

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Region Vessel Identification Requirements
OMB Control No. 0648-0355

Abstract

This is a request for an extension of an approved information collection. The success of fisheries management programs depends significantly on regulatory compliance. The vessel identification requirement is essential to facilitate enforcement. The ability to link fishing (or other activity) to the vessel owner or operator is crucial to enforcement of regulations issued under the authority of the Magnuson-Stevens Fishery Conservation and Management Act. A vessel's official number is required to be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. It identifies each vessel and should be visible at distances at sea and in the air. Law enforcement personnel rely on vessel marking information to assure compliance with fisheries management regulations. Vessels that qualify for particular fisheries are also readily identified, and this allows for more cost-effective enforcement. Cooperating fishermen also use the vessel numbers to report suspicious or non-compliant activities that they observe in unauthorized areas. The identifying number on fishing vessels is used by the National Marine Fisheries Service (NMFS), the United States Coast Guard (USCG), and other marine agencies in issuing regulations, prosecutions, and other enforcement actions necessary to support sustainable fisheries behaviors as intended in regulations. Regulation-compliant fishermen ultimately benefit from these requirements, as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This submission requests renewal of Office of Management and Budget (OMB) approval for a vessel identification requirement in the Pacific Coast Groundfish Fishery.

The success of fisheries management programs depends significantly on regulatory compliance. The vessel identification requirement is essential to facilitate enforcement. The ability to link

fishing or other activity to the vessel owner or operator is crucial to enforcement of regulations issued under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (including provisions at 16 U.S.C. 1853).

Vessel identification is required by all open access and limited entry commercial vessels over 25 ft. in length in the West Coast region. Vessel identification requirements are set forth in the regulations implementing the Pacific Coast Groundfish Fisheries Management Plan at [50 CFR 660 Subpart C](#).

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

A vessel's official number must be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. It identifies each vessel and should be visible from a distance at sea and in the air. The official number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, to ascertain whether the vessel's observed activities are in accordance with those authorized for that vessel. The identifying number is used by the National Marine Fisheries Service (NMFS), the U.S. Coast Guard (USCG), and other marine agencies in issuing violations, prosecutions, and other enforcement actions. Law enforcement personnel rely on this information to assure compliance with fisheries management regulations. Vessels that qualify for particular fisheries are readily identified and gear violations are more readily prosecuted, allowing for more cost-effective enforcement. Cooperating fishermen also use the number to report suspicious activities. Regulation-compliant fishermen ultimately benefit as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

The information collected will not be disseminated to the public; as it consists solely of marking vessels with the appropriate vessel number. This information is not submitted to NMFS.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The requirement that each vessel display an identification number on its deckhouse or hull, and its weather deck, does not lend itself to technology. Vessel monitoring system (VMS) units are currently required on all groundfish vessels consistent with regulations at 50 CFR 660.14. Although VMS signals, which are transmitted hourly, can be used to identify a vessel's fishing location, it is difficult for enforcement personnel aboard vessels and aircraft to use to identify specific vessels. Therefore a vessel identification number requirement continues to be useful for basic enforcement.

4. Describe efforts to identify duplication.

Existing Federal and State reporting requirements have been reviewed to ascertain that no duplication of information collection results from this action. There is no duplication with other collections. The USCG requires the name of the vessel and hailing port to be marked on its stern for documented vessels (46 CFR 67) and state-issued block numbers on the forward half of the vessel for undocumented vessels (i.e., small boats that are registered with the state) (33 CFR 173); however vessel names, ports, and block numbers may be changed, making tracking and identification of the vessel more difficult and complex. The USCG also requires documented vessels to have their official identification number permanently marked on the vessel. However, this is usually done on an interior structural beam in the engine room. For efficient enforcement and accurate reporting, an identifying number is required on the outside of the vessel in large numbers by the NMFS because a vessel's identification number does not change.

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

Although nearly all vessels in the respective fisheries are categorized as small businesses, the collection of information will not have a significant economic impact or burden on small businesses in terms of time and resources. Therefore, no special modifications of the requirements were considered necessary.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The NMFS and the USCG could not enforce the fisheries management measures if this collection were conducted less frequently. The numbers must periodically be maintained to remain legible.

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

This collection is consistent with the OMB guidelines.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice was published on April 2, 2024 (89 FR 22677). No comments were received. In addition to the Federal Register notice, NMFS contacted stakeholders outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. No comments were received.

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

Neither payments nor gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

No confidentiality is promised. The information is on public display.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

12. Provide an estimate in hours of the burden of the collection of information.

Table 1 provides an estimate in the total hours of burden from this collection of information. It also provides an estimate of wage burden costs. The estimated total number of vessels affected is 1,007 vessels - 415 limited entry vessels and 592 open access vessels. This number is an overestimate because it includes vessels under 25 feet, and limited entry permits that may be stacked on the same vessel. The identifying number must be displayed on the vessel in three locations and maintained in good condition. NMFS staff consulted with various groundfish vessel captains participating in various groundfish pot, longline, midwater trawl, bottom trawl fisheries, and determined that gear markings have a five-year life span. The estimated time to display or otherwise affix the number at each location is 15 minutes. Estimated burden of total annual response time: 1,007 vessels x 3 marking locations x 15 minutes = 755.25 hours, **with responses annualized to 201 responses and hours annualized to 151 hours** (Table 1.)

Labor costs in the fishing industry are estimated at \$26.62 per hour utilizing labor estimates provided via United States Bureau of Labor Statistics *Occupational Employment and Wages, May 2023* (<https://www.bls.gov/oes/current/oes472141.htm>) for occupation title “Painters, Construction, and Maintenance” in the Ship and Boat Building industry.

Total fleet labor cost: \$21,549.80, **annualized over 5 years is \$4,309.96** (Table 1).

Table 1	Limited Entry	Open Access	Fleet Totals
Total number of vessels	415	592	1,007
Number of markings per vessel	3	3	
Total number of markings	1,245	1,776	3,021 (604.2 annualized)
Estimated time per vessel to display or affix	15 min	15 min	

the number at each location			
Estimated time per vessel to display or affix all required markings	45 min	45 min	
Total burden hours all vessels	311.25	444	755.25 (151.05 annualized)
Cost per vessel for materials	\$21.40 per vessel	\$21.40 per vessel	
Total annual cost for materials	\$8,881	\$12,668.80	\$21,549.80 (\$4,309.96 annualized)
Cost per hour for labor, cost per marking	\$26.62	\$26.62	
Total annual cost for labor	\$8,285.48	\$11,819.28	\$20,104.76 (\$4,020.95 annualized)

Table 1. Total Annual Burden Hours and Annual Wage Burden Costs

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Limited Entry Vessels	Painter	415	1	83*	0.75	62	\$26.62	\$1,650
Open Access Vessels	Painter	592	1	118*	0.75	89	\$26.62	\$2,369
Totals		1,007		201		151		\$4,019

*Annualized over 5 years. Due to rounding in ROCIS numbers/totals may be 1-2 digits above or below.

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

The cost to fishermen is minimal. Materials needed are paint and paintbrush, and possibly a stencil. Material costs are estimated as follows: 1 quart of exterior paint = \$14.95, 1 paintbrush = \$2.00, 1 small container of mineral spirits (cleaning) = \$4.45 (total \$21.40). A paint-on number stencil is optional, and optional custom printed stick-on numbers = \$120 (set of 3). Given the higher cost for the stick-on option, these vessel marking estimates provided assume that vessel

captains would not choose the stick-on marking option. For 1,007 vessels, the material cost would be \$21,549.80, and **annualized over 5 years, would be \$4,301.** (Table 2).

Table 2. Total Annual Cost Burden (excluding burden hours)

Information Collection	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Limited Entry Vessels	415	1	83*	\$21.40	\$1,776
Open Access Vessels	592	1	118*	\$21.40	\$2,525
TOTALS	1,007		201		\$4,301

*Annualized over 5 years. Due to rounding in ROCIS numbers/totals may be 1-2 digits above or below.

14. Provide estimates of annualized cost to the Federal government.

No costs are incurred by the federal government for this information collection as the maintenance/preparation for this information collection is less than 1% of a federal employee's effort annually.

15. Explain the reasons for any program changes or adjustments.

There are no changes or adjustments from the previous collection renewal.

16. For collections whose results will be published, outline the plans for tabulation and publication.

No results are published.

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

There are no forms or survey associated with the collection where the OMB control number will be displayed.

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