



Conservation
Law Foundation

Adrienne Thomas
NOAA PRA Officer
NOAA.PRA@noaa.gov

June 16, 2026

Re: Reporting Requirements for Commercial Fisheries Authorization Under Section 118 of the Marine Mammal Protection Act OMB Control Number 0648-0292

Dear Ms. Thomas,

Please consider these comments submitted on behalf of Whale and Dolphin Conservation, Inc. (WDC), Conservation Law Foundation (CLF), and their thousands of members and supporters.

WDC is federally appointed to the Atlantic Large Whale, Atlantic Trawl Gear, Harbor Porpoise, Bottlenose Dolphin, and Pelagic Longline Take Reduction Teams (TRTs). Staff at Conservation Law Foundation is appointed to the Atlantic Large Whale TRT. The data provided through the Marine Mammal Authorization Program's Mortality / Injury Reporting Form is not only legally required but provides essential information on marine mammal bycatch enabling TRTs to more effectively recommend temporal and spatial risk reduction measures which reduce widescale impacts and unnecessary regulatory burdens on commercial fisheries.

While we cannot comment on the accuracy of the cost of burden of the data collection itself, we reiterate that the collection of these data are mandated under Section 118 of the Marine Mammal Protection Act (MMPA) and that costs associated with the collection may be reduced through improved methods of electronic data collection.

First, the data collection may be enhanced as well as the reporting burdens reduced by developing an easy-to-use app that can be downloaded on android or iOS systems. If possible, the app could temporarily store data and upload it to a cloud-based system when the reporter was within cell phone range, reducing the burden on vessels which may not be equipped with satellite transmissions. As most apps will store information including the vessel owner, permit number, address, emails, etc., it would reduce the need for this information to be repeatedly provided as is currently required. An app could also provide a connection to a camera and provide an image of the animal which would improve data accuracy through confirming species and/or reported injuries. Meta data stored in the image could be used to verify the date and time of the take and the app could include GPS capabilities to automatically provide a location when the app is in use.

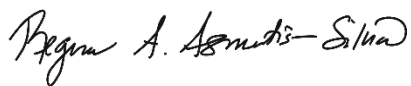
In addition, more specific data should be collected to help evaluate the potential impacts on the animals and provide more context for mitigation recommendations. For example, it would be helpful to know whether animals were seen prior to setting or retrieving gear. While the current codes request information on injury status (i.e. loss or damage to appendage, laceration,

eyeball rupture, etc) there is currently no means to provide information on which part of the gear may have caused the injury, whether the gear remained on the animal during the retrieval, if the gear was cut from the animal, and/or if the animal was released still entangled in gear.

Even for codes regarding injury, additional information as to what body part was involved that was cut resulting in blood flow, where on the body the laceration was located, or more information on "other wound or injury" could help identify how an animal may be interacting with gear.

It would also be helpful for information to be provided as to how an animal was released and the behavior of those animals upon release to better evaluate techniques that could improve survivability of live bycaught animals.

Thank you for the opportunity to comment,

A handwritten signature in black ink that reads "Regina A. Asmutis-Silva".

Regina Asmutis-Silvia
Executive Director
Whale and Dolphin Conservation
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A handwritten signature in blue ink that reads "Erica Fuller".

Erica Fuller
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