

SUPPORTING STATEMENT
Shipboard Observation Form for Floating Marine Debris
OMB CONTROL NO. 0648-0644

A. JUSTIFICATION

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

This request is for extension of a currently approved collection.

Resources, funding, and time limitations as well as an increased safety risk all restrict regular at-sea surveys of marine debris. Because of these limitations, marine debris surveys at sea have been conducted as an add-on to other research at sea. These opportunities are typically quite rare. Building on a small-scale project begun by James Callahan (recreational sailor) in Hawaii, there is currently an opportunity to collect additional information needed on debris within areas such as the North Pacific Subtropical High (aka “Great Pacific garbage patch”), other areas of marine debris concentration at sea, potential Japan tsunami debris, and debris from possible future disasters. Information is collected through a partnership between the NOAA Marine Debris Program and non-government organization (NGOs) and recreational sailors who are on the ocean regularly. This survey will assist us in carrying out activities prescribed in the [Marine Debris Act of 2012](#), mainly “identify, determine sources of, assess, prevent, reduce, and remove marine debris and address the adverse impacts of marine debris on the economy of the United States, marine environment, and navigation safety”.

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.

Data collection forms will be distributed each year to recreation sailors during the TransPacificYacht Race and Pacific Cup Race (each takes place every other year with one race going on each year). Additionally, forms will be made available to other recreational sailors as well as NGOs that frequently sail our oceans. The NOAA Marine Debris Program will promote the form at outreach events, presentations, and other outreach opportunities as well as through a project website. Outreach opportunities typically occur two to three times per year.

The collected data and information will be used to better model movement and concentration of the debris, facilitate greater understanding of marine debris and marine debris concentration areas in the open ocean as well as prepare (as needed) for response to debris generated by natural disasters. The data, once collected, will undergo simple analysis (e.g., main debris type seen) and mapping and the results will be posted on the project Web site.

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.

This data collection form is meant to be filled out primarily by hand and can be done electronically if the respondent has the necessary means, such as computer, smartphone, or email access. Related technologies are the collection of latitude and longitude locations for transect lines, typically with a GPS unit. Submission of completed and scanned forms can be via email or facsimile, but is expected to be primarily through mail. The data is displayed at <http://marinedebris.noaa.gov/>.

4. Describe efforts to identify duplication.

There exist other partnership efforts to collect additional information on debris within areas such as the North Pacific Subtropical High (aka “Great Pacific garbage patch”), other areas of marine debris concentration at sea, and potential disaster-related debris. Those efforts are on a smaller scale and currently ongoing, coordinated among the NOAA Marine Debris Program, the NOAA Observer Program and NOAA Office of Marine and Aviation Operations. This effort seeks to partner with a broader range of ocean users (NGOs and recreational sailors).

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

NA.

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

There are no immediate consequences if data is not collected; however the data and information, particularly about debris generated by natural disasters or “severe marine debris generating events”, are integral to coordination for debris deposition and possible additional impacts. Knowledge of likely quantities and types of debris coupled with computer model simulations and predictions of deposition timeframe will help all managers best prepare for arrival (or not) of this debris. Large debris items could pose an economic and environmental hazard as well as potential human health and safety, depending on the type of debris. Smaller items may pose less of a risk; however, they may arrive in larger quantities.

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

NA.

8. Provide information on 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 published on January 24, 2018 (83 FR 3307) solicited public comments. One comment was received from the Marine Mammal Commission indicating that the collection of this data is important to understanding the impact of debris on marine mammals. Respondents and stakeholders were contacted for feedback on the program and information collection, and two responded, both stating overall support for the program.

A US Coast Guard (USCG) District 14 partner felt the form was appropriate and useful, and suggested the form be made into a fillable PDF, which it already is.

A recreational sailing partner suggested that heading changes are rare when conducting visual surveys, it would be good to include spaces to record transect # and height of eye above water, and to suggest an appropriate length of time for observations (30 minutes). NOAA responded to these comments and made revisions to the form.

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

No gifts or payments 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.

Data are combined and names are removed to ensure anonymity. Respondents are made aware of this by a statement on the data collection form.

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.

NA.

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

The number of anticipated respondents and responses each year is 5. These estimates are based mainly on previous annual rates of response. Commercial vessels have historically opted to report debris sightings through means other than this form, and thus are not included in this estimated number of respondents per year. Response frequency is one time per year (based on likelihood of outreach event and/or sailing race) with the average response time per respondent being 30 minutes, based on time necessary to complete the form and mail it back. The total annual response time is **2.5 hours**.

Annualized labor cost to respondents for their time participating in this data collection project is \$58.23, based on the 2015 national volunteer average value of \$23.29/hr. (<http://www.volunteeringinamerica.gov/national>) multiplied by an average of 30 minutes per respondent and 5 expected responses.

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

Total annual cost burden to the respondents is \$0. Respondents will be provided with envelopes with prepaid postage.

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

Total annual cost burden Federal government (materials costs) is approximately \$200/year. This is the cost of waterproof paper and copying of data sheets onto that paper. Time burden through regular labor costs is estimated at \$3,700 per year through contractor support for data processing. Total annual costs: \$3,900.

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

The reduction in expected number of responses is based on the decreased level of interest and amount of Japan tsunami debris in the North Pacific. Commercial vessels have been reporting debris sightings directly to NOAA through disasterdebris@noaa.gov rather than through the use of this form.

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

As data forms come in, they will be scanned and sent to the NOAA Marine Debris Program. Data will then be entered into a simple Microsoft Excel spreadsheet and simple analyses completed (e.g., avg., min, max, graphing). Results will be shown online at <http://marinedebris.noaa.gov/>.

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.

NA.

18. Explain each exception to the certification statement.

NA.