

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Western and Central Pacific Fisheries Convention Vessel Information Family of Forms
OMB Control No. 0648-0595

Abstract

This request is for a revision and extension of the current information collection. The revision will include the following: A section at the beginning of the Area Endorsement form, paper, and online format, was added for vessel IMO numbers to be included, alongside the Official Number and Vessel Name sections.

National Marine Fisheries Service (NMFS) administers regulations that implement decisions of the Commission for the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (WCPFC or Commission). The regulations require the owners or operators of U.S. vessels to (1) apply for and obtain a WCPFC Area Endorsement if the vessel is used for fishing for highly migratory species (HMS) on the high seas in the WCPFC area (or Convention Area) (50 CFR 300.212), (2) complete and submit a Foreign Exclusive Economic Zone (EEZ) Form if the vessel is used for fishing for HMS in the Convention Area in areas under the jurisdiction of any nation other than the United States (50 CFR 300.213), and (3) request and obtain an IMO number if the vessel is used for fishing for HMS on the high seas or in areas under the jurisdiction of any nation other than the United States (50 CFR 300.217(c)).

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 Western and Central Pacific Fisheries Convention Implementation Act (16 U.S.C. 6901 *et seq.*; WCPFCIA), gives the Secretary of Commerce the authority to enact regulations to fulfill the requirement under the Convention on the Conservation and Management of Highly Migratory Fish Stocks in the Western and Central Pacific Ocean (Convention) that all member States maintain and provide to the Commission a list of vessels flagged by the member State and (1) authorized by the member State to be used for fishing for HMS on the high seas in the WCPFC Area, or (2) authorized by other States to be used for fishing for HMS in their areas of jurisdiction in the WCPFC Area, and to maintain and provide for each vessel on that list certain information on its characteristics and its owner and operator.

Vessels in the first category already provide most of the required information under other laws and regulations. All such vessels must be documented by the United States Coast Guard (USCG) or be state-registered and must hold a valid High Seas Fishing Permit (issued under the authority of the High Seas Fishing Compliance Act (HSFCA)). Under these other documentation/registration and permitting requirements, the vessel owner or operator must comply with information collection requirements that fulfill most of the needs under the WCPFCIA. This

information collection requirement serves to collect the few pieces of information required under the WCPFCIA that are not already collected via other mechanisms, and a form customized for this category of vessels is used.

Vessels in the second category provide information as part of the USCG documentation or State registration processes, but such vessels do not need to hold High Seas Fishing Permits (unless they also fish on the high seas), so they will not necessarily be submitting the information collected via that permitting process. This information collection requirement serves to collect the pieces of information required under the WCPFCIA that are not already collected via existing mechanisms, and a form customized for this category of vessels is used.

An additional piece of information that the United States must provide to the Commission for both categories of vessels for vessels greater than 12 meters in overall length is the vessel's IMO number. An IMO number, also known as an IMO ship identification number, is a unique number issued for a ship or vessel under the ship identification number scheme established by the International Maritime Organization. Once issued, an IMO number will remain with the vessel for its life, regardless of changes to the vessel's name, flag, ownership, or other attributes. This information collection requirement serves to collect information based on a decision of the Commission made under Conservation and Management Measure (CMM) 2013-10 and amended in CMM 2018-06, which requires each member of the Commission to ensure that IMO numbers are issued. To satisfy this WCPFC requirement, NMFS requires that the owner of each subject vessel request and obtain an IMO number, which they can do by submitting certain information about the vessel and its ownership and management to the administrator of the IMO ship identification number scheme, which is a private third party not associated with the United States government or any other government. Although NMFS does not collect this information directly, the requirement to submit the information to the third party is covered by this information collection.

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

The information is used by NMFS, the USGC, and the Commission to monitor the size and composition of the HMS fleets in the WCPFC Area for compliance-related and scientific purposes. Knowing such information as the number of vessels, the specifics of the vessels and their ownership, and the types of gear employed enables effective monitoring of vessel activity for enforcement and assessment purposes.

The frequency of this collection of information, with the exception of obtaining an IMO number, is the same as the frequency of collection used for High Seas Fishing Permit applications, currently once every five years (the overall collection is continuous; the collection frequency from the perspective of the vessel owner/operator will be once every five years). The information required for a vessel to obtain an IMO number is a one-time collection.

Owners or operators of vessels in the first category (see response to Question 1) are required to provide the information specified in an application for a *WCPFC Area Endorsement*, which is a fishing authorization that is issued supplemental to, and as an endorsement on, the High Seas

Fishing Permits issued under the HSFCA. The information collected on this application includes the following:

- a) USCG documentation number
- b) International Maritime Organization (IMO) number
- c) State registration number and vessel name;
- d) Total fish hold capacity;
- e) International radio call sign;
- f) Refrigeration/freezer types, number of units, and refrigeration/freezer capacity;
- g) Fishing methods used;
- h) Vessel operator information: name and country of citizenship;
- i) Vessel communication types and numbers (Inmarsat mobile unit numbers and satellite telephone number);
- j) Color photograph of vessel and date of photograph; and
- k) Signature of vessel owner or operator and date of signature.

Owners or operators in the second category will be required to provide the information specified in the form *Information Required for U.S. Vessels Used for Commercial Fishing for Highly Migratory Species in the Western and Central Pacific Fisheries Convention Area in Areas under the Jurisdiction of any Nation other than the United States* (hereafter, *Foreign EEZ Form*), available on our Website (see Question 3). The information collected on this form will include the following:

- a) USCG documentation number
- b) State registration number and vessel name;
- c) International Radio Call Sign;
- d) Indication of whether or not a High Seas Fishing Permit or a WCPFC Area Endorsement for the vessel has been issued or applied for;
- e) Total fish hold capacity;
- f) Crew size (including officers);
- g) Shaft horsepower;
- h) Refrigeration/freezer types, numbers of units, and refrigeration/freezer capacity;
- i) Fishing methods used;
- j) Fishing vessel type;
- k) Vessel communication types and numbers (Inmarsat mobile unit numbers, and satellite telephone numbers);
- l) Vessel ownership information: corporate/individual name(s), incorporation date, address(es), and telephone and fax numbers;
- m) Vessel operator information: name and country of citizenship;
- n) Previous vessel flags and names (if flagged under other nations, for each flag: nation, period flagged, name of vessel, international radio call sign, and homeport);
- o) Authorization-to-fish information: for each authorization issued by another nation: name of issuing nation, name of issuing authority and authorization, activities authorized, species for which fishing is authorized, areas in which the vessel is authorized to fish, period of validity, and authorization number/identifier;
- p) Color photograph of vessel and date of photograph; and
- q) Signature of vessel owner or operator and date of signature.

Owners and operators of vessels in both categories are required to provide information specified by the administrator of the IMO ship identification number scheme. The current administrator is IHS Maritime. Instructions on how to apply for an IMO number are available at:

<https://imonumbers.lrfairplay.com>. The required information includes but is not limited to:

- a) Current ship name/shipyard ID
- b) Original name
- c) Flag
- d) Fishing number
- e) Gross and net tonnage
- f) Overall length
- g) Shipbuilder
- h) Place of build
- i) Hull number
- j) Registered owner and owner address
- k) Manager and manager address
- l) Company name
- m) Contact name
- n) Sender's email

For those elements of this information collection that are collected by NMFS, up to the point of submitting the information to the Commission, sharing it with other U.S. agencies such as the USCG, or disseminating it to the public, NMFS retains control and safeguards it from improper access, modification, and destruction consistent with NOAA policies. None of the collected information is considered to be confidential or protected by NMFS as such. Once submitted to the Commission, the Commission will maintain and control access to the information in accordance with its *Rules and Procedures for the Protection of, Access to, and Dissemination of Data Compiled by the Commission*. According to those rules and procedures, the information will be treated as public domain data; that is, it will not be treated as confidential or protected as such. Most or all of the information will be disseminated by the Commission to the public via the Commission's public website. It will be disseminated in close to its original form.

The information provided in applications for IMO numbers is used by the administrator of the IMO ship identification number scheme to generate an IMO number for the vessel that is unique and stays with the vessel. The administrator makes the IMO number publicly available and also uses the data in its commercial products, such as directories of vessels.

The information collection is designed to yield data that meets all applicable information quality guidelines. Prior to dissemination, the information collected by NMFS 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.

The website for the Pacific Islands Regional Office of NMFS at <http://www.fpir.noaa.gov> is used to inform the public about the collection of information necessary to comply with management program requirements. The required forms and instructions for the *WCPFC Area Endorsement* and *Foreign EEZ Form* are available online for downloading, filling, and e-mailing, at the same website. Required forms and instructions to obtain an IMO number are available and may be submitted online at <https://imonumbers.lrfairplay.com>. NMFS has added a new field on the *Area Endorsement Form* for reporting on the status of IMO numbers.

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

As mentioned in Question 1, some of the vessel information required under the WCPFCIA is collected via the HSFCA, by the USCG, and by the third-party administrator of the IMO ship identification number scheme. The forms used for the *WCPFC Area Endorsement* and the *Foreign EEZ Form*, described in Question 2, are designed to avoid duplication and avoid the collection of information already collected under other mechanisms. In addition to the two forms customized for each of the two categories of vessels, owners/operators of vessels in the second category are required to submit only those pieces of information specified on the *Foreign EEZ Form* that they have not provided on applications for a High Seas Fishing Permit and a WCPFC Area Endorsement (which some but not all are expected to apply for). The form used to collect information necessary to apply for an IMO number is specified by the third-party administrator of the IMO ship number identification scheme, and the information is not collected by NMFS. NOAA and NMFS have no control over the information that is required to obtain an IMO number and so it is possible that information submitted for that purpose duplicates information submitted to NMFS for other purposes.

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

All fishing operations subject to this collection of information, with the possible exception of a few large-scale tuna purse seine, carrier, and bunker vessel operations, are small businesses. However, all of the data collected have been deemed necessary by the Contracting Parties to the Convention, including the United States, and the reporting burden is very minor relative to the overall cost of fishing. As described in Questions 1, 3 and 4, efforts have been made to rely on existing information collection mechanisms as much as possible.

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 information is not collected, the U.S. government will not meet its obligations as a Contracting Party to the Convention and a member of the Commission, and would consequently fail to fulfill the provisions of the WCPFCIA. The lack of collected data from the U.S. HMS fleets operating in the Convention Area would provide a disincentive to the other fishing nations in the region to provide the Commission vessel data for their fleets. The effective management of the fishery resources under the Commission would consequently be compromised.

As described in Question 2, the information included in both the *WCPFC Area Endorsement* application and *Foreign EEZ form* is collected once every five years, in part to keep this collection in synchrony with the related collection under the HSFCA. Collecting the information less frequently would be administratively awkward and possibly less efficient for both the government and the respondents. It would probably also result in less reliable data, as they would be updated less frequently. The information collected to obtain an IMO number is a one-time collection.

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

The collection is consistent with Office of Management and Budget (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.

NMFS published a notice in the Federal Register on June 6, 2024, soliciting comments on the extension of this information collection (89 FR 48397), for a 60-day comment period. No comments were received.

NOAA consulted with 3 representatives of fishing fleets subject to this information collection 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. Responses were received expressing agreement with NMFS' estimate of burdens and noting the ease of filling out the WCPFC Area Endorsement form. No changes are needed to the information collection in response to comments.

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

No payment or gifts to respondents will be provided.

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 assurance of confidentiality will be provided to respondents.

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.

No questions of a sensitive nature will be asked.

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

Information Collection	Type of Respondent (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)	Mean Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Foreign EEZ Form	45-1011	21	0.048	1	2	2	\$29.23	\$43.82
WCPFC Area Endorsement Form	45-1011	203	0.2	41	1	41	\$29.23	\$1,186.74
Request for IMO Ship Identification Number	45-1011	2	1	2	0.5	1	\$29.23	\$29.23
Totals				44	3.5	44		1,259.80

*Estimated rounding is displayed in charts for Q12-15.

Occupational Code 45-1011, First Line Supervisors of Farming, Fishing, and Forestry Workers, was used to determine the mean hourly wage rate. https://www.bls.gov/oes/current/oes_nat.htm#45-0000

The number of vessels subject to the collection will vary over time, depending on the number active in the WCPFC Area. This number cannot be predicted with great certainty. For the purposes of this collection, respondents are expected to include the following: (1) 20 purse seine vessels, which is the estimated maximum number of participants for 2021-2025; (2) 164 longline vessels, which is the maximum number of Hawaii longline limited entry permits available; and (3) 189 troll vessels, which is the maximum number of West Coast-based albacore vessels that fished in the Convention Area in any one of the last five years (2018-2022) and which NMFS continues to consider an appropriate projection for the medium-term future. The total estimated number of vessels that will be subject to this collection of information is 203.

WCPFC Area Endorsement:

It is 1 response per vessel per 5 years. Therefore, the number of vessels (203) needs to be multiplied by the annual number of responses/respondents (0.2). This calculation equals 40.6, which is the total number of annual responses.

We estimated 1 burden hour per response, therefore the total annual burden hours is 1 multiplied by the total number of annual responses (40.4), which equals 40.46 hours.

Foreign EEZ form:

Some of the vessels expected to respond to this form may also fall in the first category and therefore may not have to provide redundant information specified in this form. For the purposes of this collection, respondents are expected to include the following: (1) 20 PS vessels, the estimated maximum number of participants for 2021-2025, and (2) 1 longline vessel. Therefore, the total number of estimated respondents is 21.

It is 1 response per 21 respondents (1 response divided by 21 respondents), which equals 0.0476 annual responses/respondent

We estimated 1.5 burden hours per response, therefore the total annual burden hours is 1 multiplied by 1.5, equally 1.5 hours.
(Rounded to 2 in ROCIS)

IMO Number:

The number of respondents required to apply for an IMO number will depend on the number of *new* respondents in either of the above listed categories. Based on the vessels currently in the two categories, NMFS estimates that zero respondents will initially be subject to this element of the collection. Because this element will be a one-time requirement, subsequently only *new* vessels falling in either of the two categories (and that are at least 12 meters in overall length in size and that do not already have an IMO number) will be subject to this element of the collection. It is projected that the number of such vessels will be approximately two per year.

IMO number application:

Vessels (2) multiplied by responses per vessel (1), multiplied by minutes per response (30), equals 1 hr/yr. This means it is a total of a 1 estimated burden hours per year and the total estimated responses per year is 2 at 30 minutes for each response.

Totals (WCPFC Form +FEEZ Form + IMO number application):

The total estimated burden per year is ~43 hours, since it is 40.6 hours for the WCPFC Area Endorsement Form, 1.5 hours for the Foreign EEZ Form, and 1 hour for the IMO Application.

The total estimated responses per year is ~43 responses, since there is estimated to be 40.6 responses for the WCPFC Area Endorsement Form, 1 for the Foreign EEZ Form, and 2 for the IMO Application.

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).

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)
Foreign EEZ Form	21	0.048	1	\$1	\$1
WCPFC Area Endorsement	203	0.2	41	\$51	\$2,091
Request for IMO Ship Identification Number	2	1	2	\$1	\$2
TOTALS			44		2,094

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					
Process WCPFC AE and FEEZ forms	ZA-03-03	169,570.50,	0.982		\$1,665.18
Review WCPFC AE and FEEZ form	ZP-03-03	169,570.50,	0.163		\$276.40
Communications in extraordinary circumstances when IMO Ship Identification Number is unable to be procured	ZP-03-03	169,570.50,	0.239		\$405.27
TOTAL					\$2,346.85

Labor rates were determined using the 2024 CAPS pay tables, Rest of U.S. locality rate for a ZP-III, interval 03. The Rest of U.S. locality area was used as NMFS employees are geographically dispersed and can live/work anywhere in the U.S. A multiplier of 1.5 was used to calculate the loaded salary.

(https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf)

Review and Processing of WCPFC area endorsement and FEEZ (SFD):

Labor is considered to be 30 minutes per form, multiplied by 41 forms per year, and multiplied

by 1 year's worth of working hours, which is roughly 2087 working hours.

Review of WCPFC area endorsement and FEEZ (IFD):

Labor is considered to be 5 minutes per form, multiplied by 41 forms per year, and multiplied by 1 year's worth of working hours, which is roughly 2087 working hours.

Communications in extraordinary circumstances when IMO number cannot be obtained:

Labor is considered to be 5 hours per annual response, multiplied by 1 year's worth of working hours, which is roughly 2087 working hours.

The estimated annual cost to the Federal Government to administer this collection of information is estimated to be \$2,347. This includes: (1) the cost of processing (receiving and entering data into database) and issuing WCPFC area endorsements and FEEZ forms and (2) the cost of addressing when a vessel is unable to obtain an IMO number.

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

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	
Foreign EEZ Form	21	21	1	1	2	2	No change
WCPFC Area Endorsement Form	203	202	41	40	41	40	Increase in expected number of troll vessels resulted in change to number of respondents.
Request for IMO Ship Identification Number	2	48	2	48	1	24	Labor increase. Error occurred in ROCIS during the request for a temp collection under 0648-BI79; respondent estimate was not updated to final number.
Total for Collection	226	271	44	89	44	66	
Difference	-45		-45		-22		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Foreign EEZ Form	\$43.82	\$36.63	1	1	Labor increase

WCPFC Area Endorsement Form	\$1,186.74	\$986.60	2091	3070	Increase in expected number of troll vessels resulted in change to number of respondents. Decrease in cost of nonrefundable processing fee.
Request for IMO Ship Identification Number	\$29.23	\$24.42	2	48	Labor increase. Error occurred in ROCIS during the request for a temp collection under 0648-BI79 respondent estimated was not updated to final number.
Total for Collection	1,259.80	1,047.65	2,094	3,119	
Difference	-212.15		-1,025		

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.

As described in Question 2, the data will be made publicly available on the Commission website, along with similar data from other Commission members, in a searchable and downloadable online database. No information collected is specifically intended for formal scientific publication at this time, but it might be used for such purposes by NMFS or other parties. In addition to using the information in its raw format for day-to-day management purposes, NMFS, the USCG, and the Commission may also use the data (primarily in aggregated, summarized, and synthesized format) for informal publications such as technical papers and reports.

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 expiration date for OMB approval of the information collection will be displayed on all forms, except for the form for requesting an IMO number. The form used to collect information necessary to apply for an IMO number is specified by the third-party administrator of the IMO ship number identification scheme, and the information is not collected by NMFS.

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\(b\)\(3\)](#).”