



# MARINE MAMMAL COMMISSION

31 October 2024

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 Application No. 27543  
(Marine Ecology and  
Telemetry Research)

Dear Ms. Harrison:

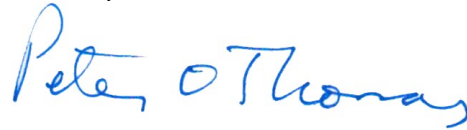
The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit application with regard to the humaneness and *bona fide* criteria of the Marine Mammal Protection Act. The Commission believes that the proposed activities meet these requirements and recommends that the National Marine Fisheries Service (NMFS) issue the permit, as requested.

Given the discussions about invasive tagging of endangered species at the North Atlantic right whale tagging workshop in September 2023, the Commission is compelled to comment on instrumenting North Pacific right whales with Type C consolidated tags. The Commission recognizes that invasive tagging of North Pacific right whales has been authorized previously. The Commission also appreciates the fairly detailed conditions that would be placed on any tagging of North Pacific right whales under the proposed permit and agrees that gaining an improved understanding of these animals' movements and exposure to anthropogenic threats is important. However, the eastern North Pacific population of right whales has been characterized by Wade et al. (2011) as the smallest whale population in the world for which an abundance estimate exists. Therefore, the Commission encourages NMFS and the applicant to ensure that any tagging of North Pacific right whales under this permit is conducted with the utmost care and strictly adheres to the proposed protocols and NMFS's standard permit conditions pertaining to animal selection and post-tag monitoring.

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

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas". The signature is written in a cursive style with a large initial "P" and "T".

Peter O. Thomas, Ph.D.,  
Executive Director

Reference

Wade, P.R., A. Kennedy, R. LeDuc, J. Barlow, J. Carretta, K. Sheldon, W. Perryman, et al. (2011).  
The world's smallest whale population? *Biology Letters* 7(1): 83-85.  
<https://doi.org/10.1098/rsbl.2010.0477>