



Náttúruverndarsamtök Íslands

Iceland Nature Conservation Association

Frumvarp til laga um breytingu á ýmsum lögum vegna banns við hvalveiðum

Breyting á [lögum um vernd, friðun og veiðar á villtum fuglum og villtum spendýrum, nr. 64/1994](#).

Þingskjal 99 — 99. mál.

Reykjavík, 24. október 2023

Náttúruverndarsamtök Íslands fagna þessu frumvarpi. Tími kominn til að Alþingi ræði bann við hvalveiðum.

Velferð dýra

Þökk sé auknu eftirliti með hvalveiðum er nú ótvírætt að dráp á langreyðum stenst ekki lagaákvæði um verndun dýra.

Afstaða almennings

Andstaða almennings við hvalveiðar hefur aukist á undanförunum árum. Skoðanakannanir sýna það. Jafnframt hafa áhyggjur fólks af hnignun lífríkisins og breytingum í loftslagi Jarðar aukist.

Hefð?

„Tradition is a modern invention,“ sagði Sir Anthony Giddens, sem eitt sinn stýrði London School of Economics. Hvalveiðar hófust ekki af alvöru hér við land fyrr en 1948. Fyrir þann tíma voru erlendir hvalveiðiflotar hér við land og stunduðu stjórnlausa rányrkju.

Efnahagslegur ávinningur?

Engum blöðum er um það að flétta að landsmenn hafi [engan hag af hvalveiðum](#). Frá því að veiðar á langreyðum hófust á ný árið 2009 til ársins – 2018 var hlutfall hvalkjöts af útlutningsverðmæti landsins 0,12%. Þess utan voru hvalveiðar þessi árin harla óstöðugur atvinnuvegur á umræddu tímabili (sjá töflu á bls. 2).

Sjá [skýrslu](#) matvælaráðherra frá í sumar.

Sjá grein Lovana Veal: [ICELAND: Whaling Puts Fish Sales at Risk](#)

Sjá [frétt Morgunblaðsins](#) 24. október 2006 um viðskiptatækifæri sem glataðist vegna hvalveiða það árið. Engar hvalveiðar urðu árin 2007 og 2008, sem skýrist af framboði Íslands til Öryggisráðs Sameinuðu þjóðanna.

Falsrök

Í ljósi þess að útflutningstekjur af hvalveiðum hafa dregist saman allt frá upphafi níunda áratugar síðustu aldar hafa talsmenn hvalveiða beitt rökum þess efnis að hvalveiðar séu þrátt fyrir allt nauðsynlegar þrátt. Nokkur dæmi eru:

- að árvisst verði að drepa ákveðið magn af hvölum (helst hrefnur og langreyðar) ella verði jafnvægi í lífríki sjávar raskað;
- að verja verði rétt íslensku þjóðarinnar til að nýta lifandi auðlindir sjávar (algjörlega óháð því hvort nýting hvala skilar arði eða spillir orðspori);
- að ekki megi gefa eftir í baráttunni við *efgasinnuð* umhverfisverndarsamtök því ella muni þau færa sig upp á skaftið og hefja baráttu gegn fiskveiðum.¹

Tregur markaður

Kristján Loftsson hefur með litríkum hætti lýst því hversu erfitt sé að eiga við japanska embættismenn, og hvers vegna hann gafst upp á [endalausú skrifaðri](#) árið 2016 og aftur [2017](#). Síðan var aftur haldið til hvalveiða árið 2018. Sennilega til að geta sótt um fimm ára kvóta árin 2019–2023.

Veiðar á langreyðum 2006–2022

Ár	Ár sem fimm ára kvóti er gefin út	Dýr veidd
2006	Leyfi til að veiða 9 langreyðar	7 ²
2009	Leyfi veitt fyrir 2009–2013, 150 dýr á ári	125
2010		148
2011		0
2012		0
2013	Kvóti veittur fyrir 2014–2018	134
2014		137
2015		155
2016		0
2017		0
2018		146
2019	Leyfi veitt fyrir 2019–2023	0
2020		0
2021		0
2022		148
2023		24
Alls		1.024

Á árabílinu 2009–2023 hafa skip Kristjáns Loftssonsson haldið til veiða 7 vertíðir af 15. Að meðaltali annað hvert ár. Hvalur hf. er því ekki sérlega áreiðanlegur vinnuveitandi.

Japanskt fyrirtæki hefur sótt um lán með ríkisábyrgð til að flytja inn hvalkjöt frá Íslandi.³ Gangi það eftir yrði innflutningur á hvalkjöti frá Íslandi niðurgreiddur af japönsku stjórnvöldum.

¹ Sjá leiðara Morgunblaðsins 22. júní 2022, *Rétturinn til nýtingar gæða lands og sjávar*.

² Síðla árs veitti sjávarútvegsráðherra leyfi til veiða á 9 langreyðum. 7 dýr veiddust. Afurðirnar voru fluttar út í júní 2008 en fengust ekki tollafgreiddar fyrr en í nóvember sama ár.

³ Sjá viðhengi: 1) Financing of Icelandic Whale Meat Imports Scrapped, Kyodo Senpaku tells Minato Shimbun og that Fisheries Agency “has not made a decision” Minato Shimbun: May 30, 2022 og 2) *Kyodo Senpaku and*

Flutningur á hvalkjöti í bága við CITES-samninginn

Kristján Loftsson hefur átt í miklum vandræðum með flytja hvalkjöt til Japans. Á árunum 2013 og 2014 voru 169.960 tonn af langreyðarkjöti endursend til Íslands. Hafnir í Hamborg og Rotterdam lokuðu síðan á umskipun á hvalkjöti í ljósi banns við alþjóðlegri verslun með dýr í útrýmingarhættu (CITES).⁴ Þrisvar hefur Kristján Loftsson mátt sigla með hvalaafurðir fyrir Góðrarvonarhöfða til að ná öruggri höfn í Japan. Miðjarðarhafið er of áhættusöm siglingaleið með hvalkjöt enda eru langreyðar samkvæmt flokkun CITES í sama flokki og filabein.

Mikilvægi hvala í vistkerfinu

Undanfarin misseri hafa birst vísindagreinar um mikilvægi hvala í vistkerfinu. Mikilvægara fyrir okkur til skamms tíma er þó að hvalir eru í huga flestra Vesturlandabúa tákni fyrir verndun hafsins. Náttúruverndarsamtök Íslands leyfa sér að minna á að hafið umhverfis Ísland súrnar nú mun hraðar en lífríkið getur þolað til lengdar. Jafnframt er ljóst af fréttum að hitnun hafsins hefur náð methæðum sunnan við landið, en nú er óvenju kalt norðan við landið. Við megum engan tíma missa.

Fyrir 15 árum mæltist landlæknir Færeyja til þess að konur á barnseignaraldri neyttu ekki grindarkjöts vegna kvikasilfurs- og PCB-mengunar í kjötinu. Gegnir furðu að færeysk stjórnvöld hafa ekki enn stöðvað grindadráp í ljósi þess að „því meira sem er af þessum efnum í blóði kvenna á meðgöngu, þeim mun veikara verður ónæmiskerfi barnsins við fæðingu,” eins og segir í tilmælunum. Þar segir ennframt að „kvikasilfursmagn í blóði móður á meðgöngu [hafi] bein neikvæð áhrif á þætti eins og minni, orðaforða, viðbragðsflýti og rýmisskynjun barnsins“.

Verndun lífríkis sjávar er það verkefni sem ríkisstjórn og Alþingi eiga að beina kröftum sínum að í miklu meiri mæli en raunin er nú. Alþingi ber skylda til að taka ábyrgð á að einskis verði látið ófrestað til að takmarka hækkun hitastigs Jarðar við 1,5°C á þessari öld og að stöðva súrnun hafsins.

Veigamiklir þættir við verndun hafsins eru þeir sömu og í baráttunni fyrir verndun hvala. Þann málstað eiga Íslendingar að verja.

Virðingarfyllst,

F.h. Náttúruverndarsamtaka Íslands



Árni Finnsson

Misaka Shoji Seek Reasonable Explanation from Fisheries Agency for Cancellation of Loan for Importation of Icelandic Whale Meat Minato Shimbun: June 7, 2022

Kyodo Senpaku and Misaka Shoji Seek Reasonable Explanation from Fisheries Agency for Cancellation of Loan for Importation of Icelandic Whale Meat

Minato Shimbun: June 7, 2022

Kyodo Senpaku (Chuo-ku, Tokyo; President: Hideki Tokoro), the largest whaling company in Japan, and Misaka Shoji (Yokohama; President: Kenta Inaba) held a press conference in Tokyo on June 3 to protest the Fisheries Agency's policy of withdrawing financing to the company. The two companies are aiming to resume imports of Icelandic whale meat in order to protect the size of the whale meat market, and had received informal consent from the Fisheries Agency's International Division last year for a loan from a related organization (the Overseas Fisheries Cooperation Foundation: OFCF) to provide the necessary funds. The company requested that the Fisheries Agency reconsider the loan, and if the reconsideration is not forthcoming, to explain the reasons why. If the reason remains unclear, they say, it will hinder their ability to procure funds from private banks.

The contentions of the two companies at the press conference are as follows.

The supply of whale meat to the domestic market, which used to be around 5,000 tons per year, will be reduced to around 2,500 tons since 2020 due to the cessation of research whaling in the Antarctic Ocean and the suspension of whale meat imports from Iceland. The supply of whale meat to the domestic market is expected to be around 2,500 tons from 2020 onward. Since the supply of 5,500 tons of whale meat is necessary to maintain the culture and employment related to whaling, it is necessary to ask Iceland, which has a potential production capacity of more than 2,000 tons per year, to resume whaling operations and exports.

Behind the Icelandic whaling industry's suspension of operations was Japan's dependence on subsidies in the whale meat market and the slump in export prices. Kyodo Senpaku and Misaka Shoji requested Hvalur, a major Icelandic whaling company, to resume operations, stating that they would purchase all whale meat at a price that would be profitable for the export side. Kyodo Senpaku plans to pay for the purchase (up to 3 billion yen per year) with a loan from OFCF, which received informal consent last year from the Fisheries Agency's International Division, which oversees OFCF, and this is recorded in the recordings and minutes of Kyodo Senpaku's board meetings.

Kyodo Senpaku estimates that the pace of recovery in the price of whale meat, which has continued for the past two years, will be sufficient to make the business of selling imported Icelandic whale meat profitable. As a result, Hvalur has decided to resume operations.

However, many of the Fisheries Agency's staff in charge of whaling were transferred in April, and since then, the agency has put its attitude toward financing on hold. On May 23 [2022], the head of the Fisheries Agency's International Division gave an explanation to Kyodo Senpaku, saying, "The official in charge in the previous year made informal consent without any organizational decision within the Fisheries Agency. The current section chief has not been informed of any of this matter," and "The decision not to allow financing is an order from the Director-General of the Fisheries Agency, so it will not be reversed." However, no details were provided.

The best thing for the two companies is to get the Fisheries Agency to approve the loan again, but if that does not happen, they plan to negotiate with four institutions, including banks, in order to obtain financing from the private sector. However, negotiations with the private sector have been delayed because the Fisheries Agency's attitude remained unclear until late May. Even now, it is difficult for the private sector to even go to the negotiating table because they are concerned that the reason for the Fisheries Agency's refusal of the loan is unclear. The company hopes to seek a reasonable explanation from the Fisheries Agency as to why the loan was turned down.

Hvalur is preparing to start whaling operations by the end of June and has no choice but to stop now, so they are asking Kyodo Senpaku and Misaka Shoji to remit the necessary funds in a large amount at the earliest possible date. However, with a loan from a private bank, it will be difficult to remit the funds as requested. The Hvalur side commented, "We thought Japan was a sincere country, but we are disappointed."

Some Icelandic government officials have also stated that the quota issued by the Icelandic government will expire in 2023, and that if operations continue to be suspended, the government will not issue a quota for 2024 and beyond. The smooth resumption and continuation of Icelandic whaling operations is becoming more and more important for the very survival of the Icelandic whaling industry.

However, after the two companies' press conference, the Fisheries Agency commented to Minato Shimbun that they have explained in detail the reasons for not financing the project.

水産庁に融資白紙の合理的説明求める 共同船舶と三坂商事、アイス産鯨肉輸入で

2022年6月7日

国内捕鯨最大手の共同船舶（東京都中央区、所英樹社長）と三坂商事（横浜市、稲葉健太社長）は3日に東京都内で会見し、水産庁関係機関から同社への融資取りやめ方針について抗議姿勢を示した。両社は鯨肉の市場規模を守る目的でアイスランド産鯨肉の輸入再開を目指しており、この必要資金について昨年より水産庁国際課から関係機関（海外漁業協力財団）による融資の内諾を得ていたが、5月に融資の約束をほごにされたと主張。水産庁側に融資の再考を求めつつ、再考がかなわない場合は理由を説明するよう求めた。理由が不明なままだと、民間の銀行からの資金調達に差し支えるという。

会見した2社の意見は次の通り。

商業捕鯨再開に伴う南極海調査捕鯨の閉幕と、アイスランドからの鯨肉輸入の停止で、従来年間5000トン程度あった国内市場への鯨肉供給は2020年以降2500トン前後とみられる。捕鯨に関する文化と雇用を保つため、鯨肉供給が5500トン必要なので、年間2000トン超の生産能力を潜在的に持つアイスランド側に操業・輸出の再開を求める必要がある。

アイスランドの捕鯨業界が操業を停止していた背景に、日本の鯨肉市場の補助金依存と輸出価格の低迷があった。共同船舶と三坂商事はアイスランドの捕鯨大手クバル社に対し、輸出側の採算に合う価格で鯨肉を全量買い取るとし、操業再開を要請。買い取り費用（年間最大30億円程度）は共同船舶が同財団からの融資で用意する方針で、同財団を監督する同庁国際課に昨年より内諾を得ており、共同船舶取締役会の録音や議事録なども残っている。

共同船舶の試算上、ここ2年続けてきた鯨肉単価の回復ペースなら、アイスランド産輸入鯨肉販売事業に十分な採算性を見込める。結果、クバル社が操業再開を決断した。

ただ、水産庁側では4月に旧捕鯨担当者の多くが異動し、以降、融資についての態度を保留。5月23日に国際課課長から共同船舶に説明があったが「前年度の担当者の動きは庁としての組織決定を受けず行われた。現課長も一切の報告を受けていない」「輸入資金を供与させないことは水産庁長官命なので覆らない」旨にとどまり、詳細がなかった。

会見した2社としては水産庁に再度融資を認められる展開が最善だが、かなわない場合には民間から融資を受け、銀行など4機関と交渉予定。しかし5月下旬まで水産庁側の態度がはっきりしなかったため、民間との交渉が遅れている。今も、民間側が「水産庁が

融資を断った理由が不透明」と不安視しているため、交渉の土俵につくことすら難しい。融資を断った理由についての合理的な説明を、水産庁に求めたい考えだ。

クバル社側は6月中の操業開始へ人員確保など準備を進め、今更操業をやめる選択肢がないため、必要資金を早期にまとまった額で送金するよう、共同船舶・三坂商事側に要請中。ただし、民間銀行からの融資だと、要請通りの送金は難しい。クバル社側は「誠実な国と思っていたが失望した」とコメントしている。

また現状、アイスランド政府の発給している鯨捕獲枠の期限は23年いっぱい、操業が停止した状態が続けば24年以降の枠を発給しないという同国政府高官も存在。アイスランド捕鯨の存続自体のためにも、円滑な操業再開・継続が重要になっている。

ただ、2社の会見後、水産庁から本紙に「融資をしない理由については具体的に説明している」とコメントがあった。

水産庁に合理的説明求める

共同船舶と三坂商事 アイス産鯨肉の融資白紙で

国内捕鯨最大の共同船舶（東京都中央区、所英樹社長）と三坂商事（横浜市、稲葉健太社長）は3日に東京都内で会見し、水産庁関係機関から同社への融資取りやめ方針について抗議姿勢を示した。両社は鯨肉の市場規模を守る目的でアイスランド産鯨肉の輸入再開を目指しており、この必要資金について昨年より水産庁国際課から関係機関（海外漁業協力財団）による融資の内諾を得ていたが、5月に融資の約束をほごにされたと主張。水産庁側に融資の再

考を求めつつ、再考がかなわない場合は理由を説明するよう求めた。理由が不明なままだと、民間の銀行からの資金調達に差し支えるという。会見した2社の意見は次の通り。

商業捕鯨再開に伴う南極海調査捕鯨の閉幕と、アイスランドからの鯨肉輸入の停止で、従来年間5000ト程度あった国内市場への鯨肉供給は2020年以降2500ト前後とみられる。捕鯨に関する文化と雇用を保つため、鯨肉供給が5500ト必要なので、年間2000ト超の生産能力を潜在的に持つアイスランド側に操業・輸出の再開を求める必要がある。アイスランドの捕鯨業界が操業を停止していた背景に、日本の鯨肉市場の補助金依存と輸出価格の低迷があった。共同船舶と三坂商事はアイスランドの捕鯨大手クバル社に対し、輸出側の採算に合う価格で鯨肉を全量買い取るとし、操業再開を要請。買い取り費用（年間最大30億円程度）は共同船舶が同財団からの融資で用意する方針で、同財団を監督する同庁国際課に昨年より内諾を得ており、共同船舶取締役会の録音や議事録なども残っている。

共同船舶の試算上、この年続けてきた鯨肉単価の回復ペースなら、アイスランド産輸入鯨肉販売事業に十分な採算性を見込める。結果、クバル社が操業再開を決定した。

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Financing of Icelandic Whale Meat Imports Scrapped

Kyodo Senpaku tells Minato Shimbun that Fisheries Agency “has not made a decision”

Minato Shimbun: May 30, 2022

On May 25, at the Yamaguchi Prefecture convention of the National Federation of Restaurant and Food Service Associations, Kyodo Senpaku (Chuo-ku, Tokyo) president Hideki Tokoro gave an exclusive interview to Minato Shimbun at a hotel in Shimonoseki, Yamaguchi, referring to the company's plan to resume whale meat exports from Iceland. President Tokoro's assertions are as follows.

Kyodo Senpaku has been planning to import Icelandic whale meat since last year in order to **protect the size of the whale meat market.** The plan is to purchase all imported whale meat from Iceland at the market price calculated by the company, which will require up to 3 billion yen per year. To obtain the funds, the company had been working with officials from the **Fisheries Agency to obtain a loan from the Overseas Fisheries Cooperation Foundation (OFCF).**

However, the loan proposal fell through. The person in charge at the Fisheries Agency who had been working on this project was replaced this year due to a personnel change, and instead of proceeding with the loan proposal, it was rejected by the Fisheries Agency's division in charge of the matter. When Mr. Tokoro asked the division why the loan proposal was rejected, he was told, “My predecessor had never reported to me, his superior, on any of the details of the project,” and the plan that had been in the works was essentially scrapped. Nevertheless, preparations for the whaling operation on the Icelandic side appear to be progressing, and Kyodo Senpaku is said to be scrambling to find a new financier, as the Icelandic operator wants to sell the whale meat in one lump sum and make a lump-sum payment. So far, this is Kyodo Senpaku's claim.

On the other hand, when we asked the Fisheries Agency about this, they replied, “We are aware that there was a plan to export and purchase Icelandic whale meat, but no decision was made as an organization on the loan matter.”

Kyodo Senpaku has not received a satisfactory answer on this matter and intends to hold a joint press conference in the near future.

アイスランド鯨肉輸入の融資白紙

共同船舶が本紙に経緯 水産庁「意思決定ない」

2022年05月28日 17時50分 配信

鯨共同船舶

全国飲食業生活衛生同業組合連合会山口県大会が開かれた25日、共同船舶（東京都中央区）の所英樹社長は山口県下関市内のホテルで本紙の単独取材に応じ、アイスランドからの鯨肉輸出を再開する計画について言及した。所社長による主張は次の通り。

共同船舶は、鯨肉の市場規模を守る目的でアイスランド産鯨肉の輸入を昨年から画策した。同計画は、アイスランドからの輸入鯨肉を同社が算出した相場での全量買い取りを行うもので、年間最大30億円もの資金が必要になる。資金を得るために海外漁業協力財団（OFCF）から融資を受けることで、水産庁内担当者らとともに道筋を立てていたという。

ところが一転、その融資案は頓挫する。この案件をすすめていた水産庁内の担当者が今年の人事異動により交代し、融資案は進行するどころか水産庁担当課からは却下された。所社長が同課にその事由について求めると「前任者から上司である私へはこれまでの経緯などの報告は一切受けていなかった」と説明があり、取り組んできた計画は実質白紙の状態となった。それでもアイスランド側の捕鯨作業の準備は進んでいるようで、同国事業者は鯨肉の一括販売と一括支払いを望んでいることから、共同船舶は新しい融資先に奔走しているという。ここまでが共同船舶側の主張だ。

一方、この内容について本紙が水産庁の担当課に聞き取りをしたところ「アイスランド産鯨肉の輸出と購入の構想があったのは承知しているが、融資の事案について組織として意思決定が成されたものではない」と回答があった。

共同船舶はこの件に関して納得のいく回答が得られていないとして、共同記者会見を近いうちに開く意向を示している。

アイス鯨肉輸入の融資白紙

共同船舶が
本紙に経緯 水産庁「意思決定ない」

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「前任者から上司である私へはこれまでの経緯などの報告は一切受けていなかった」と説明があり、取り組んできた計画は実質白紙の状態となった。それでもアイスランド側の捕鯨作業の準備は進んでいるようで、同国事業

者は鯨肉の一括販売と一括支払いを望んでいることから、共同船舶は新しい融資先に奔走しているという。ここまでは共同船舶側の主張だ。

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