



## NATURAL SCIENCE COLLECTIONS ALLIANCE

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Public Comments Processing  
Attn: FWS-R9-IA-2011-0087  
Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, MS 2042-PDM  
Arlington, VA 22203

Dear Sir or Madam,

Thank you for the opportunity to comment on resolutions, decisions, and agenda items for consideration at the sixteenth regular meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The NSC Alliance is a nonprofit association that supports natural science collections, their human resources, the institutions that house them, and their research activities for the benefit of science and society. Our institutional members are part of an international community of museums, botanical gardens, herbariums, universities, and other institutions that house natural science collections and utilize them in research, exhibitions, academic and informal science education, and outreach activities.

Many of our member organizations have a strong interest in CITES, both as a mechanism for conserving the species we study and because the shipment of scientific specimens of birds, mammals, fishes, amphibians, and many other organisms is affected by CITES.

Unfortunately, numerous researchers at museums, herbaria, and other institutions that house natural history collections have experienced difficulties in the import/export of scientific specimens. Delays in the validation of permits have damaged specimens, yielding specimens unsuitable for research. Moreover, we have received reports that shipments are seized, refused entry, or destroyed because of problems in the validation process, resulting in the complete loss of the specimens.

NSC Alliance is committed to working with the United States government to ensure its policies and positions at the 2013 meeting protects endangered species, but also reduces barriers to research and education. As such, we suggest that the United States include a discussion of how to improve the permit validation process for scientific specimens on the meeting agenda.

We would welcome an opportunity to work with the Fish and Wildlife Service to further identify and address issues involving the import and export of specimens for scientific research. Please do not hesitate to contact me at 202-628-1500 x 250 or [rgropp@aibs.org](mailto:rgropp@aibs.org) if we may provide additional information.

Sincerely,

A handwritten signature in cursive script that reads "Robert Gropp".

Robert Gropp, Ph.D.  
Director of Public Policy