



Applicant Information Form 12b Holding, taking, importing, exporting marine mammals for non-research purposes

The Department recommends that you contact us to discuss the proposed activity prior to completing the application forms:

Permissions Advisor (Support)

Phone: +64 3 371 3700

Email: permissionschristchurch@doc.govt.nz

This form must be completed when applying for permits to hold, take, import, export marine mammals for non-research purposes ONLY. If you wish to hold, take, import, export marine mammals for research purposes please fill in [Form 12a](#), available on the DOC website.

Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

Please note that the application process involves notification in the *Gazette* for 28 days (see s.5.5 of the Act), allow sufficient time when submitting the application for this to be undertaken.

Once you have filled in your application form, please complete this checklist to ensure that all components of your application are complete. This will help prevent any possible delays in the processing of your application.

- Legal status (company/trust/inc society) registration number (if not an individual)
- Written consultations (if applicable)
- Have you read and accept the section regarding the liability of the applicant for payment of fees
- Have you signed your application?**

All efforts in putting together a detailed application are greatly appreciated and will allow the Department to effectively and efficiently process your application.

A. Applicant Details

Applicant Name
(full name of registered company or individual, student or university) Brian E Thomas

Legal Status of applicant (tick) Individual Registered Company Trust Incorporated Society

Other (please specify full details)

Please supply the company, trust or incorporated society registration number:

If an individual please supply your date of birth (this is a unique identifier for you): 03/11/1960

Trading Name
(if different from Applicant name)

Postal Address (of Applicant)

Street Address (if different from Postal Address)

Phone

Website

Contact Person and role Brian E Thomas, Self

Phone

Cell Phone

Email

Contact Person and role

Phone

Cell Phone

Email

B. Details of Proposed Activity

Take Hold Import Export

NB please tick all applicable activities

C. Purpose of Proposed Activity

- Description of activity

I will be moving to Palmerston North, New Zealand in June of 2026. I wish permission to bring with my household goods two items of Native Alaskan art procured legally in Alaska. The first is a pair of gloves purchased at the gift shop of the hospital where I have been employed. They are made of suede leather with the back portion made from Spotted Seal skin harvested by subsistence hunters near Nome, AK. The second is a vest made from leather combined with Steller Sea Lion skin harvested by subsistence hunters in Southeast Alaska. This was purchased at the gift shop of the Alaska Native Heritage Center in Anchorage, AK. Both of these items were purchased approximately two years ago, before I had made the decision to relocate to New Zealand.

- Species of marine mammal item/part (if known):

1. Spotted Seal (Phocidae Phoca)
2. Steller Sea Lion (Eumetopias jubatus)

- Type of marine mammal item/part (eg tooth):

1. Skin used in making gloves
2. Skin used in making vest

- Number of marine mammal items/parts:

One per item being imported

- How was the marine mammal item/part obtained:

1. Purchased at the gift shop of the hospital where I am currently employed as a Psychiatrist.
2. Purchased at the gift shop of the Alaska Native Heritage Center in Anchorage in March of 2024.

- Proposed dates for import/export if applicable:

Approximately August of 2026, will be moved with my household goods if approved.

D. Other

Is there any further information you wish to supply in support of your application?

The native people of Alaska have practices subsistence hunting for thousands of years. In this process, no part of the animal is allowed to go to waste.

The native Inupiaq people of the Bering Sea area have hunted seal for centuries as a subsistence practice and continue to do so until this day. No part of the animal goes to waste and skin is used to make warm and waterproof clothing. The gloves in question were made by an artist living in Anchorage to be sold at the gift shop of the Alaska Native Medical Center, the hospital where I am employed as a Psychiatrist.

Regarding subsistence hunting, from the US NOAA website:

Population Status

No accurate range-wide abundance estimates exist for spotted seals. Based on crude estimates available in historic literature, the worldwide population of spotted seals is estimated to be more than 500,000 individuals.

There is one recognized stock of spotted seals in US waters: the Bering stock. Abundance estimates for this stock are provided in the stock assessment report.

Historically, subsistence harvest of spotted seals has been moderately low and is not anticipated to increase significantly. While the United States does not allow the commercial harvest of marine mammals, such harvests are permitted in some other portions of the species' range. Based on available data, these harvests are not thought to have been high enough historically to cause significant reductions in abundance and appear to be generally limited.

The most recent stock assessment report is from 2020, providing a minimum population estimate:

Minimum Population Estimate The minimum population estimate (NMIN) for a stock is usually calculated using Equation 1 from the potential biological removal (PBR) guidelines (NMFS 2016): $NMIN = N / \exp(0.842 \times [\ln(1 + [CV(N)^2])^{1/2}])$, which approximates the 20th percentile of a distribution that is assumed to be log-normal. However, the abundance estimate based on Conn et al (2014) was calculated using a Bayesian hierarchical framework, so we used the 20th percentile of the posterior distribution of abundance estimates as a more direct estimator of NMIN than Equation 1 to provide an NMIN of 423,237 spotted seals in the US Bering Sea in the spring.

Likewise, for the Steller Sea Lion, the skin is used in making warm and waterproof clothing. In March of 2024, while visiting the Alaska Native Heritage Center in Anchorage, Alaska, I had the opportunity to

purchase a vest made with leather and also using the skin of a legally harvested Steller Sea Lion. The Heritage Center is no longer able to provide specific details regarding the artist who made this particular piece as it was approximately two years ago and they do not maintain specific records of this type.

From the US NOAA website, regarding population of this species:
The Eastern DPS includes Steller sea lions originating from the rookeries of Cape Suckling. The eastern stock increased at a rate of 4.25 percent per year (95 percent credible intervals of 3.77-4.72 percent) between 1987 and 2017, based on an analysis of pup counts in California, Oregon, Washington British Columbia and Southeast Alaska.

The site also notes:

It is illegal to shoot Steller sea lions unless you are an Alaska Native and the take is for subsistence purposes (food or handicraft" and is not accomplished in a wasteful manner.

E. Consultation Undertaken

Some applications require consultation with whānau/hapū/iwi (local Māori), and other interested parties. Please contact the nearest Department of Conservation office to discuss what is required. Written expert views, advice or opinions concerning your proposal may also be attached to support the application. Attach any proof of consultation to the application.

F. Fees

Section 60B of the Conservation Act enables the Department to recover all direct and indirect costs from an Applicant to process an application regardless of whether the application is approved or declined. If at any stage an application is withdrawn the Department will invoice the Applicant for the costs incurred by the Department up to that point. Applicants are required to pay the processing fees within 28 days of receiving an invoice. The Director-General is entitled to recover any unpaid fees as a debt.

We will send you an estimate of fees before they are incurred and invoice you once we have processed your application. Please contact us for further information.

Waiving or Reducing Fees:

The Director-General of Conservation has discretion to reduce or waive processing fees.

You may apply for a fee waiver or reduction if you provide information to the permissions team about how your application meets at least one of these criteria:

- The activity will make a direct contribution to management
- The activity will support or contribute to the Department's priority outcomes – which are stated in the Department's 2013-2017 Statement of Intent ([available on the DOC website](#))
- There will be other non-commercial public benefits from the permission (if approved)
- Activity covered by the authorisation (other than research, collection or educational activities) will make a contribution to the management of, or the public interest in, the lands that are covered by the permit

Paying fees:

The Department will ordinarily invoice the applicant for processing fees after a decision has been made on the application, but in some cases interim invoices will be issued.

Please select your method of payment below:

- I have attached a cheque
- I have direct credited the DOC account (please use Applicant name and MMRP as references)
Department of Conservation
Westpac Bank
Account number: 03 0049 0002808 00

- I have a purchase order/number from an organisation registered with DOC

Order number/purchase number:

- I do not intend to pay the fees at the time of applying and/or I require an invoice for payment – I have filled in the Terms and Conditions for an Account with the Department of Conservation (following) with my own information.

Terms and Conditions for an Account with the Department of Conservation:

Have you held an account with the Department before? (Please tick) Yes No

If yes, under what name:

1. I/We agree that the Department of Conservation can provide my details to the Department's Credit Checking Agency to enable it to conduct a full credit check.
2. I/We agree that any change which affects the trading address, legal entity, structure of management or control of the applicant's company (as detailed in this application) will be notified in writing to the Department of Conservation within 7 days of that change becoming effective.
3. I/We agree to notify the Department of Conservation of any disputed charges within 14 days of the date of the invoice.
4. I/We agree to fully pay the Department of Conservation for any invoice received on or before the due date.
5. I/We agree to pay all costs incurred (including interest, legal costs and debt recovery fees) to recover any money owing on this account.
6. I/We agree that the credit account provided by the Department of Conservation may be withdrawn by the Department of Conservation, if any terms and conditions of the credit account are not met.
7. I/We agree that the Department of Conservation can provide my details to the Department's Debt Collection Agency in the event of non-payment of payable fees.

Declaration

I certify that the information provided on this application form and all attached additional forms and information is to the best of my knowledge true and correct.

Note: The Director-General may vary any permit granted if the information given in this application contains inaccuracies.

Signature (Applicant)	[Redacted]	Date	03/03/2026
Signature (Witness)	[Redacted]	Date	03/03/2026
Witness Name	[Redacted]		
Witness Address	[Redacted]		

This application is made pursuant to the Marine Mammals Protection Act 1978.

Applicants should familiarise themselves with the relevant sections of the Marine Mammals Protection Act 1978.

NOTE: Further information may be sought from you for this assessment if this application is not completed fully as required. The purpose of collecting this information is to enable the Department to process your application. The Department will not use this information for any reason not related to that purpose.

Applicants should be aware that provisions of the Official Information Act might require that some or all information in this application be publicly released.

For Departmental use only

Credit check undertaken	[Redacted]
Comments :	[Redacted]
Signed	[Redacted]
Approved (tier 4 manager or above)	[Redacted]
	Name
	Name