



# Marine Mammal Commission

An independent agency of the U.S. Government

## Performance and Accountability Report

Fiscal Year 2025



Credit: Christian Miller/Ocean Alliance | NMFS Permit 23644-03

November 2025

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8 December 2025

### Message from the Chair

With this letter, I submit the Commission's Fiscal Year 2025 (FY 2025) Performance and Accountability Report, including financial and program performance results. The performance data in this report are complete and reliable and there are no material inadequacies. Prior to preparation of the report, the Commission evaluated its management controls and financial management system pursuant to the Federal Managers' Financial Integrity Act of 1982. No material weaknesses were identified and the financial management system conforms to government financial system requirements. In accordance with OMB Circular 123, Appendix C, no improper payments were made. An independent, certified public accountant audited the Commission's financial statements, internal controls, and management systems and verified that they conform to generally accepted accounting principles, laws, regulations, and requirements.

The Commission's work is guided by its Strategic Plan, which helps the agency focus its attention on the most pressing issues pertaining to marine mammals and their environments.

On behalf of the Marine Mammal Commission, I am pleased to submit this FY 2025 Performance and Accountability Report to the Office of Management and Budget.

Respectfully,

A handwritten signature in black ink that reads "F Gulland".

Frances M.D. Gulland, Vet. M.B. Ph.D.  
Chair

The Marine Mammal Commission’s Performance and Accountability Report consists of two elements: 1) the Management Discussion and Analysis, presented here, and 2) the Financial Audit Report and Financial Statement provided in a separate document.

## Management’s Discussion and Analysis

### The Mission of the Marine Mammal Commission

The Marine Mammal Commission (Commission) is an independent federal agency established by the Marine Mammal Protection Act of 1972 (MMPA) to further the conservation of marine mammals and their environment. The Commission’s work is directed at restoring and maintaining global marine mammal populations as significant functioning elements of healthy marine ecosystems for future generations, with human activities managed to minimize impacts on those populations and ecosystems. The Commission provides independent, science-based oversight of domestic and international policies and actions, thereby promoting effective implementation of the MMPA and its goals of protecting and conserving marine mammals and their habitat. This promotes consistency with the MMPA and other relevant mandates to protect and conserve marine mammals. Our role is unique—we are the only U.S. government agency that provides comprehensive oversight of science, policy, and management actions affecting all species of marine mammals. To learn more about us and what we do [please visit our website](#)<sup>1</sup>.

### Commission Structure

Title II of the MMPA created the Commission as an independent agency of the Executive Branch. The Commission consists of three members appointed by the President with the advice and consent of the Senate. The Commission is assisted by a nine-member Committee of Scientific Advisors on Marine Mammals (Committee) and a full-time staff of 12, which includes the Commission’s Executive Director. A Special Advisor on Native Affairs serves the Commission under contract.

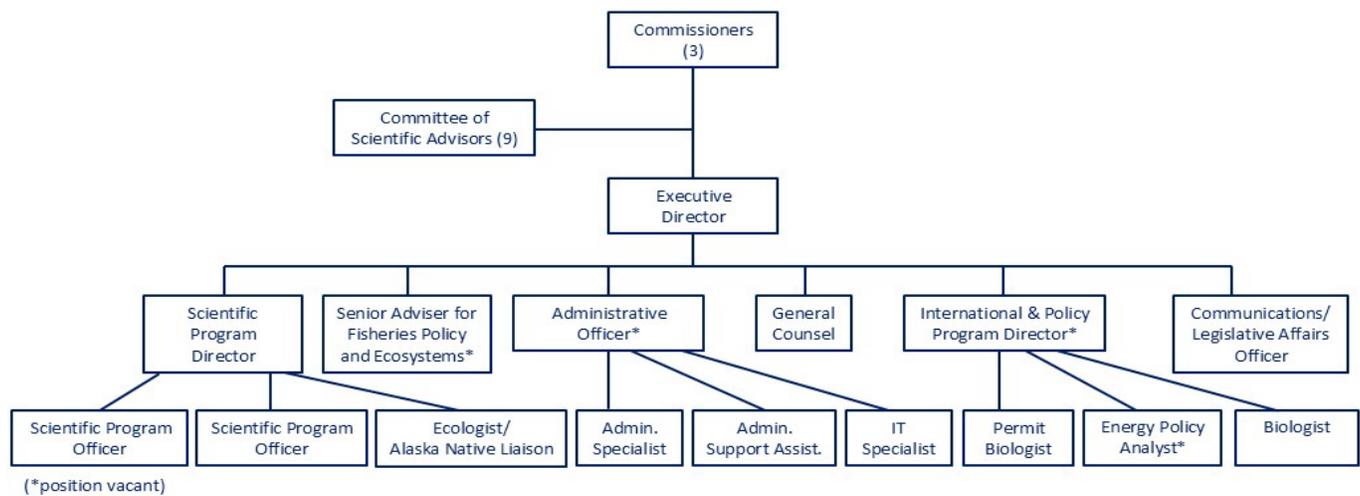


Figure 1. Organizational Structure of the Marine Mammal Commission

<sup>1</sup> <https://www.mmc.gov/about-the-commission/our-mission/>

## Financial Analysis: Overview of Commission Finances in FY 2025

The Marine Mammal Commission’s electronic financial systems are maintained by the General Services Administration (GSA), External Services Branch.

The Marine Mammal Commission complies with applicable federal financial laws, including the Antideficiency Act. The Administrative Officer has received appropriations law training and confers with the Executive Director and General Counsel to ensure that the agency remains in compliance.

### Annual Appropriations and Distribution of Funds

Congressional appropriations are the only source of funding for the Commission. The Commission used its FY 2025 appropriation to meet its general oversight responsibilities as mandated by the MMPA. Total annual appropriations for the Commission from FY 2021 to 2025 are listed in Table 1. In FY 2025, the Commission’s appropriation was \$4,500,000.

Approximately 67 percent of the Commission’s appropriation was used for salaries and benefits (including salaries for Commissioners and non-federal advisory Committee members, see Commission

Structure above), 19 percent for rent, administration, and communications, 10 percent to fund the Commission’s Scientific Program and research grants, and 4 percent for travel (Fig. 2).

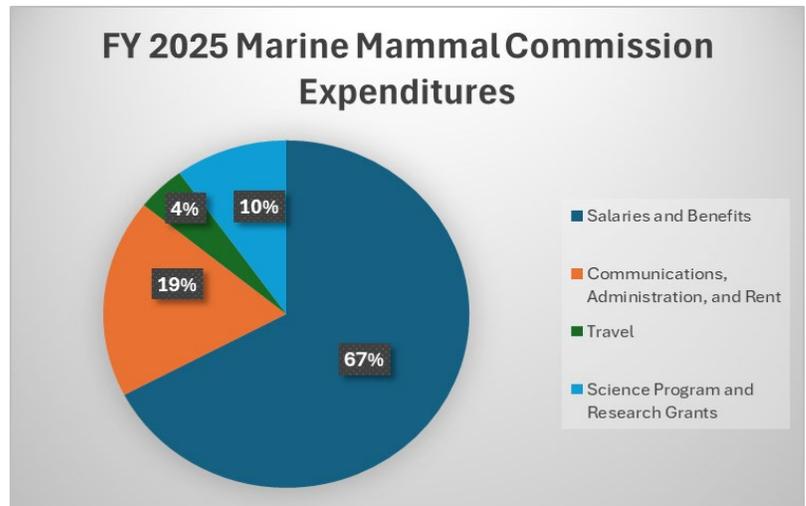
**Table 1. Annual Appropriations for the Marine Mammal Commission, FY 2021 to 2025**

Fiscal Year	Appropriation
2021	\$3,769,000
2022	\$4,200,000
2023	\$4,500,000
2024	\$4,500,000
2025	\$4,500,000

### Management of Commission Finances

The Executive Director oversees and assumes responsibility for all financial transactions. The Administrative Officer manages and is responsible for all day-to-day budgetary matters, including issuing purchase orders, processing time cards, and overseeing invoice payments. An Administrative Assistant processes all paperwork related to invoices and travel expenses and assists the Administrative Officer in day-to-day management of the Commission’s budget. A Scientific Program Officer oversees all day-to-day fiscal transactions related to Commission-sponsored research. The Executive Director

works with a team of senior staff to address key issues, including budget planning and management of the Commission’s finances. An independent, certified public accountant examined all financial systems and controls and completed a comprehensive audit for FY 2025. The audit found no material internal weaknesses in financial systems and controls. The audit report concluded that the Commission’s financial statements are presented fairly and in accordance with generally accepted U.S. accounting principles. The financial statements for the Commission are included in the audit report.



**Figure 2. Distribution of Funds Appropriated to the Commission for FY 2025**



8 December 2025

### **Analysis of Systems, Controls, and Legal Compliance**

The Marine Mammal Commissioners and senior staff are responsible for managing risks and maintaining effective internal control to meet the objectives of Sections 2 and 4 of the Federal Managers' Financial Integrity Act. The Marine Mammal Commission conducted its assessment of risk and internal control in accordance with OMB Circular No. A-123, Management's Responsibility for Enterprise Risk Management and Internal Control. Based on the results of the assessment, the Agency can provide reasonable assurance that internal control over operations, reporting, and compliance was operating effectively as of September 30, 2025.

Respectfully,

A handwritten signature in black ink that reads "F Gulland". The signature is written in a cursive, flowing style.

Frances M.D. Gulland, Vet. M.B. Ph.D.  
Chair

## Performance Goals and Results: Commission Accomplishments in FY 2025

The work performed by the Commission is centered around the five strategic goals set forth in the Commission's [Strategic Plan](#)<sup>2</sup>. Below is a summary of accomplishments for FY 2025 under each strategic goal.

### Provide Policy and Legal Oversight

- **Regulatory Agency Relationships:** In FY 2025, the Commission worked proactively with relevant regulatory agencies to assist them in addressing emerging or ongoing marine mammal conservation issues. It also worked with those agencies to help streamline regulatory processes. The other federal agencies with which the Commission engaged most frequently in its oversight role were the National Marine Fisheries Service (NMFS), National Ocean Service (NOS), U.S. Fish and Wildlife Service (FWS), Bureau of Ocean Energy Management (BOEM), U.S. Coast Guard (USCG), Department of State, and Navy. It also engaged frequently with state agencies and coastal Native American Tribes and Organizations, particularly Alaska Native Organizations.
- **Implementation of the MMPA:** The Commission worked with agencies by advocating for faithful and effective implementation of the MMPA and fostering a science-based, fully-informed regulatory process that adheres to Congressional directives and considers relevant stakeholder views. For example, the Commission reviewed and commented on proposed incidental take authorizations and associated National Environmental Policy Act (NEPA) documents to assess potential impacts on marine mammals and identify appropriate mitigation measures for inclusion in those authorizations. The Commission also reviewed and commented on permit applications submitted under the MMPA, including all scientific research permit applications, to ensure that the proposed research is *bona fide* and the taking of marine mammals is humane. Further, the Commission made recommendations concerning statutory requirements relating to reducing mortality and serious injury of marine mammals incidental to commercial fisheries and the preparation of stock assessment reports required by the MMPA.
- **Science-Based Recommendations:** The Commission worked with other federal agencies to identify and support critical research that promotes well-informed decisions concerning marine mammal programs, including those designed to reduce potential threats from interactions with fisheries, offshore energy development, and other coastal and offshore activities. For example, the Commission reviewed offshore energy leasing and construction plans in Alaska and proposed take of marine mammals incidental to training and testing activities for the U.S. Navy.

### Improve Population Assessment and Health Surveillance

- **Marine Mammal Stock Assessments:** The Commission reviewed and evaluated all aspects of stock assessments relating to the status of marine mammal populations (hereafter, stocks), pursuant to section 117 of the MMPA. This included reviewing draft stock assessment reports, participating in regional scientific review group meetings, and developing strategic

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<sup>2</sup> <https://www.mmc.gov/wp-content/uploads/Marine-Mammal-Commission-FY22-26-Strategic-Plan.pdf>

recommendations or plans in collaboration with other agencies to improve the information used to meet section 117 requirements. In a letter to NMFS, the Commission encouraged the agency to increase its efforts to incorporate emerging technologies that can help address the insufficiency of basic stock assessment metrics required under MMPA section 117. These basic metrics, a minimum population estimate and an estimate of human-caused mortality and serious injury, are not available for approximately one third of marine mammal stocks under NMFS jurisdiction. In addition, at its August 2025 Annual Meeting, the Commission brought together leading researchers from NMFS, USFWS, academia and non-governmental organizations who are on the cutting edge of technology development to discuss how emerging technologies can be applied to improve efficiency and support innovation for marine mammal stock assessments.

- **Considering the Cumulative Effects of Multiple Stressors:** Marine mammals are exposed to multiple stressors that are a consequence of human activities (e.g., fisheries, interactions with vessels, or underwater noise) and environmental drivers (e.g., changing ocean temperatures or harmful algal blooms). These multiple environmental and anthropogenic stressors can interact in unpredictable ways. In FY 2025, Commission scientists have continued to pursue and support research, and development of tools and technologies, to identify, understand, and mitigate the impacts of multiple stressors on marine mammals. New developments were presented at the Commission's 2025 Annual Meeting and the Commission collaborated with the field's leading experts to publish a peer-reviewed paper on new analytical approaches for understanding the combined effects of multiple stressors.
- **Marine Mammal Health Monitoring and Analysis Platform (or Health MAP):** In FY 2025, the Commission advised NMFS and regional stakeholders on the development of Health MAP, a platform designed to maximize the availability and use of marine mammal health information and integrate that information with other ocean observing systems. The Health MAP platform will provide the public, scientists, and resource managers rapid access to marine mammal health information and support efforts to detect and communicate potential public and animal health risks arising in a changing ocean environment.
- **Restoration Efforts in the Gulf:** The Commission has engaged at many levels to further efforts to restore Gulf marine mammal populations impacted by the *Deepwater Horizon* (DWH) oil spill. In 2025, the Commission participated in an expert elicitation focused on quantifying benefits from planned restoration projects for offshore cetaceans, as well workshops focused on identifying possible measures to reduce adverse effects on coastal dolphins from proposed large-scale coastal restoration or development projects. The Commission also served as a technical advisor for a restoration project that is using passive acoustic monitoring devices throughout the Gulf, including in Mexican waters, to monitor movements of large whales, including Rice's whales.

- **Marine Mammal Unusual Mortality Events:**

The Commission served with other federal partners on the Working Group for Marine Mammal Unusual Mortality Events (UMEs). Recent marine mammal UMEs highlight the need to monitor marine mammal health and integrate that information into interagency efforts to promote a One Health approach to wildlife disease surveillance, which recognizes interactions among animal health, human health, and the environment. The need for a One Health approach is



*Gray seal (Marine Mammals of Maine).*

exemplified by the global spread of highly pathogenic avian influenza, H5N1, which killed thousands of marine mammals in South America in 2023 and 2024, has been detected sporadically in carcasses of seals and dolphins in the U.S. in 2024 and 2025, and has potential to cause pandemics in humans. The Commission continues to promote collection and inclusion of marine mammal data as the One Health approach to ocean conservation is developed. The ongoing UME of North Atlantic right whales off the east coast of the United States is of grave concern due to the critically small size of this population, the continuing threat of fishing gear entanglement and vessel strikes, and the slow pace of establishing additional regulatory measures to mitigate these threats (see below).

### **Assess and Address Threats Facing Marine Mammals**

- **Fisheries Interactions:** During FY 2025, the Commission worked closely with federal and state agencies, fishermen, scientists, and representatives from conservation organizations to identify and implement measures designed to reduce mortalities and serious injuries of marine mammals incidental to commercial fishing operations. The Commission is an active participant on all eight Take Reduction Teams established by NMFS and has provided recommendations on actions and policies designed to reduce marine mammal deaths and serious injuries from fisheries to the levels mandated by the MMPA.
- **North Atlantic Right Whales:** Entanglement in pot/trap fishing gear and vessel strikes are the two gravest threats to the survival and recovery of the critically endangered North Atlantic right whale. The ongoing North Atlantic Right Whale UME (2017-present) involves 167 whales to-date, including 41 confirmed dead, 39 seriously injured, and 87 whales injured or in poor health. These totals include 25 confirmed human-caused whale deaths since 2017, 10 from entanglement and 15 from vessel strikes. In addition, 107 human-caused injuries to right whales have been recorded in that period -- 95 attributed to entanglement in fishing gear and 12 caused by vessel strikes -- with 36 of those injuries serious enough that the whale has died or is expected to die as a result. Eleven right whale calves were born during the 2025 calving season, giving hope for eventual recovery, but the species' abundance remains precariously low, with fewer than 400 individuals remaining in the population. The Commission remains committed to preventing the extinction of the North Atlantic right whale and promoting its recovery. In FY 2025, the Commission participated in webinars to address threats to the species from fisheries and participated in the work of the Atlantic Large Whale Take Reduction Team, supported efforts to transition to whale-safe ropeless gear, and provided advice to Congress on needed measures and funding priorities. The

Commission advocated for technologies capable of detecting whales from space and reducing the risk of vessel strikes.

- **International Efforts to Conserve other Endangered Marine Mammals:** The Commission participated as an active partner with the U.S. and Mexican governments and international non-governmental organizations in efforts to prevent extinction of the vaquita a small porpoise endemic to the Upper Gulf of California in Mexico. In addition, the Commission worked with an international team to address threats to Mekong River dolphins in Cambodia and is a member of the Arabian Sea Whale Network, working to conserve humpback and other whale species in that area. The Commission assisted in building international awareness of threats to particular marine mammals and supplying expert technical assistance through its work with the IWC Scientific Committee, the International Union for the Conservation of Nature’s Cetacean Specialist Group, the Rare Pinniped Conservation Network (RAPCON), the Global Stranding Network and other international and national bodies. The Commission also directed grant funds to support international projects directed at conserving species of concern.



A critically endangered vaquita mother and calf alongside an illegal gillnet fishing boat in October 2019 (CONANP/Museo de la Ballena/Sea Shepherd).

- **Southern Resident Killer Whales:** The Commission continued to monitor the status of Southern Resident killer whales, providing advice on the ecological links between this endangered and declining killer whale population and the availability of their preferred prey, Chinook salmon, and on efforts to conduct health assessments of these whales. The Commission continued to promote the restoration of key salmon populations, protection of critical Southern Resident killer whale foraging grounds, and mitigation of disturbance from vessels.
- **Sea Otters:** The Commission tracked proposals to expand the range of sea otters on the West Coast through translocation and engaged with FWS following the release of that agency’s “Feasibility Assessment: Sea Otter Reintroduction to the Pacific Coast” mandated by the Consolidated Appropriation Act for 2021. The Commission supports further consideration of such proposals and related research on sea otter contributions to coastal ecosystem health and carbon sequestration/storage, both in Oregon and in states with extant sea otter populations (Alaska, Washington, and California).

### Improve Marine Mammal and Ecosystem Research

- **Small Grants Program:** With a relatively modest budget, the Commission’s Grants and Research program has filled an important niche in marine mammal research for many years by funding novel, low-cost, small-scale research projects. The Commission is currently supporting 29 active projects targeting marine mammal conservation, protection, and management, including seven new grants awarded under the FY 2025 request for proposals, which focused on the development of new tools, technologies, or methods to improve marine mammal stock assessments. Funded projects develop novel, low-cost approaches to

1) estimating abundance of marine mammal stocks (populations or other management units), and/or 2) estimating marine mammal mortality and serious injury (SI).

- **Survey of Federally Funded Marine Mammal Research (the Survey):** The Commission manages an online survey and data repository to collect and collate information on federal funding of marine mammal research by agency, species, objective, and location. The Commission uses the results of this Survey to identify gaps in research funding, illuminate areas of strength in federal research investment, and inform recommendations on needed agency actions and budget priorities. Commission launched a new survey platform for FY 2019, designed with interagency input, to make data reporting easier and results more accessible. Summary results for each fiscal year data call are posted on the Commission’s website after thorough review and collaboration with agency partners.



Humpback whale in the Hawaiian Islands entangled in gear thought to be used to trap crabs (NOAA, Hawaiian Islands Humpback Whale National Marine Sanctuary).

- **Arctic Marine Mammal Research:** As a member of the Interagency Arctic Research Policy Committee (IARPC), the Commission continues to support the development of systematic monitoring to document the effects of environmental change on Arctic ecosystems and the marine mammal species that reside in them. The Commission worked with BOEM, NMFS, USCG, and Alaska Native Organizations and Tribes to promote comprehensive monitoring of marine mammal abundance and movements to provide critical information in support of Alaska coastal communities and document the impacts of increased human activities in the Arctic as a result of climate change. The Commission also advised NMFS and local stranding network responders on marine mammal health monitoring in the Arctic to ensure it follows the One Health approach (see above).
- **North Pacific Right Whale:** With an estimated 50 individuals of the approximately 500 remaining North Pacific right whales residing in U.S. waters, the Commission continued to highlight the species’ endangered status and high risk of extinction. Significant gaps in our understanding of the population’s distribution, movements, and the risks they encounter in their range, hinder effective management and protection of the population.

### Engage with Marine Mammal Protection Act Stakeholders

- **Collaboration with Agencies:** In addition to sending comment letters to other federal agencies providing recommendations on implementing the MMPA and related laws, the Commission collaborated with, and supported the work of those agencies in a number of other ways. For example, the Commission assisted in preparing and implementing recovery plans for endangered species (e.g., manatees), developing approaches for reducing vessel strikes of cetaceans, understanding and reducing impacts of offshore energy development on marine mammals, and supporting NMFS’ and FWS’ implementation of the MMPA, including their work on the stock assessment process, reducing the take of marine mammals

in commercial fisheries, marine mammal health and strandings, and the MMPA-mandated import rule for fish and fish products coming into the United States from other countries.

- **Legislative Affairs:** During FY 2025, the Commission served as an important resource for Congress on issues pertaining to marine mammals and their ecosystems. The Commission responded to inquiries from Congressional committees and offices, consulted with and provided briefings for member offices, and offered technical drafting assistance. The Commission also worked through the OMB legislative review process to formulate Administration testimony and views on proposed legislation and recommended measures to further the policies of the MMPA.



False killer whale mother and calf, October 2010 (Robin Baird, Cascadia Research).

- **Building Partnerships among Stakeholders:** Each calendar year, the Commission holds its annual meeting to examine regional issues and/or priority topics at the national and global levels. At our annual meetings, we engage other federal agencies, stakeholders, and interested members of the public on the science, policy, and management issues related to the Commission’s mission to conserve marine mammals and their ecosystems. The Commission’s September 2025 Annual Meeting focused on emerging technologies to improve efficiency and support innovation for marine mammal stock assessments. Additionally, the Commission is a partner in the Arctic Watch program, a collaborative initiative to build critical real-time communication between Alaska Native subsistence communities and the Marine Exchange of Alaska on vessel traffic, subsistence hunting activities, and marine mammal occurrence in the Bering Strait region. In FY 2025, the Commission supported this program by providing drafting assistance for the Arctic Watch Partners Workshop report.
- **Promoting Co-Management:** The Commission participated in meetings of the Indigenous People’s Council for Marine Mammals (IPCoMM), the Alaska Beluga Whale Committee (ABWC), the Eskimo Walrus Commission (EWC), and other Alaska Native organizations. To further the engagement of Alaska Native youth in co-management, the Commission, in partnership with Alaska Sea Grant, sponsored a summer 2025 internship with Alaska Sea Grant staff based in Nome, AK. The Commission is represented on the U.S. delegation to the IWC and its Scientific Committee and serves on the inter-agency team that develops U.S. positions on whaling issues, especially those regarding Aboriginal Subsistence Whaling. The Commission also serves on U.S. delegations to meetings of the polar bear Range States (the parties to the Agreement on the Conservation of Polar Bears), which reviews progress on implementing the Circumpolar Action Plan and discusses research and management activities of mutual interest, and to meetings of the U.S.-Russia Polar Bear Commission, which, although currently suspended, jointly manages the shared Chukchi Sea polar bear population.
- **Data Sharing:** The Commission continued to work with local, state, Tribal, regional, national, and international partners to identify ocean observations essential for evaluating and monitoring the health of ocean ecosystems and the marine mammal species and stocks

that are a part of those ecosystems. The Commission facilitated the sharing of data and information on essential ocean observations and marine mammal strandings and health monitoring, while advocating for a “measure once, use often” philosophy.

### **Commission Outlook**

Consistent with the purposes and policies of the MMPA, the Commission strives to ensure that marine mammal populations are maintained at optimum sustainable population levels and as significant functioning elements of healthy marine ecosystems.

In FY 2026, the Commission will continue to look for ways to reduce operational costs and leverage its resources and expertise by working with a diverse set of partners. For example, we will continue to collaborate with other agencies, industry, foundations, and others to facilitate participation of key stakeholders and experts to promote the success of workshops and meetings. We will continue to host fellows and interns to support multiple mission-critical projects at little or no cost to the Commission. We also plan to promote new partnerships through our research and grants program to enhance novel and ongoing investigations in the field of marine mammal science at research institutions at home and abroad.





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