

RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION

1. Table 1 (Beluga Whales Requested for Import). The estimated ages of some of the animals have changed from the preliminary draft. Can you clarify the process for estimating the ages?

The draft we provided to you was, as you note, “preliminary.” That preliminary draft had a few typographical errors and a very limited amount of information that had not yet been fully updated or was in the process of being reviewed. Regarding our process for estimating ages, we use standard methodologies. This includes, but is not limited to, morphometrics (length, girth, fluke sizes), skin color, tooth emergence, and behavior.

2. We appreciate the additional information regarding the transfer of the animals between the carriers in Liege Airport.

a. The application indicates that there is no additional risk associated with transferring the animals from one container to another because of the methods developed. Can you briefly describe the mitigation measures that are referenced being part of the methods?

Any transport, including the movement of humans, has risk. Those risks are mitigated by utilizing standard practices that have been perfected over decades of animal movements. Procedures recommended by IATA, AZA, AMMPA, and others recognize and account for such risks. The transport will be in full compliance with all of those recommendations.

- b. The application states that the transfer will be done expeditiously. Can you provide an estimated time on how long you expect the transfer process to take (*i.e.*, how long will the animals be at Liege Airport)?

The timeframe for the transfer is accounted for in our standard practices for moving marine mammals. As stated, we will utilize recommended protocols recommended by IATA, AZA, AMMPA, and others, and the transfer will be done expeditiously.

3. The application states that animals not passing their health examination at the Liege Airport will have a delayed transport. Can you explain what this means?

The issuance of veterinary health certificates that are based on an examination of each animal's health, including an examination of blood parameters, physical inspections, and record reviews, occurs prior to the animals leaving the facility in Russia where they are currently housed. At the Liege Airport, the animals will receive visual examinations by veterinary and animal care staff as they are transferred to U.S. bound aircraft. Should an animal be determined to be compromised or in need of medical attention that cannot be given during flight to the U.S., arrangements will be made for the animal to return to the Russian facility for appropriate care and observation.

4. It is unclear which flight the animals destined to the SeaWorld parks would be on. In addition, it would be helpful to note the approximate flight times to each of the airports nearest to the Sea World parks.

The flight on which the animals will be placed has yet to be finalized. Standard flight times from New York to San Antonio/San Diego or Atlanta to Orlando/San Antonio are all less than 4 to 5 hours (utilizing 747 standard speeds).

5. Under effects on the individuals, are there any risks associated with breeding that should be indentified?

It is not clear what is meant by “risks associated with breeding.” Certainly any mammal (terrestrial or marine) has potential physiological challenges. These issues are the same whether an animal is held in human care or is free ranging. Therefore, there are no additional risks other than those currently existing for all breeding age mammals.

6. We appreciate you providing the original capture permits. Do you have translated copies of these documents?

We can provide official if the agency wishes.



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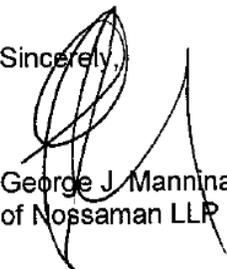
August 9, 2012

Michael Payne  
Permits and Documentation Division Chief  
Office of Protected Resources  
National Oceanic and Atmospheric Administration  
United States Department of Commerce  
Silver Spring Metro Center 3  
1315 East-West Highway, Room 13822  
Silver Spring, MD 20910

Dear Mike:

Attached is an Addendum to Permit Application 17324 submitted by the Georgia Aquarium. If you have any questions, please feel free to give me a call.

Sincerely,



George J. Mannina, Jr.  
of Nossaman LLP

GJM/jm  
Enclosure

cc: Jennifer Skidmore  
Kristy Beard

## **ADDENDUM TO PERMIT APPLICATION 17324**

The Georgia Aquarium submits this Addendum to Permit Application 17324 to clarify the transport and disposition of the 18 beluga whales that would be imported if the permit is issued.

The permit application indicates the whales, all owned by the Georgia Aquarium, would be flown into New York and Atlanta and some would be distributed pursuant to breeding loan agreements to Shedd Aquarium, Mystic Aquarium, and the three SeaWorld facilities. As stated in the permit application, the Georgia Aquarium, and other North American beluga whale holders, will be managing the North American collection of beluga whales in order to optimize social integration and to take advantage of appropriate breeding opportunities. Toward that end, veterinary and animal care staff from the Georgia Aquarium, Vancouver Aquarium, SeaWorld, Mystic Aquarium, and Shedd Aquarium met on August 6, 2012 to further consider the best social groupings for the whales subject to the permit application and how to best integrate these whales into the existing collections.

As a result of that discussion, it was determined that the initial distribution of the 18 whales proposed to be imported should be as follows: Georgia Aquarium – 3; Shedd Aquarium – 4; SeaWorld San Antonio – 6; SeaWorld Orlando – 2; and SeaWorld San Diego – 3. After the 18 whales are fully socialized and integrated into the existing collections, it is possible that a group, which would include one of the whales proposed to be imported, will be moved to Mystic Aquarium. At all times, the whales will be owned by the Georgia Aquarium. All transfers of custody to other facilities will be pursuant to breeding loan agreements.

Once it was decided to change the initial distribution of the whales, it became obvious that the best interests of the whales will be served by using Atlanta and Chicago as the points of entry into the United States. Therefore, the Georgia Aquarium is proposing to transport the whales from Belgium to Atlanta and Chicago, instead of Atlanta and New York,

Three of the whales arriving in Atlanta will be transferred to the Georgia Aquarium, two will be placed aboard another aircraft and flown to Orlando, Florida, for transfer to SeaWorld Orlando. Six whales will remain on the aircraft arriving from Belgium and will be flown to San Antonio for transfer to SeaWorld San Antonio. Of the whales arriving in Chicago, four will be transferred to Shedd Aquarium and three will remain on the aircraft and will be flown to San Diego for transfer to SeaWorld San Diego. This revised transport plan will reduce the overall transport time by approximately 10%.



Jennifer Skidmore <jennifer.skidmore@noaa.gov>

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## Adjusted flight data

1 message

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**Billy Hurley** <bhurley@georgiaaquarium.org>

Sat, Aug 11, 2012 at 9:12 AM

To: Kristy Beard <kristy.beard@noaa.gov>

Cc: Jennifer Skidmore <jennifer.skidmore@noaa.gov>, "George J. Mannina" <gmannina@nossaman.com>

Good morning Kristy,

In response to your inquiry regarding flight adjustments:

Chicago port of entry would be O'Hare International due to the runway length.

Flight time from Liege to O'Hare is approximately 9 hours.

Regarding how this changes overall timelines, I believe George previously resounded that this may result in 10% less time in transit. That itself may be conservative in estimation.

Warmest regards,

BH

William Hurley  
Sr. Vice President &  
Chief Zoological Officer  
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Sent from my iPhone