



MARINE MAMMAL COMMISSION

4 March 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

Re: Permit Application No. 15510
(Jennifer Burns, Ph.D.)

Dear Mr. Payne:

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

The applicant is requesting authorization to obtain, import, and export an unspecified number of samples (hard and soft parts, including muscle, blood, blubber, skin, and organs) from up to 50 marine mammals of each of the following pinniped species: harp, hooded, gray, bearded, ringed, harbor, spotted, and ribbon seals. The applicant would obtain the samples from animals taken legally in Alaska Native subsistence harvests and from animals taken by scientists and subsistence hunters in other countries, primarily Canada, Norway, and the United Kingdom. The applicant would import and export samples from Canada, Norway, the United Kingdom, and other countries and from animals taken on the high seas. The applicant also is requesting authorization to import annually an unspecified number of samples of the same type from up to six captive northern fur seals and up to six captive Steller sea lions maintained at a facility in Canada. The purpose of the proposed research is to study the physiological development of pinnipeds, including the development of thermoregulation, muscle performance characteristics, tissue oxygen stores, and hormonal and other regulatory elements and compounds in tissues. The permit is requested for five years.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the requested permit, provided that—

- it require the applicant to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing or exporting any marine mammal parts;
- the applicant maintain detailed records indicating the source of each specimen and the circumstances under which it was collected;

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- the applicant specify the approximate numbers and types of samples that would be collected and imported from live northern fur seals and Steller sea lions in Canada and clarify whether these specimens would be collected specifically for purposes of the proposed research or would be collected for other purposes (e.g., separate research, health screening, or husbandry);
- the applicant specify the species, approximate numbers, and types of samples that would be collected and imported from live animals maintained at the Institute of Arctic Biology in Norway and clarify whether these specimens would be collected specifically for purposes of the proposed research or would be collected for other purposes (e.g., separate research, health screening, or husbandry);
- the applicant provide periodic reports (e.g., at least annually) to the Service summarizing by country and species the number of animals from which such samples were taken and providing sufficient information to demonstrate that each specimen was taken in accordance with the laws of the country of origin, was not taken in violation of the Marine Mammal Protection Act or other applicable U.S. laws, and is being used for bona fide scientific purposes only.

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,

A handwritten signature in black ink, appearing to read "Timothy J. Ragen" followed by a flourish and the number "101".

Timothy J. Ragen, Ph.D.
Executive Director