



MARINE MAMMAL COMMISSION

30 March 2015

Ms. Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Amendment Application No. 17278
(James Shine, Ph.D., Harvard University)

Dear Ms. Harrison:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Shine is requesting authorization to amend his permit (which expires on 28 August 2017) to import, receive, and possess samples from long-finned pilot whales.

Dr. Shine is authorized to import, receive, and possess samples from up to 15 adult long-finned pilot whales per year that were taken during subsistence hunts and later archived at the Faroese Museum of Natural History in the Faroe Islands. The objectives of the study include (1) determining the concentrations and geographic source (including geographic origin and transport mechanisms) of mercury in subsistence-hunted whales and (2) examining how those sources may have contributed to greater concentrations of mercury observed in Arctic and sub-Arctic ecosystems than other locales. The information gained also should help the Faroese evaluate the risks (i.e., potential toxic effects) associated with consuming whales from this hunt. Dr. Shine is requesting to increase the number of samples allowed to be imported from 15 to 100 per year and would include both muscle and liver samples collected from adult whales. He also would analyze the samples for chlorinated and fluorinated organic chemicals.

The Commission acknowledged in its 6 August 2012 letter regarding the original application that the proposed importation and analysis of the pilot whale samples was not an incentive for the subsistence hunts that resulted in the collection of the samples. Similarly, by issuing this permit, the Commission did not, and still does not, believe that the National Marine Fisheries Service (NMFS) would necessarily be sanctioning the Faroe Islands hunt or providing any incentive to continue it. In addition, the Commission does not believe that the MMPA explicitly prohibits the issuance of a scientific research permit authorizing the importation of samples from the Faroe Islands pilot whale hunt. Because a longitudinal time-series of samples is necessary to address the study objectives and incidental bycatch in commercial fisheries and strandings are rare for this species, the only samples available for analysis are those collected from subsistence-hunted whales. For these reasons, the Commission believes that the proposed amendment is consistent with the purposes and policies of

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the MMPA and therefore recommends that NMFS issue the permit amendment, provided that the current permit conditions remain in effect.

Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a large initial "R" and a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.
Executive Director