

Erna Solberg  
The Office of the Prime Minister  
P.O. Box 8001 dep.  
(NO-)0030 Oslo  
Norway

Copy:  
Sveinung Rotevatn, Minister of Climate and the Environment  
Ingunn Midttun Godal, CEO, Mattilsynet  
Ole Aamodt, Head of Section, Mattilsynet

21st May 2021

Dear Prime Minister Solberg

I write on behalf of over 50 scientists and veterinarians who have signed the below statement. We wish to express our deep concerns relating to the permit issued by the Mattilsynet for the capture of 12 minke whales for auditory evoked potential (AEP) hearing tests in Vestfjord this month.

The researchers acknowledge that this type of experiment has never previously been attempted. As detailed below, our grave concern is that the capture of minke whales and experimentation for up to 6 hours at a time has significant potential for causing injury and stress, potentially resulting in capture myopathy.

If allowed to proceed, these experiments could lead to considerable suffering for the individual whales and risk undermining Norway's reputation. If something goes wrong, questions will be asked as to why consent was granted in the first place. We strongly urge you to call for a cancellation of these trials, as they are completely unacceptable from a conservation, scientific and animal welfare point of view.

Yours sincerely



**Vanesa Tossenberger**  
WDC Director of Policy and Science

WHALE AND  
DOLPHIN  
CONSERVATION



## Statement of concern

We, the undersigned, call for the planned capture and auditory evoked potential (AEP) hearing tests on minke whales off Lofoten, Norway, due to start in May 2021 to be cancelled on safety and welfare grounds.

We understand that a permit (FOTS ID: 19536) has been issued by the Norwegian Food Safety Authority for the deliberate capture of up to 12 juvenile minke whales as they migrate through this area on their way north to foraging grounds in the Barents Sea.<sup>1</sup>

We understand that the research team plans to set a net measuring 1,300m across the strait at Vestfjord. As a whale moves into the netted area, the exit is sealed and the whale will be channelled into an enclosure, 280m long, 150m wide and 27m deep. The trapped whale will then be assessed by a veterinarian before being moved into a modified salmon cage, where it will be held fast between two rafts, with researchers both in the water and on the rafts.

The researchers estimate that the whale may be held in this position for up to six hours whilst its hearing is measured by mapping AEP via electrodes attached to the skin.

The researchers acknowledge that the whale will likely experience 'moderate distress and discomfort'. We believe this is an understatement. This process risks causing the whale considerable stress leading to panic, creating a dangerous situation for both whales and humans. The researchers plan to attach a satellite tag to each whale before release and they have permission to hold each whale in the enclosure for up to four days.

Previous attempts to catch minke whales for similar experiments have failed<sup>2</sup>. There are also accounts of minke whales reacting with great force after breaking into aquaculture pens<sup>3</sup>, so it is hard to imagine how the safety of researchers can be guaranteed. We note also the recent instance of a juvenile minke whale that stranded in shallow water in the River Thames in London on the 10<sup>th</sup> May. Rescuers relocated the whale to specially designed whale re-flotation pontoons; however, the whale became distressed and managed to free itself.

The project includes provision for sedation to be used in an emergency. However, if the situation escalates to the point where a whale does require sedation, this is a risky process which is rarely attempted in cetaceans as these taxa are highly adapted for hypoxia. The use of sedation in larger, free swimming whale species is limited. It is also important to note that attempted sedation does not necessarily result in the desired effect. For example, the initial drug cocktail used in the attempted sedation at sea of a North Atlantic right whale, resulted in an increase in swim speed and boat avoidance.<sup>4</sup> Our view is that it is not acceptable to consider exposing juvenile minke whales (which, in this case, are research subjects rather than facing genuine danger in the open ocean) to the risks associated with sedation.

We note that there is only provision for a single veterinarian (from Dyreparken in Kristiansand) to be present, rather than a team of vets, as would be preferable. Further, it is unclear as to what level of experience in cetacean biology and live cetacean capture is being required? We are concerned that the protocol does not require that the attending veterinarian must have specific experience in handling whales.

WHALE AND  
DOLPHIN  
CONSERVATION



**Our concern is that the capture of juvenile minke whales, forcible restraint and experimentation upon them for a period of up to six hours, has significant potential for causing injury and stress, potentially resulting in long-term impacts or even capture myopathy.**

We understand that this study aims to learn more precisely what sounds minke whales can hear and at which frequencies, including those pertaining to seismic testing and naval sonar. The researchers acknowledge that this project is ‘high risk’ as AEP mapping has never been attempted on captured minke whales and certainly not on juveniles of this species. We believe there is a reason for this: the safety and welfare risks (for both humans and whales) are too great: it is simply not possible to guarantee that entrapped minke whales can be handled in a manner which is safe for all those involved.

Further, the context in which this proposed research will take place is unnatural since the subtle ecological as well as biological factors which govern the response of free-ranging minke whales to noise in the open ocean are stripped away. Thus, it is difficult to see how it can provide the researchers with meaningful data with which to make robust policy recommendations regarding exposure of this species to anthropogenic noise.

We urge this project to be stopped as it may lead to considerable trauma for the whales targeted, without contributing to useful science.

**Signed by the following (alphabetical order):**

**Lucy Babey** Head of Science and Conservation, ORCA, UK

**Sandra Baker** DPhil, Research Fellow, University of Oxford, UK

**Giovanna Bertella** PhD, Associate Professor, School of Business and Economics, UiT, The Arctic University of Norway, Tromsø, and Ocean Sounds, Norway

**Jaime Bolaños Jiménez** Founder, Researcher and Executive Director Sea Vida, Venezuela

**Philippa Brakes** Research Fellow, Whale and Dolphin Conservation

**Dr Andy Butterworth** BVSc BSC PhD DipECAWBM FLS MRCVS, UK

**Matt Curnock** PhD, Minke Whale Project, James Cook University, Townsville, Australia

**Abdul-Rahman Dirisu** PhD, Senior Research Fellow, University of Benin, Nigeria

**Sarah Dolman** Policy Manager, Whale and Dolphin Conservation, UK

**Harry Eckman** CEO, World Cetacean Alliance, Brighton, UK

**Peter Evans** DPhil, Director, Sea Watch Foundation; Honorary Senior Lecturer at the School of Ocean Sciences, University of Bangor, North Wales



**Fernando Félix** PhD, Associate Researcher to the Pontificia Universidad Católica del Ecuador (PUCE) and the Whale Museum, Salinas, Ecuador

**Dr. Pete Goddard** BVetMed PhD DipECSRHM DipECAWBM (AWSEL) MRCVS EBVS European Veterinary Specialist in Animal Welfare Science, Ethics and Law; Chairman, Wild Animal Welfare Committee, UK

**Jonathan Gordon** PhD, Marine Ecological Research, UK

**Mick Green** CEnv, FCIEEM, Environmental Consultant, Senior Policy Advisor, Whale and Dolphin Conservation, Wales, UK

**Carlos Guerra-Correa** PhD, Director, Regional Center for Environmental Studies and Education, University of Antofagasta, Chile

**Sally Hamilton** ORCA (Director), UK

**Lauren Hartny-Mills** PhD, Science and Conservation Manager, Hebridean Whale and Dolphin Trust, Scotland.

**Nicola Hodgins** Policy Manager, Whale and Dolphin Conservation; Visiting Researcher, University of Exeter, UK

**Erich Hoyt** Research Fellow, Whale and Dolphin Conservation and Co-chair, IUCN SSC-WCPA Marine Mammal Protected Areas Task Force, UK

**Miguel A. Iñíguez** M.Sc., Fundación Cethus, Argentina

**Maria Lien** Cand.med.vet., NOAH - for dyrs rettigheter, Oslo, Norway

**Alison Lomax** Director, Hebridean Whale and Dolphin Trust, Scotland, UK

**Rob Lott** Policy Manager, Whale and Dolphin Conservation, UK

**Colin D. MacLeod** PhD, Founder, GIS In Ecology, Glasgow, Scotland, UK

**Lori Marino** PhD, Cetacean Neuroscientist; President, Whale Sanctuary Project

**Siri Martinsen** Cand.med.vet; Director, NOAH - for dyrs rettigheter, Oslo, Norway

**Dr. Steven P. McCulloch** BVSc BA PhD FHEA DipECAWBM (AWSEL) MRCVS EBVS European Veterinary Specialist in Animal Welfare Science, Ethics and Law; Senior Lecturer in Human-Animal Studies, Centre for Animal Welfare, University of Winchester, UK

**Alan McElligott** PhD, Associate Professor of Animal Behaviour and Welfare, Jockey Club College of Veterinary Medicine and Life Sciences, City University of Hong Kong

WHALE AND  
DOLPHIN  
CONSERVATION



**Roy Mulder** President, Canadian Marine Environment Protection Society, Canada

**Dr Elizabeth Mullineaux** MRCVS, RCVS Recognised Specialist in Wildlife Medicine (Mammalian), Wild Animal Welfare Committee (UK)

**Simon Mustoe** Marine Ecologist, Director of AES Applied Ecology Solutions, Australia.

**Ranil Nanayakkara** Conservation Biologist, Biodiversity Education and Research (BEAR); and University of Kelaniya, Sri Lanka

**Giuseppe Notarbartolo di Sciara** PhD, Founder, Tethys Research Institute, Milano, Italy

**Nino Pierantonio** Associated Researcher, Tethys Research Institute, Milano, Italy

**Graham Pierce** PhD, Departamento de Ecología y Recursos Marinos, Instituto de Investigaciones Marinas (CSIC), Spain

**Vanesa Reyes Reyes** PhD, Researcher, Fundación Cethus, Argentina

**Denise Risch** PhD, Scottish Association for Marine Science, Argyll, Scotland, UK

**Fabian Ritter** Marine Biologist, Director of Research, M.E.E.R. e.V., Berlin, Germany

**Kevin Robinson** PhD, Director, Cetacean Research & Rescue Unit (CRRU), Scotland, UK; Honorary Senior Lecturer at the Centre for Ecology and Conservation, University of Exeter

**Naomi A. Rose** PhD, Marine Mammal Scientist, Animal Welfare Institute, Washington DC, USA

**Conor Ryan** PhD, Research Scientist, Marine Conservation Research Ltd; Research Associate, RV *Song of the Whale* UK

**Gian Paolo Sanino Vattier** Field Biologist, Centre for Marine Mammals Research - LEVIATHAN, Chile

**Richard Sears**, PhD, President, Mingan Island Cetacean Study Inc, Canada

**Dr Alick Simmons** BVMS MSc DipAABAW MRCVS. Former UK Deputy Chief Veterinary Officer, UK

**Elizabeth Slooten**, PhD, Professor Emeritus, University of Otago, New Zealand

**Vanesa Tossenberger** Director of Policy and Science, Whale and Dolphin Conservation; Researcher, Fundacion Cethus, Buenos Aires, Argentina

**Ursula Tschertter** Marine Biologist, ORES Foundation for Marine Environment Research, Switzerland



**Marie-Francoise Van Bressem** DVM, PhD, Senior Scientist, Cetacean Conservation Medicine Group, Peruvian Centre for Cetacean Research, Lima, Peru

**Koen Van Waerebeek** PhD, Founder and Senior Scientist, Peruvian Centre for Cetacean Research, Lima, Peru

**Heike Vester** PhD, Cetacean Scientist, Director and Founder of Ocean Sounds, Germany and Norway

**Lindy Weilgart** PhD, Ocean Policy Consultant, OceanCare; Adjunct Research Associate, Dept. of Biology, Dalhousie University, Nova Scotia, Canada

**Caroline Weir** PhD, Cetacean Scientist, Ketos Ecology, UK

**Hal Whitehead** PhD, Professor of Biology, Dalhousie University, Nova Scotia, Canada

## References

1. Decision regarding the use of animals in procedures - FOTS ID 19536 Establishment number 053: Forsvarets forskningsinstitutt. Processed by the Norwegian Food Safety Authority (NFSA), 21.05.2019.
2. <https://www.soundandmarinelife.org/research-categories/physical-and-physiological-effects-and-hearing/aep-audiogram-seasonal-movement-measurements-and-vocalisation-of-individual-minke-whales-in-icelandic-waters.aspx>
3. Hatlem, T. (2009, August 16). Vågehval sprenge oppdrettsmerd. Fisk. <https://fisk.no/oppdrett/476-vagehvalsprenge-oppdrettsmerd>
4. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0009597>

## Selected bibliography

Erbe, C., Dunlop, R., and Dolman, S. (2018a). "Effects of noise on marine mammals," in *Effects of Anthropogenic Noise on Animals*, eds H. Slabbekoorn, R. J. Dooling, A. N. Popper, and R. R. Fay (New York, NY: Springer), 277–309.

Oliver Boisseau, Tessa McGarry, Simon Stephenson, Ross Compton, Anna Christina Cucknell, Conor Ryan, Richard McLanaghan, Anna Moscrop. "Minke whales avoid a 15 kHz acoustic deterrent device." (2021) Marine Ecology Progress Series. DOI:[10.3354/meps13690](https://doi.org/10.3354/meps13690)

WHALE AND  
DOLPHIN  
CONSERVATION

