



# MARINE MAMMAL COMMISSION

2 September 2020

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 Application No. 23644  
(Iain Kerr, Ph.D.,  
Ocean Alliance)

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 application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Kerr is proposing to conduct research on cetaceans in the Pacific and Atlantic Oceans during a five-year period—similar activities were authorized under permit 18636.

Dr. Kerr proposes to conduct year-round research on cetaceans in U.S. waters and on the high seas in the Pacific and Atlantic Oceans, including the Gulf of Mexico and Caribbean Sea. The purpose of the research is to investigate the effects of organic pollutants, metals, and microplastics on cetaceans, and to study the (1) abundance, (2) distribution and habitat use, and (3) demographics of various cetacean species. Researchers would be authorized to harass, observe, sample<sup>1</sup>, videotape/photograph<sup>2</sup>, conduct photogrammetry on, and acoustically record numerous individuals of various age classes and sexes of numerous cetacean species (see the application and take tables for specifics). Samples could also be imported<sup>3</sup> or exported. Researchers would use specified measures to minimize impacts on marine mammals and be required to abide by the National Marine Fisheries Service's (NMFS) standard permit conditions. Dr. Kerr's Institutional Animal Care and Use Committee has reviewed and approved the proposed research protocols.

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<sup>1</sup> Including biopsy samples, exhaled air, sloughed skin, and feces.

<sup>2</sup> Including the use of unmanned aircraft systems.

<sup>3</sup> Including samples from live and dead southern right whales obtained in South America.

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The Commission understands that NMFS would also require Dr. Kerr to abide by permit conditions specific to Gulf of Mexico Bryde's whales<sup>4</sup>. Therefore, the Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that NMFS issue the permit, as proposed. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



Peter O. Thomas, Ph.D.,  
Executive Director

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<sup>4</sup> Including obtaining annual authorization to conduct research activities on the species.