SUPPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION

9000-0194, Public Disclosure of Greenhouse Gas Emissions and Reduction Goals—Representation.

A. JUSTIFICATION

1. Need for the information collection.

FAR Case 2015-024, Public Disclosure of Greenhouse Gas Emissions and Reduction Goals—Representation, adds provision 52.223-ZZ with a new annual representation for vendors to indicate if and where they publicly disclose greenhouse gas emissions and greenhouse gas reduction goals or targets. Public disclosure of greenhouse gas emission management is increasingly becoming standard practice in many industries, because an inventory of this information provides insight into operations, spurs innovation, and helps identify opportunities for efficiency and savings, outcomes which can translate into both environmental and financial benefits. Executive Order 13693, Planning for Federal Sustainability in the Next Decade, March 25, 2015, serves as the legal underpinning for this collection of information, as it prescribes the continuation of the Federal policy that agencies shall increase their efficiency and improve their environmental performance, including the reduction of greenhouse gas emissions across Federal operations and the Federal supply chain.

2. Use of information.

The information on public disclosure of greenhouse gas emissions and reduction goals is collected on an annual basis for inclusion in the annual representations and certifications in the System for Award Management (SAM). This information is used to help the Government assess supplier greenhouse gas management practices and assist agencies in developing strategies to engage with contractors to reduce supply chain emissions, as directed by the executive order.

3. Use of information technology.

Improved information technology is used to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, contractors may submit this information collection requirement electronically. In this instance, the use of information technology is 100 percent.

4. Efforts to identify duplication.

This requirement is being issued under the Federal Acquisition Regulation (FAR), which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication. This collection is not duplicative of any other information required from contractors seeking to do business with the Federal Government.

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

In order to minimize burden on small businesses, the representation is voluntary for vendors that received less than $7.5 million in contracts during the previous Federal fiscal year.

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

The information collected is dynamic in nature, and can vary from year-to-year, as the desire for this public disclosure becomes more prevalent in both the domestic and global marketplace. Without this information from its industry partners, the Federal Government would be unable to fully assess the efficacy of greenhouse gas management practices in the Federal supply chain. However, the information is entered into the SAM representations and certifications, so it only needs to be provided annually or when the information changes. This is the minimum frequency required to keep the information up-to-date.

7. Special circumstances for collection.

The collection is fully consistent with guidelines in 5 CFR 1320.6.

8. Public comments and consultation. –

A notice was published in the *Federal Register* at 81 FR 33192 on May 25, 2016, as part of a proposed rule under FAR Case 2015-024. No public comments were received on the information collection.

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

There were no gifts or payments provided.

10. Describe assurance of confidentiality provided to respondents.

This information is disclosed only to the extent consistent with prudent business practices and current laws and regulations governing confidentiality of information disclosures. The representation required by the new provision will not require the disclosure of personally identifiable information, information that is confidential, or information that is proprietary or considered to be a trade secret.

11. Additional justification for questions of a sensitive nature.

No questions of a sensitive nature are involved.

12 & 13. Estimation of annual public burden hours and labor costs.

The representation in the provision is required for potential Federal contractors who, during the previous Federal fiscal year, received $7.5 million or more in total contract awards. The representation is voluntary for contractors that received less than this amount during the previous Federal fiscal year.

The following estimates pertain to contractors that are either required or volunteer to provide the representation and attendant disclosure in SAM:

- Based on examination of SAM registrants in fiscal year 2015, there are approximately 5,500 respondents that will most likely complete the representation, and of these respondents, approximately 2,700 are considered to be small entities, based on the NAICS code they indicated as their primary NAICS code and other information that can be obtained from SAM.

- The estimated number of responses per respondent is one, based on the fact that the reporting of this information is done one time as part of the SAM representations and certifications. The Government estimates the hourly labor effort to be fifteen minutes (.25 hours) per response for contractors that are either required or voluntarily complete the representation.

- Finally, we used a rate equivalent to a GS-12, Step 3 or $31.74 per hour (from the January 2016 OPM GS Salary Table), and added overhead at 36.25 percent (the OMB-mandated burden rate for A-76 public-private competitions OMB Memorandum M-08-13/March 11, 2008) or $11.51, and then rounded the average hourly rate to the nearest whole dollar, or $43.00 per hour. The estimated cost per response is approximately $10.75.

The following table provides a summary of the Public Burden calculation:

Estimation of Respondent Burden Hours: 52.223-ZZ	
Number of respondents	5,500
Responses per respondent	1
Number of responses	5,500
Hours per response	.25
Estimated Public Burden hours (5,500 X .25 hours per response)	1,375
Cost per hour (hourly wage)	$43.00

Annual public burden cost (estimated hours multiplied by cost per hour)	$59,125.00

There are no respondent costs (capital costs or start-up costs) associated with this information collection, since most contractors are already disclose similar information by virtue of other agency regulations and, due to the fact that such disclosures are becoming a standard industry practice. Likewise, respondents will not incur any additional operation and maintenance expenses resulting from this information collection.

14. Estimated cost to the Government.

To calculate the annual burden hours and costs to be incurred by the Federal Government we used the same estimates used in the Public Burden estimates for number of respondents (5,500) and estimated hourly wage (GS-12/Step 3 hourly rate X OMB mandated burden rate of 36.25 per hour; rounded to the nearest dollar or $43.00 per hour). The estimated amount of time for the Government to review and analyze each response is one hour. The following table summarizes the estimated burden for the Federal Government:

Estimation of Burden/Federal Government: 52.223-ZZ	
Number of responses:	5,500
Hours per response	1
Estimated Public Burden hours (5,500 X 1 hour per response)	5,500
Cost per hour (hourly wage)	$43.00
Annual public burden cost (estimated hours multiplied by cost per hour)	$236,500.00

15. Explain reasons for program changes or adjustments reported in Item 12 or 14.

This is a new information collection requirement, so there are no changes or adjustments.

16. Outline plans for published results of information collections.

Results will not be tabulated or published.

17. Approval not to display expiration date.

Not applicable.

18. Explanation of exception to certification statement.

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

Statistical methods are not used in this information collection.