



# MARINE MAMMAL COMMISSION

26 April 2012

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

Re: Permit Application No. 17217  
(Saint Louis Zoo)

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. Saint Louis Zoo is requesting to import four harbor seals from Canada.

## **RECOMMENDATION**

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit provided that the Service, in consultation with the Animal and Plant Health Inspection Service, is satisfied that the applicant's plans and facilities for transporting and maintaining the animals meet the requirements established under the Animal Welfare Act and are adequate to provide for the animals' health and well-being.

## **RATIONALE**

Saint Louis Zoo is requesting authorization to import four female captive harbor seals from Storybrook Gardens in London, Ontario, Canada, in May 2012 for public display purposes. The seals were born in captivity in Canada and have been maintained in full compliance with Canadian federal and Ontario provincial laws. Unfortunately, Storybrook Gardens does not have the funding to repair its seal exhibit, which needs extensive work. Saint Louis Zoo has agreed to import and maintain the seals in its pinniped exhibit. The Zoo (1) is open to the public on a regularly scheduled basis with access that is not limited or restricted other than by charging an admission fee, (2) offers an educational program based on professionally recognized standards, and (3) holds Exhibitor's License 43-C-0032, issued by the U.S. Department of Agriculture under the Animal Welfare Act. The attending veterinarians from both facilities have certified that animal care during all stages of the import would be adequate to ensure the well-being of the seals and all International Air Transport Association requirements would be met or exceeded.

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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 this recommendation.

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

cc: Barbara Kohn, D.V.M.