



MARINE MAMMAL COMMISSION

14 December 2015

Ms. Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Amendment Application No. 16193
(Todd Robeck, D.V.M., Ph.D.,
SeaWorld Parks and Entertainment Corp)

Dear Ms. Harrison:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Robeck is seeking to amend permit 15510 that authorizes him to import, receive, possess, and export samples from 14 species of marine mammals—the permit expires on 31 August 2017.

Dr. Robeck is authorized to import, receive, possess, and export an unlimited number of samples¹ from up to 40 dead² and 20 captive³ individuals of numerous marine mammal species per year (see the take table). All age classes and both sexes could be sampled. The objectives of the proposed research are to continue (1) studying reproductive physiology of marine mammals including endocrinology, gamete biology, and cryophysiology and (2) developing assisted reproductive technologies to enhance the genetic diversity of captive populations or to store reproductive samples in case of catastrophic loss of wild populations.

In collaboration with The Federal Institute of Education, Science, and Technologies of the Amazon in Brazil, Dr. Robeck is proposing to include importing, receiving, possessing, and exporting an unlimited number of samples⁴ from up to 300 wild Amazon River dolphins per year to investigate various reproductive and metabolic hormones. The Commission believes that the proposed amendment is consistent with the purposes and policies of the MMPA and therefore recommends that the National Marine Fisheries Service issue the permit amendment, provided that the current permit conditions remain in effect.

¹ Including but not limited to blood, urine, feces, teeth, blubber, skin, saliva, ocular and nasal secretions, and reproductive organs, cells and fluids.

² From legal subsistence hunts, fisheries interactions, dead animals at sea, or beachcast animals.

³ From rehabilitation facilities and oceanaria.

⁴ Including serum, saliva, feces, and urine previously collected during a health assessment program sponsored by the Brazilian Government.

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Please contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a large initial "R" and a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.
Executive Director