

**Supporting Statement
Ship's Stores Declaration
1651-0018**

A. 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.**

CBP Form 1303, Ship's Stores Declaration, is used by the carriers to declare articles to be retained on board the vessel, such as sea stores, ship's stores (e.g. alcohol and tobacco products), controlled narcotic drugs or bunker fuel in a format that can be readily audited and checked by CBP. The form was developed as a single international standard ship's stores declaration form to replace the different forms used by various countries for the entrance and clearance of vessels. CBP Form 1303 collects information about the ship, the ports of arrival and departure, and the articles on the ship. This form is provided for by 19 CFR 4.7, 4.7a, 4.81, 4.85 and 4.87 and is accessible at:

<https://www.cbp.gov/newsroom/publications/forms?title=1303&=Apply>

New Change:

This form is anticipated to be submitted electronically as part of the maritime forms automation project through the Vessel Entrance and Clearance System (VECS), which will eliminate the need for any paper submission of any vessel entrance or clearance requirements under the above referenced statutes and regulations. VECS will still collect and maintain the same data, but will automate the capture of data to reduce or eliminate redundancy with other data collected by CBP.

- 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 .**

CBP uses this information to keep control over articles in the ship's stores and make sure the proper amount of revenue is collected. This form also gives carriers a method of declaring articles to be retained on board a vessel.

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by CBP.

- 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 Form 1303 is a declaration of ship's stores that is reviewed by a CBP Officer during vessel boarding or vessel Entry and Clearance processing.

CBP-OFO has built and is internally testing a system, known as the Vessel Entrance and Clearance System (VECS), for the electronic submission, review, and processing of this CBP form. Currently, CBP is developing a public facing portal, with recent DHS and CBP prioritization of VECS, the plan is to have an initial public portal by 2022. A new Account type within ACE for Vessel Agencies will act as the public portal to VECS, operating as the pass-through from ACE to VECS. However, even with an initial portal, CBP will still need to perform testing and run a public pilot with a small universe of stakeholders, before nationwide roll out.

Currently, this form cannot be automated using eNOAD. As eNOAD does not collect all required data elements of CBP Form 1303. CBP does not plan on eliminating the paper Form 1303 until an adequate automated system is in place.

- 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 Item 2 above.**

Fields 1 – 5 may be derived from eNOAD, however, the data elements required for the Form 1303 are unique to each vessel arrival and most fields are not mandatory submission requirements for other government agencies outside of CBP.

The automation of maritime forms, including the 1303, will allow CBP to utilize data transmitted to CBP via eNOAD. The submitted data will be used to pre-populate all forms with shared data elements. However, a new filing would have to be created by eNOAD for the collection of *Place of Storage, Name of Article, and Quantity*; all of which are vital data elements of the CBP Form 1303.

- 5. If the collection of information impacts small businesses or other small**

entities, describe any methods used to minimize burden.

This information collection does not have an impact on small businesses or other small entities.

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

If the collection were collected less frequently, CBP would lose control of inventory for ship's stores, sea stores, bunker coal, etc. Also, failure to collect the information would compromise revenue collection.

7. Explain any special circumstances.

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

8. If applicable, provide a copy and identify the date and page number of publication 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.

Public comments were solicited through two Federal Register notices. A 60-day notice published on June 1, 2022 (87 FR 33179) on which no comments have been received, and a 30-day notice published on September 30, 2022 (87 FR 59447) on which no comments have been received.

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

There is no offer of a monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

This collection is not affected by the Privacy Act and is not impacted by a PIA or SORN. No assurances of confidentiality are 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. 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.

There are no questions of a sensitive nature.

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

INFORMATION COLLECTION	TOTAL ANNUAL BURDEN HOURS	NO. OF RESPONDENTS	NO. OF RESPONSES PER RESPONDENT	TOTAL RESPONSES	TIME PER RESPONSE
CBP Form 1303	47,232	2,624	72	188,928	15 minutes (.25 hours)

Public Cost

The estimated cost to the respondents is \$2,829,669. This is based on the estimated burden hours (47,232) multiplied by the average loaded hourly wage rate for ship and boat captains and operators (\$59.91). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2021 median hourly wage rate for Ship and Boat Captains and Operators (\$38.47), which CBP assumes best represents the wage for ship and boat captains and operators, by the ratio of BLS' average 2021 total compensation to wages and salaries for Transportation and Material Moving occupations (1.4953), the assumed occupational group for brokers, to account for non-salary employee benefits.¹ CBP assumes an annual growth rate of 4.15% based on the prior year's change in the implicit price deflator, published by the Bureau of Economic Analysis.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

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

14. Provide estimates of annualized cost to the Federal Government. Also

¹ Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2021 National Occupational Employment and Wage Estimates United States." Updated March 31, 2022. Available at https://www.bls.gov/oes/current/oes_nat.htm. Accessed May 25, 2022. The total compensation to wages and salaries ratio is equal to the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$32.7725) divided by the calculated average of the 2021 quarterly estimates (shown under Q01, Q02, Q03, Q04) of wages and salaries cost per hour worked for the same occupation category (\$21.9175). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. "ECEC Civilian Workers - 2004 to Present." March 2022. Available at <https://www.bls.gov/web/ecec.supptoc.htm>. Accessed May 25, 2022.

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.

The estimated annual cost to the Federal Government associated with the review of these documents is \$2,130,107. This is based on the number of responses that must be reviewed (188,928) multiplied by the time burden to review and process each response (10 minutes or 0.166 hours) = 31,362 hours multiplied by the average hourly loaded rate for a CBP Officer ($\$67.92$)² = \$2,130,107.

15. Explain the reasons for any program changes or adjustments reported in Items 12 or 13.

There has been an increase in the estimated annual burden hours previously reported for this information collection due to a change in program estimates. The numbers reported reflect current usage of CBP Form 1303. The information being collected will not change; the paper form 1303 is being automated into the Vessel Entrance Clearance System (VECS). The burden will be updated again after VECS implementation, to reflect the burden impact.

16. For collection of information whose results will be published, outline plans for tabulation, and publication.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date, explain the reasons that displaying the expiration date would be inappropriate.

CBP will display the expiration date for OMB approval of this information collection.

18. “Certification for Paperwork Reduction Act Submissions.”

CBP does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

No statistical methods were employed.

² CBP bases this wage on the FY 2022 salary and benefits of the national average of CBP Officer Positions, which is equal to a GS-11, Step 10. Source: Email correspondence with CBP’s Office of Finance on June 27, 2022.

