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**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
1315 East-West Highway  
Silver Spring, Maryland 20910  
THE DIRECTOR

Ms. Cathy Liss  
President  
Animal Welfare Institute  
P.O. Box 3650  
Washington, D.C. 20027-0150

Dear Ms. Liss:

Thank you for your letters to the Secretaries of Commerce and State, and me, regarding U.S. policy on whale conservation and the International Whaling Commission (IWC).

In order to address your concerns, I would first point out that U.S. policy on whaling has four main elements. These elements have remained unchanged for more than a decade, and are as follows:

- (1) support for the moratorium on commercial whaling that has been in effect since the mid-1980s, combined with,
- (2) good faith participation in negotiations to complete a strong, robust and thorough Revised Management Scheme (RMS) that would govern commercial whaling if it were ever to resume,
- (3) support for aboriginal subsistence whaling for U.S. indigenous groups, and
- (4) opposition to unnecessary lethal scientific research.

Our policy also includes support for existing and proposed whale sanctuaries, as reflected in our votes each time the issue arises in the IWC.

The United States is opposed to adopting the RMS and eliminating the moratorium provision simultaneously. We recognize, however, that the RMS and the moratorium are linked as issues. Accordingly, we have been willing to discuss with other IWC members different possible scenarios under which the Commission might gradually permit risk-averse and properly supervised harvest for some healthy stocks, while retaining the moratorium for other stocks. The United States will not decide whether to support adoption of an RMS until a package is ready for a vote by the Commission. Nevertheless, the United States believes it is important to participate in the process to ensure that a strong, robust RMS is developed for the long-term protection of whale stocks.

We are deeply concerned about the current unregulated harvests by Norway, which is not bound to the moratorium on commercial whaling, and by Japan and Iceland, which engage in "scientific



research whaling” as permitted under the International Convention for the Regulation of Whaling. We continue to oppose these unilateral whaling operations, and have voiced this opposition repeatedly and forcefully. These harvests, unmonitored and unregulated by the IWC, are not what the United States wants to see as a member of the international organization responsible for whale conservation.

On the other hand, we feel that a strong, robust RMS package would manage commercial takes, place binding restrictions on research whaling, and ensure that quotas would be based on sound science. This is a position the United States has advocated for more than ten years. For example, the 1993 Presidential letter to Congress about Norwegian whaling stated: “The United States has an equally strong commitment to science-based international solutions to global conservation...The issue at hand is the absence of a credible, agreed management and monitoring regime that would ensure that commercial whaling is kept within a science-based limit.” The United States’ goal is for the long-term protection of whale stocks.

As you noted, the United States, along with certain other pro-conservation countries, did not join the January 2006 17-country demarche delivered to Japan in response to that country’s research program. However, we did express all the reasons we oppose this program in a face-to-face meeting with Japan’s alternate IWC Commissioner shortly before the 2005-2006 research program began last fall.

Finally, your letter inquired about the status of Pelly certification for Japan, Norway, and Iceland. All of these countries remain under active Pelly Amendment certifications for their whaling actions. The Department of Commerce is currently undertaking a Pelly review of these countries.

I look forward to working with Animal Welfare Institute and other U.S. interest groups as we move forward on whale conservation in the IWC.

Sincerely,



William T. Hogarth, Ph.D.  
Assistant Administrator  
for Fisheries