



2005 Market Street, Suite 1700      215.575.9050 Phone  
Philadelphia, PA 19103-7077      215.575.4939 Fax

901 E Street NW, 10th Floor      202.552.2000 Phone  
Washington, DC 20004      202.552.2299 Fax  
[www.pewtrusts.org](http://www.pewtrusts.org)

26 February 2010

Dear IWC Commissioner,

I am writing to you today on behalf of the Pew Environment Group, with regard to the Chair's Report to the Small Working Group on the Future of IWC, which will be discussed at the 2-4 March meeting of the Small Working Group in Florida, USA<sup>1</sup>.

We appreciate the hard work and efforts of the members of the Support Group, and recognize that there are some positive elements within the document, including aspects that relate to inspection, observers, and civil society participation.

However, we are quite disappointed in one particular, crucial, aspect of the document, which we wish to bring to your attention. We support finding a solution to the impasse at the IWC, and to reforming the International Whaling Commission so that it truly benefits whale conservation. It is known to all within the IWC this has indeed been the goal of the Pew Whale Conservation Project ever since it started in 2007. We are therefore very concerned that the document proposes a legitimization of whaling in the Southern Ocean Whale Sanctuary (SOWS), by proposing a quota for whaling in the Southern Ocean by Japan, with no prospect of whaling in the SOWS going to zero in an agreed timeframe. It remains our firm view that only a phase-out to zero of whaling in the Sanctuary will allow for solutions to the other problems facing the Commission.

The Pew Environment Group remains committed to the moratorium on commercial whaling as well as to full implementation of the Southern Ocean Whale Sanctuary. We also remain committed to finding a solution to the impasse in the IWC. However, we can not, and we urge you not to, accept any 'solution' which, in trying to bring the current unilateral catches under IWC control, legitimizes and indefinitely perpetuates whaling inside the Southern Ocean Sanctuary. In addition, the proposed document disregards IWC-agreed management measures and principles. By legitimizing arbitrary determination of catch limits, not based on the Revised Management Procedure, the IWC would be voiding more than a decade of work by the IWC's Scientific Committee. This would lead the IWC down a dangerous path, reminiscent of the IWC's earlier history of disregard for science-based management with devastating results for whales.

We wish to draw your attention to Australia's proposal to improve the package for consideration of the SWG<sup>2</sup>. We welcome Australia's proposal as a positive way forward.

<sup>1</sup>Document IWC-M10-SWG4.pdf at <http://www.iwcoffice.org/meetings/swg0310.htm>

<sup>2</sup><http://www.environment.gov.au/coasts/species/cetaceans/index.html#news>

We urge you to take our concerns into account and thank you for your kind consideration. We look forward to seeing you at next week's meeting in Florida, and to working with you between now and the IWC Annual Meeting in Morocco.

Sincerely,

A handwritten signature in cursive script that reads "Susan Lieberman". The signature is written in black ink and has a fluid, connected style.

Susan Lieberman, PhD  
Director, International Policy  
The Pew Environment Group