

**Justification of Change  
Application for Plant Variety Protection Certificate  
and Objective Description of Variety  
OMB No. 0581-0055**

April 2020

The Plant Variety Protection Office (PVPO) information collection burden changes as new applications are received. OMB approved the renewal of this collection on January 28, 2019, and we stated in the supporting statement that when new crops are introduced, AMS would submit the burden increase since the same general form is used for all crops. PVPO is submitting this request to add eight new crops (Chickpea, Gomphrena, Hornbeam, Tilia, Blackberry, Raspberry, Dragon Fruit, and Nightshade) to the Exhibit C: Objective Description of Variety and will use the same ST470 form currently approved.

AMS is requesting the responses be increased by 1,173 for a total of 3,212 responses; and the burden hours increased by 1,488 for a total of 3,570 burden hours for these new crops added to the currently approved collection. Please review the AMS-71 spreadsheet for the number of respondents/responses per response time and burden hours to be added for these eight new crops. This information is needed in order to ensure that enough information is collected for the examination of a new seed variety.

New crops listed under the Objective Description of Variety:

<b>Objective Description of a Variety</b>	<b>New Form #</b>	<b>Burden Hours</b>
Raspberry	ST470-138	2
Dragon Fruit	ST470-140	1.75
Tilia	ST470-141	1.75
Hornbeam	ST470-142	1.5
Blackberry	ST470-144	2
Chickpea	ST470-146	1.5
Gomphrena	ST470-148	2.5
Nightshade	ST470-149	1.5

For each crop there are potentially 10 new Respondents each submitting 4.8817 applications. It takes various burden hours (see above) per application. These new crop additions will increase our burden as follows:

	Total Annual Responses	Total Hours
Current 0581-0055 (Approved 3/19/19)	2,039	2,082
New or Added	1,171.62	1487.95
<b>New Combined 0581-0055</b>	<b>3,211.62</b>	<b>3,569.95</b>