



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910

March 24, 2022

Dear Researchers,

The NMFS Office of Protected Resources, Permits and Conservation Division is notifying you of an upcoming change to our standard requirements in our scientific research and enhancement permitting program for applying passive integrated transponders (PIT) tags to sea turtles. This change will apply to all sea turtle species under NMFS' jurisdiction in the marine environment.

Since 2017, we have required the use of a smaller 10.3 mm PIT tag embedded with a 16-gauge needle to minimize pain and potential injury for small sea turtles ranging from 16 cm to 30 cm in straight carapace length (SCL). We will be expanding this requirement to include sea turtles up to **50 cm SCL** based on a recent study (Foley et al. 2021) evaluating the detectability of these smaller tags. Below is the current permit condition and how it will be revised in the near future.

Current PIT tagging requirement:

For turtles 16-30 cm SCL: Only use 10 mm PIT tags and a 16-gauge injector needle.

Future PIT tagging requirement:

For turtles 16-**50** cm SCL: Only use 10 mm PIT tags and a 16-gauge injector needle.

A 16-gauge needle is approximately 30% smaller in diameter than a 12-gauge needle. Thus, we expect this change to reduce sea turtles' responses to PIT tag injection (consistent with less pain) and decrease the frequency and severity of bleeding from the tag site without compromising the detectability of the PIT tags. Adopting the use of smaller PIT tags and application needles comports with our commitment to minimizing the impacts of research to sea turtles and using the best available science in their conservation and management (NMFS 2019). Therefore, although the Foley et al. (2021) study focused on tag detection in small sea turtles, we **recommend** that you also adopt the use of the smaller PIT tags and needles for sea turtles **over 50 cm SCL** once you have exhausted your existing supplies.

This change (i.e., using smaller PIT tags for animals 16-50 cm SCL) will not immediately affect your existing research permit. We recommend that you make this change as soon as it becomes feasible in your program. We will gradually transition to this new requirement beginning this year as we process requests for new permits and permit modifications.

As a reminder, applications for new permits and major permit modifications must be submitted by April 1, 2022, for processing under our programmatic framework this year. Requests for minor changes may be submitted at any time.



Please share this information with your Co-Investigators. If you have questions about this upcoming change as it relates to your research, please email Amy Hapeman or Erin Markin, Ph.D., at amy.hapeman@noaa.gov or erin.markin@noaa.gov.

Sincerely,

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Jolie Harrison
Chief, Permits and Conservation Division
Office of Protected Resources

Literature Cited

Foley, A.M., Stacy, B.A., Schroeder, B.A., Hargrove, S.K., Lloyd, C.A., Minch, K.E., Wideroff, M.A., Schaf, S.A. & M.B. Burtleson. 2021. Testing Detectability of PIT Tags by Size, Tagging Location, and Reader Model. Marine Turtle Newsletter 164: 1-5.

NMFS. 2019. Biological and Conference Opinion on the Proposed Implementation of a Program for the Issuance of Permits for Research and Enhancement Activities on Threatened and Endangered Sea Turtles Pursuant to Section 10(a) of the Endangered Species Act (2018 Reinitiation). Silver Spring, MD.

cc:

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