



# MARINE MAMMAL COMMISSION

24 September 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. 17410  
(Alaska Department of Fish and Game)

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. The Alaska Department of Fish and Game is requesting authorization to collect, receive, import, and export samples from up to 26 species of cetaceans or pinnipeds for purposes of scientific research during a five-year period. It is seeking to renew permit 10091.

## RECOMMENDATION

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit but require the Department 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 and the circumstances under which it was collected.

## RATIONALE

The Department proposes to collect, receive, import, and export an unlimited number of samples from all age classes and both sexes of numerous species of cetaceans and pinnipeds on an opportunistic basis (see take table). The objectives of the proposed research are to continue a long-term study of population status, stock structure, productivity, mortality, and overall health of marine mammals in waters off Alaska. The Department proposes to obtain samples from stranded animals, live-captured animals taken by other permitted researchers, legal subsistence hunts, fisheries interactions, and animals in foreign countries that were collected legally within that country (i.e., primarily from Canada and Russia).

The Department would collect, receive, import, and export samples that include but are not limited to the following: teeth, baleen, vibrissae, claws, bone, earplugs, tympanic bullae, ear ossicles, eyes, blood, muscle, skin, blubber, internal organs and tissues (including reproductive organs and mammary glands), milk or colostrum, fetuses, internal and external parasites, swabs, stomach and

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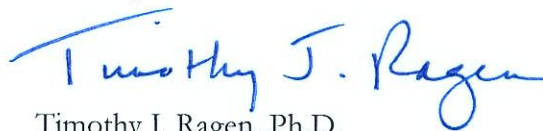
intestine contents, feces, urine, flippers, fins, flukes, heads and skulls, and entire carcasses. Researchers would archive the samples at the Department and at the University of Alaska Museum. In addition, the Department may export samples worldwide for various analyses.

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit but require the Department 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.

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 recommendation.

Sincerely,



Timothy J. Ragen, Ph.D.  
Executive Director