



# MARINE MAMMAL COMMISSION

3 September 2013

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. 17429  
(Sea Life Park Hawaii)

Dear Mr. Payne:

The Marine Mammal Commission (the MMC), 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). Sea Life Park Hawaii is seeking to renew permit 898-1764 associated with maintaining Hawaiian monk seals in permanent captivity during a five-year period.

## **RECOMMENDATION**

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit, as requested.

## **RATIONALE**

Sea Life Park is requesting authorization to continue to maintain in captivity up to four non-releasable Hawaiian monk seals of either sex and any age class. The Park currently has one adult female monk seal that was rescued for rehabilitation purposes in 1986 and deemed non-releasable. It also plans to maintain in permanent captivity monk seals that are deemed non-releasable by the Service in the future, including those that are rescued and rehabilitated under the authority of section 109(h) of the MMPA or are aggressive adult males that severely injure or kill conspecifics and subsequently are removed from the wild under the Pacific Islands Fisheries Science Center's research and enhancement permit to be issued under section 104(c) of the MMPA. Permit 17429 would authorize the continued retention and long-term maintenance of captive monk seals under section 10 of the Endangered Species Act and section 109(h) or 104(c) of the Marine Mammal Protection Act, depending on the authority under which the seals were taken originally.

As part of the Park's standard husbandry practices it would examine the caloric intake of the seals by conducting proximate caloric analysis of all fish types fed and correlating those data with gross animal body weight. The seals would be weighed monthly and the fish to be consumed by the seals would be analyzed by the University of Hawaii Agricultural Diagnostic Services Center. Those nutritional monitoring data could be extrapolated to the foraging demands and prey availability of the wild population. Husbandry staff would examine the animals daily using trained behavioral

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control. In addition, they would collect blood samples four times per year and fecal samples two times per year as part of each animal's routine examinations. Those samples would be analyzed by laboratories in Hawaii, California, and Washington.

Because the Park permanently maintains the monk seals, at some point those seals may become ill or their health may deteriorate with age. Accordingly, up to four monk seal mortalities, either intentionally via euthanasia or unintentionally, would be authorized under this permit. The euthanasia methods, if necessary, would be determined by the attending veterinarian and in accordance with the American Veterinary Medical Association Guidelines for the Euthanasia of Animals.

The MMC supports the continued maintenance of captive monk seals and the nutritional data obtained from the seals could be beneficial for assessing the wild population. Therefore, the MMC recommends that the National Marine Fisheries Service issue the permit, as requested.

The MMC believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA.

The MMC appreciates the opportunity to comment on this permit application. Kindly contact me if you have any questions concerning the MMC's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.  
Executive Director