

Supporting Statement for Cargo Securing Manuals

OMB No.: 1625-0122
COLLECTION INSTRUMENTS: Instructions

A. Justification

1. Circumstances that make the collection of information necessary.

a. Cargo Securing Manuals

This data collection is necessary for the approval of cargo securing manuals (CSM) and the notification of hazardous conditions. All vessels subject to 33 CFR 97 must have an approved CSM. As described in 33 CFR 97.100, the applicable vessels within the U.S.-flag fleet are cargo vessels that: 1) are 500 gross tons or more, and 2) carrying cargo other than liquid or solid bulk cargo. The statutory authority for the CSM regulations is 46 U.S.C. 2103 & 3306.

b. Reporting of hazardous conditions

The responsibility to immediately report a hazardous condition is found at 33 CFR 160.216. In 33 CFR 97.115, the loss or jettisoning of any cargo, including a container, is specified as a hazardous condition that meets the notification requirements of 33 CFR 160.216.

2. Purposes of the information collection.

a. Cargo Securing Manuals

CSM are reviewed and approved by organizations specifically authorized by the Coast Guard for this purpose.¹ The vessel's owner, operator, or designated agent submits a CSM directly to an authorized approval organization for review. According to 33 CFR 97.120, the minimum criteria for CSM approved after June 10, 2010 are found in Circular 1353 from the International Maritime Organization's (IMO) Maritime Safety Committee. After its review, the approval organization will provide the submitter either a letter of approval or a letter stating the reasons why the CSM was not approved. The required information may be provided in any format.

b. Reporting of hazardous conditions

Hazardous conditions may exist either onboard a vessel or result from the vessel's operation. When a hazardous condition occurs, the vessel's crew must contact the nearest Coast Guard Sector Office, Marine Inspection Office, or Coast Guard Group Office as soon as safely possible. Information on the event is usually transmitted electronically via VHS radio, cell phone, or satellite phone. The Coast Guard will use this information to initiate a response to the condition. Examples of response activities include, but are not limited to, broadcasting messages to other vessels in the area to warn them of the hazard, providing assistance to the involved vessels and facilities, and activating pollution response plans.

3. Consideration of the use of improved information technology.

a. Cargo Securing Manuals

CSM, approval letters, and disapproval letters can be mailed, faxed or electronically submitted via e-mail to the authorized approval organization. There is no specific CG form that must be completed for the request and the content of a CSM can vary.

Used of electronic documents is specifically authorized in 33 CFR 97.100(c). At this time, we estimate that approximately 100% of the CSM and reply letters are sent electronically.

¹ Per 33 CFR 97.200(a)(2)—The Commandant is responsible for overseeing and managing the review and approval of approval authority applications and provides an up-to-date list of organizations authorized to act under this subpart, which is available at this [LINK](#) or by requesting it in writing from the Commandant and enclosing a self-addressed, stamped envelope.

b. Notification of hazardous conditions

This is an electronic information collection. The information on the hazardous condition is sent from the vessel to the Coast Guard electronically via INMARSAT C, TELEX, e-mail, cell phone, or VHF radio as soon as safely possible.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that 100% of the notifications are sent electronically.

4. Efforts to identify duplication.

a. Cargo Securing Manuals

Information on cargo securing equipment and procedures are specific to each vessel and are not part of the vessel's documentation. The approval process for the cargo securing manual is the only time this detailed information is shared by the vessel's crew and owner/operator. Thus, there are no other sources of this, or similar, information.

b. Notification of hazardous conditions

The notification of hazardous conditions required by 33 CFR 160.216 represents the first time this information is sent from the involved vessel to the Coast Guard. If needed, some of this information may be recorded later on Coast Guard form CG-2692.²

5. Methods to minimize the burden to small businesses if involved.

a. Cargo Securing Manuals

Once approved, the CSM remains valid unless a modification is required. Thus, only the smallest number of information requests are needed to put this rule into effect, thereby minimizing the burden to small businesses.

b. Notification of hazardous conditions

The notification of hazardous conditions only occurs as needed. Therefore, this information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

a. Cargo Securing Manuals

The CSM is required for U.S.-flagged vessels as the U.S. is a signatory nation to the International Convention for Safety of Life at Sea (SOLAS). If the U.S. did not approve CSM it would prevent U.S.-flagged vessels from engaging in international trade and affect the U.S.'s standing with IMO.

Vessels without a CSM would have an increased risk of losing containers and other cargo overboard, which could endanger other vessels and the environment. This would hinder the Coast Guard's missions to promote safe navigation and protect the environment.

b. Notification of hazardous conditions

Hazardous conditions in U.S. ports and waterways pose a threat to commercial vessels, recreation vessels, shore side facilities and the environment. Failure of the involved vessel to report a hazard either onboard the vessel or caused by the vessel would hinder the Coast Guard's missions to promote safe navigation and protect the environment.

7. Special collection circumstances.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation.

² The use of form CG-2692 is covered under OMB Control No. 1625-0001.

A 60-day Notice (See [USCG-2019-0246], April 8, 2019, 84 FR 13939) and 30-Day Notice (June 19, 2019, 84 FR 28569) were published in the *Federal Register* to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Explain any decision to provide payment or gift to respondents.

The Coast Guard does not provide payments or gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- The estimated annual number of respondents is 193.
- The estimated annual number of responses is 193.
- The estimated annual hour burden is 226 hours.
- The estimated annual cost burden is \$20,190.

The burden to respondents is in Appendix A. The wage rates used are in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

a. Cargo Securing Manuals

We estimate that certain U.S.-flag cargo vessels will require a CSM,³ and that each year 10% of these vessels will update a CSM due to new cargo securing systems or equipment. We estimate it will take about 48 hours to develop a new CSM, about 48 hours to update a CSM due to a change in vessel type, and about 20 hours to update a CSM due to a new cargo securing system or equipment, and that the work will be by a marine engineer or naval architect. The position of a marine engineer or naval architect is equivalent to a GS-13.

b. Notification of hazardous conditions

We estimate (historically) that there are 180 notifications of hazardous conditions annually. Additionally, we estimate that there are 4 events involving lost or jettisoned cargo that will require notification to the Coast Guard. We estimate that a vessel Mate will take about 0.25 of an hour to compile the information and transmit it to the Coast Guard. The position of a vessel Mate is equivalent to an Ensign (O-1).

13. Estimates of annualized capital and start-up costs.

There are no capital, start-up or maintenance costs associated with this information collection.

14. Estimates of annualized Federal Government costs.

The estimated annual Federal Government cost is \$15,534 (see Appendix B). The wage rate shown is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

³ A CSM is a one-time event, unless the vessel type is changed.

a. Cargo Securing Manuals

We estimate that it will take GS-13 about 17 hours to review a new or updated CSM submission.

b. Notification of hazardous conditions

We estimate that it will take an E-4 about 0.25 hours to receive and process a notification of hazardous condition or a notification of lost or jettisoned cargo.

15. Explain the reasons for the change in burden.

The change in the burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of respondents. The decrease in burden is also due to the completion of the one-time submission of the CSM by U.S.-flag cargo vessels. There is no proposed change to the reporting requirements of this collection. The reporting requirements, and the methodology for calculating burden, remain unchanged.

16. Plans for tabulation, statistical analysis, and publication.

This information collection will not be published for statistical purposes.

17. Approval to not display expiration date.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

The collection of information does not employ statistical methods.