



MARINE MAMMAL COMMISSION

6 September 2011

Mr. P. Michael Payne, Chief
Permits, Conservation, and Education Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Amendment No. 15471
(Michael Adkesson, D.V.M.
Chicago Zoological Society)

Dear Mr. Payne:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act and offers the following recommendation.

RECOMMENDATION

The Marine Mammal Commission recommends the National Marine Fisheries Service approve the permit amendment and advise the applicant of the need to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing any South American fur seal part.

RATIONALE

Dr. Adkesson is authorized to import and possess biological samples collected from live and dead South American fur seals during ongoing health assessments in Punta San Juan de Marcona, Peru. His permit authorizes him to import blood, swabs, feces, blubber, milk, fur, and skin from 50 females and 50 pups per year. He also is allowed to import biological samples from a 2009 pilot project, as well as tissue samples collected from up to 250 dead fur seals during the five-year period ending 31 August 2015. To increase his sample size and diversify the sexes and age classes sampled, Dr. Adkesson is requesting authorization to import samples from up to 50 male South American fur seals and up to 50 adult and 50 juvenile South American sea lions per year for the next four years. The purposes of his research are to (1) characterize the health of the current South American fur seal and sea lion populations, (2) establish baseline health parameters to monitor future changes, (3) assess potential future threats, and (4) evaluate environmental contaminant concentrations for those species as a measure of ecosystem health.

Dr. Adkesson has applied to Peruvian authorities for permits to collect the requested samples. He also has indicated that his Institutional Animal Care and Use Committee is reviewing the proposed activities in accordance with the requirements of section 2.31 of the Animal and Plant Health Inspection Service's Animal Welfare Act regulations. He will send copies of the Peruvian collection permits and the Committee's approval letter to the Service once issued and before sample

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collection. The South American fur seal is listed under the Convention on International Trade in Endangered Species of Wild Fauna and Flora and included as an Appendix II species. Therefore, the Marine Mammal Commission recommends that the National Marine Fisheries Service approve the permit amendment and advise the applicant of the need to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing any South American fur seal part.

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 and other applicable laws. Please contact me if you have any questions concerning this recommendation.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director