



Animal Welfare Institute

900 PENNSYLVANIA AVENUE, SE, WASHINGTON, DC 20003 · 202-337-2332 · AWIONLINE.ORG

October 23, 2023

Re: Umsögn við 99. mál, frumvarp til laga um breytingu á ymsum lögum vegna banns við hvalveidum.

To the distinguished members of the Industrial Affairs Committee:

The Animal Welfare Institute (AWI) wishes to express its support for the proposed bill to ban whaling. Since Minister of food, agriculture and fisheries, Svandís Svavarsdóttir, first issued new whaling welfare regulations in 2022, requiring the Food and Veterinary Authority (MAST) to carry out regular inspections of whaling hunts, it has become increasingly clear that whaling cannot be carried out humanely. We concur with the Expert Advisory Board on Animal Welfare's evaluation in June 2023 that fin whaling is incompatible with Iceland's Animal Welfare Act.

Even taking into account Minister Svavarsdóttir's revision of the whaling regulations on August 31, 2023, which added further requirements for supervision, training, and education, a fin whale killed by the Hvalur 8 on September 7, 2023 took nearly 30 minutes to die. AWI believes all commercial whaling to be inherently cruel; the most advanced whaling methods and regulations cannot absolutely guarantee an instantaneous death or ensure that struck animals are rendered insensible to pain and distress before they die, consistent with the generally accepted standard for domestic food animals and the International Whaling Commission (IWC) definition of humane killing, *i.e.* "Death brought about without pain, stress, or distress perceptible to the animal. That is the ideal. Any humane killing technique aims first to render an animal insensitive to pain as swiftly as technically possible. In practice this cannot be instantaneous in the scientific sense." (IWC/33/15 & IWC/51/12).

We note that when Iceland rejoined the International Whaling Commission (IWC) in 2002 and lodged a reservation to the moratorium, the move was disputed by many countries as being contrary to international law. Argentina, Australia, Brazil, Chile, Finland, France, Germany, Monaco, the Netherlands, Peru, Portugal, San Marino, Spain, Sweden, the United Kingdom, and the United States all formally objected to Iceland's reservation; Italy, Mexico, and New Zealand also objected to the reservation and further noted that they do not consider the International Convention for the Regulation of Whaling as being in force between their countries and Iceland. The decision to lodge a reservation to the whaling moratorium runs counter to Iceland's reputation as a leader in ocean conservation and international marine law.

Hvalur hf.'s export of whale products to Japan also defies the global ban on commercial trade imposed by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). These exports provide infinitesimal economic benefit to Iceland and Hvalur —whose whaling activities have operated at an economic loss since the resumption of commercial whaling in Iceland — and accounts for less than one percent of the total value of Iceland's seafood exports. Japan's annual consumption of whale meat has declined dramatically from 257,000 tons in 1962 to under 2,000 tons. Further, a report by the Center on Japanese Economy and Business indicates that whale meat represents only 0.1 percent of Japan's total meat consumption. This is roughly 40 grams of whale meat per capita.



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Living whales provide enormous benefits to Iceland's local coastal communities and ocean ecosystems, including climate regulation, enhanced biodiversity, responsible eco-tourism, cultural and conservation benefits. In recent years, a range of global organizations have noted the role played by whales in ecosystem services, including the Intergovernmental Panel on Climate Change. Conserving and protecting whales would benefit Iceland's marine conservation and climate change strategies.

Considering the above, the Animal Welfare Institute respectfully urges the committee to support the proposed ban on whaling.

Sincerely,

A handwritten signature in black ink, appearing to read "Georgia Hancock".

Georgia Hancock
Director and Senior Attorney
Marine Life Program