



8403 Colesville Road, Suite 710
Silver Spring, MD 20910-3314
301-562-0777 tel 301-562-0888 fax
www.aza.org

April 15th, 2026

Ms. Adrienne Thomas
Attn: OMB Control No. 0648-0084
National Marine Fisheries Service
1315 East-West Hwy
Silver Spring, MD 20910

**Re: OMB Control No. 0648-0084: Agency Information Collection Activities;
Submission to the Office of Management and Budget (OMB) for Review and
Approval; Comment Request; Basic Requirements for Special Exception Permits
and Authorizations To Take, Import, and Export, Marine Mammals, Threatened and
Endangered Species, and for Maintaining a Captive Marine Mammal Inventory
Under Section 10(a)(1)(A) of the Endangered Species Act.**

The Association of Zoos and Aquariums (AZA) respectfully submits the following comments on OMB Control No. 0648-0084: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Basic Requirements for Special Exception Permits and Authorizations To Take, Import, and Export, Marine Mammals, Threatened and Endangered Species, and for Maintaining a Captive Marine Mammal Inventory Under Section 10(a)(1)(A) of the Endangered Species Act. As global leaders in wildlife conservation, we commend the National Marine Fisheries Service (NMFS) for the work they do in protecting wildlife through the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA). We are grateful for the opportunity to share our thoughts on the proposed revision of this information collection.

Founded in 1924, AZA is a 501(c)3 non-profit organization setting the global gold standard for zoos and aquariums in animal care and welfare, conservation, education, science, and guest experience. AZA's 254 accredited aquariums, nature centers, science centers, and zoos lead in animal wellbeing, husbandry, conservation, and research. AZA members annually host more than 209 million visitors, collectively generate more than \$35 billion in annual economic activity, and support more than 254,000 jobs. AZA members have a deep commitment and impact on domestic and international conservation through research, education, and animal care. AZA members reached over 330 million people in 2024 through educational programming and spent over \$341.4 million on mission-focused research on 1,133 species in 130 countries, 225 of which are listed under the Endangered Species Act (ESA). AZA institutions have established programs that develop long-term plans involving genetically diverse breeding, public education, field conservation, and

supportive research to ensure survival for many threatened and endangered species, including marine mammals.

AZA TAGs coordinate, facilitate, and review progress toward goals for its cooperative animal management under the supervision of the AZA Animal Population Management Committee. TAGs lead, develop, oversee, promote, evaluate, and support their cooperative animal management and related scientific initiatives, serving as the AZA experts regarding husbandry, veterinary care, research priorities, ethical considerations, and other issues applicable to their taxa. The AZA Marine Mammal TAG works closely with NMFS regarding marine mammals and we value that partnership.

AZA previously commented in support of the changes NMFS proposed on the duration of certain permits and letters of confirmation under the MMPA that were finalized in the January 13th, 2025, final rule. We appreciate that these revisions were made and welcome the opportunity to comment on these proposed changes to the information collection process for these permits and authorizations. The efforts to streamline permitting, reduce burdens on applicants and the Service, and clarify processes are very welcome, such as the proposed pillar coral instructions. To support the effort to improve ease of use and functionality permitting system and meaningfully reduce the burden on applicants, AZA and its Marine Mammal TAG offer the following recommendations:

- **Ensure the portal operates as a fully online, workflow-driven system.** Processes that rely on emailed documents and manual follow-up create delays and can result in applications sitting without action. Including built-in workflow reminders for both NMFS staff and applicants will help ensure items move through the review process in a timely and transparent manner.
- **Create a secure institutional dashboard with auto-populated fields.** Applicants currently reenter the same information for every application, including facility descriptions, staff qualifications, enclosure information, and compliance documentation. A stored institutional profile within the portal would reduce redundancy, improve accuracy, and support consistency across submissions.
- **Provide applicants with portal-based access to animal history already held by NMFS.** NMFS maintains the National Inventory of Marine Mammals (NIMM), which includes acquisition, disposition, transfer, and mortality records. Allowing applicants to view and pull this information directly when preparing applications would prevent unnecessary reconstruction of historical data already contained in NMFS's system.
- **Add automated receipt confirmations and real-time status tracking.** Applicants sometimes need to email NMFS to confirm receipt of materials or request updates. A portal that automatically confirms submission, displays review status, and provides estimated timelines would reduce administrative

burden for both NMFS and applicants.

AZA and its Marine Mammal TAG appreciate NMFS' continued work to modernize and refine permit instructions. The following recommendations are intended to complement these efforts:

- **Add an “applicant tips” section to prevent common errors and ensure answer completeness.** A brief guidance section at the start of each instruction packet would help applicants not cause avoidable delays because of error or not fully answering a question to the proper extent. Useful reminders include writing in layman's terms and avoiding zoological shorthand without explanation; describing all processes and details clearly; not assuming familiarity with facility-specific procedures or industry norms; providing context so reviewers can easily understand the reasoning behind steps, decisions, and expected outcomes; and avoiding answering “Not Applicable” unless it is clearly appropriate and supported by an explanation. These reminders would strengthen clarity and reduce the need for follow-up information requests by agency staff.
- **Provide tailored instructions for each permit type.** NMFS already offers separate instruction documents for different permit categories. As these materials continue to evolve, ensuring that each permit type has a clearly tailored, purpose-specific instruction set would help applicants focus on the information most relevant to their request. This would strengthen clarity, reduce unnecessary narrative content, and improve consistency across submissions.
- **Clarify expectations for supporting documentation.** Applicants would benefit from clearer direction on what supporting documentation should be included for each permit type. Examples include: when veterinary letters are required, the level of detail expected in behavioral or husbandry rationales, how to justify transfers or acquisitions, and what information demonstrates humane handling or import conditions. Incorporating these expectations directly into the instructions would help applicants provide complete information in the initial application submission and reduce the need for agency staff to follow up with applicants for further information.
- **Reduce redundancy in information collection.** NMFS states in the proposed instructions for permit applications that AZA accreditation is a professionally recognized standard of the public display community. By definition, all AZA accredited facilities will meet all the criteria for maintaining marine mammals for public display purposes as they would be required to be licensed by and in good standing with USDA-APHIS, regularly open to the public, and have education and conservation programs that meet the professionally recognized standard. As such, proof of current AZA accreditation and a copy of the facility's current USDA-APHIS Animal Welfare Act license are sufficient to meet the requirements for the project purpose section of the application for

import.

We are grateful for the opportunity to provide comments on this proposed revision of information collection, as we supported the changes NMFS made in the final rule on MMPA Section 104 permits and authorizations. We appreciate all the work the Service has done and continues to do to advance marine mammal conservation, rescue, research, and rehabilitation. We and our members look forward to working with you to advance our shared conservation goals.

Sincerely,

A handwritten signature in blue ink that reads "Dan Ashe". The signature is written in a cursive style, with a large, stylized "D" that loops around the first part of the name.

Dan Ashe
President and CEO