

## Talking Points for Georgia Aquarium Beluga Import Permit Application

All the permit application materials are available on the NOAA website at:  
[http://www.nmfs.noaa.gov/pr/permits/georgia\\_aquarium\\_belugas.htm](http://www.nmfs.noaa.gov/pr/permits/georgia_aquarium_belugas.htm)

These talking points are not exhaustive. There are many specific points in the permit application that need to be questioned and challenged. However, the bullet points below address broad issues raised by this proposal. Please contact Naomi Rose at [nrose@hsi.org](mailto:nrose@hsi.org) if you would like references or supporting documentation for any points addressed below.

### General

- The Georgia Aquarium is seeking to import 18 wild-caught belugas (*Delphinapterus leucas*) from the Sakhalin-Amur population in the Sea of Okhotsk, Russia. Belugas in this area were subject to intensive hunting until the early 1960s and **are still recovering**.
- These whales will go to the Georgia Aquarium and its partners in this proposal (SeaWorld parks in California, Texas, and Florida, Shedd Aquarium in Illinois, and eventually Mystic Aquarium in Connecticut). **The rationale for the import request rests on the premise held by the Georgia Aquarium and its partners that the continuation of their captive beluga collection is an important contribution to marine conservation and public education. However, this premise has no basis in fact.** It is an assumption without empirical support.
- The Georgia Aquarium and its partners have other species on display, including other cetacean species. Captive beluga displays are not needed to conserve belugas in the wild or to educate people – such conservation and education can be fostered by these facilities without live belugas on display (see Ocean Park Hong Kong).
- The Georgia Aquarium has used a “rescue rationale” to claim that these belugas would have been captured and shipped to other locations regardless of this permit request. In fact, **these animals were procured specifically for the Georgia Aquarium and its partners**, so they are supporting the ongoing capture and international commercial trade in belugas (China is currently a primary purchaser from this capture operation).
- **The plan for the Russian transport planes to land in Liège, Belgium – where the whales will undergo multiple transfers between two different shipment containers and two different planes before flying to the US – will subject the whales to considerable additional stress.** Transport and handling of cetaceans, even using established practices, elevate stress hormones and increase mortality risk for several weeks afterward. The claim by the Georgia Aquarium that this layover transfer “poses no additional risk” to the animals is spurious. Each move between carriers and airplanes is a separate event from the animals’ point of view and the stress is additive. The transfer in Liège is not typical of cetacean transports and is only necessary because the US transport planes are not allowed to land in Russia (no reason given, but it is likely political) and the Russian planes do not meet US air and noise emission standards. **It is simply not acceptable to put the animals through this additional stress – it is inhumane, which violates the Marine Mammal Protection Act.**
- The transfer in Liège clearly concerned the National Marine Fisheries Service (NMFS) as well, given its queries regarding the layover in Liège to the Georgia Aquarium after reviewing the original permit application, to which the application addendum is largely non-responsive.

- The noise levels, particularly in the Russian planes that do not meet US noise emission standards, to which the belugas will be subjected during this long transport will be considerable. Anthropogenic noise is a known stressor for cetaceans, which have very sensitive hearing.
- **The captive beluga breeding program has been unsuccessful**, despite five decades of effort by the captive industry to make its beluga collection self-sustaining. The population of captive belugas in the US has declined, from 40 animals in the early 1990s to 35 today. As a result, the captive industry seeks new animals to avoid inbreeding and further decline in numbers, which is a counter-intuitive reaction. The logical and humane reaction would be to recognize that belugas are not a suitable species for public display.
- Belugas in the wild can live a maximum of 50-60 years, based on tooth ring analysis. In captivity, they rarely live beyond 30 and frequently do not pass 25 – none have lived to the possible maximum. The permit application does not contradict this, noting that median and average life expectancies are “effectively identical” in captivity and the wild (the value for both these parameters in either environment is roughly 20 years – the permit application includes a detailed longevity analysis).
- This then begs the question of why captive belugas do not live longer, as is frequently the case with captive wildlife. The causes of mortality must be significantly different, as there are no predators, anthropogenic hazards, or food shortages in captivity and captive belugas have veterinary care. **The logical corollary is that captivity has unique causes of mortality that are as effectively lethal as natural causes. Given poor breeding success in captivity, stress is a highly probable culprit.** Despite this, the Georgia Aquarium and the NMFS illogically maintain that transporting and confining belugas results only in short-term stress from which they rapidly recover.
- Given that the captive population is in decline, captive reproductive rates are poor, and survivorship is at best unimproved over the natural state, it is clear that **belugas do not thrive in captivity**. Therefore, the wild beluga populations in Russia should not be exploited – and their individual members made to suffer – to continue a failed practice. **The captive industry should phase out the public display of belugas.**

### Alternatives

- Setting aside the false premise on which the import request is based and simply addressing the desire of the Georgia Aquarium and its partners for more belugas, **there are approximately 40 belugas – wild-caught from the same population in Russia as well as captive-born – at Marineland in Canada.** This facility was recently the subject of an investigative series in the *Toronto Star* in which former trainers came forward to reveal serious failures in animal husbandry and management at the facility.
- Rather than work to rescue these already-captive belugas just over the border, the partner facilities have been working to establish the groundwork to support a capture of healthy, functioning animals in the distant Sea of Okhotsk and transport them halfway around the world for public display and breeding. Aside from the welfare issues related to this lengthy transport, **the carbon footprint of the proposed import is excessive compared to that of an import from Canada, an additional irony given the threat global warming presents to Arctic belugas.**

- The rationale given by the Georgia Aquarium for not seeking already-captive belugas at Marineland was “an incompatible relationship, both financially and philosophically” with management there. **This does not adequately explain why this is not a “viable alternative” to wild capture in Russia.** It also does not take into account the recent developments revealed by the *Toronto Star*.
- The Environmental Assessment for this permit request considered two alternatives – No Action and the Proposed (Preferred) Action. The permit application itself considered five alternatives, including acquiring already-captive animals and artificial insemination. Although dismissed by the Georgia Aquarium, **it is unclear why these alternatives were not even considered, let alone more comprehensively evaluated, by the NMFS.**

### Captures

- The Georgia Aquarium and its partners have invested considerable funds in beluga research in the Sea of Okhotsk. **“The goal of this project [was] to estimate the sustainable annual take quota” from the Sakhalin-Amur region, not to address conservation needs.**
- The captures of these 18 whales took place in 2006, 2010, and 2011, well before the issuance of the import permit. This is a case of asking for forgiveness rather than permission – **the partner facilities have clearly prejudiced the NMFS’ decision-making by capturing the belugas before receiving an import permit** and placing the whales in a holding facility on the Black Sea in anticipation of receiving the permit, despite the requirement by law for the NMFS to consider public input prior to making a decision on the import request.
- The Georgia Aquarium assumed throughout the application that the likelihood was strong, based on nuclear DNA analysis, that the Sakhalin-Amur population mixed during the breeding season with the Shantar population, which it argued would give a higher overall sustainable removal level for all sources of human-caused removals (increasing the sustainable removal level from 30 to as high as 86). **This is not precautionary thinking,** which is counter to the aquarium’s self-styling as “a leading facility for aquatic animal conservation and research,” and is evidence of its attempt to minimize and downplay the actual impacts of this request.
- The International Union for Conservation of Nature (IUCN) reviewed the sustainability research conducted by the Georgia Aquarium and its partners and noted that “the sustainability of removals from [the Sakhalin-Amur population] *does not depend* on whether there is interbreeding, or mixing, outside of the season when belugas are captured” (emphasis added). What is relevant for the live capture operation is the strong site fidelity of females during the feeding season (when they are captured). These smaller, distinct summer feeding aggregations are susceptible to overexploitation. **The Georgia Aquarium ignored this point entirely in the permit application.**
- **The sustainable removal level of 30 animals per year from the Sakhalin-Amur population could devastate a matriline if all captures were made from one location, as the permit application indicates is the case** (all captures relevant to this permit application took place at Chkalova Island). This concern is exacerbated by the fact that young females are preferred by the captive industry, as evidenced by the permit application and the age/sex ratio of the 18 animals to be imported.
- Even if the overall population in the Sea of Okhotsk does not decline, localized depletions may result in the loss of important matrilineally inherited gene complexes, as well as

important cultural, behavioral and social information that are contained and transmitted within these matrilineal groups. **The Georgia Aquarium and its partners did not consider this social aspect of live captures, either in their research or the permit application.**

- The Georgia Aquarium assumed throughout the application that live captures are the main source of anthropogenic removals, which would suggest that the sustainable removal level of 30 has not been exceeded on average (since the average live capture removal has been 21 animals annually for the last decade). **However, the information on other sources of human-caused take is deficient, weakening this assumption.** In fact, the Sea of Okhotsk live capture operation on its own has exceeded the sustainable removal level (in fact, 33 were taken in 2011, which means the last capture for the Georgia Aquarium was in a year of overexploitation). The government-established quotas for live captures (ranging from 40 to 57 animals) are certainly not precautionary, begging the question of the appropriateness of the Georgia Aquarium utilizing this live capture operation.
- The IUCN noted that anthropogenic take of belugas, from entanglement, hunting, ship strikes, etc., in the Sea of Okhotsk (other than live capture) is probably minimal. However, it is not non-existent, and frankly monitoring of these types of take is low in the region. Regardless, the live capture operation leaves a minimal buffer for other sources of human-caused removals in the Sakhalin-Amur area (**only 9 or 10 additional animals could be killed or removed per year on average by human activities if the sustainable removal level is not to be exceeded**).

### Queries

- To what do the Georgia Aquarium and its partners ascribe the comparable survivorship and longevity between captive and wild belugas? That is, what kills captive belugas as effectively as natural causes of mortality?
- Is there video of the captures in 2006, 2010, and 2011? If not, why not? If they were humane, video evidence is a reasonable expectation given modern technology.
- The transfer in Liège is complicated and additionally stressful to the animals for inadequate reasons (which are purely logistical and possibly political, rather than biological or medical). The NMFS asked for an estimate of how long the animals would be at the airport undergoing this transfer from one set of containers to others and one plane to another; the Georgia Aquarium was non-responsive. In fact, how long does the aquarium estimate the animals will be at Liège Airport? If it is not possible to estimate how long it will take to perform these multiple transfers, why not, given the expertise of the transport team?
- Given the developments at Marineland in Canada since the Toronto Star exposé, why are the Georgia Aquarium and its partners not working with Ontario authorities to rescue the 40 belugas held at this inadequate facility?
- The permit application claimed that no mother-calf pairs were targeted, yet several of the animals listed in the application were taken when they were approximately 1.5 years of age. At this age, the animals would still be dependent on their mothers. How were mother-calf pairs identified in the field?