

**JUSTIFICATION OF CHANGE  
INTERNATIONAL DOLPHIN CONSERVATION PROGRAM  
OMB CONTROL NO. 0648-0387**

The Tuna Tracking & Verification Program (TTVP) intends to request voluntary collaboration with middle, junior, and high schools across the country. Interested science teachers and students will be asked to volunteer to purchase cans and pouches of tuna at their local retail markets and forward the samples (the individual cans or pouches of tuna) to the TTVP. Once the samples are received by the TTVP, the remaining portion of the program's usual spot check audit will be conducted by contacting distributors or manufacturers of these samples to supply documentation (as already described in the approved collection) which supports the dolphin-safe claim found on the product.

It is expected that up to a maximum of 50 schools may participate each year. For each participating school, a science teacher will ask for 1 – 2 students to volunteer to purchase 2 tuna cans or pouches. Information on where the samples were purchased, when, & how much they cost (this is usually found on the included receipt) will also be requested. It will be optional for each school to send photos of the class participation for eventual inclusion on the DolphinSafe.Gov website. The teachers and students will not be reimbursed for their purchases. However, TTVP promotional material may be sent to each participating school, as well as age-appropriate curriculum for use in their class.

**Additional Respondents and Responses**

Although there will probably be no more than 15-25 schools participating per year, we are requesting approval for up to 50 schools. Thus, the maximum number of respondents and responses is 150 (i.e. 50 schools x 2 student respondents/responses per school + 1 teacher respondent/response per school).

**Additional Burden Hours**

Thirty minutes per student respondent x 100 student respondents = 50 estimated annual hours of burden to the public, for tuna purchases.

Thirty minutes per teacher respondent for packaging & shipping samples back to the TTVP x 50 teachers = 25 additional hours estimated annual hours of burden.

50 hours for purchases + 25 hours for shipping = 75 total estimated additional burden hours.

**Additional Total Annual Cost Burden to Respondents**

Two samples per student respondent x \$1.75 per sample = Estimated \$3.50 cost per student respondent.

Fifty schools per year x \$3.50 per student respondent x 2 student respondents per school = Estimated annual maximum cost to the public of \$350.

Note – The shipping costs will be covered by the TTVP; thus it is not included as an additional cost burden to the respondents.

## **Additional Annual Cost to Federal Government**

No additional cost to the Federal Government should be realized. Instead, a substantial cost savings is expected, since the samples were previously collected via travel trips requiring airfare purchase, car rental & gas, and per diem expenses.