



MARINE MAMMAL COMMISSION

15 May 2026

Mr. Trevor Spradlin, Supervisor
Directed Take Program
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. 29313
(Michelle Shero, Ph.D.,
Woods Hole Oceanographic Institution)

Dear Mr. Spradlin:

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. Shero proposed to conduct research on Weddell seals in the Ross Sea during a 10-year period.

The purpose of the research is to investigate (1) energy dynamics, (2) dive behavior, (3) genetics, and (4) health of Weddell seals to understand the mechanisms underlying reproductive rates of female seals. Dr. Shero would harass, observe, photograph/videotape¹, handle, restrain, measure/weigh, conduct ultrasound and photogrammetry on, mark, sample, and instrument Weddell seal pups of either sex and adult females. Dr. Shero requested up to five adult and five pup unintentional or intentional² mortalities per year, not to exceed 15 total mortalities during the 10-year period. Dr. Shero's Institutional Animal Care and Use Committee will review and approve all research protocols prior to conducting any field work.

Personnel qualifications

According to the application, Dr. Allen would be authorized to conduct all research activities, except UAS piloting and transrectal ultrasound. Dr. Allen's qualifications form (QF) described her experience conducting various procedures under the supervision of an expert, including capture and handling, administering intravenous and subcutaneous drugs, invasive sampling, and flipper tagging. Her QF, however, did not describe any experience sedating or anesthetizing animals, unlike the other personnel who included their experience with anesthesia (injectable sedative) in addition to administering intravenous and subcutaneous drugs. The Commission recommends that the National Marine Fisheries Service refrain from authorizing Dr.

¹ Including using unmanned aerial systems (UAS).

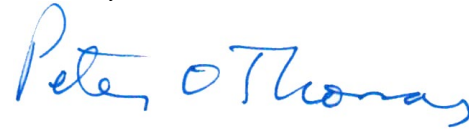
² Via euthanasia for humaneness purposes.

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Allen to sedate Weddell seals until she has received sufficient training and has sedated animals under supervision.

The Commission believes that the proposed activities are consistent with the purposes and policies 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 style with a large initial "P" and "T".

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