

**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>

- 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.

- 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 .**

CBP – OFO is working to automate the collection of information required by CBP Form 1303. Upon completion, the trade will be able to provide the data to CBP via a CBP-approved automated system. The CBP electronic Vessel Entrance and Clearance System (eVECS) will allow the trade user to upload data via multiple formats (i.e. note pad, word, excel, etc.) and will eliminate the need to print and sign forms as all data will be collected and stored in an electronic only format. eVECS is close to testing stage, however no estimated date of completion has been established. Currently, this form cannot be automated

using eNOAD. eNOAD does not collect all the required data elements of CBP Form 1303. So for these reasons, 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 including a

60-day notice published on June 5, 2018 (Volume 83, Page 26072) on which one comment was received, and a 30-day notice published on October 2, 2018 (Volume 83, Page 49566) on which one comments have been received.

Comment Receive: June 6, 2018 and October 2, 2018

Commenter: Lake Carriers' Association

Comment: When a U.S.-flag laker enters the United States from a Canadian port, the Master and operator must submit 20 pages of forms to U.S. Customs and Border Protection. Most of the forms, 1303 included, require the Master's or Vessel Agent's signature. This means each form must be filled out on line, printed, signed, and then either scanned or faxed to the appropriate CBP office, where they are then printed again. The process must be streamlined and we can start by retiring Form 1303. There is no information on this form that isn't, or couldn't be, included on a consolidated form that can be submitted online, in conjunction with eNOAD and APHIS, for example

Program Response: OFO is working to automate the collection of information required by CBP Form 1303. Upon completion, the trade will be able to provide the data to CBP via a CBP-approved automated system. The CBP electronic Vessel Entrance and Clearance System (eVECS) will allow the trade user to upload data via multiple formats (i.e. note pad, word, excel, etc.) and will eliminate the need to print and sign forms as all data will collected and stored in an electronic only format. eVECS is close to testing stage, however no estimated date of completion has been established. Currently, this form cannot be automated using eNOAD. eNOAD does not collect all the required data elements of CBP Form 1303. So for these reasons, CBP does not plan on eliminating the paper Form 1303 until an adequate automated system is in place

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	26,000	8,000	13	104,000	15 minutes (.25 hours)

Public Cost

The estimated cost to the respondents is \$1,322,360. This is based on the estimated burden hours (26,000) multiplied by (x) the average loaded hourly wage rate for ship and boat captains and operators (\$50.86). CBP calculated this loaded wage rate by first multiplying the Bureau of Labor Statistics' (BLS) 2017 median hourly wage rate for Ship and Boat Captains and Operators (\$33.14) by the ratio of BLS' average 2017 total compensation to wages and salaries for Transportation and Material Moving occupations (1.5346), the assumed occupational group for ship and boat captains and operators, to account for non-salary employee benefits.^{1,2} This figure is in 2017 U.S. dollars and CBP assumes an annual growth rate of 0 percent; the 2017 U.S. dollar value is equal to the 2018 U.S. dollar value.

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.

1 Source of median wage rate: U.S. Bureau of Labor Statistics. Occupational Employment Statistics, "May 2017 National Occupational Employment and Wage Estimates, United States- Median Hourly Wage by Occupation Code." Updated March 30, 2018. Available at https://www.bls.gov/oes/2017/may/oes_nat.htm. Accessed June 11, 2018.

2 The total compensation to wages and salaries ratio is equal to the calculated average of the 2017 quarterly estimates (shown under Mar., June, Sep., Dec.) of the total compensation cost per hour worked for Transportation and Material Moving occupations (\$29.2075) divided by the calculated average of the 2017 quarterly estimates (shown under Mar., June, Sep., Dec.) of wages and salaries cost per hour worked for the same occupation category (\$19.0325). Source of total compensation to wages and salaries ratio data: U.S. Bureau of Labor Statistics. Employer Costs for Employee Compensation. Employer Costs for Employee Compensation Historical Listing March 2004 – March 2018, "Table 3. Civilian workers, by occupational group: employer costs per hours worked for employee compensation and costs as a percentage of total compensation, 2004-2018 by respondent type." March 2018. Available at <https://www.bls.gov/web/ecec/ececqrtn.pdf>. Accessed June 11, 2018.

- 14. 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.**

The estimated annual cost to the Federal Government associated with the review of these records is \$1,109,902. This is based on the number of responses that must be reviewed (104,000) multiplied by (x) the time burden to review and process each response (10 minutes or .166 hours) = 17,264 hours multiplied by (x) the average hourly loaded rate for other CBP employees (\$64.29)³ = \$1,109,902.

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

There has been no increase or decrease in the estimated annual burden hours previously reported for this information collection.

- 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.

³ CBP bases this wage on the FY 2018 salary and benefits of the national average of other CBP positions, which is equal to a GS-12, Step 8. Source: Email correspondence with CBP's Office of Finance on June 1, 2018.