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STATEMENT BY DR. NAOMI ROSE MARINE MAMMAL SCIENTIST THE HUMANE SOCIETY OF THE UNITED STATES

Good afternoon. I am Naomi Rose, marine mammal scientist for The Humane Society of the United States. I first became involved in the issue of the damage inflicted on the marine environment by once-through cooling systems at nuclear power stations when the Seabrook Nuclear Power Plant in New Hampshire applied for a small take exemption under the Marine Mammal Protection Act (or MMPA) in 1997. A “small take exemption” allows an entity to kill or injure – that is, “take” – some small number of protected animals as long as population-level impacts are negligible. However, such take must also be minimized and monitored

When I learned of Seabrook’s application and discovered that in fact the plant had been killing seals for some time without authorization, I submitted comments to the National Marine Fisheries Service, pointing out that there was no reason why the plant could not virtually *eliminate* seal mortality and injury. I was willing to accept that it would take some time for Seabrook to identify solutions, but I cautioned against giving the plant a small take exemption without specifying strict timetables for achieving those solutions. Yet here we are, four years later, and apparently little has changed.

From a humane standpoint, the entrainment of marine mammals is a serious concern – the trauma suffered by an individual animal before actually drowning must be horrific. However, the entrainment of endangered species, such as manatees in Florida, is of even greater concern, because such takes have conservation implications for entire populations.

The Humane Society of the United States believes that once-through cooling systems have impacts on the marine environment that are negative enough to justify their elimination. We do not feel the cost of installing cooling towers, a far less damaging technology, excuses the continued harm inflicted on any number of species, including marine mammals, as well as habitat, by the discharge of super-heated water and the entrainment of organisms. The Precautionary Principle has received a great deal of lip service in the last few years by governments and industry but little direct application. This is a situation where its direct application is an obvious choice. We urge the nuclear power industry to move away from business as usual in the 21st century and make an investment in minimizing harm to the environment.