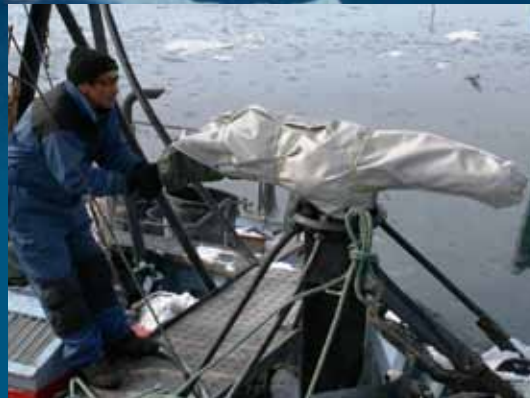


Questionable quotas

Why a credible IWC must reject the Greenlandic proposal



Greenland's whaling is undermining the credibility and effectiveness of the International Whaling Commission (IWC). At the last three annual meetings of the IWC, Greenland has (through Denmark) sought to increase its aboriginal subsistence whaling (ASW) quota. Despite concerns about Greenland's lack of conformity with IWC requirements, including its failure to properly document its claim to need more whales, the IWC has gone to extraordinary lengths to accommodate these applications in recent years. In 2007 the Commission took the unprecedented step of relying on interim advice by its Scientific Committee to satisfy Greenland's request for a new quota of two bowhead whales and an additional 25 minke whales annually until 2012¹.

Despite the 2007 increase, Greenland claims that its current quota remains insufficient to meet its aboriginal subsistence needs and has repeatedly sought an additional quota of 10 humpback whales per year. This request was withdrawn at the 59th annual meeting of the IWC in 2007, rejected by the IWC in 2008 and deferred at the 61st meeting in June 2009. However, the proposal will be presented again at an intersessional meeting of the IWC in March 2010.

WDCS and WSPA believe that voting on this proposal in March is premature for a number of reasons summarised in this briefing. To maintain its reputation as a credible management body, the IWC must ensure consistent application of the agreed criteria that define and limit ASW operations. We encourage contracting governments not to consider Greenland's request until the following concerns are resolved.



Greenland is seeking an additional quota of 10 humpback whales.

Summary of concerns and recommended actions

Concern	Recommended action
The conversion factors for meat yield per species used by Greenland to calculate quotas are unreliable and cannot be validated without new data.	Reject any ad hoc or interim scientific advice on meat yield conversion factors and insist that Greenland collects all data necessary for a review by the full Scientific Committee.
There is significant and demonstrable wastage of meat in existing hunts.	Reject requests for any new quotas until Greenland has demonstrated a significant improvement in the efficiency of its flensing and processing techniques.
Greenland has not submitted a full, quantitative needs statement to the IWC since 1983.	Request that Greenland submit a detailed needs statement, fully and quantitatively documenting its nutritional, subsistence and cultural need for large whales.
The contribution to the subsistence diet made by small cetacean and other hunts has not been quantified since 1983.	Request that Greenland submit to the IWC, as part of its needs statement, a breakdown of the proportional contribution of each hunted species to the diet of the general population as well as to the nutritional subsistence needs of indigenous people.
Greenland's use of whale products does not conform to the IWC's stipulation of 'local consumption' and includes extensive commercialisation.	Consider new quotas only when assured that Greenland is allowing trade and barter on a limited scale (i.e. fresh products at local markets) and has prohibited the commercial processing and sale-for-profit of whole whales.
Greenland's 'multi-species' quotas are contrary to the precautionary principle, ignore species not managed by the IWC, and set the bad precedent of ASW quotas reflecting consumer dietary preferences, not nutritional need or sustainability of removals.	Request that the Scientific Committee completes a Strike Limit Algorithm for each species hunted so that quotas are based on sustainability, not preferences.

Conclusions

The divisive discussions generated by Greenland's repeated requests for more whales have compromised the important category of ASW and blurred the distinction between ASW and commercial hunting. Greenland's repeated failure to provide the IWC with the information requested by numerous contracting governments shows a lack of regard for valid international concerns and an unwillingness to accept international oversight for ASW hunts, despite the IWC's agreement that international regulation is necessary. Granting these unreasonable quota requests would set an extremely poor precedent, undermining the credibility of the IWC as a consistent and rational management body. This is clearly not in the interests of indigenous peoples who conduct legitimate ASW operations in conformity with the IWC.

Awarding a humpback quota to Greenland would be an effective endorsement of the *modus operandi* of its existing hunts, including the unacceptably large wastage and commercialisation of products from the other whale species hunted. Such a move could prevent the serious issues highlighted in this briefing from being resolved. It would also be detrimental to good faith efforts by conservation-minded countries to ensure both the proper management of aboriginal subsistence hunts and the maintenance and enforcement of the moratorium on commercial whaling.

WDCS and WSPA acknowledge that there is a genuine subsistence need for whale products among indigenous people in Greenland. However, we believe that the IWC should not consider increasing Greenland's quota until it is satisfied that Greenland has:

- properly documented the nutritional and cultural basis of its subsistence need for whale meat (including reporting on alternative sources of meat)
- eliminated the commercial elements in its distribution network
- significantly reduced wastage by improving its flensing and processing techniques.

It is fundamental to the IWC's credibility that no quota increase should be considered before Greenland has provided all the data necessary for the full Scientific Committee to determine accurate conversion factors.

The following sections expand on these concerns and introduce others.



Whaling vessel in Greenland's capital, Nuuk.

Multi-species management

Greenland asserts that its whaling communities need the flexibility to take whatever is available to them when they need it, and should be allowed to hunt a fourth great whale species to make up shortfalls in food availability. It is misleading, however, to use the term 'multi-species management' for this practice, because the IWC does not manage, or consider the contribution made by large hunts of small cetaceans (and other marine mammals) to Greenland's nutritional subsistence needs. Furthermore, by relying only on the Scientific Committee's ad hoc interim advice to support Greenland's minke, bowhead and humpback quotas, the IWC is not following its own long-established management practice for ASW – the Aboriginal Whaling Management Procedure's Strike Limit Algorithm.

Greenland has acknowledged that humpbacks are preferred by consumers over other whales. Its willingness to reduce its quota of other whales, even if that results in less available meat, strongly suggests

that its new quota request is driven more by consumer preference than nutritional need. For example, at the 2008 IWC meeting, Greenland offered to reduce its annual fin whale take from 19 to eight whales if its proposal for 10 humpback whales was agreed. This was hardly a compromise considering that Greenland has only taken an average of 10.5 fin whales over the last two five-year quota blocks. This bargaining undermined Greenland's assertion that it needs more meat since the 11 fin whales it offered to give up would have yielded almost 30 per cent more meat than the 10 humpbacks it would have gained².

WDCS and WSPA believe that endorsing this kind of 'multi-species' approach to meet consumer preference is contrary to the precautionary principle and establishes a bad precedent for future ASW quota decisions.

Unreliable meat yield conversion factors

Unlike other nations, Greenland bases its request for an ASW quota on the tonnage of whale meat that it claims to need, rather than the number of whales. This means that a species-specific 'conversion factor' is applied to calculate the number of whales requested in its quota. At the 61st meeting of the IWC in June 2009 (IWC61), the Scientific Committee noted that it had been unable to validate Greenland's conversion factors. It advised that to determine an accurate conversion rate for each species hunted (fin, minke, bowhead³), Greenland must provide reliable:

- data on the measured weight of meat, ventral grooves, blubber and skin from a representative sample of animals of each species
- data on sex, length, date and position of capture
- sampling and validation protocols
- information on factors that might have affected yield.

During a discussion of the issue in the Aboriginal Subsistence Whaling Sub-committee, Greenland claimed to be unable to provide the data listed above due to practical difficulties at flensing stations, including lack of equipment, poor weather conditions and variability between hunters' collection techniques. When asked how it might improve its collection of data from hunts, Greenland responded that it *"does not have the finances to ensure the practicalities needed to collect all the information required can be met"*. The chair terminated discussion in plenary before a vote was taken and held the agenda item over to an intersessional meeting of the Commission, which is to be held in March 2010. He sought the creation of a small group of scientists, led by the IWC's Head of Science, to document relevant elements of the

Greenlandic hunts and develop a detailed workplan for collection of the data needed to estimate conversion factors (including sampling protocols). The group was expected to report to the IWC in late October/early November, but had not yet done so at this document's date of publication (January 2010).

Even if the group of scientists presents some on-the-ground information from Greenland by March 2010, the Commission still will not have the necessary information to take an informed vote on Greenland's request. Greenland must first collect at least one full season's worth of data which will need to be considered by the full Scientific Committee. Greenland made it clear that it would not collect this information during its 2009 hunts and – even if it commits to collecting the information in 2010 – its hunting seasons will commence after the 62nd meeting of the IWC (June to October for fin and minke whales, spring months for bowheads). Realistically, the Scientific Committee is unlikely to be able to calculate new conversion factors for Greenland's hunts before the 63rd meeting in 2011, the year before its entire quota will need to be revisited.

WDCS and WSPA are concerned that the small group of scientists may develop interim conversion factors despite the unavailability of all relevant data. With so much information lacking, we believe the IWC should protect its credibility and effectiveness by rejecting any ad hoc or interim advice, instead insisting that Greenland collect all data necessary for a review of conversion factors by the full Scientific Committee.



The 61st meeting of the IWC heard of the Scientific Committee's uncertainty over Greenland's meat conversion factors.



Greenland must update its needs statement to reflect its changing society.

Significant wastage of whale products

Papers presented to the Scientific Committee at IWC61 by Greenlandic scientists indicate that Greenland's whalers waste on average more than half of the meat from each minke whale and as much as 81 per cent from each fin whale they land. Although questions were raised in the Scientific Committee about the reliability of the data presented, Greenland told the Aboriginal Subsistence Whaling Sub-committee that the data and analysis *"fit very well with the conversion factors that Greenland has been using over time"* – namely that a minke whale yields two tonnes of meat and a fin whale 10 tonnes.

The IWC should not consider granting a new quota until Greenland demonstrates that it has significantly improved the efficiency of its flensing and processing techniques. This may require assistance from other subsistence whaling nations, such as the USA.

Failure to provide a full needs statement to the Aboriginal Subsistence Whaling Sub-committee

Since the IWC established the commercial whaling moratorium almost thirty years ago, governments seeking ASW quotas have submitted a detailed 'needs statement' to the Aboriginal Subsistence Whaling Sub-committee. The IWC has mandated this sub-committee to *"consider ... nutritional, subsistence and cultural needs relating to aboriginal subsistence whaling and the use of whales taken for such purpose"* and to advise the IWC *"on the dependence of aboriginal communities on specific whale stocks ... for its consideration and determination of appropriate management measures"*¹⁴.

Greenland submitted detailed needs statements to the Aboriginal Subsistence Whaling Sub-committee in the 1980s and early 1990s, providing details, including by region, of the human population relying on whale meat for nutritional subsistence. This also included the proportion of their needs met by whales compared with small cetaceans and other marine mammals. However, Greenland has provided far less detail in recent years and, despite repeated requests from Commissioners for more information, it provided no formal needs statement in support of its requests for quota increases in 2007, 2008 or 2009. Greenland relied instead on a 'White Paper'¹⁵ that failed to quantify its nutritional, subsistence and cultural needs and omitted other relevant information. In 2009, at IWC61, Greenland bypassed the Aboriginal Subsistence Whaling Sub-committee entirely, choosing instead to belatedly

Yield per strike or yield per whale?

Since whales are 'struck and lost' more often in aboriginal than commercial hunts, the IWC protects whale populations (and encourages improvements in hunting techniques) by setting limits on the number of whales that can be shot (strike limits) rather than the number landed (catch limits) in ASW operations.

Currently, Greenland's conversion factors represent an average yield per whale based upon various sources of weight/length data. These were considered, but not agreed upon, by the Scientific Committee at IWC61. Rather than trying to agree average weight/length data for each species, the small group of scientists tasked with providing advice on this issue may elect instead to calculate new conversion factors based on a 'yield per strike' to reflect hunting losses in Greenland's hunts.

While it is helpful to have this figure (for example to compare efficiency with other ASW hunts), yield per strike is affected by several factors including the efficiency of the hunt, extent of edible products utilized, and flensing techniques. Commissioners must consider that using lower 'yield per strike' conversion factors will result in the need for larger quotas to provide a fixed amount of meat. This would be a tacit acceptance and even endorsement of Greenland's wasteful flensing practices as well as its current 'struck and lost' rates and could act as a disincentive for hunters to improve their performance. Indeed, Greenlandic scientists openly presented this approach to Scientific Committee as *"risk averse"* to the hunters, not to the whales.

Basing conversion factors on calculations of the maximum and average yield per whale is a more scientific and consistent approach, since these are not affected by factors such as consumer dietary preferences and ability to process all parts of the whale in a given period of time.

provide information to the IWC plenary¹⁶. This untimely paper again failed to provide a full or quantitative elaboration of Greenland's need for whale meat.

The IWC should not consider increasing Greenland's ASW quota until Greenland has submitted a detailed and up-to-date needs statement to the Aboriginal Subsistence Whaling Sub-committee.

Meat from other wild animal hunts



© WSPA

Greenland is now the largest sealing nation in the world, taking some 190,000 animals annually.

Greenland's hunters kill approximately 4,000 small cetaceans each year, including narwhals, belugas, killer whales and pilot whales. They also hunt seals, walrus and terrestrial mammals such as reindeer. Historically, Greenland gave an account of these significant sources of meat to the IWC, quantifying the relative contribution made by large whales, small cetaceans and other mammals. It also distinguished meat needed to fulfil the nutritional subsistence needs of indigenous people (the concern of the IWC) from meat which contributed generally to the national diet.

Greenland last presented a fully comprehensive needs statement to the IWC in 1983⁷, when it sought 670

tonnes of whale meat annually – a figure based on catches of large and small whales between 1976 and 1980. Greenland acknowledged several important facts at that time which must be re-evaluated today if an informed decision on its needs is to be made:

- only between one fourth and one fifth of the population of Greenland was entirely dependent upon hunting for subsistence and the need for whale meat differed significantly between regions
- small cetaceans and great whales collectively represented only 24 per cent of the total available meat per capita from all domestic sources (including hunts of marine and terrestrial mammals and farmed sheep)
- Greenland's small cetaceans contributed almost half as much meat to per capita consumption as large whales.

Today, the relative contribution of small cetacean products must be significantly higher since Greenland's hunters now take almost double the number of small cetaceans that they did between 1976 and 1980⁸. Furthermore, the contribution of meat from bycaught humpbacks and other large whales must be considered, since they are commonly euthanized and their meat distributed. Three humpback whales were entangled in nets in Greenland's waters in 2008; three in 2006; five in 2005 and one in 2003⁹ (no data were submitted to the IWC for the 2004 and 2007).

In order to objectively assess Greenland's case for more large whales in March 2010, it is important for the IWC to understand the context of these products in the wider subsistence diet. Greenland should be encouraged to report on contributions that other species make to both the diet of the general population and to the nutritional subsistence of indigenous people. Further, the Scientific Committee should be instructed to calculate the meat yielded by small cetaceans in order for this to be explicitly taken into account.

Use of products: widespread consumption and commercialisation

The Schedule to the International Convention for the Regulation of Whaling states that *"the taking of whales by aborigines is permitted only when the meat and products are to be used exclusively for local consumption"*¹⁰. The IWC accepts limited trade or sharing beyond the participants in the harvest, but requires that the *"predominant portion of the products from each whale are ordinarily directly consumed or utilized in their harvested form within the local community"*¹¹. Contrary to the IWC's clear intent, Greenland interprets 'local' as the whole (including non-indigenous) population of Greenland (approximately 55,000 people) and permits a commercial processing and supply chain to supply frozen and dried whale products for profit through retail sales across the entire territory.

In 2008, a WSPA investigation¹² found that a privately owned company called Arctic Green Food¹³ buys approximately a quarter (40-50 whole whales¹⁴) of Greenland's annual quota of West Greenland minke whales directly from hunters. The meat, blubber and skin (mattak) is processed (dried or frozen) and distributed for retail sale through over 100 supermarkets across Greenland. Whale products are available for purchase by anyone, including foreign nationals. The disparity between retail prices of whale meat and the sums paid by processors to indigenous hunters demonstrates that Arctic Green Food and the retailers they supply make significant profit from the products of 'subsistence' whaling¹⁵.

Greenland responded to some of the concerns raised by WSPA's report in the paper it submitted to plenary at IWC61. Admitting to a wide commercial network, Greenland asserted that it is *"meaningless to differentiate between subsistence and commercial*



Frozen fin whale meat in Arctic Green Food storage.



One of over 100 supermarkets selling whale products in Greenland.



Frozen minke pieces and blubber for sale in a Nuuk supermarket.

*hunting as contradictory or mutually exclusive activities ...*¹⁶. However, the IWC does make such a distinction. To protect the integrity of ASW and its own credibility, the IWC must conclude that third-party profit-making commercial processing in Greenland, especially of whole whales, violates the spirit of trade and barter 'on a limited scale'¹⁷ as a legitimate component of the subsistence use of whale products.

Such extensive commercialisation is also far removed from how Greenland characterised its whaling in its 1983 needs statement, which stated that *"...Greenlandic hunting may be characterized as mainly subsistence with a minor commercial element"*¹⁸. The commercialisation of whale meat in Greenland today is not a minor element; in a 2008 interview with the BBC, the director of Arctic Green Food confirmed that his company processed around 40 whales each year, affirming: *"We're selling it frozen; and if we didn't sell it like that, if people weren't able to buy it frozen, then the waste would be very high"*¹⁹. The Commission should seriously examine whether this commercial 'surplus' indicates that Greenland's current ASW quotas exceed its true subsistence needs.

Hunting humpbacks could harm whale-watching industries

Greenland's recent efforts to promote nature-based tourism are proving successful and numbers of international visitors to Greenland are growing rapidly. However, recently published studies, including surveys of international tourists, indicate that the hunting of humpback whales at the peak of tourist season could deter tourists from choosing Greenland as a holiday destination, or lead them to avoid areas where the hunting is expected to take place²⁰.

Consistent with this are growing concerns that a Greenland humpback hunt would target a population of whales that is the foundation for a growing whale-watching industry. A recent masters thesis – *Habitat use of humpback whales (Megaptera novaengliae) in Nuuk fjord, with implications for commercial exploitation*²¹ – reveals that these whales show a strong degree of 'fidelity' to particular fjords in West Greenland, making them an easier target for both the growing whale-watching industry and hunters. The thesis concludes that if individuals are killed within the fjord, they may not be replaced by new individuals.

The opening of a humpback hunt in Greenlandic waters may also have a negative impact on the animals' behaviour around whale-watching boats elsewhere. Studies of a US population of humpback whales over a 25 year transition period from whaling to whale watching show that hunted populations were broadly less tolerant of vessels and less likely to approach them²². The IWC currently lacks the necessary information about this population's structure and migratory routes to know whether whale watching elsewhere could be impacted by a humpback hunt in Greenland. As humpback whales are a focal species for a global whale-watching industry worth some US\$2.8 billion annually²³, human activities liable to change their behaviour must be seriously questioned.



- ¹ IWC Schedule Para 13(b)(3)
- ² Greenland has argued that its low take of fin whales is explained by the difficulty of catching them, yet its average take for a previous five-year period (1990–1994) was 19 fin whales a year
- ³ The Committee would need to use existing data to calculate a conversion rate for humpbacks
- ⁴ Rep. int. Whal. Commn 48:31
- ⁵ *White Paper on Hunting of Large Whales in Greenland*. IWC/59/ASW/8rev
- ⁶ Background information in relation to the schedule amendment IWC61/11 on the request of 10 humpback whales off West Greenland. Submitted by Denmark IWC/61/12
- ⁷ *Nutritional Needs Relating to Aboriginal Subsistence Whaling among the Inuit in Greenland* (TC/AB/2) and *Subsistence and Cultural Needs relating to Aboriginal Subsistence Whaling Among the Inuit in Greenland* (TC/AB/3). Appended to Aboriginal Subsistence Whaling Sub-Committee IWC/35/17
- ⁸ According to Greenland's existing conversion factors, its current ASW quota would give at least 634 tonnes of whale meat (assuming 10 tonnes per bowhead), 38 tonnes higher than average removals between 1976 and 1980
- ⁹ Scientific Committee Progress Reports, see www.iwcoffice.org/sci_com/scprogress.htm
- ¹⁰ <http://www.iwcoffice.org/commission/schedule.htm>
- ¹¹ Cultural Anthropology Panel, Report of the Panel Meeting of Experts on Aboriginal/Subsistence Whaling, Report of the Cultural Anthropology Panel, in *Aboriginal/Subsistence Whaling* 35, 37 (G.P. Donovan, ed., 1982). App. I at 49
- ¹² WSPA (2008) *Exploding Myths*, see www.wspa-international.org/Images/ExplodingMyths_tcm25-3402.pdf
- ¹³ Arctic Green Food has been a wholly privately owned company since 2007, not owned by the Home Rule Government as stated by Greenland in 2008 at IWC60 (Rep. Int. Whaling. Comm 2008 p.99 paragraph 3)
- ¹⁴ *Minus the guts and head*. Transcript of interview with Tonnes Berthelsen, Managing Director of Arctic Green Food, April 2008
- ¹⁵ For example, see Arctic Green Food's website which lists both wholesale and recommended retail prices (RRP) for ten minke whale products and one fin whale product. RRP are on average 26 per cent higher than wholesale prices, see [www.arcticfood.gl/?GB/Products/Domestic%20market/Minke%20whale%20\(Balaenoptera%20acutorostrata\).aspx](http://www.arcticfood.gl/?GB/Products/Domestic%20market/Minke%20whale%20(Balaenoptera%20acutorostrata).aspx)
- ¹⁶ Background information in relation to the schedule amendment IWC/61/11 on the request of 10 humpback whales off West Greenland. Submitted by Denmark IWC/61/12
- ¹⁷ IWC/33/14 ad hoc Technical Committee Working Group on Development of Management Principles and Guidelines for Subsistence Catches of Whales by Indigenous (Aboriginal) Peoples, p.7
- ¹⁸ 'Subsistence and Cultural Needs Relating to Aboriginal Subsistence Whaling among the Inuit in Greenland', an extract for the 35th meeting of the IWC from *Subsistence Whaling in Greenland* TC/33/WG/S3
- ¹⁹ *Greenland whale hunt 'commercial'* (published online 17 June 2008), see <http://news.bbc.co.uk/1/hi/sci/tech/7458155.stm>,
- ²⁰ See for example: Higham, J.E.S., and Lusseau, D. (2008) Slaughtering the goose that lays the golden egg: Are whaling and whale-watching mutually exclusive? *Current Issues in Tourism*, 11(1), 63-74; Parsons, E. C. M., and Draheim, M. (2009) A reason not to support whaling – a tourism impact case study from the Dominican Republic, *Current Issues in Tourism*, 12:4, 397-403; Hoyt, E., and Hvenegaard, G.T. (2002) A review of whale watching and whaling with applications for the Caribbean, *Coastal Management*, 30(4), 381-399
- ²¹ Boye, T.K. (2009) *Habitat use of humpback whales (Megaptera novaeangliae) in Nuuk fjord, Greenland, with implications for commercial exploitation*. MSc thesis under University of Aarhus, Denmark and with supervision from the Greenland Institute of Natural Resources
- ²² William A. Watkins (1986) Whale Reactions to Human Activities in Cape Cod Waters, *Marine Mammal Science*, 2:4, pp.251-262
- ²³ O'Connor, S., Campbell, R., Cortez, H., and Knowles, T. (2009) *Whale Watching Worldwide: tourism numbers, expenditures and expanding economic benefits*, a special report from the International Fund for Animal Welfare, Yarmouth MA, USA, prepared by Economists at Large

WSPA INTERNATIONAL

89 Albert Embankment
London, SE1 7TP
United Kingdom
T: +44 207 587 5000
F: +44 207 587 5057
E: wspa@wspa-international.org
W: www.wspa-international.org

WDCS UK

Brookfield House
38 St Paul Street
Chippenham
Wiltshire, SN15 1LJ
United Kingdom
T: +44 (0)1249 449500
E: info@wdcs.org
W: www.wdcs.org