

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Groundfish Trawl Economic Data
OMB Control No. 0648-0618

Abstract

This is a request for revision and extension of an existing information collection. Revisions to three forms - the quota share owner form, the first receiver and shorebased processor form, and the catcher vessel form - are proposed. The purpose of the changes are fourfold: remove requests for information that are not used in development of a Pacific Fishery Management Council Fishery Management Plan, consolidate questions where additional detail is no longer required, clarify handling of intercompany transfers and inventory, and collect more accurate information about hourly wages.

In 2011, NOAA Fisheries and the Pacific Fishery Management Council (PFMC) implemented a catch shares program for the West Coast groundfish trawl fishery. To monitor the impact of this new program, the PFMC proposed the implementation of the mandatory collection of economic data.

The Economic Data Collection (EDC) Program is a mandatory component of the West Coast groundfish trawl catch share program, collecting information annually from all catch share participants: catcher-processors, catcher vessels, motherships, first receivers, shorebased processors, and quota share owners. The EDC information is used to monitor the economic effects of the catch share program, and consists of data on operating costs, revenues, and vessel and processing facility characteristics.

The EDC Program is intended to help meet the Magnuson-Stevens Fishery Conservation and Management Act (MSA) requirement for regular reviews of catch share programs. The information created by the EDC Program was fundamental to the formal 5-year review of the catch share program required under the MSA, finalized in early 2018; and will be essential to the next review, scheduled to commence in 2023.

The data collected allow for evaluation of program goals including: provide for a viable, profitable, and efficient groundfish fishery; increase operational flexibility; minimize adverse effects from an IFQ program on fishing communities and other fisheries to the extent practical; promote measurable economic and employment benefits through the harvesting, processing, distribution, and support sectors of the industry; provide quality product for the consumer; and, increase safety in the fishery.

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.

In 2011, NOAA Fisheries and the Pacific Fishery Management Council (PFMC) implemented a catch shares program for the West Coast groundfish trawl fishery. The data collection program described in this document is designed to meet the requirements of the PFMC's call for mandatory economic data collection as part of the implementation of catch share management in the West Coast groundfish trawl fishery (50 CFR Part 660.114). This mandatory data collection program is needed to meet the monitoring requirements of Section 303A(c)(1)(G) of the MSA.

In response to the regulatory mandate, the Northwest Fisheries Science Center implemented the Economic Data Collection (EDC) program. Participants in the West Coast groundfish trawl fishery, who

must have a limited entry permit with a trawl endorsement, account for about 70% of groundfish landings (by revenue) on the West Coast of the United States (U.S.). The fishery includes an at-sea whiting component (vessels that harvest and process whiting at-sea), a shorebased whiting component (vessels that harvest whiting and deliver to shorebased processors), and a non-whiting groundfish component (all non-whiting groundfish is delivered by catcher vessels to first receivers or shorebased processors).

As mandated in the regulations, data are collected from “All owners, lessees, and charterers of a catcher vessel registered to a limited entry trawl endorsed permit at any time in 2011 and beyond”, “All owners, lessees, and charterers of a mothership vessel registered to an MS permit at any time in 2011 and beyond”, “All owners, lessees, and charterers of a catcher processor vessel registered to a C/P-endorsed limited entry trawl permit at any time in 2011 and beyond”, “All owners of a first receiver site license in 2011 and beyond”, “All owners and lessees of a shorebased processor (as defined under “processor” at §660.11, for purposes of EDC) that received round or headed-and-gutted IFQ species groundfish or whiting from a first receiver in 2011 and beyond”, and “All owners of a Quota Share permit and account.” To date, data have been collected for 2009-2022. The 2009-2010 data collection serves a baseline for comparison.

The collection of data allows for evaluation of the PFMC’s goals for the program:

- 1) Provide for a viable, profitable, and efficient groundfish fishery.
- 2) Increase operational flexibility.
- 3) Minimize adverse effects from an IFQ program on fishing communities and other fisheries to the extent practical.
- 4) Promote measurable economic and employment benefits through the seafood catching, processing, distribution elements, and support sectors of the industry.
- 5) Provide quality product for the consumer.
- 6) Increase safety in the fishery.

These goals are an important consideration in the development of the EDC program, as the MSA includes provisions for monitoring the degree to which the goals have been met. Section 303A(c)(1)(G) states that any limited entry permit program (LAPP) shall:

“include provisions for the regular monitoring and review by the Council and the Secretary of the operations of the program, including determining progress in meeting the goals of the program and this Act, and any necessary modification of the program to meet those goals, with a formal review 5 years after the implementation of the program and thereafter to coincide with scheduled Council review of the relevant fishery management plan (but no less frequent than once every 7 years).”

In order to meet the monitoring requirements of the MSA, it is necessary to continue to have economic data on all catcher vessels, catcher-processors, motherships, first receivers/shoreside processors, and quota share owners participating in the West Coast groundfish fishery. A separate survey form was developed for each of these five groups.

NMFS needs the economic data included in this information collection to comply with or support the following laws, Executive Orders (EOs) and NOAA Fisheries strategies and policies, which require economic analyses.

1. The Magnuson-Stevens Fishery Conservation and Management Act (MSA)
2. The Marine Mammal Protection Act (MMPA)

3. The Endangered Species Act (ESA)
4. The National Environmental Policy Act (NEPA)
5. The Regulatory Flexibility Act (RFA)
6. EO 12866 (Regulatory Planning and Review)
7. EO 13771 (Reducing Regulation and Controlling Regulatory Costs)
8. EO 13840 (Ocean Policy to Advance the Economic, Security, and Environmental Interests of the United States)
9. The NOAA Fisheries Guidelines for Economic Reviews of Regulatory Actions
10. The NOAA Fisheries Strategic Plan 2019-2022 (Strategic Plan)
11. The NOAA Fisheries Ecosystem-Based Fishery Management (EBFM) Road Map
12. The NOAA Fisheries National Bycatch Reduction Strategy
13. NOAA's Catch Share Policy

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.

Vessel Cost and Earnings Surveys

Vessel characteristics: This section includes information about the vessel and the fisheries in which it participates. The vessel characteristics include vessel name, ID, home port, length, fuel capacity, and engine horsepower, total fuel use as well as average fuel use, speed, crew size, and total days at sea by fishery. Information about the marine survey requested includes year of last survey, replacement and market value, and whether quota, permits, processing equipment, and fishing gear were included in the valuation. In addition to the number of crew/employee positions, the forms also request the total number of people who worked on the vessel.

Contact information: The first part of the form includes administrative information, including contact information for the owner of the vessel, lessee of the vessel (if applicable), and the person who filled out the form. A sub-question asking for lease dates was added in 2012. This information enables the calculation of revenue associated with each form submission.

Capitalized expenditures: Only the Mothership vessels and Catcher-Processor forms request capitalized expenditures separately from expenses. These include vessel and on-board equipment, fishing gear, and processing equipment. The total expenditures on vessel and on-board equipment is requested on the form; where "total" includes all expenditures made on operations in all fisheries, including Alaska. Other capitalized expenditure categories include fishing gear and processing equipment broken out into expenditures for West Coast fisheries and expenditures that are shared by West Coast fisheries and Alaska. The Catcher Vessel operators generally do not have accountants on staff to respond to the surveys and are unable to separate their outlays into capitalized expenditures and expenses. For this reason, the cost categories are combined to not avoid placing undue burden on participants.

Annual expenses: This section contains a list of twenty-three expense categories, depending on the survey instrument, including captain, processing, non-processing, and crew wages, travel, observer fees and electronic monitoring, fishing association and commission costs, state licensing and federal permit fees, fuel, food, ice, bait, off-load fees, freight, other supplies, communications, trucking of fish to buyer, insurance, moorage, lease or bareboat charter fees, depreciation, and quota and permit lease and purchase fees. In this same section, the number of pounds landed in Alaska is requested, and is used to disaggregate the shared expenses between the West Coast and Alaska. There is also a question about

whether fish were processed on-board. Few changes were made in 2011: the expense “Commission costs” was appended to “Fishing association costs” and “State licensing and Federal permit fees” was added as a separate category.

Form change: Questions about gear-specific expenses were removed because companies did not track their expenditures to be able to accurately answer the questions

Fish purchases: Catcher-processors report total weight of landed catch in the whiting fishery and other fisheries. Motherships report the total weight and cost of fish purchased in the whiting fishery and other fisheries.

Quota and permit expenses: Catcher vessels are asked to report total expenses on purchase and lease of quota shares, quota pounds, limited entry trawl permits, and limited entry fixed gear permits. Catcher-processors report purchase or lease of co-op shares, and catcher-processor endorsed permits. Motherships report purchase or lease of mothership endorsed permits.

Annual earnings: The annual earnings section on the catcher vessel survey asks for West Coast at-sea deliveries to motherships, Alaska shoreside landings and at-sea deliveries, and sale and lease of permits, quota shares, and quota pounds. Additionally, earnings from salmon disaster relief payments, and chartering, research or leasing vessels are requested. This section does not ask for West Coast shoreside landings because this information can be obtained from state fish ticket data. Mothership and catcher-processor vessels report the total weight of production and total value of production for nine whiting products (e.g. surimi, filets, fishmeal), and total weight and value of production of any other species processed on the West Coast. Earnings from sale or lease of permits is requested for mothership and catcher-processors.

Wage payment system: The last section of the catcher vessel form covers the crew share system used on the vessel while participating in the groundfish fishery. This section uses checkboxes for participants to indicate which expenses are deducted from gross revenues before calculating crew shares. The last page of the form asks how often the vessel owner serves as captain. This section also includes two questions that ask about the percentages that are paid to crew, captain, and vessel. The first question regards trips when the owner serves as captain and the second is when there is a hired captain on-board.

Loan Payments: *Form change:* A four-part question about vessel financing. The questions are whether there were any loans on the vessel, how much was still owed at the end of the fiscal year, total amount paid to interest, and total amount paid to principal. The purpose of this new question is to collect the necessary information to comply with recent NOAA fisheries guidance on calculation of net returns of fishing businesses.

First Receiver and Shorebased Processor Survey

Facility characteristics: This section includes information about the receiving and/or processing facility. The facility characteristics include facility name, state identification numbers, and first receiver site license number. Information about the most recent facility appraisal requested includes year of last appraisal, replacement and market value, and whether processing equipment was included in the valuation.

Contact information: This part of the form includes administrative information, including contact information about the facility and the person responsible for follow-up questions pertaining to the form.

Capitalized expenditures: This section requests information on capitalized expenditures on buildings and on new and used machinery and equipment.

Employees: Participants provide the number of production workers and total hours worked during the week that includes the twelfth day of each month to provide a general idea of seasonal shifts in labor. Production workers include workers involved in fabricating, processing, assembling, inspecting, receiving, packing, warehousing, shipping, maintenance, repair, janitorial, product development, or transporting product on-site, as well as the line-supervisors. A subsequent question asks for the number and hours of all other non-production employees, including other supervisors, and individuals involved in sales, advertising, credit, collection, installation, cafeteria, record-keeping, clerical, and routine office functions, guard services, executive, purchasing, finance, and legal. Another question in this section asks for labor expenses for both employee categories, including wages, bonuses, benefits, payroll taxes, unemployment insurance, and other forms of compensation. In 2013, a question was added, “Provide the total number of individuals who worked at this facility” for both employment categories to provide an upper bound of the total number of people employed by the sector. *Form change:* a new column was added to the number of workers and hours worked table to collect the average hourly wage for production workers.

Annual expenses: This section includes selected expenses and depreciation, specifically quota expenses, utilities, rental or lease payments, repair and maintenance costs, depreciation, custom processing fees, and other expenses. Other expenses include costs associated with shoreside monitoring, offloading, production supplies, cleaning and custodial supplies, packing materials, trucking of fish to this facility, freight, non-fish additives, off-site product freezing and storage, communications and office supplies, insurance payments, property and excise taxes, and licensing fees. The final portion of this section asks for weight and cost of groundfish purchases by landing origin, including the West Coast, Alaska, and Canada.

Fish purchases: The fish received portion of the survey asks for weight of fish paid and not paid for, and the gross cost of fish paid for from vessel sources and then non-vessel sources. This section is subdivided into more than twenty species categories, adding categories for arrowtooth flounder, Pacific sanddab, and sturgeon on the 2011 forms in response to participant feedback on the 2009 and 2010 forms. *Form change:* For groundfish species, the existing form requests weight not paid for, weight paid for, and cost of fish by species group for three fisheries (LE Trawl, LE Fixed Gear, and Other) as well as Non-vessel sources. In the revised form, the table will be consolidated to only request Vessel sources and Non-vessel sources. Additionally, the transfers column will be removed. This will be a net reduction of 72 data entry cells on the form (12 species groups x removal of 2 fisheries x 3 fields). We will no longer request this information because fishery-detail information can be obtained from other sources.

Earnings and fish production: Participants provide information about the total weight and total value of fish production by fish type and product type, including fresh, frozen, unprocessed, and other. Other earnings sources that participants can report on the form include custom processing revenue, offloading earnings, sale and lease of quota, and earnings from insurance settlements. Two questions were added in 2017 requesting information about groundfish processing operations and groundfish markets this facility sells to. *Form change:* We plan to add an additional row to the fish production table for each species to capture inventory. Previously instructions were provided to include product that was placed into inventory, but participants often overlooked the instructions. Adding inventory as a specific category highlights the information being requested and also makes it easier to perform quality checks because it will be immediately obvious whether inventory was included.

Fish transfers: *Form change:* Starting with this next cycle, we plan to add a table that lists transfers between related fisheries. Previously this information was captured in an extra column in the fish

purchases table and was confusing for participants to include in the fish production table. This should make it more straightforward for the companies that use intra-company transfers because the instructions are clearer and more straightforward for companies that do not conduct transfers because they can skip the entire table instead of navigating columns within the fish purchases table.

Services provided to vessels: *Form change:* Anecdotally we know that processors provide services to vessels such as bait, ice, loans, moorage, and storage. We plan to add a new category to capture whether those services are provided and whether the vessels are charged for those services. This information will help answer questions often posed by external reviewers when evaluating studies conducted using the data collected in these surveys.

Quota Share Owner Survey

The quota share owners survey collects just two types of data: 1.) Descriptions of each quota share owner's fishery participation, and 2.) Quota sale earnings. Annually, each quota share owner needs to complete these descriptions for the renewal of Quota Share Permits. Example descriptions of fishery participation include vessel owner, family member, etc.

The full population is defined in regulation §660.114 and includes:

- All owners, lessees, and charterers of a catcher vessel registered to a limited entry trawl endorsed permit
- All owners, lessees, and charterers of a mothership vessel registered to an MS permit
- All owners, lessees, and charterers of a catcher processor vessel registered to a C/P-endorsed limited entry trawl permit
- All owners of a first receiver site license
- All owners and lessees of a shorebased processor (as defined under “processor” at §660.11, for purposes of EDC) that received round or headed-and-gutted IFQ species groundfish or whiting from a first receiver.
- All owners of a Quota Share permit and account (as defined under §660.25 (c))

Form change: Two changes are proposed for the quota share owner form. First, the question “Is this permit owned solely by a non-profit?” will be removed from the survey as it was determined that sufficient information is available from other sources to make this question redundant. The second proposed change is to replace the survey’s third question with a series of shorter questions guiding the participant to provide the correct information. This change will clarify which information should be reported for each type of respondent and will reduce the need for lengthy instructions section describing how the participant should answer. The series of questions are:

“Which types of quota transactions were associated with QSXXXX in 20XX? Check all that apply” This question helps the participant determine whether any earnings need to be reported on the survey. If appropriate categories are checked, they will be asked question B.

“How much did this quota share account earn from leasing quota in year 20XX?” Participants will answer this question with a dollar amount. To ensure there is no duplicate reporting, participants will be asked question C:

“Did you record any earnings from 20XX quota leasing on an EDC form?” If participants answer “No,” they will be prompted to affirm that their response to question B was correct and submit the survey. If they answer “Yes,” they will be asked to respond to question D.

“How much in quota lease earnings did you record on your EDC form(s)? Participants will answer with a numerical value and proceed to question E.

“Please confirm your total quota lease earnings in 20XX was ‘Response to question B + ‘Response to question D.’ After confirming, participants will then submit the survey.

We anticipate no additional burden with this change because the new structure of the survey will generate fewer incorrect responses and survey administrators will no longer need to contact participants outside of the survey to confirm that they did not provide duplicate responses across survey forms.

Submissions of the catcher-processors, catcher vessels, motherships, first receivers, and shorebased processors forms can be submitted by paper (fax or mail) or via the EDC web form system. Quota share owners must submit their information online as part of the annual quota share permit/account renewal process.

Information received from this survey will continue to be used for reporting annual economic performance measures, informing the development of environmental impacts statements/environmental assessments for the biennial harvest specification process, and informing the regional economic impact model developed by the Northwest Fisheries Science Center (Input-Output Pacific Coast, or IO-PAC). Examples of economic performance measures based on statistical inference of survey variables include calculation of expenditures for each input, calculation of total costs incurred when operating the vessel, calculation of total revenue earned through operation of the vessel, variable profit (total revenue minus variable costs), vessel operating characteristics (speed and fuel use), crew size, and crew compensation methods (what share of revenue is paid to the crew and which expenses are deducted from landings revenue before the crew is paid). Performance measures that require the estimation of economic models include efficiency of operation and average cost curves for different length vessels (that provide the level of harvest output at which a specific length vessel minimizes its cost per pound of fish landed). These performance measures are made available to state and federal fisheries managers, industry, and the public via a public-facing data exploration tool.

These data provide information on vessel expenditures by cost category (captain, crew, fuel, etc.), which drives the estimates of how changes in landings affect regional economies and coastal economies. Estimates from IO-PAC are used in the PFMC’s bi-annual groundfish specifications process, which sets allowable landings levels by groundfish species and gear type. Since the implementation of the EDC Program, the analysis of the groundfish specifications process has been expanded to calculate net benefits in addition to the generation of impact estimates. The data were also used for a tech-memo looking at productivity in catch share programs, and in another analysis for the PFMC analyzing the effects of observer and electronic monitoring costs on net benefits among various other analyses.

Lastly, the EDC data were an essential component of the MSA-mandated 5-year review of the trawl catch share program, finalized in 2018. The analysis allowed the PFMC to develop several follow-on actions and new analyses using EDC data continue to inform the development of alternatives for implementation.

The Quota Share Owner survey component of the EDC Program was first conducted in 2020 (collecting data about 2019). It has already been used for multiple ad-hoc analyses to support PFMC analysis for development of alternatives and will be a key component of the next review, as mentioned above. To date, it has primarily been used to describe the distribution of the benefits of the catch share program. In the future, it will be used to more accurately assign quota lease earnings between vessels and non-vessel owners when calculating profit as well increasing our understanding of where geographically the

benefits are accruing.

Participants required to submit catcher-processors, catcher vessels, motherships, first receivers, shorebased processors surveys have the option to submit their information via paper (mail or fax) or electronically through the EDC web form system. The quota share owner survey participants must submit their data online.

The information will be collected annually.

NOAA 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. The information collected 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 and MSA 402(b). Summarized information will be made available to the public.

Since the implementation of the data collection in 2011 there have been periodic adjustments to the survey instruments, these include wording changes for clarification, and addition of new questions to request information that was previously irrelevant. The one major change since the first year of the program was the implementation of a Quota Share Owner module of the program. This was requested by the PFMC as part of the follow-on actions from the first catch share program review (concluded in 2018), put into regulation in 2019 and first fielded in 2020.

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.

Survey participants completing catcher vessels, motherships, catcher-processors, and first receivers/shorebased processors forms will have the option to complete either a paper survey or a web form. Quota share owners are required to submit their forms online. Paper copies of the catcher vessels, motherships, catcher-processors, and first receivers/shorebased processors forms are mailed to the participants; enclosed in the survey packet is information about how to submit their data through the web form. Quota share owners are mailed a reminder letter about the requirement to complete the EDC form as part of their annual quota share permit/account renewal process.

A new data entry system was implemented in 2023. This new system allows users to save previous submissions and access them when completing future forms. This is expected to reduce some burden associated with finding their previous submissions in their personal records. This information is supplied as a convenience to participants and does not replace the requirement for maintaining personal copies of their submissions.

The five EDC survey forms (catcher vessels, motherships, catcher-processors, and first receivers/shorebased processors, quota share owners) are posted on the NWFSC website. Summaries of survey results presenting cost, revenue, physical characteristics, and input compensation methods as well as an interactive data explorer are posted annually on the NWFSC website once the data are available: www.nwfsc.noaa.gov/edc.

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

To the best of our knowledge, based on extensive interactions with the survey population and fishery managers regarding this data collection, this is the only source for these data. Extensive review of the forms with owners of catcher vessels, catcher-processors, motherships, and first receivers/shorebased processors has not revealed any questions on the forms which could be answered through the use of existing data sources. The Quota Share owner survey is integrated into the pre-existing permit renewal system to avoid requesting duplicate information.

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

Based on available information, the NMFS believes that all of the catcher vessels in the survey population qualify as small businesses. Existing (non-survey) data sources do not provide information on all potential revenue sources for catcher vessels participating in the West Coast limited entry trawl fishery (in particular, NWFSC staff do not have access to revenue data from Alaska fisheries). However, survey responses to two previous voluntary surveys of catcher vessels delivering to shoreside processors indicate that all of these vessels are small businesses. Revenue data is not available for all operations (West Coast and Alaska) of catcher-processors and motherships. Similarly, revenue data is not currently available for individual shoreside processing plants.

Two methods have been used to minimize survey burden on all members of the survey population, including small businesses. First, survey design has sought to avoid duplication of data collection (discussed in the response to question 4). Second, NMFS economists have met with industry participants to discuss all four forms. These discussions have focused on making questions easily understandable and consistent with the record keeping practices of survey respondents. These meetings with industry participants have resulted in numerous improvements in survey content and clarity.

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.

Failure to conduct this survey would limit NMFS economists to monitor the impact of fisheries management on fisheries participants, report on the status of West Coast catch share fisheries, nor emphasize the net economic benefits generated. While it would still be possible to monitor changes in revenue earned by catcher vessels, there would be no information available on production costs, the processing sector, motherships, or catcher processors. No evaluation of the economic benefits, distributional impacts, or efficiency effects of catch share management could be made. It would not be possible to evaluate if catch share management was achieving many of the goals identified by the PFMC. As a result, MSA monitoring requirements as stated in section 303(c)(1)(G) could not be met.

In addition, NMFS economists would not be able to produce analysis evaluating the need for modifications to catch share program design and regulation. For example, evaluating the potential need to revise caps on quota share or quota pound accumulation requires knowledge of how much fish vessels of different sizes (lengths) must harvest in order to minimize cost per pound of fish harvested. In order to determine the level of catch at which a vessel minimizes cost per pound, it is necessary to have the cost data collected by this survey. Data from this collection are also necessary to evaluate the distributional consequences of catch share management, and the effects on regional economies. These

are issues that fishery managers may wish to address by adjusting the catch share program.

Conducting data collection less frequently would slow the delivery of results from the economic monitoring process. For example, even with annual data collection, the evaluation of the results of regulatory changes made at the beginning of 2020 will not be available until the end of 2021 (discussions with industry participants emphasized the importance of collecting economic data after industry participants have prepared data for tax filings), and the data verification and matching (with other data sources which provide data used in conjunction with the cost earnings data collected by this survey) process will take additional time. If economic analysis of the cost earnings data indicates unanticipated consequences of the regulatory change, additional time is needed in the PFMC process to discuss and recommend regulatory changes. The consequence of collecting cost earnings data less frequently than the annual basis proposed in this filing is to allow unanticipated consequences of regulatory changes to persist for needlessly extended periods of time.

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 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 published on April 06, 2023 (88 FR 20492) solicited public comment. No comments were received.

Since the last PRA approval, extensive outreach has been conducted with participants required to complete the First Receiver and Shorebased Processor survey form. The first purpose of this outreach was to learn how the survey questions related to fish purchases, fish production, and fish transfers could be less burdensome. The outcome of these discussions was to restructure the survey tables to make it clearer how to handle transfers and to reduce the number of categories requested in the fish purchases table. Additionally, more information was obtained from survey participants about how to restructure the labor questions to make it easier for participants to provide the information and to make the data more useful for analysis and reporting. A similar outreach effort was undertaken to restructure the quota lease question on the Quota Share Owner survey form. The information collected is identical to the past, but it is broken into a continuous set of questions to more clearly articulate which information should be provided. Finally, to adhere to new NOAA Fisheries guidance for calculating net returns, add a new question related to loan payments.

Changes to the EDC forms often result from communication with participants regarding the types of information collected and how it is collected. Other changes are the result of fishery managers and stakeholders who ask for specific analyses and types of information.

EDC staff work extensively with participants during each data collection year. It is common for participants to contact the EDC program (usually by telephone) to ask about questions that arise while filling out the form, or for more information about the purpose of the data collection. During the initial years of the program, there was a large volume of communications with participants. The frequency of phone calls has decreased over time as the participants have learned how to better complete the forms,

and the forms have improved, both in terms of the clarity of instructions and the questions themselves. There were no comments received related to survey burden.

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

There are no payments or gifts 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.

No PII information is collected from participants. The notice of proposed new privacy act system of records was issued under 80 FR 47454 and the effective data notice was issued under 80 FR 55328. This data collection is covered by SORN COMMERCE/NOAA-23. Responses to this information request are confidential under 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, et seq.). The database where the data are stored is covered by U.S. Department of Commerce Privacy Impact Assessment NOAA/Northwest Fisheries Science Center NOAA4600, project: 006-48-01-14-02-3305-00.

The NMFS will not publish any numbers based on fewer than three survey responses in papers, reports, presentations, or other public documents. Nor will a summary statistic be reported if one observation makes up more than 90% of the total. Only NWFSC employees will have access to the survey data with information that can be used to identify individual respondents (vessel ID number, owner name, owner address, etc.). Unprotected confidential data are only released to individuals as designated by §600.415. Contractors only access data with NOAA-issued equipment and follow all NMFS guidelines.

In the case of a Freedom of Information Act (FOIA) request for the data, the NMFS will seek to protect the data from release through Exemption 4 by noting the data is confidential and highly sensitive business data.

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 sensitive information is collected on these forms.

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

The survey population for 2022 data (collected in 2023) consisted of 128 catcher vessels, 10 catcher-processors, 6 motherships, 47 first receivers/shorebased processors, and 169 quota owner forms.

The average hourly wage rate was obtained from the 2018 catcher vessel and first receiver and shorebased processor surveys. To calculate the wage rate for the catcher vessel forms, the average annual captain payment was divided by 2080 hours. For mothership, catcher-processor, and first receiver/shorebased processor forms, the total payments to “non-production employees” was pulled from the first receiver/shorebased processor forms, divided by the number of employees, and divided by 2080 hours. The first receiver/shorebased processor wage rate was used for catcher-processors and motherships because it is unlikely an employee that works on the vessel filled out the form and the forms do not collect off-vessel costs. Finally, an average of the catcher vessel and first receiver/shorebased processor wage rates was used to calculate the rate for the quota share owner form because those forms are completed by a combination of vessel owners/captains and shorebased companies.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (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)
Mothership	Non-production employee	6	1	6	8	48	\$37.22	\$1,787
Catcher Vessel	Vessel captain	128	1	127	8	1,016	\$67.62	\$68,702
Catcher-Processor	Non-production employee	10	1	10	8	80	\$37.22	\$2,978
First Receivers/Shorebased Processors	Non-production employee	48	1	47	20	940	\$37.22	\$34,987
Quota Share Owner	Mix of vessel captains and non-production employees	169	1	152	1	152	\$52.42	\$7,968
Totals				342		2,236		\$116,422

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).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. The majority of responses are submitted electronically, resulting in no costs to the respondent.

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.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP4/1	\$ 178,979	30		\$53,694
	ZP3/3	\$157,967	30		\$47,390
Contractor Cost					
Contractor #1		\$132,000	40%		\$52,800
Contractor #2		\$132,000	30%		\$39,600
Travel					
Other Costs:					
TOTAL					\$193,484

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

Revisions to three forms - the quota share owner form, the first receiver and shorebased processor form, and the catcher vessel form - are proposed and outlined in the response to Question 2. The purpose of the changes are the following: remove requests for information that are not used in development of a Pacific Fishery Management Council Fishery Management Plan, consolidate questions where additional detail is no longer required, clarify handling of intercompany transfers and inventory, collect information about loan payments to more accurately calculate common economic performance metrics, collect more accurate information about hourly wages, and reframe questions to avoid duplicate responses. Because the changes eliminate the collection of unnecessary information and clarify requests for other information, it is not anticipated that there will be any change to the burden response time. However, NOAA will reach out to stakeholders prior to the next renewal to obtain their feedback on the accuracy of the response times.

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	
Mothership	6	6	6	6	48	48	The number of respondents was updated based on the most recent

Catcher Vessel	128	130	127	129	1,016	1,032
Catcher-Processor	10	8	10	8	80	64
First Receivers/Shorebased Processors	48	47	47	45	940	900
Quota Share Owner	169	168	152	151	152	151
Total for Collection	361	359	342	339	2236	2,195
Difference	2		3		41	

fishery information.

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Mothership	\$1,787	\$1,413	0	120	Miscellaneous costs removed as almost 100% of submissions are electronic.
Catcher Vessel	\$69,243	\$68,5678	0	2580	
Catcher-Processor	\$2,978	\$1,884	0	160	
First Receivers/Shorebased Processors	\$35,731	\$26,496	0	900	
Quota Share Owner	\$8,859	\$7,240	0	30	
Total for Collection	\$118,598	\$105,600	0	3790	
Difference	\$ 12,998		-\$3,790		

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.

NMFS continues to require submission of the EDC between May 1 and September 1 of each year, as dictated by the regulations. A data exploration tool is updated annually, including costs by category, earnings by category, vessel and plant physical characteristics, and compensation to labor inputs (crew on vessels and line workers in processing plants) are to be published in the Spring of the following year. Data are also used in scientific publications and to support management decisions by the Pacific Fishery Management Council.

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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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