



IFAW input to the public consultation on “Trade in seal products – fitness check of EU rules”

Dear IFAW supporter,

Below you will find out how IFAW answered the European Commission’s Public Consultation on trade in seal products. This public consultation is open not only to NGO’s and experts, but also to concerned citizens from the EU and beyond.

The European Commission wants to hear a variety of voices and arguments. Below are our responses, and when providing your valuable input, we kindly ask you to use these answers only as inspiration. **Responding on these issues in own words would make your answer more valuable in the eyes of the Commission.**

What can you expect?

The online questionnaire consists of an introduction and several questions.

How can I take part?

Click the following link:

<https://ec.europa.eu/eusurvey/runner/2024FitnessCheckEUSealRegime?surveylanguage=en>

On the webpage, click Log-in with your EU log-in. If you do not have a log-in, click on “Create an account” or sign in with eID / Facebook / Google. You will be asked to fill in your name and email-address. A confirmation email will be sent to the email address you provided. Open the link in the email to create a password. Once the password has been repeated, you will be forwarded to the questionnaire page.

Until when can I take part?

Deadline: 7 August 2024 (midnight Brussels time)

The legislation

* Question 1. Are you aware of the EU legislation on trade in seal products?

	Not aware
	Partly aware
X	Very aware

Question 2. Your understanding of the EU seal regime is that:

	True	False	Don't know
There is a complete ban on the placing of seal products on the EU market.		X	
EU Member States can continue hunting seals, in line with the Habitats Directive, for the sustainable management of their marine resources, but they can no longer place the products from these hunts on the EU market.	X		
Products from seals hunted by Inuit and other indigenous communities who hunt seals for their subsistence can be placed on the EU market only if they are accompanied by an attesting document issued by an official body recognised for that purpose by the European Commission.	X		
Occasional imports of seal products into the EU are allowed when these goods are exclusively for the personal use of travellers or their families.	X		
There is a ban on the commercial imports into the EU of products from pups from all seal species.		X	

Question 3. If seals products (such as meat, oil, omega-3 capsules, fur skins, garments or leather goods) were available on the EU market, would you buy them?

	Yes	No
Irrespective of their origin	The current EU regime has an exemption for Inuit seal products. IFAW encourages you to answer this question as an individual.	
If they are from Inuit or other indigenous community origin	The current EU regime has an exemption for Inuit seal products. IFAW encourages you to answer this question as an individual.	
If they are from hunts to protect fishery activities		X
To support the local communities in the coastal areas of the EU Member States around the Baltic Sea		X
If they are made from seal pups		X

Question 4. To what extent do you agree that:

	Strongly disagree	Disagree	Neutral	Agree	Fully agree	No opinion
Seal hunting raises animal welfare concerns, regardless of the hunting method used.					X	
Seal hunting does not raise significant moral concerns if it is conducted with due regard to animal welfare, e.g. by using hunting methods which guarantee instantaneous death.		X				
Seal pup hunting raises more moral concerns than adult seal hunting.	X					
All seal products should be allowed for sale on the EU market, provided these products originate, for the EU, from hunts conducted in line with the Habitats Directive.	X					

Products from seals hunted by Inuit and other indigenous communities should be allowed on the EU market, because seal hunting is an integral part of their culture and identity, and contributes to their subsistence.				X		
Products from seals hunted by Inuit and other indigenous communities should be accompanied by an attesting document to allow them to be placed on the EU market.					X	
Occasional imports into the EU of seal products for the personal use of travellers or their families should be allowed.			X			
A small-scale sale of seal product handicraft by local communities from the coastal areas of the EU Member States around the Baltic Sea should be allowed, to contribute as a source of income and showcase their creativity and traditions, provided hunting is carried out in line with applicable legislation, such as the Habitats Directive.	X					
Products from seal hunts to protect fishery activities should be allowed for sale on the EU market, as long as these hunts are in line with the Habitats Directive.	X					
The import and placing on the EU market of seal pup skins and derived products from whitecoat pups of harp seals and blue-back pups of hooded seals				X		

should be allowed if they come from Inuit and other indigenous communities.						
The import of seal pup skins and derived products should be forbidden for all seal species, unless they come from Inuit and other indigenous communities.			X			
The import and placing on the EU market of seal pup skins and derived products should be forbidden for all seal species, even if they come from Inuit and other indigenous communities.		X				
No seal products at all should be allowed for import and placing on the EU market.		X				

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- Regardless of their species, age, killing methods, or the conservation status of their species – commercial hunting of seals represents a serious animal welfare issue.
- Fish stocks are mainly threatened by overfishing, illegal and unregulated fisheries, devastating fishing methods such as bottom trawling, pollution, and the effects of climate change. Seals' impact is minimal compared to the impact of these activities.
- The EU Seal Regulation has resulted in indirect conservation benefits that should be celebrated in the context of the current biodiversity crisis.

* Question 5. In your opinion, how successful has the legislation been in regulating the import and placing on the EU market of seal products?

X	Very successful
	Partly successful
	Not successful
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger)

1500-character(s) maximum

- Since public concerns of EU citizens regarding seal welfare have not changed, and neither have the hunting methods used, this legislation clearly remains fit for purpose.
- Considering there are no seal products illegally placed on the EU market, this legislation is implemented and enforced successfully.

* Question 6. In your opinion, how successful has the legislation been in allowing the import and placing on the EU market of seal products from Inuit and other indigenous communities?

X	Very successful
	Partly successful
	Not successful
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- Canada has not provided sufficient support in building Inuit capacity to take advantage of the exemption. However, there is no restriction on the products originated from subsistence hunts and Inuit can, as a result, place these products on the EU market.

* Question 7. In your opinion, has the legislation addressed the public moral concerns related to seal hunt?

X	Yes, fully
	Yes, partly
	No
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- This legislation ensures that EU citizens with concerns about products derived from cruel commercial seal hunts can be certain that those products do not end up on EU markets.

* Question 8. In your opinion, are there factors that may have hindered the effective implementation of the legislation?

	Yes
X	No
	Don't know

If yes, please indicate which ones (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

* Question 9. In your opinion, has the legislation had an impact on the socio-economic interests of the relevant stakeholder groups (e.g. Inuit and other indigenous communities, fishers and seal hunters)?

X	Yes
	No
	Don't know

If you wish, please provide comments, namely on positive or negative impacts (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- Canada has claimed difficulties in utilising the exemption for products from traditional subsistence hunting, but this is due to a lack of communication and support for capacity building from the Canadian government and must not be linked to the EU legislation itself. There is no restriction on the products originating from subsistence hunts and Inuit and other indigenous communities can, as a result, place these products on the EU market.

* Question 10. In your opinion, has the legislation had an impact on seal populations within or outside the EU?

X	Positive impact
	Negative impact
	No impact
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- Many seal populations that are commercially hunted, such as harp seals, are reliant on stable ice platforms to reproduce. As climate change reduces this critical breeding ice habitat, the reduction in the number of seals killed for commercial purposes has likely helped build resiliency to climate change in these populations.

* Question 11. In your opinion, has the legislation changed seal hunting practices in terms of their animal welfare impacts?

	Yes
X	No
	Don't know

If you wish, please provide comments, namely on positive or negative impacts (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- Seal killing methods in Canada's commercial seal hunt have not changed as a result of the EU legislation. Welfare concerns raised by veterinary experts, such as killing seals in open water and the inability to ensure immediate unconsciousness and death, are still valid.

* Question 12. In your opinion, has the legislation had any other impacts (including unexpected or unintended)?

X	Yes
	No
	Don't know

If you wish, please provide comments, namely on positive or negative impacts (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- The EU seal regime led to increased global awareness of the cruelty of commercial seal hunts, and inspired other countries to act.
- Due to the legislation, fewer seals have been killed for commercial purposes. Marine mammals such as seals provide important ecosystem services and build resiliency to climate change.

* Question 13. In your opinion, are the direct and indirect costs of the legislation justified, given the results it has achieved, within and outside the EU?

X	Justified
	Not justified
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500 character(s) maximum

* Question 14. In your opinion, is there any simplification and/or cost reduction potential for the legislation, within or outside the EU?

	Yes
X	No
	Don't know

If you wish, please provide comments.

1500 character(s) maximum

- No, in any way

* Question 15. In your opinion, are the Regulation on Trade in Seal Products and the Seal Pups Directive and their requirements coherent with one another?

X	Yes, fully
	Yes, partly
	No
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

* Question 16. In your opinion, is the legislation coherent with other EU policies and priorities, such as the EU Habitats Directive or the EU Marine Strategy Framework Directive?

X	Yes, fully
	Yes, partly
	No
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

* Question 17. To your knowledge, do other (non-EU) countries regulate trade in seal products?

X	Yes
	No
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- The EU Seal regime is very similar to how other countries regulate trade in seal products, e.g., the United States, Mexico, India, Switzerland, and the Eurasian Economic Union.

* Question 18. In your opinion, is the legislation coherent with the work of international organisations such as the North Atlantic Marine Mammal Commission (NAMMCO) or the Baltic Marine Environment Protection Commission (HELCOM)?

	Yes, fully
	Yes, partly
	No
X	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

* Question 19. In your opinion, are the legislation's objectives still relevant?

X	Yes, fully
	Yes, partly
	No
	Don't know

If you wish, please provide comments (kind reminder - use your own words, it will make your input stronger).

1500-character(s) maximum

- This legislation fulfils its purpose and remains relevant.

* Question 20. In your opinion, is there added value for EU level action compared to national or regional action?

X	Yes
	No
	Don't know

If you wish, please provide comments.

1500-character(s) maximum

- The harmonisation of trade rules represents an important EU competence. Trade and imports into the EU are controlled efficiently and obstacles to the functioning of the internal market are eliminated.

Please upload a document if you wish to share a more extensive contribution or any background materials that will help us to understand your answers. Only files of the type pdf, txt, doc, docx, odt, rtf are allowed.