Fishery Management Plan (FMP) was developed and implemented to manage Atlantic HMS fisheries and establish the framework for managing the U.S. quotas.

Timely access to recreational bluefin tuna catch data (e.g., landings and dead discards) and swordfish and marlin landings is vital to effectively monitor and manage the U.S. quotas for those species. This collection provides such access so that managers can implement appropriate measures to limit catch or landings as necessary. For example, fishing seasons may be closed when a designated limit is reached. This collection also allows NMFS to report the total catch of bluefin tuna and total landings of swordfish and billfishes annually to ICCAT, consistent with international obligations. Quota overages may require adjustments in future years under domestic regulations or result in penalties including reductions in future annual quota allocations through ICCAT.

This collection also includes mandatory reporting of bluefin tuna that are landed or discarded dead by recreational Angling category and commercial Atlantic Tunas General category, Atlantic Tunas Harpoon category, or HMS Charter/Headboat permit holders (i.e., vessel reporting). NMFS implemented catch reporting by vessels under Amendment 7 to the 2006 Consolidated Atlantic HMS FMP (HMS FMP) to better account for all sources of bluefin tuna fishing mortality as required by ICCAT. Catch data includes information about bluefin tuna that are caught and discarded dead as well as those that are landed.

Under this collection, fishermen (i.e., HMS vessel permit holders, or those required to hold such permits) in states other than North Carolina and Maryland have the option of using a phone-in system, internet website, or a smartphone app, to report their recreational landings of Atlantic swordfish, white marlin, blue marlin, or sailfish or their commercial or recreational catch of bluefin tuna. Additionally, if a fisherman reports recreationally landing a bluefin tuna greater than or equal to 73" in length, NMFS calls to verify reported information. These data collection systems are in place for states along the Atlantic and Gulf of Mexico and the U.S. territories in the Caribbean. However, when a fish is landed in either Maryland or North Carolina, state reporting stations are used to submit a state landings report (catch card) and obtain a fish tag. The states report these landings to NMFS on a weekly (NC; year-round) or bi-weekly (MD; during the bluefin tuna season, June-October) basis, and submit final, complete, annual summary reports at the end of the year. The State of Maryland also requires landings of sharks to be reported via the Maryland landing card; this aspect of the collection is voluntary under Federal regulations.

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.

This information collection applies to all recreational fishermen that land billfishes or swordfish along the U.S. Atlantic, Gulf of Mexico, and Caribbean; recreational fishermen that land sharks

in the State of Maryland; and commercial or recreational fishermen who catch bluefin tuna with handgear. NMFS requires a report for each landing (i.e., individual fish) of billfish or swordfish from recreational fishermen, and a report for each bluefin tuna caught and landed or discarded dead by Angling category (recreational), General category, Harpoon category, and Charter/Headboat permitted fishermen.

NMFS uses the information collected to monitor and manage domestic fisheries for swordfish, bluefin tuna, sharks, and billfishes to comply with ICCAT limits and annual reporting requirements, and domestic law. NMFS also uses the information in stock assessments or in scientific studies as appropriate. Other states and agencies, including fishery management councils and interstate fishery management commissions, may use the data to coordinate with other fishery management programs. The information is also valuable for determining the geographic distribution of the catch and recreational landings of these species, which is an element of NMFS' domestic fishery management.

In lieu of the Federal collection above, for recreational landings of swordfish, billfishes, and bluefin tuna in the States of Maryland or North Carolina, and for sharks in the State of Maryland, the angler must instead meet state requirements. These state requirements require the angler to complete a catch card at a state reporting station and affix a state tag to the landed fish. The catch card requests the information identified below. The States of Maryland and North Carolina then summarize this information and report it to NMFS on a weekly (NC) or bi-weekly (MD, June-October) basis. A complete summary report is presented annually to NMFS by each State.

The following information is collected on the Maryland and North Carolina catch cards:

Date is necessary for verification of landings information and for use in scientific studies of stock movements and domestic policy development. Species is necessary to categorize and account for the landing appropriately. Vessel name, registration # (state ID), permit holder's name, and Atlantic HMS Permit number (including Atlantic Tunas permit number) are necessary to verify that the angler has valid permits (state fishing license and HMS vessel permit), and to identify any fraudulent reporting. The permit holder's name, phone number, vessel name, and vessel identification number are collected with purchase and renewal of HMS vessel permits (OMB 0648-0327), and can be compared to the information entered on the catch card. Type of trip (private, charter, or headboat) is necessary to characterize the fishery for the development and analysis of regulatory actions. Was the fish caught during a tournament and tournament name are necessary to identify fish that would/should have already been reported through the tournament reporting collection (OMB 0648-0323) and avoid double counting. Fish size (length and/or weight) and, for sharks, sex, is necessary for use in scientific studies of stock life history (e.g., reproductive potential).

Recreational fishermen that land swordfish or billfish in a State other than Maryland or North Carolina, including the U.S. Virgin Islands and Puerto Rico, or recreational fishermen or commercial General or Harpoon category or HMS Charter/Headboat category fishermen that catch bluefin tuna in any state or federal waters must report their catch/landing via phone, internet, or smart phone app. To report bluefin tuna catch or landings, fishermen may call (toll-free) 1-888-872-8862, and will be led through an interactive voice reporting (IVR) system. Fishermen answer automated questions by keying in responses. If a recreationally-caught bluefin tuna greater than or equal to 73" is landed and reported, a follow-up call may be made by NMFS

staff to the respondent to verify the submitted data. Swordfish and billfish may also be reported by calling a separate toll-free number. When reporting swordfish and billfish on this system, anglers will be prompted to leave a voicemail detailing permit, landings, and contact information and will receive a follow-up call from NMFS staff to verify the report and give a report confirmation number.

In addition to the same information collected by the Maryland and North Carolina catch cards that is itemized above, the following information is also collected for bluefin tuna, swordfish, and billfish through the phone, online reporting, and phone app systems: trip departure date and time; port and state of departure; trip end date and time; port and state of landing; fishing technique (deep drop, drift, troll, kite, or other); bait type (live, dead, lure, combination, or other); hook type (“J” hook or circle hook); approximate time hooked; approximate fight time; and number of releases for each species. Responses to each of these items provide trip and fishery-specific information for social, economic, and biological analyses, thereby enhancing NMFS’ ability to gauge the impacts of regulations and demonstrate compliance with international requirements.

The information collected is disseminated to the public or used to support publicly disseminated information. Please see Question 16 for more information on data dissemination and use. NMFS will retain control over personal information such as the angler’s name and address and safeguard it from improper access, modification, and destruction, consistent with legal requirements and NOAA policy for confidentiality, privacy, and electronic information. 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.

¹This information collection is highly automated. Fishermen reporting recreational bluefin tuna, swordfish, or billfish in States other than Maryland or North Carolina, including the U.S. Virgin Islands and Puerto Rico, or reporting commercial bluefin tuna catch have the choice of reporting online, with a mobile smart-phone app, or via the telephone using either an interactive voice response (IVR) telephone system (bluefin tuna only), or a standard telephone voice recording system (swordfish and billfish only). For-hire captains with federal electronic logbook reporting requirements can now also report their HMS catch via their logbook reports if they are using the SAFIS eTrips Mobile or Online systems. North Carolina and Maryland recreational catch cards are submitted in hard copy, but the data are transferred to an electronic database by the State. The summary reports are electronically transmitted from the States to NMFS. Further, the IVR data are already digitized when accessed by NMFS for summary or analysis.

The landings report website (www.hmspermits.noaa.gov) is also used by NMFS to disseminate important regulatory information to fishermen, such as inseason fishery actions (e.g., fishery closures).

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 minimizes duplication or overlap with any other information collection. NMFS is the Federal agency responsible for marine fisheries data collection and the management of Atlantic HMS fisheries. See Question 1 above for a detailed description on how NMFS coordinates with the Maryland and North Carolina catch card programs. Further, as described in Question 2 of this Supporting Statement, reports ask if the fish were caught in a fishing tournament and, if so, what tournament. These questions are included to allow NMFS to identify fish that may have already been reported by a tournament operator through HMS tournament reporting (OMB 0648-0323). As described in question 3, NMFS has further worked to reduce duplicate reporting burden by collaborating with the Atlantic Coast Cooperative Statistics Program (ACCSP) to integrate HMS catch reporting into their SAFIS eTrips system which is commonly used for electronic for-hire logbook reporting.

NMFS exercises a high degree of internal coordination between this collection and two other long-term information collections from recreational fishermen: the Marine Recreational Information Program (MRIP fishing effort survey, OMB 0648-0652, and MRIP Access Point Intercept Survey, OMB 0648-0659) and the Large Pelagics Survey (LPS, OMB 0648-0380). MRIP is a general (dockside, telephone, and mail) survey of anglers fishing for all species, including HMS (tuna, billfish, swordfish, and sharks). MRIP sample sizes are typically too small to provide the catch estimate precision needed to manage many HMS fisheries. HMS anglers are specifically targeted by the LPS, which produces more precise estimates of HMS catch than the general MRIP survey, but not precise enough to replace the exact counts of the targeted HMS species, nor could it do so within 24 hours of landing. The HMS recreational reporting program overlaps with these surveys only minimally on the small percent of surveyed trips that resulted in bluefin tuna, billfish, or swordfish being landed. To the extent that overlap occurs (e.g., a person reporting via catch card or directly to NMFS is also selected for a dockside, mail, or telephone interview), the information is useful to assess compliance with the mandatory reporting requirement.

Bluefin tuna survey data and HMS recreational landings data are used for different purposes by fishery managers and stock assessment scientists. For billfish landings, several data sources are combined (MRIP, LPS, catch cards, tournament reports, and recreational (non-catch card) landings reports) but protocols are in place to identify double counting across programs. Therefore, data collected from other recreational programs are mostly used in a complementary manner along with HMS catch card and recreational reporting data. The collection of bluefin tuna catch data from commercial fishermen does not duplicate any other collection and is the only mechanism to collect this data.

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

All of the respondents are considered small entities. The collection is not expected to have a significant impact on them. Minimizing reporting burden on the public was one of the primary reasons for use of automation in this program. All reporting options (voice recording, IVR,

internet, smart phone app) are available 24 hours a day, seven days a week. Since the phone numbers are toll-free, there are no associated costs. Similarly, no costs are associated with reporting on the internet or using the smart phone app. Reporting requires a minimal investment of time, is cost-free for the public, and can be performed at any public phone or internet access site. The Maryland and North Carolina catch card programs have reporting stations conveniently located in areas where these species are landed.

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 bluefin tuna catch portion of this collection were not conducted, NMFS would not be able to effectively monitor the amount of bluefin tuna landings and interactions, which are essential to keeping catch within the specified quotas. It is also essential for achieving domestic management objectives, including the goal of the 2006 Consolidated FMP and its amendments to better account for all sources of bluefin tuna fishing mortality.

If this entire information collection were not conducted, or were conducted less frequently, the United States could exceed quotas and be subject to ICCAT penalties, including reduction of the nation's allocated catch quota, the potential imposition of trade restrictions, and other sanctions.

The stock assessments for these species, which provide the basis for domestic and international management decisions, would be less accurate without this information, since approximately 50 percent of the western Atlantic bluefin tuna quota and 30 percent of North Atlantic swordfish quota is allocated to the U.S. Without close monitoring of these fisheries, the conservation and management objectives of MSA and ATCA with respect to the rebuilding programs for these species could be jeopardized. Furthermore, it would be difficult for the United States to formulate domestic policy consistent with the MSA, which must be based on the best available scientific and socio-economic data. The information gathered in this collection is essential for NMFS in its preparation of documents such as Regulatory Impact Reviews and Environmental Impact Statements, as required under the MSA, National Environmental Protection Act, and other applicable laws during the formulation of domestic policy. Please also see the Question 7 of this Supporting Statement.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

OMB guidelines state that respondents should not be required to report information more often than quarterly. States report weekly (NC) or bi-weekly (MD) rather than quarterly. This frequency is a necessary component of a responsive management program. Each individual catch and/or landing must be reported, and if reports are not immediately accounted for, enforcement of this requirement would be difficult. Moreover, reports are needed on a per-trip basis to reduce the potential for recall bias and to prevent a build-up of backlogged reports. Frequent reports of state data are required to implement a responsive management program. Without frequent landings reports, NMFS would not be able to monitor seasonal harvest in a timely manner, and might be required to close seasons early to avoid excess harvest, or risk overharvesting ICCAT quotas, both of which could unnecessarily penalize U.S. fishermen.

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](#) (87 FR 43008, July 19, 2022) was published soliciting public comment on these information collection requirements. Additionally, public comment was also solicited at the Fall HMS Advisory Panel meeting which was held on September 7-8, 2022. We received one comment related to this information collection that encouraged the agency to expand the current HMS Recreational Landings and Bluefin Tuna Catch Reporting system to be expanded to collect data on bluefin tuna live releases in addition to landings and dead discards. In fact, HMS permit holders already have the option to submit reports of live releases of bluefin tuna and other HMS via this system if they wish to do so voluntarily. The agency may consider expanding reporting requirements in the future. The commenter also suggested the agency combine reported catch data with weather data to examine how weather affects catch rates. Indeed, weather data has been used by the agency in the past in models designed to assess catch per unit effort within the fishery. The commenter also addressed the Large Pelagic Survey, but since that information collection is covered under OMB Control Number 0648-0380 those comments will not be further addressed here as they are outside the scope of this information collection.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

1No payments 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.

As stated in the Paperwork Reduction Act statements available for review on all electronic reporting venues and forms for this collection, 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 FMP regulatory amendments, and in supporting documents made available to the public upon request. 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.

1This collection does not include questions of a sensitive nature.

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

COMMERCIAL CATCH (bluefin tuna only)

All commercial bluefin tuna caught (e.g., landed or discarded dead) with handgear must be reported to NMFS. Potential respondents include the universe of individuals with HMS permits in the General category, Harpoon category, or Charter/Headboat category with a Commercial Sale Endorsement (Table 1).

Table 1. Universe of commercial HMS permit holders that would be required to report if they caught a bluefin tuna.

Permit Category	Number of Permit Holders in 2021
General	2,767
Harpoon	35
Charter/Headboat with commercial sale endorsement	1,793
TOTAL	4,595

Table 2 compares dealer landings data, which is an accurate census of total commercial bluefin tuna landings, with vessel reported landings data obtained under this information collection. Charter/headboat and General category permit holder data were combined since landings are attributed to the same subquota. The requirement to report commercially landed bluefin tuna went into effect in 2015, and at the time of the 2016 renewal compliance among the General category fishery was very low at around 14 percent. By the time this Information Collection Review (ICR) was renewed in 2019, compliance had increased another 50 percent to over 65 percent. Since then, compliance rates have remained stable, with the overall compliance rate currently sitting at 69 percent (Table 2).

Table 2. Compliance with reporting requirements for landed fish during 2020.

Quota Category	Dealer Reports		Vessel Reports		% Compliance	
	No. of Bluefin Reported	No. of Fishermen	No. of Bluefin Reported	No. of Fishermen	% Fish Reported	% Fishermen Reporting
General	4,505	1,055	2,990	686	66.4	65.0
Harpoon	547	23	503	18	92.0	78.3

TOTAL	5,052	1,078	3,493	704	69.1	65.3
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NMFS assumes that the reporting compliance for landed fish was the same for discarded fish, and estimated the number of reports for discarded fish by adding a 35% increase to the number of General category reports and 10% to the number of Harpoon category reports for discarded fish (Table 3).

Table 3. Estimated number of discarded fish estimated to be reported for each category. General and Charter/Headboat reported numbers were increased by 31 percent to account for under-reporting.

Permit Category	Dead Discards	
	Reported	Estimated
General & Charter/Headboat	21	28
Harpoon	0	0
TOTAL	21	28

Table 4 includes landings and estimated discards for each category for 2020. Landings numbers from 2020 were used to estimate potential burden instead of 2021 figures, as nearly 500 more bluefin tuna were landed in 2020. The number of landings and number of dead discards are added for each category to give the total number of responses. Reporting of most bluefin tuna caught by commercial handgear is expected to take approximately 5 minutes per report, whether completed via phone, internet, or phone app. Catch for each category was added and multiplied by the 5 minutes it takes to complete a report for each fish, for an estimated total reporting burden of **5,080 responses and 423 hours**, affecting a total of potentially **4,595 permit holders (Table 1)**. However, in 2020 only **1,078 permit holders** successfully landed bluefin tuna commercially.

Table 4. Calculation of number of responses and reporting burden (hours) based on actual number of bluefin tuna landings and estimated numbers of dead discards.

Permit Category	Number of Bluefin Tuna Landed in 2020	Estimated Number of Bluefin Discarded Dead 2020	Projected Total Annual Catch (Number of Fish Landed + Number Discarded Dead) = Total Responses	Total Amount of Time (hrs) (5 mins per response / 60 min/ hour)
General & Charter/Headboat	4,505	28	4,533	378
Harpoon	547	0	547	46
TOTAL	5,052	28	5,080	423

RECREATIONAL CATCH

1Reporting of most recreationally caught (e.g., landed or discarded dead) bluefin tuna and/or landed swordfish and billfish is expected to take approximately 5 minutes per report, whether completed via phone, internet, or phone app. In the States of Maryland or North Carolina, filling out a landing card and affixing a tag to each fish landed is expected to take approximately 10 minutes. Call-back verification for bluefin tuna greater than or equal to 73" is also expected to

take approximately 5 minutes per landing. The number of respondents is calculated separately for bluefin tuna and billfish/swordfish. Numbers of respondents for all species landings in Maryland and North Carolina are calculated separately from all other states.

Bluefin Tuna

Recreational landings of bluefin tuna from 2000-2021 for the States of Maryland and North Carolina are given in Table 1. Each landing represents a single response as recorded via each State's tag and report program. The year with the greatest number of landings (responses) in total for these states was 2001, and landings have been much lower since 2009 reflecting changes in the management of the recreational bluefin tuna fishery. NMFS used the data from 2011 for North Carolina and 2018 for Maryland as proxies to provide a reasonable margin, which gives an estimated total of **1,131 potential responses**. This margin should account for any additional changes in future years.

$$(1,131 \text{ responses} \times 10 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{188 \text{ hours}}$$

The total number of bluefin tuna that could be landed or discarded dead based on the ICCAT-recommended U.S. quota is estimated to be 10,691 fish. This estimate is based upon weights of fish within the various bluefin tuna size classes using previous years' landings data. Subtracting the adjusted total potential responses for the States of North Carolina and Maryland (1,131) from the U.S. quota, the total number of bluefin tuna that could be landed or discarded dead in other states is estimated to be 9,560 fish.

$$\begin{aligned} \text{Total U.S. Quota} - (\text{MD} + \text{NC landings}) &= \text{Catch (landings + dead discards) for all other states} \\ 10,691 - 1,131 &= 9,560 \end{aligned}$$

Table 5. Annual recreational landings of bluefin tuna in Maryland and North Carolina catch card program (2000 – 2021).

YEAR	MD Landings (Number of Fish)	NC Landings (Number of Fish)	TOTAL
2000	1,247	274	1,521
2001	4,240	336	4,576
2002	2,329	176	2,505
2003	2,246	0	2,246
2004	3,549	50	3,599
2005	2,308	30	2,338
2006	1,163	31	1,194
2007	1,629	175	1,804
2008	1,271	133	1,404
2009	572	135	707
2010	423	573	996
2011	430	324	754
2012	190	179	369
2013	416	201	617
2014	372	69	441
2015	208	44	252
2016	584	74	658
2017	366	39	405
2018	807	34	841
2019	517	69	586
2020	10	17	27
2021	650	31	681

The total number of bluefin tuna expected to be landed or discarded dead in all other states is equal to **9,560 responses**.

The number of respondents is estimated to equal the number of fish landed or discarded dead.

$$(9,560 \text{ responses} \times 5 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{797 \text{ hours}}$$

During the last three years, approximately 20 respondents have been called annually to verify information for bluefin tuna landed that exceed 73" in length. Verification takes approximately five minutes per response.

$$(20 \text{ responses} \times 5 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{2 \text{ hours}}$$

Swordfish and Billfish

Pursuant to ICCAT recommendation, the United States may recreationally harvest up to 250 blue and white marlin (combined) on an annual basis. In the past few years, the reported number of these fish landed has been significantly less than the 250 limit (**Table 6**); however, to allow for the full 250 marlin landing limit to be reported through this collection, NMFS is calculating burden based on a maximum of 250 marlin landings. Roundscale spearfish are included in the white marlin estimates because they are hard to distinguish from white marlin and landings data are likely a mix of the two species. Sailfish landings data must be reported to ICCAT annually.

Table 6. Total and non-tournament recreational landings of billfish by year.

Year	Species									
	Blue Marlin		White Marlin		Roundscale Spearfish		Sailfish		Swordfish	
	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.	Total	Non-Tourn.
2009	44	5	53	6	5	0	140	140	474	389
2010	28	3	72	5	19	0	192	185	331	285
2011	43	3	56	6	7	0	173	166	347	318
2012	63	18	30	7	4	0	184	163	415	386
2013	55	11	49	15	1	0	173	171	279	263
2014	54	5	42	6	2	0	118	113	304	281
2015	63	23	66	20	10	0	114	113	332	315
2016	80	17	60	14	22	1	114	114	500	458
2017	62	17	61	11	6	0	105	104	568	518
2018	90	15	78	27	20	0	98	94	661	619
2019	79	28	75	31	35	2	110	96	1,296	1,234
2020	74	22	95	19	66	0	50	50	940	872

Based on the recent fishing years that presented the greatest number of non-tournament landings, NMFS anticipates up to 703 swordfish and sailfish landings [1,234 swordfish (2019) + 185 sailfish (2010) = 1,419]. In order to ensure that our estimate is slightly higher to allow for a greater number of landings, 10 percent is added, giving an adjusted total of 1,561 potential responses (1,419 x 1.1 = 1,561). Therefore, NMFS estimates that a maximum of **1,811 responses** [(250 blue marlin + white marlin) + (1,561 swordfish + sailfish) = 1,811] could be required to report non-tournament recreational landings of swordfish and billfish.

Table 7. Total catch of billfish and swordfish recorded by each State catch card program per year.

Year	NC	MD	TOTAL
2009	13	82	95
2010	17	59	76
2011	12	40	52
2012	18	28	46
2013	13	40	53
2014	17	44	61
2015	25	51	76
2016	32	55	87
2017	27	62	89
2018	48	54	102
2019	105	168	273
2020	39	242	281
2021	51	88	139

The greatest number of swordfish and billfish landings reported through Maryland and North Carolina’s catch card programs came in 2020, with a total of 281 landings (Table 7). Adding 10% to this number equals about 309 potential reports of swordfish and billfish from these States’ catch card programs. These 309 reports are subtracted from the total number of reports based on Table 6 to perform the separate burden hour estimate for the reports through the State catch cards:

$$(1,811 - 309 \text{ responses (all states – MD \& NC)}) \times 5 \text{ minutes/response} \div 60 \text{ minutes/hour} = \mathbf{125 \text{ hours}}$$

$$(309 \text{ responses (MD \& NC catch cards)}) \times 10 \text{ minutes/response} \div 60 \text{ minutes/hour} = \mathbf{52 \text{ hours}}$$

$$125 \text{ hours (all states, excluding MD \& NC)} + 51.58 \text{ hours (MD \& NC catch cards)} = \mathbf{177 \text{ hours}}$$

Sharks

The State of Maryland’s catch card program for sharks has been in place for several years now, and NMFS used those data to estimate the number of responses (Table 8).

Table 8. The number of sharks reported in Maryland’s catch card survey since it was implemented in 2013.

Year	Number of Sharks
2013	69
2014	87
2015	80
2016	97
2017	116
2018	85
2019	99
2020	77

Adding 10% to the largest number of sharks landed (2017) will account for potential future increases in numbers, and gives a total of **128 responses**.

$$1.10 \times 116 = 128 \text{ responses}$$

The Maryland catch cards for sharks will take the same amount of time to fill out as catch cards for billfish and bluefin tuna (less than 10 minutes).

$$(128 \text{ responses} \times 10 \text{ minutes/response}) \div 60 \text{ minutes/hour} = \mathbf{21 \text{ hours}}$$

Combined State Catch Card Reports

Across all species, NMFS estimates 1,568 total catch card reports will be submitted annually in Maryland and North Carolina (1,131 bluefin tuna + 309 swordfish and billfish + 128 sharks = 1,568).

State Summary Reports of Recreational Landings

In addition to the reporting burden on the part of anglers, it is expected that 62 weekly (NC) or bi-weekly (MD) reports (1 hour each) and two annual reports (4 hours each) will be submitted by Maryland and North Carolina fishery management agencies each for a total of **64 responses** and **70 hours**.

Total Calculations

Table 9. Estimates number of annual respondents, responses, burden hours, and annual wage costs associated with HMS recreational landings and bluefin tuna catch reports.

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
Commercial Bluefin Tuna Catch Reports - General, Harpoon, and Charter/Headboat	Commercial Fishing Captains	1,078	5	5,080	0.083	423.3	\$26.18	\$11,082.87
Recreational Bluefin Tuna Catch Reports - Other states/territories reported landings and call-backs for fish over 73"	All occupations	9,580	1	9,580	0.083	798.3	\$28.01	\$22,361.32
Billfish and Swordfish Catch Reports - internet and voicemail	All occupations	1,502	1	1,502	0.083	125.2	\$28.01	\$3,505.92
Bluefin Tuna Landing Cards for MD and NC	All occupations	1,131	1	1,131	0.167	188.0	\$28.01	\$5,265.88
MD and NC swordfish and billfish landings reports	All occupations	309	1	309	0.167	52.0	\$28.01	\$1,456.52
Maryland Shark Landings Reports	All occupations	128	1	128	0.167	21	\$28.01	\$588.21
MD and NC State Summary Reports	State Government	2	32	64	1.09	70	\$21.31	\$1,491.70
Totals				17,794		1,677		45,752

Based on a comparison of Maryland catch cards, telephone reports, and dockside intercept sampling (MRIP and LPS), compliance with the catch card program appears to be quite high. The high compliance with the catch card program may be due to a number of factors including better awareness of the program, increased visibility of state personnel at docks, a greater sense of participation or buy-in from fishermen, a combination of all of these, or some other unknown factor(s). Thus, NMFS encourages other states to consider implementing catch card programs in order to improve the compliance with self-reported landings programs. NMFS will continue to work cooperatively with individual states to select the program that best suits the needs of state

and Federal fishery managers on a case-by-case basis. NMFS will submit a non-substantive change request to OMB to correct burden estimates, if and when such changes take place for each state. If other states opt to use catch card programs, their report burden would double (10 minutes per response for catch cards versus 5 minutes per landing for telephone or internet reports), and there would be an increase of 34 hours per state due to the drafting of weekly and annual reports.

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).

1There are no costs in supplies or materials other than the time burden. Costs to states to distribute weekly and annual summary reports are covered in the grants to the states as indicated in Question 14.

Table 10. Estimated annual recordkeeping cost burden to respondents for HMS recreational landings and bluefin tuna catch reports.

Information Collection	# of Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Cost Burden / Respondent	Total Annual Cost Burden
Commercial Bluefin Tuna Catch Reports - General, Harpoon, and Charter/Headboat	1,078	5	5,080	\$0.00	\$0.00
Recreational Bluefin Tuna Catch Reports - Other states/territories reported landings and call-backs for fish over 73"	9,580	1	9,580	\$0.00	\$0.00
Billfish and Swordfish Catch Reports - internet and voicemail	1,502	1	1,502	\$0.00	\$0.00
Bluefin Tuna Landing Cards for MD and NC	1,131	1	1,131	\$0.00	\$0.00
MD and NC swordfish and billfish landings reports	309	1	309	\$0.00	\$0.00
Maryland Shark Landings Reports	128	1	128	\$0.00	\$0.00
MD and NC State Summary Reports	2	32	64	\$0.00	\$0.00
TOTALS			17,794		\$0.00

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.

Annual maintenance costs for the recreational reporting automated program are reimbursed by an administrative cost recovery fee included in Atlantic HMS permit fees, which are collected via the same system. While there will be no cost to the Federal government in the end, the budget

breakdown for administration of the system is included in Figure 11.

The North Carolina catch card program is carried out by the NC Division of Marine Fisheries in cooperation with NMFS at a cost to the Federal government of **\$37,000 per year**. The Federal share of the Maryland program is funded at a level of **\$47,000 per year**. It should be noted, however, that ancillary data may be collected by dockside staff in conjunction with catch cards (e.g., biological sample materials or dockside intercepts approved under 0648-0380); thus, these costs are not entirely attributable to the landings reports. Similar costs are anticipated for future cooperative catch card programs and the Federal share will depend on the amount and type of services contributed by the states.

Table 11. Estimated costs to the Federal government for administration of HMS recreational landings and bluefin tuna catch reports.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZA-IV	\$160,000	5.8%		\$9,280
Other Federal Positions	ZP-IV	\$150,000	5.0%		\$7,500
Other Federal Positions	ZP-IV	\$135,000	5.8%		\$7,830
Other Federal Positions	ZP-III	\$100,000	5.0%		\$5,000
Other Federal Positions	ZA-V	\$155,000	2.5%		\$3,875
Contractor Cost					\$613,350
Other Costs:					
State Grants for Catch Card Programs					\$84,000
Indirect Costs					\$30,861
FMS Collection Expense					\$97,849
TOTAL					\$859,545

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

Program changes:

There are no program changes.

Program adjustments

The number of fish caught and number of permitted fishermen during recent years is used to estimate future responses and burden. Landings and catch varies from year to year. Additionally, reporting compliance has increased. However, an adjustment in the proxy values used to estimate the number of catch card reports submitted in Maryland and North Carolina, and a redistribution of those reports to other states where anglers report via federal reporting systems, resulted in an overall reduction in estimated reporting burden of **-101 hours** as the federal reports take less

time to complete. Estimated labor costs also increased by **\$45,920** as these were not included in the last renewal.

Table 4. Estimated change or adjustment to annual reporting burden associated with HMS recreational landings and bluefin tuna catch reports.

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	
Commercial Bluefin Tuna Catch Reports - General, Harpoon, and Charter/Headboat	1,078	4,488	5,080	4,488	423	374	Increase in commercial landings
Recreational Bluefin Tuna Catch Reports - Other states/territories reported landings and call-backs for fish over 73"	9,580	5,548	9580	5,548	798	462	Increase in recreational landings
Billfish and Swordfish Catch Reports - internet and voicemail	1,502	918	1,502	918	125	77	Increase in recreational landings
Bluefin Tuna Landing Cards for MD and NC	1,131	4,576	1,131	4,576	188	763	Decrease in landings in MD and NC
MD and NC swordfish and billfish landings reports	309	105	309	105	52	18	Increase in recreational landings
Maryland Shark Landings Reports	128	128	128	128	21	21	No change
MD and NC State Summary Reports	2	2	64	64	70	70	No change
Total for Collection	13,798	15,765	17,794	15,827	1,677	1,785	
Difference	-1,967		1,967		-108		

Table 5. Estimated change or adjustment to annual reporting costs associated with HMS recreational landings and bluefin tuna catch reports.

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Commercial Bluefin Tuna Catch Reports - General, Harpoon, and Charter/Headboat	\$11,082.87	N/A	\$0.00	\$0.00	Labor costs were not previously reported
Recreational Bluefin Tuna Catch Reports - Other states/territories reported landings and call-backs for fish over 73"	\$22,361.32	N/A	\$0.00	\$0.00	Labor costs were not previously reported
Billfish and Swordfish Catch Reports - internet and voicemail	\$3,505.92	N/A	\$0.00	\$0.00	Labor costs were not previously reported

Bluefin Tuna Landing Cards for MD and NC	\$5,265.88	N/A	\$0.00	\$0.00	Labor costs were not previously reported
MD and NC swordfish and billfish landings reports	\$1,456.52	N/A	\$0.00	\$0.00	Labor costs were not previously reported
Maryland Shark Landings Reports	\$588.21	N/A	\$0.00	\$0.00	Labor costs were not previously reported
MD and NC State Summary Reports	\$1,491.70	N/A	\$0.00	\$0.00	Labor costs were not previously reported
Total for Collection	\$45,752	\$0	\$0.00	\$0.00	
Difference	\$45,752		\$0		

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.

1Collected information is published in stock assessments, environmental impact statements, environmental assessments, reports to ICCAT, the annual HMS SAFE Report, and regulatory impact reviews. The data are presented in aggregate form, which cannot lead to the identification of individuals.

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.

11For the Bluefin Tuna and Billfish/Swordfish scripts, the operator reads the OMB Control No., expiration date and PRA statement on request. This is to avoid incurring costs of script changes when the expiration date changes.

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