# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**Shipboard Observation Form for Floating Marine Debris**

**OMB Control No. 0648-0644**

**SUPPORTING STATEMENT PART A**

# Abstract

This is a request for extension of a currently approved information collection. This data collection project will be coordinated by the NOAA Marine Debris Program, under the authority of Marine Debris Act (33 U.S.C. 1951 et seq.) to 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. Information is collected from recreational and commercial vessels, shipboard observers, and nongovernment organizations (NGOs) who are on the ocean regularly, as well as numerous experts on marine debris observations at sea. The Shipboard Observation Form for Floating Marine Debris was created based on methods used in studies of floating marine debris by established researchers, previous shipboard observational studies conducted at sea by NOAA, and the experience and input of recreational sailors. The goal of this form is to be able to report the amount and types of visible, floating marine debris within an area of a water body of a known size. Additionally, this form will help collect data on floating marine debris that could result from future severe marine debris generating events in order to model the movement of the debris as well as prepare (as needed) for debris arrival. This form can be used to collect data on floating marine debris in any water body.

# 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.**

Marine debris is defined as any persistent solid material that is manufactured or processed and directly or indirectly, intentionally or unintentionally, disposed of or abandoned into the marine environment or the Great Lakes. Marine debris is a pervasive global problem that touches every corner of our oceans and Great Lakes. The information collection will assist the NOAA Marine Debris Program to carry out activities prescribed in the [Marine Debris Act](https://marinedebris.noaa.gov/about-our-program/marine-debris-act) (33 U.S.C. § 1951 *et seq),* to “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”. Further, under 33 U.S.C. § 1952(b)(5), NOAA is required to develop interagency plans for the timely response to events determined to be severe marine debris events, including coordinating a cross government response; assessing the composition, volume, and trajectory of marine debris; and estimating the potential impacts including economic impacts, and navigation safety among others.

# 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 data collected by this form will help the federal government model marine debris movement, 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 be utilized by NOAA oceanographic modelers to determine source or trajectory depending upon the event. Examples include running a hindcast model to identify the location, source or pathway of an unusual concentration of floating debris and modeling the trajectory and movement of debris resulting from a severe marine debris event such as a natural disaster that generates large amounts of marine debris.

The Shipboard Observation Form for Floating Marine Debris will facilitate the collection of floating marine debris by recreational and commercial vessels, shipboard observers, and nongovernment organizations (NGOs). Respondents have a choice of either electronic or paper forms. Methods of submission include email of electronic forms, and mail and facsimile transmission of paper forms.

The use of this form will be infrequent, with an estimated 5 respondents. The collection of this information will be situation driven and require the ability to provide the form to respondents in a timely manner.

The information collected may be shared with outside agencies, depending upon the nature of the observations. For example, if data collected indicates potential illegal dumping activity, information may be shared with the United States Coast Guard (USCG). The USCG enforces MARPOL Annex V under the International Convention for the Prevention of Pollution by Ships.

This is an ongoing collection. The purpose initially was to work with a recreational sailor in Hawaii to collect information on floating marine debris in areas of high concentration, such as the North Pacific Subtropical High, and potential debris from the Japan tsunami. The purpose remains to collect information on marine debris from events such as natural disasters or other unusual concentrations of marine debris in the environment.

1. **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.**

This data collection form is meant to be filled out primarily by hand or 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.

1. **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**

There exist other partnership efforts to collect information on debris within areas such as the North Pacific Subtropical High (aka “Great Pacific garbage patch”), and other areas of marine debris concentration at sea. 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) as opportunities arise.

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

This collection is not expected to impact small business or other small entities. Efforts have been taken to ensure that only the minimum amount of information necessary is collected.

1. **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.**

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 landfall and possible additional impacts as required under 33 U.S.C. § 1952.

1. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**

This collection will be conducted in a manner consistent with OMB guidelines.

1. **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.**

A Federal Register Notice published on January 29, 2021 (86 FRN 7540) solicited public comments. No comments were received.

The NOAA Marine Debris Program reached out to previous respondents 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. No comments were received.

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

No gifts or payments will be provided to respondents.

1. **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.**

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

1. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are asked.

1. **Provide estimates of the hour 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. Recreational vessels are most likely to report debris through this form. 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 $68.00, based on the 2020 national volunteer average value of $27.20/hr (<https://independentsector.org/value-of-volunteer-time-2020/>)

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Type of Respondent (e.g., Occupational Title)** | **# of Respondents/year (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)** |
| Shipboard Observation Form for Floating Marine Debris | Recreational boater | 5 | 1 | 5 | .5 | 2.5 | 27.20 | 68.00 |
| **Totals** |  |  |  | **5** |  | **2.5** |  | **68.00** |

1. **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).**

Total annual cost burden to the respondents is $0. Recordkeeping burden is expected to be less than 1 hour per year.

1. **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.**

Total annual cost burden Federal government (labor only) is approximately $100/year. This is the cost of time required for recordkeeping.

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

There are no changes to the information collection since the last OMB approval.

1. **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.**

There are no plans to publish this data.

1. **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 agency plans to display the expiration date for OMB approval of the information collection on all instruments.

1. **Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions."**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).