

A large whale is breaching the water in a fjord, with its tail and part of its back visible above the surface. The background features rugged, rocky mountains under a clear sky. The water is calm, reflecting the light.

Time to Act on the Evidence:
**Iceland's Critical
Juncture for Whaling**

WHALE AND
DOLPHIN
CONSERVATION

WDC

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Introduction

Whaling began in Iceland with spear-drift hunting as early as the 12th century. In the late 19th century, modern commercial practices began to be developed and, initially, a handful of foreign operators increased their whaling activities in Icelandic waters until whale populations were significantly depleted. Due to economic and environmental pressures, the numbers of whaling vessels has dwindled over the last 10 years and, since 2020, only one whaling company remains: Kristján Loftsson's company, Hvalur hf.

Since the temporary hiatus on whaling, caused in part by the COVID-19 pandemic, hunting resumed in 2022. The world watched as 148 fin whales were killed, many having needed to be shot with two harpoons before dying, and one of the males was seen to have four harpoons piercing its body. A government-commissioned report revealed the cruelty inflicted by the 2022 season's hunt. This resulted in the Icelandic government's announcement on 20th June 2023 that the controversial fin whale hunt would be suspended until 31st August.

There was international outcry when whaling was permitted to be resumed from 1st September and Hvalur hf. went on to kill 25 whales (including an unborn calf) before the season ended. The recent introduction of new regulations aimed at improving the welfare of hunted whales has demonstrated that there is no way to humanely kill a whale at sea.

The current licence under which Hvalur hf. operates expires this year and all eyes are on the Icelandic government to see whether a new licence will be issued or if the country's whaling activities have finally reached an end.

This report examines the ethical, ecological and economic arguments surrounding the continuation of whaling in Iceland and urges the Icelandic government to base its decision making on the clear and mounting evidence against issuing a further licence.

Iceland is at a critical crossroads in determining its future environmental and animal welfare policy. At stake is the opportunity for Iceland to become a leading advocate for marine protection, the promotion of ocean biodiversity and animal welfare. The case against the renewal of whaling licenses in Iceland is compelling: continuing to hunt whales is harming ecosystems and the climate, is detrimental to Iceland's international positioning, and is causing untold suffering to these ocean heroes.



Evidence #1

Whaling Breaches Animal Welfare Law

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A fin whale clearly shot with three harpoons

Evidence gathered from the whaling seasons of 2022 and 2023 depicts distressing welfare breaches and the inhumane treatment of hunted whales. Alongside drawn-out pursuits and prolonged deaths, grenade harpoons that are meant to guarantee a quick death are known to not always detonate¹ and the nature of whaling frequently targets pregnant whales which are easier to catch. This level of cruelty would not be allowed in the slaughter of other animals killed for food.

THE 2022 WHALING SEASON SCRUTINISED

In May 2023, the Icelandic Food and Veterinary Authority (MAST) prepared a report² on the 2022 whaling season during which 148 fin whales were killed. Of these whales, 36 (24%) were subjected to multiple strikes from a harpoon: 27 were hit by two harpoons, five whales were shot three times, and four were struck four times. One whale who was struck by a harpoon endured a five-hour pursuit but was not successfully caught by the whalers and was lost at sea.

Onboard monitoring took place of 58 hunted whales which additionally revealed that:

- 35 of the 58 whales (approximately 59%) were killed instantly according to International Whaling Commission (IWC) guidelines to determine death during whaling.
- Five whales showed convulsions.
- It took nearly an hour for one whale and two hours for another to die following the initial harpoon strike.
- On average, it took 11.5 minutes for the whales who did not perish immediately to die.

A follow-up report from the Expert Advisory Board on Animal Welfare³ found that the whaling methods employed in 2022 were inconsistent with Iceland's animal welfare laws. Following the evidence presented, Iceland's Minister of Food, Agriculture and Fisheries, Svandís Svavarsdóttir, made the decision to suspend the 2023 whale hunting season for two months. She stated:

“ I have decided to suspend all whaling operations in view of the decisive opinion of the Expert Advisory Board on Animal Welfare. In my opinion, the conditions of the Act on Animal Welfare are mandatory. This activity cannot continue in the future if the authorities and the license holders cannot ensure the fulfilment of the welfare requirements.”⁴

FAILURE OF THE NEW 2023 REGULATIONS

A working group of experts composed of representatives of the Ministry of Food, Food and Fisheries and the Directorate of Fisheries was appointed in July 2023 and tasked with evaluating ways to reduce anomalies during the hunt. The group's report was submitted on 28th August and concluded that it is possible that new hunting techniques, proposed by Hvalur hf., could be successful in bringing the killing within Icelandic animal protection law⁵.

Although it was acknowledged that the continued use of new hunting practices should remain contingent upon a subsequent and comprehensive evaluation.

Whaling was permitted to continue, and new regulations were introduced which included the use of targeting systems that was suggested would ensure whales were killed instantly. The updated targeting system involved a new correction mechanism built into the harpoons that was said to ensure shot accuracy, irrespective of the ship's speed and sea conditions. Shooting practice which took place in Hvalfjörður was meant to ensure that guns were set correctly.

Whaling took place during September, and on completion, the Icelandic Directorate of Fisheries assessed the hunts that took place following the introduction of the new regulations. The Directorate declared that there were many examples where whales were shot twice, unmistakable evidence of the failure of the new targeting measures.

One incident received widespread media coverage when a MAST representative found that a harpooned fin whale had not died until it was shot a second time, which was nearly half an hour after the first strike⁶. Hrönn Ólína Jörundsdóttir, CEO of MAST, said:

“ [They were] ill-prepared and the shooter does not appear to be sufficiently competent. We are very worried that a lot has gone wrong there⁷ ”

Kristján Loftsson justified the incident by claiming that a technical failure had made it impossible for the harpoon to fire immediately after the first shot⁹. However, when MAST investigated the incident, they stated that the technical issue lasted for only 12 minutes after the first shot was fired⁹, leading to unanswered questions about why it had taken an additional 17 minutes before the whale was harpooned again.

WDC has been provided with the following details of the September 2023 hunts by a representative of the Icelandic Food and Veterinary Authority¹⁰:

- Of the 24 whales harpooned, five of these animals (21%) were shot twice.
- For those animals who were harpooned twice, the time to death was from 7-35 minutes, with the average duration of death taking 9 minutes.

It is clear from this information that there continue to be breaches of Icelandic animal welfare law during the 2023 whaling season, despite the implementation of new regulations.

To exacerbate the cruelty which took place during the 24-day 2023 hunt, one of the fin whales that was killed was heavily pregnant¹¹. Biologist Edda Elísabet Magnúsdóttir concluded that the fin whale involved in this incident was in an advanced stage of pregnancy, with the calf estimated as likely to be born 4-8 weeks later.

COMPARING WHALING TO OTHER METHODS OF KILLING

It is a widely accepted principle that to be considered humane, the slaughter of animals killed to be used as food (or for any other reason) must be carried out in a way which causes no unnecessary pain or suffering. Humane methods of slaughter will either kill an animal outright or will stun the animal so that it becomes unconscious and insensible to pain. In either case, this should be instantaneous or near instantaneous. Unconsciousness should be sustained until the animal is dead (for example, because of exsanguination).

In an assessment of the 2023 hunt, Alick Simmons, former UK Government Deputy Chief Veterinary Officer and former chair of the Humane Slaughter Association said:

“ I have been shown data collected by the Icelandic Food and Veterinary Authority on the recent killing of fin whales in the 2023 whaling season. This shows that at least one-fifth of the whales that were killed in Iceland this year needed to be shot twice for their death to be brought about. Of these animals, the time to death ranged from 7-35 minutes from when each of the whales was struck by the first harpoon.

Any method of killing that requires animals to be shot twice at least 20% of the time or when the time to death is several minutes is unacceptable. These outcomes would be unacceptable in any other killing method including in a slaughterhouse.

This testimony shows that the deaths caused by whaling are not in line with the standards of slaughter that are expected of other animals which are killed for food. Killing in a slaughterhouse takes place in controlled environments that are aimed to limit harm and minimise time to death. Whaling in the ocean presents an uncontrolled environment and whales suffer a prolonged, painful death that would not be considered acceptable when compared to other methods of killing.

Kristján Loftsson has tried to defend the outcome of this year’s whaling efforts by stating that “the use of an electric current would have increased efficiency even further”¹². This suggestion is close to ‘electro-

immobilisation’ – a practice that is prohibited in many countries including the UK¹³. Furthermore, the IWC has previously noted the inhumaneness of the use of electricity as a secondary killing method¹⁴.

In relation to the use of electric current to kill animals, the Chief Executive and Scientific Director of the Humane Slaughter Association, Huw Golledge, said:

“ Electrical stunning can be used to render animals unconscious prior to slaughter and is routinely used for humane slaughter of livestock in slaughterhouses. However, the electricity must flow through the animal’s brain in a highly controlled manner, ensuring that adequate current to rapidly induce unconsciousness is delivered. If these conditions are not met the animal will at best not be rendered unconscious and at worst also suffer serious additional pain through electrocution. Electrical current flow through an animal’s body can also cause cardiac arrest, which could speed up the time to death, but this is unlikely to ensure an instantaneous humane death (i.e. one which occurs without pain and distress) if the animal is conscious when cardiac arrest occurs.

In slaughterhouses the positioning of stunning electrodes is tightly controlled, the current delivered is monitored and recorded, and processes are in place to check the animal is stunned and ensure it is immediately re-stunned if the first stun is ineffective. Once stunned, animals are killed by immediate bleeding ensuring there is little chance that they will recover consciousness. It is difficult to see how this level of control could be achieved at sea to ensure that whales are humanely stunned and killed.

SUMMARY OF SUFFERING

It is clear from the evidence presented that whaling in Iceland causes significant suffering of the whales involved. These sentient animals have often suffered multiple harpoon strikes, endured prolonged, painful deaths, and have been subjected to unnecessary fear from the pursuit. The suffering of these animals caused by whaling continued in 2023, despite the implementation of new regulations.

Verdict: Whaling causes significant suffering and breaches Icelandic animal welfare legislation.



An unborn fin whale calf being dragged from its mother’s womb

Evidence #2

Whaling Causes Environmental Harm

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One of the two Hvalur hf. whaling ships with two dead fin whales

Whaling has significantly harmed whale populations and marine ecosystems, disrupting crucial processes like carbon regulation and nutrient cycling. Allowing whaling to continue directly threatens Iceland's ability to meet its biodiversity and climate goals. Protecting and restoring fin whale populations is essential not only for their survival, but also for supporting the health and balance of marine ecosystems and, by extension, the global environment.

IMPACT OF WHALING ON WHALES AND ECOSYSTEMS

At the heart of the current whaling debate in Iceland lies the fin whale – the species targeted by Icelandic hunts – which is classified as “Vulnerable” by the International Union for Conservation of Nature (IUCN) Red List¹⁵. This classification is based on several factors such as external threats and species factors. Examples of the threats considered for fin whales include historical and ongoing whaling, ship strikes, bycatch and entanglement in fishing gear. Population information that is examined includes biological parameters such as the inherent challenges of population recovery due to slow reproductive rates and long generation times.

Over the decades, whaling has led to a substantial decrease in whale populations¹⁶. The decline in great whale numbers has likely altered the structure and function of the ocean¹⁷. Research has shown that the great whales, which includes fin whales, have a “powerful and positive influence” on the function of the ocean, global carbon storage, and notably on the health of commercial fisheries¹⁸.

A healthy marine ecosystem depends on the presence and well-being of baseline populations of whales and other marine mammals. Even in death, whales provide benefits to the ocean, as their carcasses provide a concentrated food source for specialist organisms in the deep sea; this is known as ‘whale fall’. Studies have suggested that due to the massive reduction in whale fall habitats occurring over the past 200 years, fauna that rely on them have been driven to extinction¹⁹. Whaling prevents this natural process of decomposition from taking place which normally supports a succession of hundreds of marine species.

The deliberate removal of whales from the ocean environment due to whaling also leads to a loss of the

regulating ecosystem services they provide, including climate regulation via carbon fixation, storage, and sequestration²⁰. Whaling reduces provisional ecosystem services that whale populations offer, such as nutrient cycling which has a positive impact on marine productivity and in turn, increases the provision of healthy fish and other marine species populations²¹. Wild fish populations also supply carbon and nutrient cycling services and so these interactions have multiplier effects. These services are vital not only for the ocean but for the global environment.

THE POSITIVE CONTRIBUTION OF WHALES TO ECOSYSTEM HEALTH

Fin whales are baleen whales, meaning that they do not have teeth but instead strain their food from the water through baleen plates. It has been suggested that baleen whales are playing a role in mitigating climate change through their carbon sequestration abilities.

Before industrial whaling disrupted these natural processes, populations of whales were estimated to have transported an annual carbon load of 190,000 to 1.9 million tonnes to the deep ocean, which equates to removing 40,000 to 410,000 cars from the road each year²². However, when these animals are hunted, the carbon stored in their colossal bodies is instead largely released into the atmosphere, increasing global warming.

To add to the loss of sequestration, during the 20th century, whaling operations contributed approximately 70 million tonnes of carbon dioxide emissions²³ which compounded climate change.

In addition to their potential as carbon reservoirs, whales also contribute to nutrient cycling by redistributing nutrients vertically through their feeding habits, (known as the Whale Pump²⁴), and laterally via their migrations (known as the Great Whale Conveyor Belt²⁵). The excretion of whale faeces, or faecal plumes, releases vital nutrients that enhance primary productivity, stimulating the growth of phytoplankton and providing the basis of a diverse and resilient marine food web. Phytoplankton, while individually minuscule, collectively act as significant carbon sinks, capturing an estimated 40% of global CO₂ emissions²⁶, a staggering four times more than the Amazon rainforest.

Whales move nutrient-rich biological material in the form of faeces, urine, sloughed skin, placentas, dead neonates and carcasses from colder waters to nutrient poor warmer waters via their migrations, boosting the productivity of temperate and tropical marine ecosystems.

Some whaling advocates have tried to justify the continuation of whaling operations by claiming that ‘whales eat all the fish’²⁷. Statements such as these ignores clear evidence that cetaceans can indirectly increase ocean biodiversity and benefit fish abundance. Particularly as it has been demonstrated that great whales are crucial ecosystem engineers who stimulate primary productivity through nutrient cycling which benefits overall fish biomass. Marine ecosystems and food webs are far more complicated than the predator-and-prey relationship implied. Models have shown that the removal of whales does not lead to increases in human-exploited fish populations and the number of fish may decrease where whale abundance is reduced²⁸.

POLLUTION CAUSED BY WHALING ACTIVITIES

In addition to creating environmental harm from removing whales from the ocean, greenhouse gas emissions are caused by the international trade in fin whales. These are emitted for example via whaling vessels, through the refrigeration of whale products, the shipping of the exported products, and at multiple other stages of the extended supply chain.

Local pollution is also known to occur due to whaling operations. In 2023, the Health Supervision of the West issued a four-year work permit to Hvalur hf. A prominent lawyer in Iceland, Katrín Oddsdóttir, claims that the permit was granted “even though the same regulatory agency had found out that the conditions of oil pollution were at the same unacceptable level as the previous year”, which puts the local environment at risk.

Hvalur hf. are said to remain in breach of regulation 884/2017 on oil pollution from operations on land²⁹. This breach regards the oil tank situated in Hvalfjörður which has not been fixed despite having 12 months’ notice to make repairs. The repairs required the oil tank to be placed on a concrete foundation with an “oil trap” as the law demands³⁰. Hvalur hf. have been given a time limit to follow the regulations by 1st June 2024, which means

many further months of risk of the tank leaking, and pollution could easily enter the soil and wider habitat, causing serious environmental harm.

CUMULATIVE IMPACT OF WHALING ON THE ENVIRONMENT

Kristján Loftsson has claimed that whaling in Iceland could contribute to the country’s climate objectives³¹, yet the evidence against this assertion is clear. Rather than permitting whaling to take place, every effort should be made in Iceland to help whale populations recover to their pre-whaling numbers as current science shows they are playing a positive role for the climate which could advance ocean-based climate change mitigation strategies. Acting in this precautionary way would have both direct and indirect carbon sequestration benefits, contributing to the reduction of atmospheric carbon, and potentially benefiting Icelandic international responsibilities under the goals of the Paris Agreement³².

Historical and recent whaling activities have led to substantial declines in whale populations, jeopardising the delicate balance of marine ecosystems. The removal of whales from marine environments not only disrupts carbon fixation, storage, and sequestration but also affects nutrient cycling and the productivity of marine ecosystems, which reduces ecosystem resilience and, by extension, global environmental health. The detrimental impact of whaling on both whales and ecosystems is undeniable and has been acknowledged by a recent report commissioned by Minister Svavarsdóttir, carried out by the University of Iceland, which found that whaling reduces the ocean’s ability to sequester carbon³³.

Verdict: The environmental harm caused by whaling is two-fold: not only does it remove a potential nature-based solution that assists with carbon sequestration and enhanced biodiversity abundance, whaling also harms the environment by causing pollution and increasing greenhouse gas emissions.



Evidence #3

Continuing Whaling is at odds with International Obligations



A meeting at the IWC 68

Since the global moratorium on whaling came into effect in 1986, the commercial hunting of whales has continued in just three countries: Iceland, Norway, and Japan. With the vast majority of nations no longer participating in this practice which has largely been deemed outdated and cruel, Iceland's sustained involvement in whaling puts the country at odds with the broader international community and contradicts its key global environmental commitments.

ICELAND'S CONTRADICTION TO THE GLOBAL BIODIVERSITY FRAMEWORK

Target 4 of the Kunming-Montreal Global Biodiversity Framework (GBF) urges signatory countries to undertake swift management actions to prevent human-induced extinctions by 2030³⁴. This target also emphasises the requirement to take action to aid the recovery and conservation of threatened species in order to reduce the risk of extinction. Iceland is a signatory of the GBF despite continuing to permit whaling.

The IUCN Red List is considered the world's most authoritative listing of species' extinction risk. Its classification of fin whales as "Vulnerable" places this species within the broader category of "threatened" species³⁵. Therefore, Iceland's continuation of hunting which targets fin whales is a contradiction of the aims of the GBF. Allowing the deliberate killing of fin whales challenges the spirit of this convention, which seeks to halt and reverse biodiversity loss, and works directly against Target 4. By continuing to consent to whaling operations, Iceland is not only failing to contribute to the recovery of marine biodiversity but is also permitting actions which adds to the extinction risk of fin whales. Any further killing of fin whales would mean that Iceland could not achieve this crucial 2030 GBF target; in addition, the conservation efforts of other countries would also be potentially negatively impacted given that fin whales are a migratory species.

CONTENTIOUS POSITIONING AT THE INTERNATIONAL WHALING COMMISSION

Iceland's participation in the IWC has long been controversial, but it took a downward turn when in 2006 it opted to resume commercial whaling operations in contravention of the global consensus to protect whales. This move came after Iceland rejoined the

IWC in 2002³⁶, taking out a reservation to the IWC's moratorium on commercial whaling which Iceland claimed allowed it to bypass the ban.

This controversial reservation met strong international resistance with 19 member countries objecting to Iceland's decision³⁷ and has had profound long-term implications on the country's reputation. By taking advantage of a procedural loophole, Iceland undermined the very purpose of the IWC's moratorium through impeding the global collective effort to allow whale populations to recover from the devastating impacts of 20th century industrialised whaling. Iceland's actions have had far-reaching consequences for the survival and recovery of fin whales.

CONTRAVENTION OF CITES AND THE TRADE IN ENDANGERED SPECIES

Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) includes species threatened with extinction which are afforded the highest degree of protection. Almost all species of great whale are listed under Appendix I³⁸ and the international trade of products derived from these species is prohibited in all but the most exceptional circumstances.

Despite this, Iceland has entered reservations to the Appendix I listing of many species of great whale which means that these stricter protections do not apply to the country. The consequence of this is that Iceland can continue to trade these whale species internationally for commercial purposes regardless of the conservation status of these animals, undermining the purpose of the Convention. Experts have repeatedly voiced concerns over the high volume of trade in Appendix I species, such as fin whale, which may threaten the survival of the species^{39, 40}.

Further questions have also been raised over Iceland's compliance with the Convention which is legally binding. CITES specifies that a species may only be exported if the Management Authority of the exporting Party is satisfied that the animal or plant was not obtained in contravention of the laws of that Party for the protection of plants and animals. Yet, the MAST report showed that whaling methods were not in line with Icelandic animal protection legislation⁴¹. Therefore, the legality of any permits issued allowing the export of

whale meat harvested during the 2022 and subsequent whaling seasons are cast into doubt. Any future export of fin whale meat that has been stockpiled from the 2022 season or was recently obtained has the potential to be held illegal.

REPUTATIONAL PRECIPICE

Further renewal of whaling quotas could continue to strain Iceland's international relations. Dozens of governments have agreed to several strongly worded diplomatic protests (démarches) against Iceland since it resumed whaling in 2003⁴². This tension is particularly apparent when considering the country's relationship with the United States which has undertaken diplomatic sanctions (Pelly Amendment sanctions) against Iceland since 2014 due to its commercial whaling activities and international whale meat trade⁴³. A recent disagreement between the United States and Japan around whaling

language within the Indo Pacific trade deal⁴⁴ shows that whaling is still an issue for the United States, which is the largest goods importer in the world. In fact, the United States government recently again urged Iceland to end its commercial whaling activities⁴⁵.

Iceland's continued participation in whaling conflicts with numerous international commitments and responsibilities and has profound consequences for the country's global reputation and the conservation of whales. By ensuring that whaling comes to an end and preventing licences from being renewed, Iceland will be better able to demonstrate adherence to international agreements and conventions.

Verdict: Continuing to allow whaling damages Iceland's international reputation and is incompatible with the country's global biodiversity obligations.

Evidence #4

Whaling Does Not Boost the Icelandic Economy



An example of the anti-whaling graffiti that is appearing in Iceland



A pregnant fin whale shot with two harpoons

Contrary to what is sometimes claimed, whaling in Iceland does not significantly contribute to the nation's finances. The industry faces substantial challenges due to international opposition which makes its costly operations uneconomical. In addition, whaling has a negative impact on the tourist industry in Iceland, and national reputational risks outweigh any economic advantages of whaling.

THE ECONOMIC IMPACT OF WHALING

Whaling in Iceland has long been presented as a positive economic activity. Proponents argue that it contributes to the nation's economy, particularly through the sale of whale meat and related products.

According to a recent study undertaken by Intellect on behalf of the Ministry of Fisheries, Food, and

Agriculture, the direct economic impact of whaling in Iceland is insignificant in a macroeconomic context⁴⁶. At best, the export value of these products is calculated to amount to just over 0.79% of the total export value of marine products.

Hvalur hf. exports whale meat to Japan but the consumption of whale meat in this country has decreased rapidly, from 233,000 tonnes in 1962 to only 1,000-2,000 tonnes in 2021 and 2022⁴⁷. Transporting whale products has also proven difficult in recent years due to unwillingness from other governments to allow the transport of whale products through their countries. Whaling has often made a financial loss and the combined loss of these operations from 2011 to 2019 amounted to three billion ISK⁴⁸. This can be attributed to outlays incurred due to ship maintenance, running the whaling station, and export-related costs. The majority

of Hvalur hf.'s earnings came from its shares in the company Vogunhf, which is the largest shareholder of the fishing company HB Grandi. Hvalur hf. reportedly owns up to 99.8% of Vogunhf is⁴⁹.

Substantial international opposition to whaling significantly hampers future financial prospects for Hvalur hf. and negatively impacts other sectors, compounding adverse effects to the country's economy. During 2023, more than 60 professionals from the international film industry pledged not to work in Iceland if whaling continues, threatening a \$150 million dollar a year industry⁵⁰. The subsequent injunction filed by Icelandic film and TV production company, True North, against Hvalur hf. on the grounds of lost business and ecological damage, reveals the detrimental impact whaling can have on other areas of Iceland's economy⁵¹.

WHALING'S EFFECT ON TOURISM

Iceland's thriving tourism industry is a significant contributor to the nation's economy. The country's pristine natural landscapes and diverse wildlife are powerful draws for tourists. However, whaling activities in Iceland have been the subject of international criticism, leading to reputational damage for the country as a desirable tourist destination.

Evidence has pointed towards a substantial number of tourists potentially choosing to avoid visiting Iceland because they oppose the continuation of whaling. Recent polling found that 28% of UK adults would be more likely to go on holiday to Iceland if the country stopped whaling⁵².

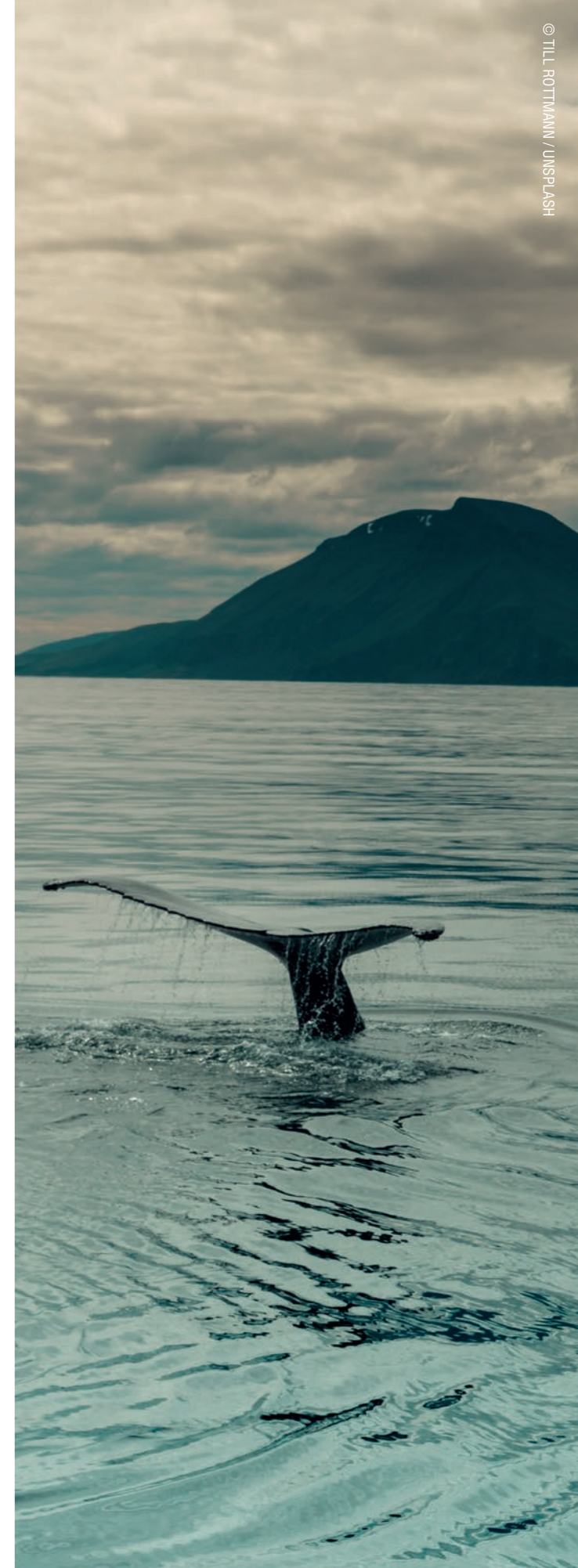
The strength of opposition against whaling within Iceland is also evidenced. In May 2023, an Icelandic opinion poll found that people who oppose whaling in the country are now in the majority⁵³. The number of people against whaling rose to 51% of Icelanders, up from 42% four years ago.

As Iceland grapples with the economic and ethical dimensions of continuing whaling, the broader implications on its reputation and economic interests are becoming increasingly pronounced. The pursuit of sustainable alternative national income which better aligns with contemporary societal values, offers a more promising path for Iceland's economic prosperity and tourist appeal.

Verdict: Whaling is likely to do more harm than good to the Icelandic economy.



You can hunt a whale once, but you can take its picture 1,000 times



Evidence #5

Alternative Employment Could Benefit Hvalur hf. Employees

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Hvalur 9 taking two dead fin whales back to the whaling station



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Kristján Loftsson overseeing a twice-shot hunted whale being landed at the Whaling Station

The potential discontinuation of whaling activities in Iceland raises pertinent concerns about consequences for Hvalur hf. employees. Whilst change is often challenging, this occupational shift is likely to bring a more sustainable future for those involved.

SUPPORTING AN EXIT FOR WHALERS

Representatives of the Akranes trade union say that around 120 people have worked in the processing of whale products during the last season⁵⁴; this represents 0.03% of the Icelandic population. If whaling licenses are not renewed, it is presumed that people working for Hvalur hf. would be made redundant. This is a regrettable situation but would affect each employee differently. However, economic forecasts predict that 15,000 new jobs will be created in Iceland between 2022 and 2025⁵⁵.

According to Hannes G. Sigurðsson, advisor to the Board of Directors and the Executive Board of the Confederation of Icelandic Employers, there will likely be a great need for more immigrants to staff the new jobs created in the coming years. With the country's

working-age population increasing by only three thousand, a vast range of employment opportunities are available for those people leaving the whaling industry.

The creation or extension of an existing government support scheme could assist in easing any hardship experienced by Hvalur hf. employees who are not able to find alternative employment immediately. Potential approaches might include financial support which alleviates any economic challenges faced, with the possibility of repurposing current whaling subsidies or tax breaks to assist with the cost.

With only one remaining whaling company, the long-term employment prospects of those people working for Hvalur hf. are already in doubt. By showing leadership in consciously bringing whaling to an end, it is possible to cast a safety net around Hvalur hf. employees and transition them into sustainable employment opportunities.

Verdict: Whaling does not provide long-term job security for employees.



An Iceland Without Whaling

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The cessation of whaling in Iceland would mark a transformative moment for the nation, offering a host of positive outcomes across ethical, ecological, and socioeconomic dimensions.

Enhanced animal welfare: The end of whaling would signify Iceland's commitment to the ethical treatment of marine mammals and demonstrate clear adherence to national animal protection legislation.

Flourishing biodiversity: Ending whaling would facilitate the recovery of fin whale populations, contributing to the restoration of marine ecosystems and biodiversity.

Climate stewardship: With whaling halted, Iceland would take an active step towards climate change mitigation by eliminating the environmental harm associated with the industry, enabling improved carbon regulation, and reducing greenhouse gas emissions.

Global collaboration: By formally abstaining from whaling, Iceland will rebuild its international reputation as well as making tangible contributions to collective global conservation, biodiversity, and climate efforts.

Adherence to global frameworks: The termination of whaling fulfils national requirements for global commitments by aligning with international biodiversity frameworks and demonstrating a real commitment to the recovery of threatened species.

Tourism upsurge: The absence of controversial whaling practices is likely to boost Iceland's tourism industry by attracting more ethically conscious travellers.

Diversified, sustainable economy: Redirecting current resources away from whaling subsidies and towards sustainable industries will foster economic diversification and financial stability.

An Iceland without whaling represents national progress towards an ethical and sustainable future, with positive impacts for people, the environment, and the world.

Conclusion



A twice-shot fin whale about to be processed by Hvalur hf. Workers

The Icelandic government has a long-held desire to ensure sustainability⁵⁶, uphold international obligations, and respect animal welfare⁵⁷. Over successive years, whaling has been shown to be at odds with these goals. This report has demonstrated that permitting whaling in Iceland through the renewal of industry licences would be illogical, given the strength of evidence against its continuation:

- Whaling causes significant suffering and breaches Icelandic animal welfare legislation.
- The environmental harm caused by whaling is two-fold: not only does it remove a potential nature-based solution that assists with carbon sequestration and enhanced biodiversity abundance, whaling also harms the environment by causing pollution and increasing greenhouse gas emissions.
- Continuing to allow whaling damages Iceland's international reputation and is incompatible with the country's global biodiversity obligations.
- Whaling is likely to do more harm than good to the Icelandic economy.
- Whaling does not provide long-term job security for employees.

The case against renewing whaling licences is vast and leaves no room for doubt. With international thoughts firmly fixed on slowing climate change, enabling the protection of marine ecosystems, and restoring biodiversity breakdown, the deliberate killing of whales must be brought to a permanent end.

As the debate over the future of whaling in Iceland looms, the world is watching with anticipation. The impending decision which might see the renewal of whaling licenses in Iceland has far-reaching implications, not only for fin whales, but also for the international community which has long waited for Iceland to take a leadership role in the protection of marine life.

Operating in contravention of the global consensus not only damages the status of Iceland internationally, but also hinders the efforts of the various intergovernmental fora to fulfil their crucial mission of safeguarding species, protecting biodiversity, and promoting

conservation. It is time for Iceland to reverse the damage inflicted through decades of relentless whaling by aligning the country's future actions with collective global aims that will improve Iceland's standing on the world stage.

The vitality of marine ecosystems and the future prospects of Icelanders are intrinsically tied to the choices made today. Whales occupy a pivotal role within the ocean, and the deliberate killing of whales – including pregnant whales who carry the next generation – upends this equilibrium, leading to unstable whale populations, disruptions in ecosystem dynamics, and the loss of invaluable ecological services.

Despite the implementation of new regulations in the last season, whaling operations continued to inflict needless suffering on whales in 2023, with a substantial proportion of hunted whales enduring a prolonged death. It is clear the requirements for animal welfare improvements that would bring whaling in line with the standards in the Animal Welfare Act have not been – and cannot be – met.

Encouraging whalers to exit an already-dying industry through the creation of financial incentives will provide for a smooth and practical transition for these employees to move to alternative opportunities which offer long-term job security in ethical and sustainable employment.

It is crucial to be guided by the evidence available, and the case against the continuation of commercial whaling in Iceland is unmistakable. Icelanders themselves are calling for an end to whaling. The imminent decision as to whether to allow the last remaining whaling company to continue its operations is a critical juncture for the nation: at stake is the opportunity for Iceland to ascend as a global champion of marine conservation which will cast a hopeful beacon for the future of our ocean, its inhabitants and for all coastal nations.

References

1. Hard to Port. (2022). An Animal Welfare Nightmare. Retrieved from <https://hardtoport.org/2022/08/02/an-animal-welfare-nightmare/>
2. Stjórnarráðið. (2022). Eftirlitsskýrsla Velferð hvala við veiðar á langreyðum á Íslandi 2022. Retrieved from <https://www.stjornarradid.is/>
3. MAST. (2023). Álit fagráðs um velferð dýra á hvalveiðum með leiðréttingu. Retrieved from <https://www.mast.is/>
4. Government of Iceland. (2023). Hunting of Fin Whales Suspended. Retrieved from <https://www.government.is/news/article/2023/06/20/Hunting-of-fin-whales-suspended/>
5. Stjórnarráðið. (2023). Skýrsla um leiðir til að fækka frávikum við veiðar á langreyðum. Retrieved from <https://www.stjornarradid.is/>
6. Jónasdóttir, P.J. (Personal communication, October 27, 2023). Email seen by WDC.
7. Vísir. (2023). Það er bara ítrekað eitthvað að klika hjá þeim. Retrieved from <https://www.visir.is/g/20232465998d>
8. Vísir. (2023). Það er bara ítrekað eitthvað að klika hjá þeim. Retrieved from <https://www.visir.is/g/20232465998d>
9. Vísir. (2023). Segir frávík eiga sér eðlilegar skýringar. Retrieved from <https://www.visir.is/g/20232462761d/segir-fravik-eiga-ser-edlilegar-skyringar>
10. Jónasdóttir, P.J. (Personal communication, October 27, 2023). Email seen by WDC.
11. Vísir. (2023). Kalfurinn dreginn ur modurkvíði nanast fullvaxta. Retrieved from <https://www.visir.is/g/20232466290d/kalfurinn-dreginn-ur-modurkvidi-nanast-fullvaxta>
12. Vísir. (2023). Veruleg aukning a tafarlausum dauda og hvalur hyggst leita rettar sins. Retrieved from <https://www.visir.is/g/20232485390d/veruleg-aukning-a-tafarlausum-dauda-og-hvalur-hyggst-leita-rettar-sins>
13. RSPCA. (n.d.). What is Electro-Immobilisation and What Impact Does It Have on Animal Welfare? Retrieved from <https://kb.rspca.org.au/>
14. International Whaling Commission. (n.d.). Retrieved from <https://archive.iwc.int/>
15. IUCN Red List. (n.d.). Fin Whale. Retrieved from <https://www.iucnredlist.org/species/2478/50349982>
16. International Whaling Commission. (n.d.). Fin Whale. Retrieved from <https://iwc.int/about-whales/whale-species/fin-whale>
17. Knapik, J.J., Cosio-Lima, L.M., & Reynolds, K.L. (2015). Efficacy of functional movement screening for predicting injuries in coast guard cities. *Journal of Strength and Conditioning Research*, 29(5), 1157-1162.
18. Roman, J., Estes, J.A., Morissette, L., Smith, C., Costa, D., McCarthy, J., ... Smetacek, V. (2014). Marine mammal impacts in exploited ecosystems: would large scale culling benefit fisheries? *Frontiers in Ecology and the Environment*, 12, 377-385.
19. Roman, J., Estes, J.A., Morissette, L., Smith, C., Costa, D., McCarthy, J., ... Smetacek, V. (2014). Marine mammal impacts in exploited ecosystems: would large scale culling benefit fisheries? *Frontiers in Ecology and the Environment*, 12, 377-385.
20. Morissette, L., Christensen, V., & Pauly, D. (2012). Marine mammal impacts in exploited ecosystems: would large scale culling benefit fisheries? *PLoS ONE*, 7, e43966.
21. Morissette, L., Christensen, V., & Pauly, D. (2012). Marine mammal impacts in exploited ecosystems: would large scale culling benefit fisheries? *PLoS ONE*, 7, e43966.
22. Scales, K.L., Hazen, E.L., Jacox, M.G., Edwards, C.A., Boustany, A.M., Oliver, M.J., ... Bograd, S.J. (2022). Advancing marine conservation through machine learning and satellite data. *Frontiers in Marine Science*, 9, 872679.
23. Pershing, A. (2021). Why saving whales can help fight climate change. Retrieved from <https://www.bbc.com/future/article/20210119-why-saving-whales-can-help-fight-climate-change>
24. Roman, J., Estes, J.A., Morissette, L., Smith, C., Costa, D., McCarthy, J., ... Smetacek, V. (2014). Sizing ocean giants: patterns of intraspecific size variation in marine megafauna. *PeerJ*, 1, e248.
25. Roman, J., Estes, J.A., Morissette, L., Smith, C., Costa, D., McCarthy, J., ... Smetacek, V. (2014). Sizing ocean giants: patterns of intraspecific size variation in marine megafauna. *PeerJ*, 1, e248.
26. NOAA Research. (2023). One of the Planet's Most Important Carbon Sinks Is Revealing Its Secrets. Retrieved from <https://research.noaa.gov/>
27. Grapevine. (2014). Pylsusþjall: Whaling in Iceland. Retrieved from <https://grapevine.is/mag/interview/2014/07/16/pylsusþjall-whaling-in-iceland/>
28. Morissette L, Christensen V, and Pauly D. (2012). Marine mammal impacts in exploited ecosystems: would large scale culling benefit fisheries? *PLoS ONE*, 7, e43966.
29. Alþingi. (2017). Reglugerð um vistkerfi hafsins. Retrieved from <https://island.is/reglugerdir/nr/0884-2017>
30. Alþingi. (2017). Reglugerð um vistkerfi hafsins. Retrieved from <https://island.is/reglugerdir/nr/0884-2017>
31. mbl. (2023). Veidibann gegn loftslagsmörkum. Retrieved from https://www.mbl.is/200milur/frettir/2023/08/15/veidibann_gegn_loftslagsmarkmidum/
32. United Nations. (2015). Paris Agreement. Retrieved from <https://www.un.org/en/climatechange/paris-agreement#:~:text=substantially%20reduce%20global%20greenhouse%20gas,and%20impacts%20of%20climate%20change>
33. Stjórnarráðið. (2023). Hvalir í vistkerfi hafsins við Ísland - skýrsla. Retrieved from <https://www.stjornarradid.is/>
34. Convention on Biological Diversity. (2022). Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization. Retrieved from <https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf>
35. IUCN Red List of Threatened Species. (2022-2). Retrieved from <https://www.iucnredlist.org/species/2478/50349982>
36. IWC (International Whaling Commission). (n.d.). Iceland. Retrieved from <https://iwc.int/iceland>
37. Roman, J., Palumbi, S.R., & O'Hara, T. (2010). Whales as marine ecosystem engineers. *Frontiers in Ecology and the Environment*, 8(7), 377-385.
38. CITES. (n.d.). Appendices. Retrieved from <https://cites.org/eng/app/appendices.php>
39. Species+ (2023). Selection of species for inclusion in the Review of Significant Trade following CoP18: Extended analysis. Retrieved from <https://www.speciesplus.net/api/v1/documents/15270>
40. CITES. (2023). Proposals to amend the Appendices. Retrieved from <https://cites.org/sites/default/files/documents/E-AC32-14-02.pdf>
41. MAST. (2023). Álit fagráðs um velferð dýra á hvalveiðum (16.06.2023) með leiðréttingu. Retrieved from <https://www.mast.is/>
42. Whale and Dolphin Conservation. (2014). Iceland Whaling Report. Retrieved from <https://uk.whales.org/wp-content/uploads/sites/6/2018/08/iceland-whaling-report-2014.pdf>
43. U.S. Fish & Wildlife Service. (1978). Pelly Amendment and Fishermen's Protective Act. Retrieved from <https://www.fws.gov/law/pelly-amendment-fishermens-protective-act#:~:text=The%20Pelly%20Amendment%20to%20the,undermines%20the%20effectiveness%20of%20any>
44. Mongabay. (2023). Iceland's Whaling Paradox. Retrieved from <https://news.mongabay.com/2023/10/icelands-whaling-paradox-commentary/>
45. Stjórnarráðið. (2023). Efnahagsleg áhrif hvalveiða. Retrieved from [https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20\(2\).pdf](https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20(2).pdf)
46. Stjórnarráðið. (2013). Reglugerð um velferð dýra á hvalveiðum. Retrieved from https://www.mast.is/static/files/library/Regluger%C3%B0ir/55_2013LogVelferddyraEN1505.pdf
47. Vísir. (2022). Hollywood-stjórnur hóta snið gongu verði hvalveiðar leyfðar á ný. Retrieved from <https://www.visir.is/g/20232456559d/hollywood-stjornur-hota-snid-gongu-verdi-hval-veidar-leyfdar-a-ny>
48. Iceland Review. (2023). True North Demands Injunction Against Whaling Company. Retrieved from <https://www.icelandreview.com/news/true-north-demands-injunction-against-whaling-company/>
49. OnePoll. (2023). Research commissioned by Whale and Dolphin Conservation (WDC) in 2023. (Unpublished Data)
50. Stjórnarráðið. (2023). Retrieved from [https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20\(2\).pdf](https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20(2).pdf)
51. Iceland Monitor. (2022). Great Demand for Foreign Labor in Iceland. Retrieved from https://icelandmonitor.mbl.is/news/news/2022/01/26/great_demand_for_foreign_labor_in_iceland/
52. EEA. (2020). Iceland Country Profile - SDGs and the 2030 Agenda. Retrieved from <https://www.eea.europa.eu/themes/sustainability-transitions/sustainable-development-goals-and-the/country-profiles/iceland-country-profile-sdgs-and>
53. Reglugerðasafn. (2015). Reglugerð um tilkynningu um aflun hvalveiðis. Retrieved from <https://www.reglugerdir.is/reglugerdir/eftir-raduneytum/atvinnuvega--og-nyskopunarraduneyti/nr/21418>
54. Stjórnarráðið. (2023). Efnahagsleg áhrif hvalveiða. Retrieved from [https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20\(2\).pdf](https://www.stjornarradid.is/library/01--Frettatengt---myndir-og-skrar/MAR/Fylgiskjol/230820_MAR_Efnahagsleg_ahrif_hvalveida%20-%20Copy%20(2).pdf)
55. MBL (2022). Great Demand for Foreign Labor in Iceland. Retrieved from https://icelandmonitor.mbl.is/news/news/2022/01/26/great_demand_for_foreign_labor_in_iceland/
56. European Environment Agency. (2020). Iceland country profile - SDGs and the environment — European Environment Agency. Retrieved from <https://www.eea.europa.eu/themes/sustainability-transitions/sustainable-development-goals-and-the/country-profiles/iceland-country-profile-sdgs-and>
57. MAST. (2015). Act on animal welfare. Retrieved from https://www.mast.is/static/files/library/Regluger%C3%B0ir/55_2013LogVelferddyraEN1505.pdf

