

May 31, 2024

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Office of Protected Resources  
National Marine Fisheries Service  
1315 East-West Highway  
Room 13705  
Silver Spring, MD 20910

**Re: Comments on the Proposed Rule To Modify the Duration of Certain Permits and Letters of Confirmation Under the Marine Mammal Protection Act (Docket No. NOAA-NMFS-2024-0054)**

The Natural Science Collections Alliance, Society for the Preservation of Natural History Collections, and the institutions and individuals we represent appreciate the opportunity to comment on this proposed rule change. We support the changes in permit terms proposed by the National Marine Fisheries Service (NMFS), which we think would benefit all institutions and organizations engaged in marine mammal research and conservation.

The Natural Science Collections Alliance (NSCA) is a non-profit association that supports natural science collections across the United States, including their human resources, the institutions that house them, and the research activities they pursue for the benefit of science and society. The Society for the Preservation of Natural History Collections (SPNHC) is an international society with members from more than 30 countries spanning six continents, engaged in the preservation, conservation and management of biological objects stored in natural history collections to ensure their continuing value to scientific research, education, and society. Together, NSCA and SPNHC represent the largest and most active scientific collections of marine mammals in the United States and abroad. These collections have a long and consistent history of maintaining specimens and data in support of scientific research, education, and conservation, providing those specimens and data to qualified researchers, and acting as repositories for voucher specimens. All of these activities enhance U.S. and international scientific and conservation efforts, promote the findability, accessibility, reusability, and permanence of specimens and data, and support the reproducibility of scientific research on marine mammals. As part of the nation's longstanding infrastructure for biodiversity research, natural history collections and their staff work with U.S. and international researchers, federal and state agencies, resource managers, and conservation organizations, benefiting the entire community. The maintenance and sharing of specimens in these natural history museum collections in itself constitutes "bona fide scientific research" under the Marine Mammal Protection Act (MMPA) (50 CFR 216.3). The deposition of

specimens in our repositories makes them accessible to scientists who investigate the basic biology, ecology, and evolution of marine mammals and the ecosystems they inhabit. The long-term stability of museum collections and their activities is central to their use by the scientific community and their role as permanent repositories.

Natural history collecting institutions interested in continually developing and sharing collections of marine mammals must maintain permits issued by both the National Oceanic and Atmospheric Administration's (NOAA) NMFS and the U.S. Fish and Wildlife Service. Specific to this proposed rule change, most professional collections maintain a NOAA scientific research permit for the acquisition, receipt, import, and export of parts of MMPA species regulated by NMFS, such as cetaceans and most pinnipeds. Many also maintain other permits or agreements and/or participate in NOAA's stranding network, all of which may result in the acquisition of specimens that are then covered by MMPA permits. This allows collections to accept new specimens and samples from sources such as captive animals, other authorized institutions or researchers, foreign strandings, and legal take during fishery or subsistence activities. The same permit allows established collections to export and re-import marine mammal parts accessioned into their permanent collections, to support loan requests from non-U.S. scientists or institutions and facilitate international research. In most such loans and acquisitions, the natural history collection is acting only as a permanent repository for a specimen that is already dead, not participating in the active take of wild marine mammals nor in captive husbandry, for which a separate entity may have a separate permit. These activities of acquiring samples or already-dead specimens, maintaining them in a permanent repository, and loaning them to researchers are fundamental to the operation of natural history collections, and persist much longer than any one permit.

Currently, natural history collections must re-apply for these permits every five years, providing an extensive packet of information including the qualifications of professional staff and descriptions of the sources of samples that are very likely to be the same from application to application; all of this repetitively submitted material must be considered carefully by NOAA's permit specialists. This is the case even though permit applications from natural history collections frequently do not involve complex or rapidly changing research techniques, live animals, or activities that could negatively affect wild populations. For longstanding collections that maintain their permits for many cycles with only minor changes, a longer permit term could support the longstanding role of collections as stable repositories and save scientific and administrative effort both for museum collections staff and for NOAA, without negatively impacting the important function that these permits serve in marine mammal protection.

In addition, we agree with the additional justifications given for the proposed rule change, including the harmonization with ESA permit terms, and the benefits to researchers studying long-lived marine mammals and engaged in long-term research. At a time when urgent threats face marine mammals and the conservation and research challenges are extensive, streamlining the permit process supports the shared goals of museums, researchers, conservation groups, and NOAA itself.

Thank you for the opportunity to provide input. Please do not hesitate to contact NSCA Executive Director Jyotsna Pandey at [membership@nscalliance.org](mailto:membership@nscalliance.org) if you have any questions or require more information.

Sincerely,



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