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To:

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Re: Urgent Call to Update the Beredskabsplan for Havpattedyr (2024) in Light of Peer-Reviewed Evidence, Recent Failed Responses, and the Immediate Case of the Humpback Whale "*Hartwin*"

Dear Ms. Lemming, Mr. Karsten, and Members of the Beredskabsgruppen,

We write to you as concerned citizens, marine conservation advocates, and professionals who have followed with increasing alarm the trajectory of Denmark's marine mammal stranding response over the course of 2026. We have reviewed your current Beredskabsplan for Havpattedyr (Strandingsberedskab, April 2024), and we must respectfully but firmly state that the protocol, as written and as applied, is not consistent with the current body of peer-reviewed scientific literature, does not reflect evidence-based veterinary practices for live cetacean response, and has contributed directly to preventable animal suffering and death in Danish waters this year.

This letter sets out the specific deficiencies of the current protocol, cites the peer-reviewed literature that contradicts its foundational assumptions, reviews recent cases in which the protocol's application resulted in failure, and concludes with an urgent demand for both an immediate veterinary intervention for the humpback whale "Hartwin" currently in Danish waters and a comprehensive revision of the Beredskabsplan.

1. The Protocol's Default Position on Large Whales Is Contradicted by Peer-Reviewed Evidence

Section 5.3 of the Beredskabsplan states unambiguously: "Havpattedyr tages ikke i pleje" (marine mammals are not taken into care). Section 5.4 establishes a 4-metre threshold, above which whales are, as a default, left alone and not handled by humans ("hvaler længere end 4 meter lades i fred og naturen går sin gang"). The plan further states that the Beredskabsplan does not organise rescue operations that attempt to return stranded whales to the sea ("Beredskabsplanen organiserer ikke såkaldte redningsaktioner, der forsøger at trække strandede hvaler tilbage i havet"). This is presented as a safety and animal welfare decision.

However, the published scientific and operational literature directly contradicts the premise that large whale rescue is infeasible or inherently harmful. We draw your attention to the following peer-reviewed and documented cases:

Gulland et al. (2008) documented the case of two humpback whales (“Delta” and “Dawn”) in the Sacramento River, California, in 2007. These animals spent approximately 20 days in fresh water, sustaining visible skin damage from low-salinity exposure closely paralleling the freshwater dermatitis observed in Baltic cetaceans. The rescue effort, led by Dr. Frances Gulland of the Marine Mammal Center, included the first documented *antibiotic darting of free-ranging humpback whales* using a modified dart gun from a boat, demonstrating that pharmacological intervention on a large, free-swimming whale is both feasible and safe. The freshwater skin damage reversed within approximately 24 hours of the animals’ return to salt water. The Beredskabsplan contains no provision for remote drug delivery, despite this technique being established in the peer-reviewed literature for nearly two decades.

Thalmann, Gales, Greenwood, and Gedamke (2008, Marine Mammal Science) published the Tasmania 2007 sperm whale refloat, in which stranded sperm whales weighing in excess of 30 tonnes each were successfully refloated alive using a net-tow method after 96 hours of stranding. Senior author Sam Thalmann confirmed in writing on 10 April 2026 that the net-tow method is “fundamentally suitable” for humpback whale rescue cases. The Tasmania 2020 Macquarie Harbour mass stranding subsequently saw 114 pilot whales refloated alive, the largest documented cetacean rescue operation on record. These experiences were codified in the NRE Tasmania 2022 Cetacean Incident Manual, the most comprehensive published rescue protocol in the world. **The Beredskabsplan cites none of these sources.**

Olhasque et al. (2025, Animals) published the Rance Estuary case, in which a juvenile humpback whale trapped behind a tidal power station in Brittany, France, was successfully rescued within approximately two days using non-invasive methods in 2023. This paper was published three months before the German humpback stranding began and represents the most recent peer-reviewed account of a successful juvenile humpback rescue in European waters. It was not cited by any of the expert bodies that advised on the German case, nor is it referenced in any Danish stranding protocol.

The Humphrey cases (San Francisco Bay, 1985 and 1990) demonstrated that a large humpback whale deep inside an enclosed body of water can be guided back to the open sea using underwater acoustic playback of humpback social and feeding calls. Humphrey was moved approximately 80 kilometres in seven hours using this non-invasive technique. He was resighted alive and healthy in subsequent years. The Beredskabsplan contains no provision for acoustic luring or herding, despite these techniques being documented in the scientific record for over 40 years.

The NOAA NY4236 case (East Hampton, New York, 2010) is the most comprehensive necropsy ever performed on a stranded juvenile humpback whale. The full diagnostic workup, including complete blood count, serum chemistry, urinalysis with myoglobin testing, bacterial culture, morbillivirus PCR, and a biotoxin panel, found no underlying disease, no starvation, no biotoxins, no morbillivirus, and could not determine the cause of stranding. This directly contradicts the doctrinal

assumption embedded in the Beredskabsplan that strandings are inherently a symptom of serious underlying illness and that “nature should take its course.”

The Sharp et al. (WHOI-2024-05, November 2024) workshop report from the Woods Hole Oceanographic Institution represents the most recent expert consensus on large whale stranding response methods, including the strap method for refloating large cetaceans. This report was published only months before the current series of strandings in Danish and German waters, yet its recommendations appear nowhere in the Beredskabsplan.

2. The Protocol Failed Catastrophically in 2026: Denmark’s Record This Year

The Beredskabsplan’s default of non-intervention for large whales was tested repeatedly in 2026. The results speak for themselves.

February 2026: Eight sperm whales stranded in Denmark across three separate incidents: the first near Ålbæk Bugt/Skagen on 1 February, the second near Esbjerg/Blåvandshuk, and a mass stranding of six juvenile males off Fanø on 21–22 February. All eight animals died. The Danish Environmental Protection Agency explicitly stated that it was “not possible to euthanise a stranded sperm whale in a way that is both ethical and safe,” and officials opted to let the remaining animals die. No rescue attempt was made for any of the animals, despite the fact that the Tasmania 2007 sperm whale refloat (Thalman et al. 2008) demonstrated that sperm whales of comparable size can be refloated alive using a net-tow method after 96 hours of stranding. The Danish authorities either did not know about this peer-reviewed precedent or chose to disregard it. Either conclusion is unacceptable.

May 2026: The humpback whale “Timmy/Hope” was found dead off the island of Anholt in Danish waters on 14 May 2026, following a controversial rescue attempt in Germany and weeks of institutional paralysis. This whale had survived over fifteen months in the Baltic, had been feeding successfully, had self-refloated three times under its own power, and was assessed as “well-nourished” by the German experts’ own contemporaneous record. During the German response, medication was prohibited, evidence-based strap methods were blocked, and weeks of institutional delays allowed the animal’s condition to deteriorate, precisely the self-fulfilling prophecy that the peer-reviewed critique identifies. Denmark’s own role in this case was limited to confirming the death and planning a necropsy. The European Parliament has since raised a formal question (E-001579/2026) asking the Commission whether it intends to propose a coordinated EU-wide emergency plan for whale strandings, citing this case specifically.

3. Specific Deficiencies in the Beredskabsplan

Having reviewed the Beredskabsplan in its entirety, we identify the following specific deficiencies that are inconsistent with current evidence-based practice:

a) No provision for veterinary intervention on live large whales. The protocol’s only options for whales over 4 metres are euthanasia (which the protocol itself acknowledges is impractical for large whales) or abandonment. There is no provision for remote drug delivery by dart, no pharmaceutical protocol for large-whale

medication, no standing relationship with marine veterinary specialists who have experience with cetacean pharmacology, and no mention of the antibiotic darting technique documented by Gulland et al. (2008). The protocol references IJsseldijk et al. (2019) for decomposition classification of dead specimens but contains no clinical assessment protocol for live animals.

b) No rescue or refloating methodology. The Beredskabsplan explicitly states that it does not organise rescue operations. This is a policy choice, not a scientific conclusion. The NRE Tasmania 2022 Cetacean Incident Manual provides detailed, field-tested protocols for triage, refloating, herding, transport, release, and post-release monitoring for cetaceans of all size classes. The Sharp et al. (WHOI-2024-05) workshop report documents the strap method. The Thalmann et al. (2008) net-tow method has been successfully applied to animals twice the weight of the whales that have stranded in Denmark. None of these are referenced or incorporated.

c) No acoustic herding or luring capability. The Humphrey case demonstrated acoustic luring of a humpback whale over 80 kilometres in 1985. The Gulland et al. (2008) Sacramento River case and the Olhasque et al. (2025) Rance estuary case both employed coordinated herding techniques. The Beredskabsplan contains no provision for acoustic deterrent or lure equipment, no flotilla management protocol, and no capacity for continuous escort operations, including at night.

d) No diagnostic standard for health assessment of live whales. The protocol has no minimum diagnostic standard for assessing a live stranded whale before making the decision to abandon it. The NOAA NY4236 case demonstrates that a comprehensive diagnostic workup including blood work, urinalysis, ultrasound, and toxicology is the minimum standard required to make a defensible clinical determination. A visual inspection from a distance cannot establish a terminal prognosis and should not be the basis for a decision to let a protected animal die.

e) No cross-border coordination framework. The Timmy/Hope case demonstrated that cetaceans do not respect national boundaries. The whale stranded in Germany, was transported through the Baltic, released in the Skagerrak, and found dead in Danish waters. The Beredskabsplan contains no provisions for cross-border coordination with German, Swedish, or other maritime authorities in live stranding cases.

f) No provision for rehabilitation. The protocol states that marine mammals are not taken into care, citing risks of disease transmission, habituation, and interference with natural selection. While these are legitimate considerations for seal pups, they are not applicable in the same way to large whales that have become geographically trapped. A humpback whale that enters the Baltic and cannot find the exit is not being “naturally selected”; it is geographically disoriented. The Beredskabsplan makes no distinction between these fundamentally different scenarios.

4. International Obligations Denmark Is Failing to Meet

The Beredskabsplan’s own Bilag 1 acknowledges Denmark’s obligations under the EU Habitats Directive, ASCOBANS, OSPAR, HELCOM, and the IWC. The Habitats Directive (Council Directive 92/43/EEC) requires member states to maintain or improve the conservation status of all cetacean species. All cetaceans in EU waters

are listed on Annex IV and require a strict protection regime that prohibits deliberate killing and disturbance. While the Directive does not explicitly mandate rescue operations, the deliberate decision to withhold available, evidence-based veterinary treatment from a protected species in distress, when such treatment has been demonstrated in peer-reviewed literature to be feasible, raises serious questions about whether Denmark is meeting its obligations to maintain the “strict protection” the Directive requires.

ASCOBANS Annex 3 specifically obliges parties to “endeavour to establish an efficient system of reporting strandings and for recovering and performing necropsies.” A system that collects dead specimens efficiently but makes no effort to prevent live animals from becoming dead specimens does not fulfill the spirit of this obligation.

The European Parliament question E-001579/2026 has already highlighted that current EU and regional frameworks do not provide for a comprehensive emergency response mechanism for strandings, and that several non-EU countries have established coordinated national response systems that outperform the European approach. Denmark’s current protocol exemplifies the deficiency the Parliament is identifying.

5. The Immediate Case: Hartwin Requires Urgent Veterinary Attention

As of 25 June 2026, a humpback whale designated “Hartwin” by the organisation Stranded No More has been sighted in the Lillebælt (Little Belt) between the Danish mainland and the island of Funen. The whale has been tracked since January 2026, appearing successively off the English coast near South Shields, the Netherlands, and Denmark. Photographs and video show abnormal skin discoloration that whale expert Carl Kinze of the Danish Natural History Museum has acknowledged could indicate a fungal infection.

Under the current Beredskabsplan, this whale will receive no medical attention, no veterinary assessment beyond visual observation, and no intervention to guide it out of increasingly dangerous waters. If it strands, the protocol dictates that it will be “left in peace.” If it shows signs of suffering, the protocol’s only response option for an animal of this size is to contact the Beredskabsgruppen for discussion. This is not an adequate response to a visibly ailing protected animal for which evidence-based treatments exist.

We demand the following immediate actions regarding Hartwin:

1. Deploy a qualified marine mammal veterinarian to conduct a proper clinical assessment of the whale, including, at minimum, close-range photographic documentation of the skin condition and remote exhalation (blow) and biopsy for laboratory analysis.
2. Prepare and authorise a pharmaceutical protocol for remote antibiotic delivery by dart, following the methodology established by Gulland et al. (2008). This technique has been successfully applied to free-swimming humpback whales and does not require physical restraint.

3. Establish continuous monitoring and, if the whale's course indicates it is heading deeper into the Baltic, deploy a coordinated escort and acoustic deterrent operation to guide it toward the North Sea, following the herding protocols documented in the NRE Tasmania 2022 Cetacean Incident Manual and the Olhasque et al. (2025) Rance estuary case.

4. Coordinate immediately with German, Swedish, and Dutch maritime and environmental authorities to establish a cross-border monitoring and response framework for this specific animal.

6. Demands for Protocol Revision

Beyond the immediate case of Hartwin, we demand a comprehensive revision of the Beredskabsplan for Havpattedyr that incorporates the following:

1. Replace the default of non-intervention for large whales with a decision framework that begins from the presumption of rescue, consistent with the evidence base from successful operations documented in the peer-reviewed literature (Gulland et al. 2008; Thalmann et al. 2008; Olhasque et al. 2025; Sharp et al. WHOI-2024-05; NRE Tasmania 2022).

2. Establish a pharmaceutical protocol for remote cetacean medication, including standing veterinary authority to administer antibiotics and anti-inflammatory agents by dart without requiring case-by-case bureaucratic approval that costs critical time.

3. Develop and drill herding, acoustic luring, and escort protocols for cetaceans entering Danish inland waters, the Baltic, and other bodies of water from which they cannot navigate independently.

4. Establish minimum diagnostic standards for health assessment of live stranded whales that include blood work, biopsy, blow analysis, and ultrasound before any decision to abandon or euthanise a protected animal is made.

5. Create cross-border coordination agreements with Germany, Sweden, the Netherlands, and other relevant maritime nations for live cetacean stranding response.

6. Include on the Beredskabsgruppen at least one member with documented operational experience in successful live large-whale rescue, to ensure that the advisory body includes expertise in rescue, not only in necropsy, population biology, and specimen collection.

7. Commit to complete transparency, including publication of all decision-making processes, protocols applied, and outcomes, with independent post-case evaluation of every live stranding event that results in the animal's death.

7. Conclusion

Denmark's Beredskabsplan for Havpattedyr, as currently written and applied, is a specimen-collection protocol with an attached euthanasia procedure. It is not a rescue protocol. It is not an animal welfare protocol. It does not reflect the current state of peer-reviewed scientific knowledge on live cetacean stranding response. It did not save eight sperm whales in February. It did not contribute to saving the

humpback whale Timmy/Hope. And unless it is fundamentally revised, it will not save Hartwin.

The peer-reviewed literature is clear: large whales can be rescued from strandings and from enclosed bodies of water. Freshwater skin damage reverses upon return to salt water. Stranded whales survive refloating even after days of stranding. Pharmacological intervention by dart is possible on free-swimming humpbacks. Acoustic luring can guide a humpback out of an enclosed waterway. Comprehensive rescue manuals exist in the published literature. The question is not whether these methods work. The question is whether Denmark will use them.

We await your response regarding both the immediate case of Hartwin and the timeline for a comprehensive revision of the Beredskabsplan. We reserve the right to escalate this matter to the European Commission under the EU Habitats Directive infringement complaint procedure should no substantive response be received within 14 days.

Respectfully submitted,

StrandedNoMore

strandednomore.org

References Cited

- Gulland, F.M.D., et al. (2008). Eastern Pacific gray whale unusual mortality event, 1999–2000, and Sacramento River humpback whale intervention. NOAA Technical Memorandum.
- IJsseldijk, L.L., Brownlow, A.C., and Mazzariol, S. (2019). Best practice on cetacean post mortem investigation and tissue sampling. Joint ACCOBAMS and ASCOBANS document.
- Krause, B. (1985). First-person diary: Humphrey the Humpback rescue, San Francisco Bay. NMFS operational record.
- Miljøstyrelsen (2024). Beredskabsplan for havpattedyr, Strandingsberedskab. Danish Ministry of the Environment.
- NOAA NY4236-10 case report. East Hampton, NY, 2010. NOAA stranding database.
- NRE Tasmania (2022). Cetacean Incident Manual. Department of Natural Resources and Environment, Tasmania, Australia.
- Olhasque, A., et al. (2025). Rescue of a juvenile humpback whale from the Rance Estuary, Brittany, France. *Animals*.
- Sharp, S.M., et al. (2024). Large Whale Stranding Response Workshop Report. WHOI-2024-05. Woods Hole Oceanographic Institution.
- Stranded No More (2026). The Case of a Juvenile Humpback Whale off the German Baltic Coast, February 2025–June 2026: A Critical Brief. Version 7.2.
- Thalmann, S., Gales, N., Greenwood, A., and Gedamke, J. (2008). Refloating stranded sperm whales in Tasmania, 2007. *Marine Mammal Science*.
- European Parliament Question E-001579/2026. EU action to implement a whale stranding emergency plan.