



MARINE MAMMAL COMMISSION

1 September 2010

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

Re: Request for Amendment of Permit No. MA107933-1
(MA107933) (EcoHealth Alliance, Inc.)

Dear Mr. Van Norman:

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. The permit holder is authorized to take by harassment up to 210 manatees annually in the course of conducting research on the distribution, abundance, movement patterns, survival rates, site fidelity, and reproductive behavior of free-ranging manatees in the southeastern United States. The permit holder also is authorized to take by harassment a subset of captive manatees in holding facilities in the southeastern United States.

The permit holder is requesting that the permit be amended to authorize the annual importation of biomedical samples from up to 30 live West African manatees and tail notch samples from up to 50 live West African manatees. The permit holder also is requesting authorization to import samples (e.g., bone and tissue for genetic analysis, ear bones for age determination studies) from an unspecified number of manatee carcasses on an opportunistic basis. All samples would be imported from the 22 African countries within the range of the West African manatee. The permit holder states that samples from live manatees will be collected during capture or rescue projects in multiple West African countries where the holder is a collaborator.

RECOMMENDATION

The Marine Mammal Commission recommends that the Fish and Wildlife Service approve the requested permit amendment, provided that conditions contained in the current permit remain in effect, and that—

- the permit holder clarify the number of animals from which tail notch samples will be collected annually;
- the permit holder be required 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; and
- the permit amendment, if issued, be conditioned to require the permit holder, prior to importing any specific specimen, to submit documentation demonstrating that the specimen

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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.

RATIONALE

The amendment request states that up to 30 West African manatees likely would be captured annually throughout their range for sampling. However, the permit holder is requesting authorization to import tail-notch samples from up to 50 live manatees annually. The Marine Mammal Commission recommends that, prior to issuing the amendment, the Service request that the permit holder explain this apparent discrepancy. The Marine Mammal Commission also recommends that the permit holder be required to obtain all necessary export permits and to maintain and submit to the Service detailed records regarding sample collection.

Because the permit holder has yet to collect the samples to be exported and because the countries involved and authorizations required are not yet known, the Commission and the Service are unable to determine at this time that all samples will be taken in accordance with the laws of the country of origin and in accordance with the requirements of the Marine Mammal Protection Act. As such, the Marine Mammal Commission recommends that the permit amendment, if issued, be conditioned to require that the permit holder, before importing any specific specimen, submit documentation demonstrating that the specimen 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.

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.

Please contact me if you have any questions concerning these recommendations.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director