



# MARINE MAMMAL COMMISSION

20 December 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. 27552  
(Pacific Islands Fisheries Science Center)

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 goals, policies, and requirements of the Marine Mammal Protection Act (MMPA). The Pacific Islands Fisheries Science Center (PIFSC) is proposing to conduct research and enhancement activities on Hawaiian monk seals throughout the Hawaiian Archipelago and at Johnston Atoll during a five-year period—permit 22677 authorized similar activities.

The purpose of the research and enhancement activities is to investigate (1) survival and reproductive success, (2) abundance and distribution, (3) health and body condition, and (4) foraging ecology and to minimize threats to recovery. Researchers would harass, observe, handle, restrain, sedate<sup>1</sup>, photograph/videotape<sup>2</sup>, measure/weigh, mark, sample, instrument, passively record, and/or conduct enhancement activities<sup>3</sup> on numerous individual monk seals of either sex and any age class each year. PIFSC also requested up to 4 unintentional and 10 intentional mortalities<sup>4</sup> each year. PIFSC would implement various measures to minimize impacts on seals and also would be required to abide by the National Marine Fisheries Service's (NMFS) standard permit conditions. PIFSC's Institutional Animal Care and Use Committee has reviewed and approved the research protocols.

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<sup>1</sup> Including remotely delivered sedation (i.e., darting).

<sup>2</sup> Including using unmanned aerial systems and remotely-operated aquatic vehicles.

<sup>3</sup> Including deworming, translocating, hazing and removing aggressive adult male seals that harm or kill other seals, disentangling, dehooking, conducting medical treatments on, behaviorally modifying, and vaccinating seals, and supplementally feeding rehabilitated seals post-release. PIFSC also proposed in its application to conduct aversive acoustic playbacks on monk seals, but it has since requested that those activities be removed from any permit issued.

<sup>4</sup> Unintentional mortalities could occur during research or enhancement activities and would include euthanasia for humaneness purposes. Intentional mortalities would occur during humane killing or euthanasia of aggressive male seals (not to exceed 10 aggressive males over a 5-year period) and/or of moribund or severely injured seals (not to exceed 10 seals over a 5-year period).

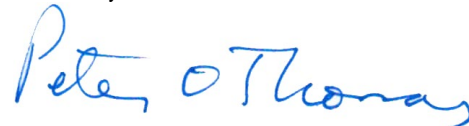
### **Remote sedation and euthanasia via gunshot**

In its application, PIFSC provided a personnel table that primarily included a list of the procedures that the Principal Investigator (PI) and each Co-investigator (CI) would not be authorized to conduct, as well as a statement saying that they could conduct all other procedures authorized under the permit. While the research would include the use of remote sedation, remote sedation was not specified anywhere in the personnel table, and none of the personnel specified in their qualification form that they have experience conducting the procedure. Additionally, while one of the footnotes in the personnel table specified that veterinary procedures, including sedation and chemical euthanasia, would be performed only by a veterinarian, none of the veterinarians appear to have direct experience with remote sedation or the use of firearms. As such, it appears that neither the PI nor any of the current CIs are qualified to conduct remote sedation. The Commission recommends that NMFS refrain from authorizing PIFSC to conduct remote sedation of Hawaiian monk seals until a qualified CI has been added to the permit or until the relevant experience of the PI or current CIs has been described in their qualification forms and the personnel table specifies that the person or persons can conduct the procedure.

Similar to remote sedation, euthanasia by gunshot was discussed as a possibility in Appendix Q but was not included as a procedure in the personnel table or qualification forms of the PI or CIs. The footnote in the personnel table specified that veterinary procedures would include chemical euthanasia, but did not specify who would be conducting euthanasia by gunshot. As such, the Commission recommends that NMFS refrain from authorizing PIFSC to conduct euthanasia by gunshot until a qualified CI has been added to the permit or until the PI or CI qualification forms have been updated to include relevant firearm experience and the personnel table specifies that the person or persons can conduct the procedure.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA. Kindly contact me if you have any questions concerning the Commission's recommendations.

Sincerely,



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