

Supporting Statement for Cargo Securing Manuals

*OMB No.: 1625-0122
COLLECTION INSTRUMENTS: Instructions*

A. Justification

1. Circumstances that make the collection of information necessary.

This collection is necessary for the approval of cargo securing manuals (CSM). 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 is 46 U.S. Code (U.S.C.) 2103 and 3306. The authority of 46 U.S.C. 2103 is delegated by the Secretary to the Coast Guard via the Department of Homeland Security Delegation No. 0170.1, Revision No. 01.2. (II)(92.a). The authority of 46 U.S.C. 3306 is delegated by the Secretary to the Coast Guard via the Department of Homeland Security Delegation No. 0170.1, Revision No. 01.2. (II) (92.b).

2. Purposes of the information collection.

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.

3. Consideration of the use of improved information technology.

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. Use 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.

4. Efforts to identify duplication.

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 CSM 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.

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

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.

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.

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

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.

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.

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2025-0243]; August 20, 2025, 90 FR 40610) and 30-Day Notice (November 28, 2025, 90 FR 54730) 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 13
- The estimated annual number of responses is 13.
- The estimated annual hour burden is 260 hours.
- The estimated annual cost burden is \$29,120.

The burden to respondents is in Appendix A. We estimate that certain U.S.-flag cargo vessels will require a CSM,² 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. For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Marine Engineers and Naval Architects (17-2121) [May 2024, mean hourly wage, load factor 2.0, and rounded].³

² A CSM is a one-time event, unless the vessel type is changed.

³ <https://data.bls.gov/oes/#/industry/000000> (accessed 06/06/2025).

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 \$19,669 (see Appendix B). We estimate that it takes a Lieutenant (LT, O-3) about 17 hours to review a new or updated CSM submission. The wage rate shown is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of CSM submissions. There is no proposed change to the reporting and recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculation 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.