



International Whaling Commission

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Mr. Jim J. Tozzi
Center for Regulatory Effectiveness
Suite 700
11 Dupont Circle N.W.
Washington DC 20036-1231
USA

Dear Mr Tozzi,

I am writing in response to your letter of 15 December. I am pleased to read that your organisation considers IWC reports to be an important resource. However, when writing to an intergovernmental organisation based outside the USA, it would be appropriate to include in your letter a brief introduction as to what is the composition and authority of your 'Center', rather than simply providing a website address. I gather from your website that the CRE is not a government agency.

Obviously it is not possible to comment on the substance of your letter ('IWC Reports That May Not Meet New US Quality Standards') until we receive your organisation's analysis of 'a number of reports' of our Scientific Committee. However, given the subject title you have allocated to your letter and the people you have placed on copy, I do feel obliged to make some general comments.

Our Scientific Committee, comprising up to 200 leading experts, continuously reviews its procedures and is always open to constructive suggestions on ways to improve further. However, given that the IWC is an intergovernmental organisation currently comprising 66 countries including the USA, any changes you or others might suggest must be shown to represent a practical improvement for all governments (and, of course, conservation and management) rather than simply to meet the criteria of one member government. In any event, it seems premature to 'suggest' to us that we should adjust our procedures before you have completed your review. This is especially the case since you have copied your letter to a number of other people/organisations. I would be grateful to receive an explanation of why this was done. Please note that the IWC, although it has excellent relations with ACCOBAMS, ASCOBAMS and CMS, is not established under UNEP.

Finally, you note that there were inconsistencies between WHO scientific dietary reports and US government quality standards that prevented the US Department of Health and Human Services from using them. Whilst you include a copy of your critique of the WHO report, I note that you did not include a reply from them; this would certainly aid our interpretation of your comments.

To conclude, I re-iterate that we welcome constructive comments and will review carefully your Center's analysis of our reports once we receive it. However, might I suggest that you take my above comments into account, particularly when considering the 'copy' list for future correspondence.

Yours sincerely,

Nicky Grandy
Secretary to the Commission

- c.c. Dr. Arne Bjorge, Chair, IWC Scientific Committee
Dr. William T. Hogarth, Assistant Administrator, NMFS
David Cottingham, Executive Director, Marine Mammal Commission
Marie-Christina Van Klaveren, ACCOBAMS Permanent Secretariat
Dr. Notabartolo di Sciara, Chair, ACCOBAMS Scientific Committee
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