

Level-Designated Recurrent Training Requirements for Large Whale Entanglement Responders

*Prepared by the Marine Mammal Health and Stranding Response Program in
NOAA Fisheries' Office of Protected Resources*

Entangled whales are large, wild, and unpredictable animals that may abruptly react to responder activities when personnel are in close proximity, making large whale entanglement response a dangerous activity. Network Responders are trained and authorized by NOAA Fisheries to conduct safe and humane entanglement response activities based on the agency's [Best Practices](#). It is imperative that members of the network maintain their skills and ideally work to improve and expand their skills and abilities to ensure that the Network operates as safely as possible. While some CIs may not have led or been a part of an entanglement response in many years, all CIs have an immense amount of experience and knowledge and have valuable input while planning, conducting, and debriefing after entanglement response operations. However, CIs that have not recently trained or deployed during a response may not be up to date on the latest Best Practices and their skills may not be as sharp as they once were. To ensure that we are operating in the safest and most efficient manner possible, NOAA Fisheries will begin to implement a level-designated recurrent training program.

This program will apply to all Co-Investigators (CIs) listed as Level 3, 4, and 5 under the MMHSRP MMPA/ESA permit (currently Permit No. 24359). Every two years, these CIs must complete one of the following activities to maintain an active status at their current responder Level:

- Lead or have an active role during a response in which the CI conducts the activities outlined in their CI letter, or the CI was verbally authorized by their Regional Entanglement Coordinator to conduct activities beyond what is authorized in their CI letter. Response efforts for large whales would be preferred, but in some instances responses to leatherback sea turtles or research on large whales that uses transferable skills (*e.g.*, suction cup tagging with poles) could also be used to meet this requirement;

OR

- Take part in at least one refresher training (either NOAA-sponsored or Network-sponsored) in which they have inspected equipment and practiced the skills needed to conduct the activities outlined in their CI letter, or skills beyond those listed in their CI letter. Training opportunities that could apply can either be on-water/hands-on or an advanced classroom training.

Inactive CI Status

Every two years, permit CIs will be asked to confirm they have met one of the two requirements to remain in an active status. If a CI has not met one of the requirements in the past two years, they will be listed as inactive. An inactive CI would only be authorized to conduct activities one Level lower than what is currently listed in their CI letter. For example, an inactive Level 4 responder would be able to lead efforts to tag, but may not intentionally cut or remove gear without verbal approval from the Regional Entanglement Coordinator. Additionally, the time a CI spends inactive may be taken into consideration when issuing new CI letters under subsequent permits. A CI in active status will continue to maintain all of the authorizations outlined in their CI letter.

Operating as an Inactive CI

In order for an inactive responder to lead a response that included activities outlined in their current CI letter, they would need to be verbally authorized by the Regional Entanglement Coordinator or another MMHSRP permit CI (Level 3, 4, or 5 responder, depending on the type of response). If an inactive CI successfully leads a verbally authorized response that includes activities outlined in their current CI letter, that response would count towards them moving back into an active status.

Success does not necessarily mean the disentanglement of the animal. For example, an inactive Level 4 CI may grapple trailing gear and attach a tag without verbal authorization. The inactive CI then calls their Regional Entanglement Coordinator to receive permission to attempt to cut the gear. The inactive CI receives verbal authorization and attempts to make cuts to the gear. The whale becomes more uncooperative and no cuts are made, however, in a debrief with the Regional Entanglement Coordinator the team acknowledges that the inactive CI and their team performed as best they could given the circumstances. Therefore, the inactive CI could once again become an active Level 4 responder.

Recently inactive CIs may still organize and lead a hands-on training of other members of the National Large Whale Entanglement Response Network. For example, a Level 3 CI that has been listed as inactive for the past two years can still organize a training in which they teach Level 2 responders how to grapple and attach tags/buoys to trailing gear. However, inactive CIs that have continuously remained inactive for more than 5 years must become active before they lead a hands-on training of other members of the National Large Whale Entanglement Response Network.

Reinstatement to Active Status

An inactive CI would become an active CI once they have met one of the requirements to maintain an active status (listed above). Once an inactive CI meets the requirements to be reinstated as an active CI, they would email a request for reinstatement to the Regional

Entanglement Coordinator and National Entanglement Coordinator and outline how they met one of the requirements to be reinstated as an active CI. Upon approval by the National Entanglement Coordinator, they would be reinstated as an active responder.