

**WILDLIFE AND COUNTRYSIDE LINK BRIEFING**

**TO THE UK GOVERNMENT:**

**KEY ISSUES FOR THE 59<sup>TH</sup> MEETING OF THE  
INTERNATIONAL WHALING COMMISSION**

**May 2007**

		
		
		

## **Wildlife and Countryside Link briefing to the UK Government: Key Issues for the 59th Meeting of the International Whaling Commission**

This briefing is provided on behalf of the following members of Wildlife and Countryside Link:

- Campaign Whale
- Environmental Investigation Agency
- Greenpeace
- International Fund for Animal Welfare
- Marine Connection
- Royal Society for the Prevention of Cruelty to Animals
- Whale and Dolphin Conservation Society
- World Society for the Protection of Animals
- WWF-UK

The Wildlife and Countryside Link (Link) Whales Working Group is composed of Non-Governmental Organisations with a range of concerns. These include organisations whose mandate relates purely to conservation issues, organisations whose mandate relates purely to welfare issues and organisations that are concerned about both conservation and welfare. Where joint documents include statements on issues relating to whale welfare these do not necessarily represent the views of all groups.

### **Political issues**

#### *Response to normalisation meeting*

Wildlife and Countryside Link (Link) anticipates that Japan will table a statement from the normalisation meeting for adoption by IWC59. We urge the UK Government to recommend to Switzerland and South Africa that they take steps to ensure they are not portrayed as endorsing any conclusions of the meeting simply because they attended.

#### *Transparency*

The normalisation meeting recommended secret ballots and closed sessions as a way forward at the IWC. This should be highlighted and opposed.

#### *A pro-conservation majority*

If the Like-Minded countries hold a majority of votes at IWC59, Link urges that it should be used proactively, not just reactively. Accordingly, we urge the UK Government to:

- seek a vote to repeal the *St Kitts and Nevis Declaration*, saying it is void and does not represent the will of the Commission;
- propose a resolution directed at CITES opposing the Japanese proposal to add whales to the Periodic Review. This resolution should not be tabled if the Like-Minded countries are not confident of having the numbers to adopt it intact. Further, in regard to CITES, we ask the UK Government to urge IWC Chairman Hogarth to attend the CITES CoP. If he does not, we fear that Vice Chair Morimoto will attend instead;

- ensure passage of an amendment to Rule of Procedure Q2 to eliminate the ability of governments to keep documents submitted to the Scientific Committee confidential, thus ending the secrecy that surrounds proposals for 'scientific' whaling and allowing them to be discussed in the wider scientific community;
- table or co-sponsor a resolution under Item 10 Scientific Permit, review of JARPA, pointing out that this review shows that the JARPA programme was deeply flawed and that it is the conclusion of the Commission that its results are not necessary for the work of the Commission and that it never should have taken place;
- table a resolution on climate change and its impacts on cetaceans (exact content currently under discussion). This will build on Defra's report '*Climate Change and Migratory Species*' (Defra 2005) and secure the UK Government's position as one of the world's leading governments on climate change. It will also support the Scientific Committee's plans for a climate change workshop;
- table a welfare resolution (exact content currently under discussion, but likely referring to a need for data on individual whales and improvements in struck and lost rates in both aboriginal and commercial hunts). More details on welfare are given in Annex 1.

#### *'Deals'*

We are concerned that Japan may push harder this year for support for its Small Type Coastal Whaling (STCW) quota, in return for support for the Aboriginal Subsistence Whaling (ASW) quotas. We remind the UK Government that incorporating an STCW quota into the Schedule would overturn the moratorium on commercial whaling (which could have devastating consequences for CITES), and that any whaling of North Pacific minke whales, including coastal whaling, involves an unacceptable risk of taking J-stock animals. The UK Government should ensure that its scientists raise concerns over the current JARPNII takes of J-stock minkes during SC in order that this sustainability concern may be referred to during the Commission's debate over whether to agree a STCW quota.

### **Agenda specific items**

Numbering follows the Annotated Provisional Agenda.

#### *2. Adoption of the Agenda*

Norway has proposed that Environment and Health Issues and Whalewatching be transferred to the Conservation Committee. This should be opposed.

#### *5. Aboriginal Subsistence Whaling*

Japan may propose to remove the word 'aboriginal' from the Schedule, saying it is considered by some to be derogatory. The real purpose of this is to blur the distinction between the aboriginal subsistence scheme, which was designed to meet the needs of indigenous people with a long standing dependence on whaling for local food and is not subject to the moratorium, and commercial whaling. It appears to be part of a wider strategy to introduce a new category of 'community based whaling' which should be strongly opposed. Any amendments proposed to Schedule Para 13 should be closely examined to ensure that Aboriginal Subsistence Whaling (ASW) remains clearly defined and separate from commercial whaling. We also remind the

UK Government that, despite the Commission's commitment to develop an Aboriginal Subsistence Whaling Scheme (akin in principle to the RMS, to regulate ASW) many years ago, this scheme has yet to be completed and adopted.

#### *Bowhead whales*

This is one of the best studied populations of whales in the world. The UK Government should instruct its scientists to be alert to efforts to cast scientific uncertainty on the population status and to oppose such attempts if they are not well justified.

#### *Greenland*

Greenland is expected to request a quota of humpback whales, and perhaps even bowhead whales, to contribute to the tonnage of whale meat that it claims to need. However, over the last five year quota block, there has been a shortfall in catches of both fin whales and minke whales apparently caused by decreased hunting effort. In addition, we have serious concerns about the sustainable management of the hunt in Greenland. We suggest that the UK Government ask Denmark in advance if Greenland plans to request additional whales and to oppose any formal request to the Commission.

#### *St Vincent and the Grenadines*

Similarly, St Vincent was awarded a total of 20 humpback whales for the season 2003-2007, but has taken only a fraction of this. We suggest that the UK Government ask St Vincent in advance of the meeting to bring a comprehensive needs statement to justify its requested quota.

#### *6. RMS*

Norway may present proposed changes to the RMP. These will be designed to increase quotas in the short term and should be vigorously opposed.

Link urges the UK Government to consider drafting and leading a resolution opposing Norway's commercial whaling, and unilateral re-tuning of the RMP, if there is a majority in Anchorage.

#### *7. IWC in the Future*

The report of the 'Normalisation' meeting will be presented under this item. The Like-Minded should resist any attempt to turn this item into a discussion of the 'Normalisation' meeting and instead advocate the future of the IWC as a conservation body.

We urge the UK Government to take a strong line to promote the position that commercial whaling without an internationally agreed precautionary and conservation-based enforceable management and compliance system, as is currently the case, is highly irresponsible in light of the following facts:

- the inherent difficulties encountered in accurately assessing and monitoring whale populations' numbers, genetic make-up, and ranges, and temporal changes to all of these;
- a lack of international consensus, despite considerable and lengthy effort, over the necessary content of a management scheme to guarantee sustainable and humane whaling;

- whales being slow-breeding, long-lived animals and therefore especially vulnerable to extinction as a result of mismanagement;
- environmental threats to cetaceans and the unpredictability of anthropogenic changes in the marine environment; and
- the inherent unavoidable and unacceptable welfare implications of whaling.

The IWC should concentrate on conservation of whales, quantifying and recommending mitigation for existing threats and expanding its commitment to this area via the Conservation Committee and through the Scientific Committee's Working Group on Environmental Concerns. In this regard, the UK Government should encourage members who have refused to attend the Conservation Committee to participate and make good faith contributions to its work.

#### *8. Sanctuaries*

We urge the UK Government to support the Argentina/Brazil proposal for a South Atlantic whale sanctuary.

#### *9. Socio-economic implications and small type whaling*

Japan's request for a coastal quota will be presented under this item. The fact that Japan offers to reduce its 'scientific' catch to compensate for any quotas assigned under this item indicates the political nature of the 'scientific' catch. Further details on this proposal, and why it should be strongly opposed, are available in a letter submitted to you by some members of Link and other non-UK groups, attached as Annex 2.

#### *10. Scientific Permits*

Current proposals to revise the way the Scientific Committee reviews proposals for 'scientific' whaling would move discussion of proposed 'scientific' takes into a small subgroup of the Scientific Committee. This subgroup would be picked by its convenor and closed to others. The proposal would be initially available only to this hand-picked group which would further restrict open and transparent discussion and decision-making on this issue. This should be vigorously opposed.

Japan has said it will not submit a resolution supporting its 'scientific' whaling. This is simply an attempt to forestall a resolution by the Like-Mindeds criticising its 'scientific' whaling. This program has killed 6,778 whales over 18 years, generating hundreds of millions of dollars in income reported on ICR balance sheets, but has failed to reach a single one of its scientific goals – it is clearly of a commercial nature, not scientific. The Like-Minded should press ahead with a resolution critical of this programme which identifies its primarily commercial nature.

The UK Government should instruct its scientists to oppose the creation of a code of conduct for 'scientific' whaling, should one be proposed. Such a code will merely legitimise some form of 'scientific' whaling and might also restrict discussion on scientific permit whaling proposals.

Link urges the UK Government to consider drafting a resolution on Iceland's Scientific Whaling programme which is expected to end in 2007.

#### *11. Safety at sea*

We expect a presentation by Japan about the activities of an NGO which claims to deliberately ram other ships (and which has been expelled from the IWC) and we

expect Japan to suggest that all confrontation with its ships at sea is a form of terrorism. We note that last year the Commission agreed by consensus that 'the Commission and Contracting Governments support the right to legitimate and peaceful forms of protest and demonstration' and urge that this be reaffirmed noting that non-violent interference in catching operations, as has occurred for many years, is a legitimate form of protest. We urge that any statement about safety of vessels and crews should also consider the safety of those involved in protests. In particular, the discharge of any weapon when a human being is in the field of fire should be strictly forbidden.

With respect to Interference with Research, we note that when the research is carried out on the high seas, both whalers and protesters have an equal right to approach a hunted whale since it does not become the property of its hunters until it is captured.

We note that under item 11.3, Environmental Concern, JARPA II dumps large amounts of waste into the ocean from whales it has taken, estimated at over 2,000 metric tons in 2005/06 and projected to rise sharply with the scaling up of the JARPA II program in 2007/08.

#### *15.1 Small Cetaceans*

We urge the UK Government to champion the Dall's porpoise at the IWC and increase pressure on the Japanese government to publish scientific data pertaining to this species, including new abundance estimates. The abundance estimates from which the current hunt quotas are calculated are based on surveys undertaken over 15 years ago; more than a quarter of a million porpoises have been removed from the populations since these surveys were carried out. We urge the UK Government to question the continuation of a clearly unsustainable hunt, which is the largest cetacean hunt in the world, and which provides meat products which are too polluted to consume. Further, we urge the UK Government to ensure support from Like-Minded countries in drawing attention to the 2001 Resolution calling on Japan to stop the hunt.

#### *19.2 NGO accreditation and participation*

The NGO community expects the proposed new rules to be used to restrict the participation of anti-whaling NGOs at the IWC. We urge that the UK Government oppose any 'test' of the competence or orientation of NGOs and, in particular, oppose the proposal to strip all existing NGOs of accreditation and force them to re-register. Instead, we urge the UK Government to propose grandfathering in all existing NGOs and have the new rules for accreditation, if any, apply only to new applications.

#### *19.3 Legal advice*

This is a potential minefield which has been explored before. If proposed Schedule amendments are to be reviewed for consistency with Article 5.2 of the Convention, who will decide if they are consistent? Japan is on record (most recently in item 8 of this agenda) as believing that the creation of the Southern Ocean whale sanctuary was not consistent with Article 5.2, despite the fact that Article 5.1 (c) provides that the Commission may fix 'open and closed waters including the designation of sanctuary areas', and that the use of sanctuaries to protect whale populations is an accepted management measure in many institutions including the IWC.

Seeking outside legal opinions in cases of disagreement has been raised before and rejected. Who will pick the source of legal advice? Who will write the question? Who will decide if the advice will be accepted? As one Commissioner said when this was last raised: "If we get an opinion, and it is not to the taste of some members, will

we get a second opinion? A third?" Whilst the collection of legal opinion and analysis can provide valuable insights, in the final analysis a decision of this nature must be taken by the Commission itself - it cannot be outsourced to lawyers.

*19.4 Amendment to the rules of debate*

Japan intends to propose an addition to the Rules of Debate as follows: 'Slandorous verbal statements and/or slanderous language in Resolutions is prohibited.' While in no way supporting slander, which is the uttering of false statements damaging to the reputation, we want to draw attention to the fact that what is seen by one party as an unpleasant truth may be seen by another as slander. For example, 'scientific' whaling is widely seen as commercial whaling in disguise and the JARPA program has produced little of scientific value, but Japan would be likely to consider such statements as slander and object to them being voiced in the meeting.

We thank the UK Government for providing language for an amendment to the rules of procedure which would make it impossible to designate proposals for 'scientific' whaling as confidential. We urge this be strongly supported.

## Annex 1 – Welfare

The whaling nations' attempts to 'normalise' the IWC have severe implications for whale welfare and are of grave concern. The 'Normalisation' meeting report claims that welfare considerations compromise the culture of whaling, and Link urges that the inference that welfare should instead be compromised be strongly challenged by the UK. Link also calls upon the UK Government to advocate a strong welfare focus to other like-minded parties. In addition to the welfare implications of 'normalisation', there are a number of other issues of welfare concern at IWC59. A summary is provided here<sup>1</sup>:

### **1. Lack of welfare data reporting to the IWC and struck and lost whales**

Japan, Norway and Iceland have said that they will not provide any further welfare data to the IWC, undermining its mandate to address the welfare issues of whaling. There is also a recognised need for improvement of struck and lost rates, but there is a lack of data availability. Link recommends the UK Government should table and encourage support for a Resolution calling for the resumption of data reporting by the whaling nations, and of additional data reporting requirements for struck and lost incidents.

### **2. Japan's small-type coastal whaling schedule amendment**

Japan's proposal does not include provision for any collection of welfare data, nor does it mention the need for controls relating to minimum hunter training, weaponry requirements, or adequate inspection. Link urges the UK Government to highlight this unacceptable 'oversight' and cite it as a key reason to oppose the amendment.

### **3. Commencement of the full JARPAII programme**

Recent Japanese data suggests that around 60% of minke whales will not die instantaneously, equating to around 560 minke whales suffering for prolonged periods in 2007/8. JARPAII will also use weaponry designed for minke whales on fin and humpback whales some 12 times heavier, inevitably leading to greater suffering potential. Link urges the UK Government to state its opinion that the exploding harpoon is an inherently inhumane slaughter method and should not be sanctioned for use in either scientific or commercial hunts.

### **4. JARPNII and efforts to reduce time to death**

There are inaccurate welfare assertions made in a Japanese government-sponsored published scientific paper<sup>2</sup>, including unsupported claims that 'special efforts' have been made to reduce time to death. Link urges the UK Government to challenge the inaccuracies in this paper, and to ask for further details of the 'special efforts' the paper cites, and for the results of these efforts to be made available, quantitatively, to the Commission.

### **5. Iceland's resumption of commercial whaling**

Iceland has resumed commercial whaling with neither relevant legislation to protect welfare nor mandatory requirement for the monitoring, recording or reporting of information relating to the welfare of the whales targeted. Iceland is also using

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<sup>1</sup> further details and substantiation can be found in: *Whalewatch welfare briefing to like-minded Governments for the 59<sup>th</sup> meeting of the International Whaling Commission*

<sup>2</sup> Urushima, T. et al., 2007 Chemical characterization of the oligosaccharides in Bryde's whale (*Balaenoptera edeni*) and Sei whale (*Balaenoptera borealis lesson*) milk. *Comparative Biochemistry and Physiology, Part B* 146 (2007) 153–159

exploding penthrite harpoons designed for minke whales to dispatch fin whales. In light of the new commercial element to the hunt, Link urges the UK Government to press Iceland for more accountability and transparency over hunt welfare.

## Annex 2 – STCW letter



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Dear Commissioner

### **Japan's small type coastal whaling / community based whaling proposal to IWC59**

I write on behalf of the undersigned NGOs to express our grave concern about the request from Japan in the provisional annotated agenda for IWC59 to amend schedule paragraph 10 to grant a quota for its so-called Small Type Coastal Whaling (STCW) communities to hunt minke whales for local consumption. We refer, for details, to the proposal circulated by Japan at the Normalisation Meeting in February 2007.

The Government of Japan has made almost 20 similar requests to the IWC for a quota of minke, and more recently, Bryde's whales - to alleviate the hardship that it claims four whaling communities – Abashiri, Ayukawa, Wada and Taiji – have suffered as a result of the moratorium on commercial whaling. Over the last two decades, Japan has amended the proposal, and the action plan that supports it; adding and removing elements to make it more palatable to the IWC.

It is clear from the provisional agenda for IWC59 that Japan wishes to blur the distinction between commercial and Aboriginal Subsistence Whaling (ASW) – for example by deleting the term 'aborigine' - presumably with the intention of creating a new category of 'traditional cultural whaling' or 'community-based whaling' that is exempt from the moratorium on commercial whaling. We strongly urge you to oppose these efforts for the following reasons:

#### **STCW is not Aboriginal Subsistence Whaling**

ASW is a long-established, distinct, category of non-commercial whaling that the IWC exempts from the moratorium on commercial whaling and for which it is charged with developing a quota setting mechanism (the AWMP) and a regulatory regime (the AWMS). The exemption exists to meet the subsistence need for whale meat of certain indigenous people who have a longstanding tradition of hunting whales and whose nutritional and cultural needs for whales have been explicitly recognised by the IWC.

#### **STCW is commercial whale hunting**

The four towns concerned have hunted whales and small cetaceans on a commercial basis since long before the moratorium. Since 1986, they have continued to hunt Baird's beaked whales,

short-finned pilot whales and Risso's dolphins on a commercial basis<sup>3</sup>. Since 2002, the STCW whaling companies have been commissioned by the Institute of Cetacean Research for their vessels to participate in a coastal component of Japan's North Pacific hunt (JARPN II) for minke whales. Since 2006, STCW vessels have been contracted to take 120 minke whales annually; some of the meat is sold within small-type whaling communities and the remainder is sold across Japan. There is no tradition of hunting Bryde's whales.

As a recent Japanese analysis shows<sup>4</sup>, although production values for the STCW communities dropped as a result of the moratorium, they increased again around 1990 as the communities monopolised almost the entire market for fresh whale products. However, when Japan began dramatically expanding its scientific whaling programmes in 2000, the glut of whale meat drove prices down and another decline in profit began.

Japan has removed all references to *sales, levies, reimbursement*, etc in the proposal. But its assertion that the proposed community based whaling will contain no commercial elements ignores the fact that the supply of meat from Baird's beaked whales and other species by these towns is a commercial operation. It also contradicts Japan's many previous requests for the IWC to respond to the town's *socio-economic* needs. For example, just last year the proposal indicated that the resumption of STCW whaling would promote local processing industries [to] help revitalise the local economies<sup>5</sup>.

An economist from the American Economics Group who reviewed the last Action Plan reviewed in 1995 concluded that<sup>6</sup>:

1. The Plan would create an enterprise that is indistinguishable from known profit-making organizations;
2. There are insufficient controls over the cost reimbursement process to forestall profits or even super-normal profits;
3. The Plan's scheme of taxation is actually a veiled pricing mechanism;
4. The plan confers on the endeavor the potential of monopoly profits which run directly from the monopoly powers implicit the Plan's structure.

#### **Approving this Schedule amendment would lift the moratorium**

The IWC Schedule only regulates two types of whaling; commercial (which is currently banned and to which Japan has no objection) and aboriginal subsistence whaling (for which Japan does not qualify). There is no right enshrined in the Schedule or the Convention to conduct "small type coastal whaling" for the purposes of cultural recovery. Japan's proposal is simply a request to conduct commercial whaling in its coastal waters outside the control of the IWC. Approving Japan's STCW quota would result in a partial lifting of the commercial whaling moratorium with no international oversight regime. Even in the unlikely event that Japan could remove all commercial elements from a STCW operation, the moratorium would still have been dealt a fatal blow by the creation of this new category of unregulated whaling.

#### **Approving the Schedule amendment could result in CITES downlisting**

Between 1975 and 1986, the Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES, placed all great whales on Appendix I (prohibiting international commercial trade). Each listing on Appendix I was a direct response to that species becoming protected from commercial whaling by the IWC.

CITES agreed in a series of resolutions that predate the IWC's moratorium that there should be no international trade in whale species "protected from commercial whaling by the International

<sup>3</sup> The current quota of 62 Baird's beaked whales, 19 Risso's dolphins and 69 short-finned pilot whales annually yields around 450 tonnes of meat annually.

<sup>4</sup> A Endo and Yamao, M. Policies governing the distribution of by-products from scientific and small-scale coastal whaling in Japan. Marine Policy 31 (2007) 169–181

<sup>5</sup> (IWC58/8).

<sup>6</sup> "Japan's Action Plan For Small-Type Coastal Whaling Is a Disguised Commercial Enterprise", Charles W. de Seve, Ph. D, American Economics Group, Inc, Washington DC, 1996

Convention for the Regulation of Whaling". This principle was codified in 2000, after the whaling moratorium consolidated all pre-existing whaling bans, in CITES Resolution 11.4.

If the moratorium on commercial whaling is amended to grant an exemption for STCW, the whaling nations could claim that the moratorium to which CITES defers in RC11.4 no longer exists, and that CITES should start permitting the resumption of trade. If the STCW proposal is adopted at IWC59, Japan could start making this argument at the CITES meeting which follows immediately thereafter. Japan has already submitted a proposal to CITES to amend the resolution in which CITES defers to the IWC and has repeatedly proposed lifting the trade ban in the past.

### **No supervision and control**

Although Japan proposes that the IWC would set STCW quotas, all monitoring, supervision, control and other 'RMS issues' would be the responsibility of Japan, not the IWC. This would mean the IWC has no more control over Japan's STCW than it currently has over its scientific whaling. Japan could take objections to STCW quotas set by the IWC, and not be bound by them. Furthermore, it could renege on its offer in the proposal to reduce scientific whaling quotas in proportion to STCW quotas. Furthermore, the IWC would have no control over welfare aspects of the hunt.

The proposal contains no provision for a catch documentation scheme to ensure that meat from STCW hunts does not mix with meat from commercial or scientific hunts. Furthermore, it provides no explanation of how minke whale meat from STCW will be handled and distributed non-commercially by the towns in parallel with their existing commercial operations for Baird's beaked whales, Risso's dolphins and pilot whales and minke whales through JARPN II.

Japan's record of compliance in hunting high value species is poor, even when there is international oversight. For example, it was revealed last year that Japan and its suppliers had illegally caught over US\$6 billion worth of blue-fin tuna; secretly catching (and under-reporting to the Commission for the Conservation of Southern Bluefin Tuna) up to three times the annual Japanese quota each year for the past 20 years<sup>7</sup>

### **J stock minke whales at risk**

At certain times of year, whales from the critically endangered J stock of minke whales mixes with animals from the more abundant O stock in the North Pacific. J stock whales are hunted and killed in fishing nets in Japan, as evidenced by DNA analysis of whale meat on sale in Japan's market and Japan's own data<sup>8</sup>.

Given Japan's assertion that the J-stock mixing proportion is much higher within 10 nautical miles of the coast, an even higher percentage of J-stock animals can expect to have been taken in the JARPN II coastal hunt since 2002 when the coastal component of the hunt increased.

Japan claims that all whales entering the market place are sampled for DNA analysis, including bycaught whales and whales from the JARPN II hunt, but it refuses to provide the raw DNA data to the IWC's Scientific Committee which would allow analysis of the proportion of J stock animals. Without allowing such an analysis by the Scientific Committee, it is impossible for Japan to claim that the proposed whaling will not impact J stock minkes.

### **Other countries may demand a STCW quota**

The Republic of Korea has also claimed that the moratorium has resulted in hardship for its coastal communities. For example, at the 46<sup>th</sup> annual IWC meeting when Japan's STCW proposal was discussed, the Republic of Korea stated that if Japan was given a catch quota, then Korea too would issue a similar demand for a quota, and stated its belief that the IWC should be equally responsive to all coastal communities' needs<sup>9</sup>.

<sup>7</sup> Australian official says Japan breached tuna quota, Reuters, 12 Aug 2006

<sup>8</sup> Japan's 2006 proposed schedule amendment to permit the catching of minke whales from the Okhotsk Sea West Pacific stock (IWC58/8) states that, of the 238 minke whales taken in sub-area 7 by JARPN and JARPNII offshore hunts between 1996 and 2002, 6.9% were determined to be J-stock animals.

<sup>9</sup> 7.2 Chairman's Report of the Forty-Sixth Annual Meeting

**Poor record of coastal management**

Japan has the seventh largest EEZ (exclusive economic zone) in the world. It already has the largest unsustainable and unregulated commercial slaughter of small cetaceans in its coastal waters, including striped dolphins and Dall's porpoises, about which the IWC has repeatedly expressed concern. The IWC has no basis on which to trust Japan to manage its STCW whaling sustainably.

The importance of protecting whales in coastal waters cannot be overstated. Species that use this habitat are extremely vulnerable to harm from human activity, including over exploitation. Environmental threats to whales which are most intensive in coastal waters include chemical and noise pollution, ship strikes, fishing gear entanglement, noise pollution, and global warming.

In light of the reasons above, we urge you to strongly oppose Japan's proposal for a STCW/community-based whaling quota and would appreciate a response to this letter indicating your views and intended action on this matter.

Yours Sincerely

Sue Fisher, Whale and Dolphin Conservation Society (WDCS)

Animalia, the Federation for the Protection of Animals (Finland)

Animal Welfare Institute (USA)

Australians for Animals International.

Born Free USA

Canadian Marine Environment Protection Society (Canada)

Cetacean Society International

Earthtrust (USA)

Environmental Investigation Agency (EIA)

Finns for the Whales (Finland)

Greenpeace

GSM-Society for the Conservation of Marine Mammals

Helsinki Humane Society (Finland)

Humane Society International

International Fund for Animal Welfare

International Wildlife Coalition (USA)

LegaSeaS International

OceanCare (Switzerland)

Prowildlife (Germany)

Sierra Club (USA)

Whaleman Foundation, USA

World Society for the Protection of Animals (WSPA)