



MARINE MAMMAL COMMISSION

24 June 2025

Mr. Drew Crane, Deputy Assistant Regional Director
Ecological Services
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503-6199

Re: Permit Application No. 14048379
(Emily Puckett, Ph.D.,
University of Memphis)

Dear Mr. Crane:

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 (MMPA). Dr. Puckett proposed to import, export, and receive polar bear parts¹ for research. Samples could originate from wild-captured polar bears in Canada and captive polar bears in Canada and the United States. The purpose of the research is to investigate traits that enabled polar bear adaptation to the Arctic environment.

The application stated that the researchers are not collecting samples themselves and instead are relying on (1) permitted researchers handling and sampling wild bears in Canada and (2) zoo-housed bears sampled by veterinarians in the United States and Canada. Attending veterinarians would collect samples from captive bears that are already under anesthesia for routine health checks. Fish and Wildlife Service's (FWS) implementing regulations (50 C.F.R. § 18) do not allow exemptions for taking during routine husbandry procedures for research purposes, as is allowed under the National Marine Fisheries Service's (NMFS) implementing regulations². As such, it is unclear whether the U.S. zoos are currently authorized to collect samples from captive bears for the proposed purposes. As stated in the application, the bears would not be anesthetized specifically for sample collection, however, the collection of samples for research purposes, even if bears are already anesthetized, must be authorized. The Commission recommends that FWS authorize the collection of samples from captive bears in the United States under a research permit³ and ensure that sample collection from captive bears at the Toronto Zoo was appropriately authorized consistent with Canadian laws prior to authorizing the importation of those samples.

¹ Including plucked or shed hair and three 5-mm skin biopsies per bear.

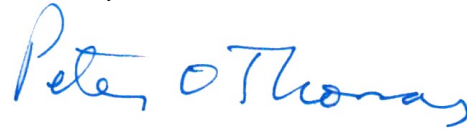
² NMFS's implementing regulations specify that intrusive research must be authorized under a scientific research permit, unless conducted on captive animals by an attending veterinarian for purposes of animal husbandry, care, maintenance, or treatment or during routine medical procedures that are unlikely to affect the health or welfare of the animal (50 C.F.R. § 216.3).

³ Including under this permit, if issued, once sample collection methods and qualified co-investigators are added to the application.

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The Commission believes that the proposed importation and exportation of samples from wild polar bears meet the requirements of the MMPA. Please contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas". The signature is written in a cursive, flowing style.

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