

To the attention of the Chief Permits, Conservation and Education Division

As a volunteer cetacean observer for the BC Cetacean Sighting Network, The Orca Network, and the Department of Fisheries and Oceans, I would like to express my serious concerns about the proposed extension of the program which uses the satellite tags that are attached to the fins the killer whales. From what I have read and researched there are substantial risks to the whales whilst the benefits of the additionally collected data is questionable at best. As you have extended the deadline for comments, I have taken the liberty to express my objections to this project. My objections are :

- 1) the risk of severe damage to tissues of the fins, the blood vessels and the potential risk of infection that may lead to serious health concerns.
- 2) the crudeness and low reliability of the tags, certainly relative to the small amount of additional information that could be gathered (compared to what is known)
- 3) the lack of alternative means proposed to obtain the desired information
- 4) the risk of health, behavior and stress on very small populations (e.g. Southern residents < 90 animals) and the huge impact this could have on this small number of animals

Besides the objections mentioned, in my personal opinion, it is surprising that it even has reached the proposal stage. We have an endangered species and it already endures many stress factors like intensive whale watching, acoustic interference from civilian and military vessels, pollution etc. So how can a very invasive tagging techniques and associated increased health risk not be seen as completely counter productive to the goal of preservation of this species? I realize that the legal aspects of these animals not being subject to country borders may seem to give you a local legal status to endorse this project. However I would hope that scientific thinking has evolved sufficiently for it to be recognized that no country/ jurisdiction can simply affect these animals without thinking about legal status and animal health concerns in a neighboring country. Especially if theses neighbors share such a narrow border.

If you are truly committed to protecting this species, then I can only assume you would accept the reasons and concerns of scientists and others for not using this technology. The community that should decide on this is larger than just those in the jurisdiction where the proposal is made.

Thank you very much for your time and consideration in advance.

Peter Mieras
Owner Operator