



MARINE MAMMAL COMMISSION

15 February 2013

Ms. Nadene G. Kennedy
Permit Office, Room 755
Office of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Ms. Kennedy:

On 17 January 2013 the National Science Foundation published a notice (78 Fed. Reg. 3921) requesting comments on a permit application from Dr. Paul Koch, University of California, Santa Cruz. Dr. Koch is seeking authorization under the Antarctic Conservation Act of 1978 to import into the United States mummified remains from four species of seals in Antarctica. The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the permit request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act and the Antarctic Conservation Act and offers the following recommendation.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Science Foundation issue the permit, as requested.

RATIONALE

Dr. Koch proposes to collect bone, fur, and skin samples from up to 75 each of crabeater, southern elephant, Weddell, and leopard seals from Antarctica. Dr. Koch would collect the samples from mummified seal remains in the McMurdo Dry Valleys and Society Range regions and adjacent coastlines. The purpose of the research is to investigate the interactions between marine mammal species and the changing climate and environmental conditions during the Holocene. Dr. Koch would import the samples into the United States to conduct radiocarbon, stable isotope, and genetic analyses.

To collect the samples and conduct the research, Dr. Koch will need authorization under the Antarctic Conservation Act, Marine Mammal Protection Act, and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The Commission understands that the National Marine Fisheries Service has provided guidance to Dr. Koch regarding the documentation needed for compliance with the Marine Mammal Protection Act. Regarding CITES, Dr. Koch is required to obtain authorization from the U.S. Fish and Wildlife Service prior to importing the samples because the southern elephant seal is listed under CITES Appendix II. He currently is in the process of obtaining that authorization.

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Regarding the Antarctic Conservation Act, the proposed research is potentially useful for investigating the effects of climate disruption on marine mammals. To that end, the research appears to be consistent with the purpose of the Antarctic Conservation Act, which is to conserve and protect the Antarctic ecosystem. Therefore, the Marine Mammal Commission recommends that the National Science Foundation issue the permit, as requested.

The Commission believes that the activities in the permit application are consistent with the purposes and policies of the Marine Mammal Protection Act and the Antarctic Conservation Act.

Please contact me if you have any questions regarding the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Timothy J. Ragen, Ph.D.
Executive Director

Cc: Mr. P. Michael Payne
Mr. Timothy Van Norman