

Dear Minister,

### **Greenland's Aboriginal Subsistence Whaling quota request to the IWC**

We, the undersigned European NGOs, write to express our profound concern about an issue on the agenda of the 60<sup>th</sup> meeting of the International Whaling Commission (IWC) commencing 23 June 2008 in Santiago, Chile.

Denmark, on behalf of Greenland, seeks to increase Greenland's Aboriginal Subsistence Whaling (ASW) quota by ten humpback whales. Greenland claims that its growing human population needs 730 tonnes of whale meat annually and that the current quota allocated by the IWC does not meet their needs. Because Greenland's proposal requires an amendment to the Schedule of the ICRW (the convention which established the IWC), the EU members of the IWC must vote the same way on it<sup>1</sup>. We are deeply concerned to learn that, at time of writing, the EU may support this proposal.

Over many decades the IWC has been consistently clear that Aboriginal Subsistence Whaling is only: (1) to be practiced by **indigenous people** with a longstanding reliance on whale products to meet their **nutritional requirements** as well as to **facilitate their cultural traditions**; (2) to meet their **local subsistence needs**; and is (3) **not for commercial use**;

We do not believe that the ASW practiced by Greenland meets these definitions. Indeed, evidence suggests that a significant proportion of its hunt is commercial. Furthermore, we do not believe that Greenland has made a convincing case that it needs more whale meat.

These humpback whales, and the other whales hunted by Greenland, live in European waters. They are European whales. Accordingly, European nations have a responsibility for their conservation under the European Habitats Directive. By supporting this quota request, we believe that European nations will fail their obligations under the Habitats Directive. Furthermore, we believe that they will fail the expectations of their citizens to provide the greatest protection to whales, and to oppose commercial whaling.

The vote on Greenland's proposal is likely to be the first time that the EU votes as a block at an IWC meeting. It would be profoundly disappointing to the European public if the first vote by the EU not only resulted in the unnecessary killing of ten European whales, but also established a dangerous precedent that Aboriginal Subsistence Whaling quotas may be used to meet commercial demand for whale meat.

**We strongly urge you to consider the facts below and direct your representatives at the IWC meeting to oppose the proposal by Greenland to expand its ASW quota by 10 humpback whales.**

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<sup>1</sup> The EU Council Decision establishing the position to be adopted on behalf of the European Community with regard to proposals for amendments to the Schedule of the International Convention on the Regulation of Whaling establishes that the EU must support proposals for the management of aboriginal subsistence whaling, on the condition that (1) conservation of relevant stocks is not compromised, having due regard to the precautionary principle and the advice of the Scientific Committee and that (2) whaling operations are properly regulated and catches remain within the scope of documented and recognised subsistence needs.

**1. We challenge Greenland's assertion that its current ASW quota does not provide enough whale meat to meet its needs.** In fact, Greenland rarely takes its full quota of whales awarded by the IWC. For example, since 1990, Greenland has taken an average of only 14 fin whales per year out of an available quota of 19 annually. Based on Greenland's own figures, this represents 50 tonnes of meat a year that is available to Greenland but not realised. This is the equivalent of five humpback whales.

**2. We have concerns about whose needs in Greenland the ASW quota is meeting.** Although the IWC specifies that the meat and products are to be used "exclusively for local consumption", Greenland interprets 'local' to mean the whole of Greenland. Accordingly, whale products are available for purchase in supermarkets across Greenland to every one of its 56,000 people and visiting tourists, not just its Inuit community. New evidence from market surveys in Greenland also indicates that significant profits are being realised by private companies from the retail sale of whale products.

**3. We have concerns about the scientific basis of the claimed need.** We understand that Greenland calculates its quota on the basis that one minke whale yields two tonnes of meat; one humpback yields eight tonnes of meat and one fin whale yields ten tonnes of meat. However, Greenland's need is satisfied by whale blubber as well as meat. Despite this, the two, eight and ten tonne conversion factors only relate to meat yield. If blubber and other edible products were included in the conversion factors, minke whales would yield a good deal more than 2 tonnes, humpbacks more than 8 tonnes and fin whales more than 10 tonnes. Accordingly, fewer – not more - whales might be needed to make up the total tonnage of 730 tonnes that Greenland claims that it needs. Before making a decision about Greenland's request for more whales, it is crucial that the IWC's Scientific Committee calculates the likely yields of meat and blubber from the stocks concerned.

4 Greenland kills 4,000 small whales, dolphins and porpoises annually, but does not take into account the meat and blubber that they provide when calculating its claimed need. These animals essentially 'top-up' Greenland's ASW quota. Before making a decision about Greenland's request for more whales, it is crucial that the IWC's Scientific Committee calculates the likely yields of meat and blubber from these 'small cetaceans' so that it can be taken into account by the IWC.

**For the reasons above, we believe that it is impossible for EU member states to be satisfied that Greenland's proposal meets both the scientific and management conditions established in the EU common position. Furthermore, if there is any scientific uncertainty about this hunt, the precautionary principle requires that the benefit of the doubt is given to the whales not the whalers.**

Sincerely

Animal Welfare Institute  
Byron Whale Action Group  
Campaign Whale  
Cetacean Society International  
Comiti Ballena Azul, Nicaragua  
Cousteau Society  
Earth Island Institute  
Environmental Investigation Agency (EIA)  
Humane Society International (HSI)  
Irish Seal Sanctuary  
LegaSeas International  
Pew Environment Group  
Polish Society for Nature Protection (SALAMANDRA)

Society for the Conservation of Marine Mammals (GSM)  
Whale and Dolphin Conservation Society (WDCCS)  
Whales Alive  
World Society for the Protection of Animals (WSPA)  
WWF