



# MARINE MAMMAL COMMISSION

11 June 2012

Mr. P. Michael Payne, Chief  
Permits and Conservation Division  
Office of Protected Resources  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910-3225

Re: Permit Application No. 16580  
(Shannon Atkinson, Ph.D.,  
University of Alaska Fairbanks)

Dear Mr. Payne:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act. Dr. Atkinson is requesting authorization to receive, import, and export samples from unidentified cetaceans and pinnipeds for purposes of scientific research and education during a five-year period.

## RECOMMENDATIONS

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit but—

- require Dr. Atkinson to (1) provide documentation sufficient to demonstrate that each sample to be imported was taken in accordance with the laws of the country of origin and was not taken in violation of the Marine Mammal Protection Act or other applicable U.S. laws and (2) maintain detailed records indicating the source of each specimen, the circumstances under which it was collected, and the researchers and associated institutions that receive the samples; and
- advise Dr. Atkinson of the need to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing or exporting any marine mammal part.

## RATIONALE

Dr. Atkinson proposes to receive, import, and export tissue samples from all age classes and both sexes of up to 1,000 each of unidentified cetaceans and unidentified pinnipeds on an opportunistic basis. The objectives of the proposed research are to (1) define mechanisms that control marine mammal physiology and (2) promote marine mammal conservation and management through an education and outreach program (i.e., DEM BONES) that allows students to dissect and re-articulate marine mammals. Dr. Atkinson proposes to obtain samples from permitted federal, state, and academic institutions including from captive animals; permitted researchers; legal

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subsistence hunts; fisheries interactions; and animals in foreign countries that were collected legally within that country. She is not requesting permission to obtain samples from stranded animals.

Dr. Atkinson would import, possess, and export samples that include but are not limited to, blood, urine, feces, saliva, milk, hair, blubber, muscle, and tears. She would store the samples until various assays for reproductive hormones, metabolic hormones, stress hormones, and chemical messengers are conducted. Her laboratory also can analyze the samples for non-essential fatty acids, heat shock proteins, moisture content, nutritional components/content and metabolic indices. In some instances, Dr. Atkinson would store the samples for extended periods of time because the permitted collector may have inadequate storage facilities or funding to analyze the samples immediately. In addition, she may export samples worldwide for archiving or analysis.

For her education and outreach program, Dr. Atkinson would import and possess marine mammal carcasses to be dissected and skeletons to be re-articulated by middle school, high school, or college students. Data obtained from those carcasses (e.g., photographs, morphometric measurements, or physical/skeletal anomalies) would be available to carcass donors, federal and state agencies, and any other collaborating researcher. The re-articulated skeletons (with the appropriate tags and accompanying documentation) may be loaned to schools participating in her program, the University of Alaska, or any other facility approved by the Service's regional office.

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit but require Dr. Atkinson to (1) provide documentation sufficient to demonstrate that each sample to be imported was taken in accordance with the laws of the country of origin and was not taken in violation of the Marine Mammal Protection Act or other applicable U.S. laws and (2) maintain detailed records indicating the source of each specimen, the circumstances under which it was collected, and the researchers and associated institutions that receive the samples. In addition, the Marine Mammal Commission recommends that the National Marine Fisheries Service advise Dr. Atkinson of the need to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing or exporting any marine mammal part.

The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the Marine Mammal Protection Act.

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

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Timothy J. Ragen, Ph.D.  
Executive Director