



# MARINE MAMMAL COMMISSION

19 April 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

Mr. Timothy J. Van Norman, Chief  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive  
Arlington, VA 22203

Dear Mr. Payne and Mr. Van Norman:

The Marine Mammal Commission has become aware that some of its general recommendations regarding research and import for public display permits are considered standard permit conditions or standard procedures. These general recommendations are in addition to those delineated in the Commission's 15 April 2013 letter (see enclosure). The Commission believes that it does not need to continue making those recommendations if the Services continue to include them as standard conditions in issued permits or standard procedures before issuing the permit. Those recommendations include—

- require the applicant to 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;
- require the applicant to 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, if applicable; and
- consult with the Animal and Plant Health Inspection Service to ensure that the applicant's plans and facilities for transporting and maintaining the marine mammal meet the requirements established under the Animal Welfare Act and are adequate to provide for its health and well-being.

If either Service plans to amend its permit conditions or procedures, please inform the Commission of the changes so that the Commission can determine whether it needs to resume or modify its recommendations.

Please contact me if you would like to discuss this matter.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen".

Timothy J. Ragen, Ph.D.  
Executive Director

Enclosure