

Justification for Change
National Organic Program
OMB No. 0581-0191

February 2013

This **Justification for Change request is to merge 0581-0280 National Organic Program; NOP Import Certificate; Reporting; and Recordkeeping Requirements into the National Organic Program 0581-0191.** Because rulemaking was involved, a new collection was created. Within the rules, supporting statements, and Federal Register Notices, it states that upon OMB approval the collection will be merged into 0581-0191. OMB approval for the 0581-0280 was granted on October 05, 2012, with Terms of Clearance authorizing this merge request for 205 respondents, 4,305 responses, and 1,091 hours be merged into the currently approved 0581-0191.

Upon approval of this request, we will submit a Discontinuation Request to delete 0581-0280 to prevent any duplication.