

To: Norwegian Directorate of Fisheries

We, the undersigned, are writing to express our deepest concern in the outcome of 'Freya' the walrus's situation in Oslo recently. In the 21st century with climate and biodiversity crises we need paradigm and philosophical shifts as our human species must adapt to live alongside nature irrespective of the inconvenience. Nature sustains us - without it we have no food, drink or life!

Freya has been present in Europe since 2019 where the public and she (along with other out of habitat species including walrus) have been managed successfully by many different organisations across multiple countries. As a protected marine mammal species which has been displaced from its natural habitat, the individual North Atlantic walrus (*Odobenus rosmarus*), known as Freya, was of multinational importance to protect, and therefore management and mitigation measure were not the sole prerogative of the Norwegian authorities. We would like to remind the Norwegian government that Norway is also subject to international agreements of particular relevance to the management of walruses and their habitats; including:

- The Convention on Biological Diversity
- The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (Wiig et al., 2014; www.coe.int/en/web/bern-convention)
- The United Nations Convention on the Law of the Sea (Jeffries, 2016; www.un.org/depts/los/convention_agreements/texts/unclos/UNCLOS-TOC.htm)

You were informed by British Divers Marine Life Rescue (see below) of a similar situation with another walrus known as 'Wally', who visited the UK, Ireland, France, Spain and Iceland in 2021 who also had a habit of hauling out on boats in harbours on a regular basis. In the case of Wally, his situation was almost entirely managed on the ground by a handful of volunteers and staff from marine conservation and welfare charities with daily monitoring, regular and consistent public messaging, and taking action to manage dynamic risk in collaboration and consultation with authorities and statutory bodies.

Walrus are a thigmotactic species. All they want to do is to lie next to another walrus. In the absence of a walrus companion, they will seek out warm, soft places to relax – boats and RIBs. So providing walrus with an alternative floating platform (particularly one that smells of walrus scent gathered from previous haul out vessels) can prevent alternative choices and so vessel damage. After a long journey, a walrus must have a period of resting and feeding building up energy reserves enough to move on to their next destination. Given the time and space to do this, they will not hang around.

In late 2021 marine mammal rescue and welfare experts from around the world came together to share their case studies of challenging and/or out of habitat individuals. This is an emerging issue for humans, likely driven by climate change, so will likely become a more frequent occurrence in future years. The workshop explored potential mitigating actions to avoid conflict with humans and financial losses. The workshop was summarised into a report for future management use. This, along with a case study of Wally, was shared with you by British Divers Marine Life Rescue via an intermediate, biologist Rune Aae, at the end of June 2022, following concerns that there were threats to shoot Freya.

Since then little had been heard on Freya's situation other than euthanasia having been ruled out as an option, until she was suddenly put to sleep on the 14th August in a dramatic reversal in strategy. As you're well aware, the reaction to this and the explanations behind it have been met with a massive backlash from the public around the world, as well as great scepticism from the international animal rescue and welfare community.

There appears to be little transparency in the process that was used to come to the decision that was taken to end her life. We all need to learn from this experience, and as such we call upon you to urgently address the following:

- Provide a fully detailed explanation on which non-lethal management methods were considered, implemented or dismissed – why, what, where, how and by whom?
- Whether advice and experience was sought and provided by third parties e.g. National Oceanographic and Atmospheric Administration in the USA who have extensive protocols on many kinds of marine mammal deterrent techniques?
- Whether the advice from BDMLR was used in any way, and if there was any subsequent outreach for more assistance from them, or other organisations?
- Detail what effort was happening on the ground to actively manage people to keep the public away from Freya?
- What legal frameworks were available and used (or not) to control the issues with people crowding around Freya and behaving inappropriately?
- Why euthanasia could not have been held off until the summer season ends and the coast gets quieter, therefore making management easier for you and giving Freya time to move on after regaining sufficient energy?

Transparency of this information about your process would go a long way to helping understand this entire situation. Sadly for now, this has set a very poor benchmark in global animal management. More worryingly it has set a very bad precedent for others. Lethal measure should only be used as a last resort once all non-lethal mitigation methods have been given time to work. In recent years this has been done successfully in all the other nations hosting out of habitat species. This provides context for the global interest in your justification of lethal measures. A situation like this cannot be repeated.

We look forward to hearing your reply.

Signed:

British Divers Marine Life Rescue

Norfolk Seal Project

Gower Seal Group

Seal Rescue Ireland

Cornish Seal Sanctuary

Thames Seal Watch

Seal Research Trust

Seal Welfare Organisation

Ecomare

Zeehondencentrum Pieterburen

ORCA Ireland

The Seal Project

Yorkshire Seal Group

Teesmouth Seal Conservation Trust

West Cork Animal Welfare

Friends of Horsey Seals

Tynemouth Seal Hospital

Sea Gypsy Research

North Wales Seal Research Organisation

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