



Government of Newfoundland and Labrador  
**Department of Fisheries, Forestry and Agriculture**

**Newfoundland and Labrador**  
**Position Paper**  
**Trade in Seal Products**  
**Fitness Check of EU Rules**

**August 2024**

## Introduction

The seal harvest in Newfoundland and Labrador (NL) is not only a deeply rooted cultural tradition, but also an essential component of the rural economy and Indigenous livelihoods. The European Union (EU) ban on seal products, enacted in 2009, has had negative impacts on the sealing industry in NL. This prohibition, driven by concerns over animal welfare, overlooks the significant strides made by Canadian sealers in ensuring humane harvesting practices. Furthermore, scientific evidence emphasizes the necessity of controlled seal populations for maintaining marine ecosystem balance and supporting the recovery of valuable fish stocks. As seal populations surge, the economic and ecological consequences have become increasingly unsustainable. Lifting this ban would not only support economic opportunities for coastal communities but also contribute to the sustainability of marine resources in our province.

## Seal Fishery in Newfoundland and Labrador

### Resource Management and Outlook:

There are six species of seal that reside in NL waters: Harp, Hooded, Grey, Harbour, Ringed, and Bearded, with Harp and Grey seals being the most abundant.

The Atlantic population of Harp seals summer in the Canadian Arctic and Greenland before migrating to the southern Labrador coast in the late fall. From southern Labrador some mature seals travel to the Gulf of St. Lawrence, while most migrate southwards along the east coast of Newfoundland. Grey seals remain present in Atlantic Canada throughout the year, with seasonal movements occurring within the region.

Approximately 70% of the annual seal harvest occurs off the north and east coasts of Newfoundland and southern Labrador.

The seal harvest has a long history with the province dating back hundreds of years with Indigenous people and Dorset settlers as a means of survival. In the mid-1700s, European demand for seal oil and skins led to the development of a commercial inshore seal harvest. Peaking in the late 1990s and early 2000s, the commercial harvest still occurs today. However, in recent years, the total harvest level has not been fulfilled. This is primarily due to the loss of key international markets for seal products.

Fisheries and Oceans Canada (DFO) estimated that in 2022 there were 7.6 million Harp seals in Atlantic Canada, a population that has grown almost 60 per cent since 1994. The total harvest level set by DFO is 400,000 annually, roughly five per cent of the total population. On average, only 10 per cent of this quota is landed. The estimated population of Grey seals in Atlantic Canada is 366,400. The total harvest level is 77,300 and typically, only three per cent of this quota is landed.

In 2022, a Seal Summit was held in St. John's, NL with government and industry stakeholders. The discussions centered around changing the narrative regarding the seal hunt, establishing, and improving market access domestically and internationally, and increasing involvement of Indigenous partners in management decisions. Efforts have been taken since the Seal Summit to work with Indigenous partners, to advance seal science and to improve market access for seal products. In particular, there are

several multi-year seal science projects in progress by Memorial University of Newfoundland and Labrador and the Fish, Food and Allied Workers (FFAW) assessing seal abundance, distribution, seasonality, diet and interaction with fish species.

The seal harvest remains an integral part of Indigenous communities and the rural economy. The focus remains on a sustainable harvest based on solid science, the full utilization of the animal, and humane harvesting methods with zero tolerance for inhumane practices.

### **Sealing is a Sustainable Fishery:**

The Marine Stewardship Council defines sustainable fishing as fishing that “leaves enough fish in the oceans and minimizes impacts on habitats and ecosystems”. Sealing is a well-regulated fishery in NL that can sustain a commercial harvest. Total harvest levels used in seal management support sustainable removals accounting for age, season, and location.

As shown in Figure 1, the harvest level of Harp seals in NL has not been reached in some time and landings continue to decrease.

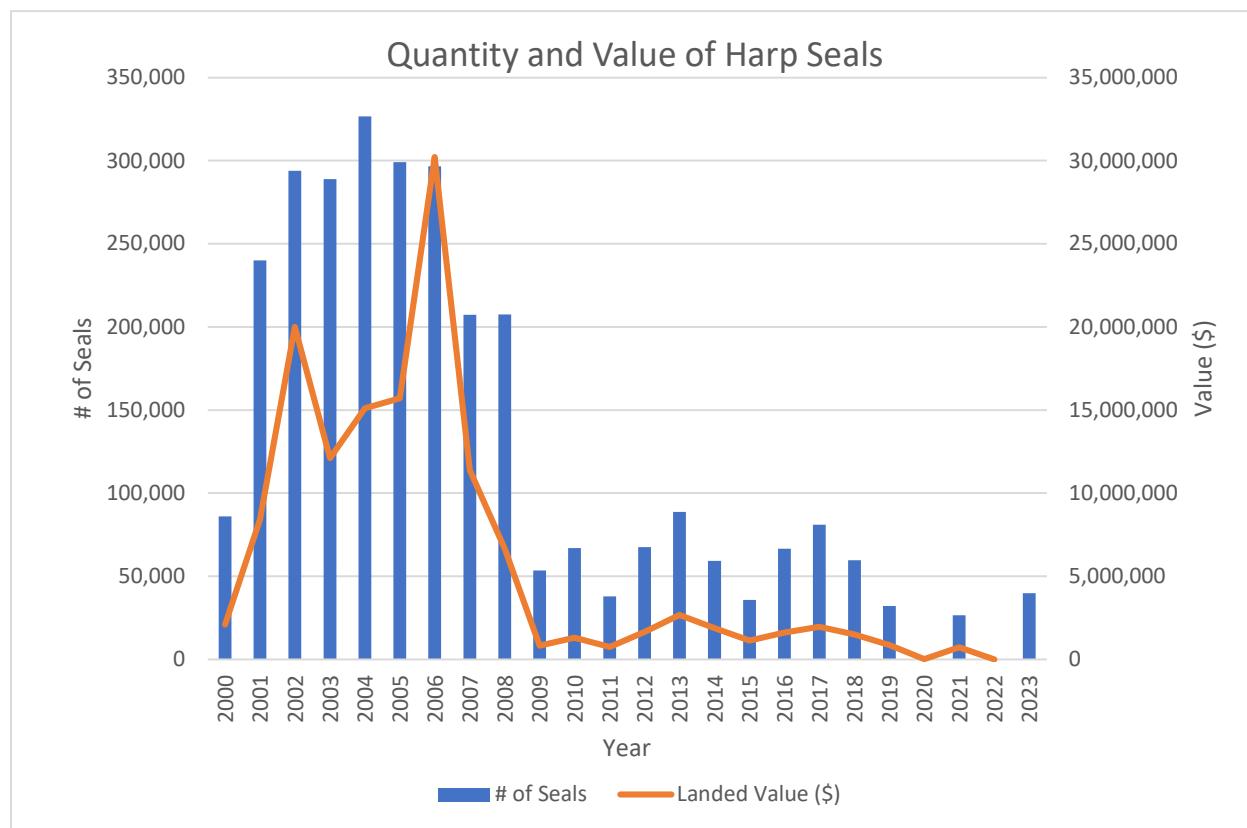


Figure 1: Quantity and Value of Harp Seals in NL

This has contributed to the exponential rise in seal populations, the highest numbers ever observed by DFO. Science has shown that this population increase impacts the biodiversity and ecosystem balance of the surrounding marine environment. Unless

there is a decrease in seal population, valuable commercial fish stocks in Newfoundland and Labrador such as Northern cod, shrimp and capelin are at risk.

### **Canadian Seal Fishery is Humane:**

Canada has some of the best managed wild animal harvests in the world and follow the highest standards of humane harvesting. Canadian harvesting practices are globally recognized for their excellence. The Government of Canada enforces strict, science-based regulations, that are regularly reviewed to ensure humane harvesting methods.

In 2009, several amendments to the Marine Mammal Regulations (MMR) were introduced by the Government of Canada. The intent of the amendments were to enhance the humaneness of the Canadian seal harvest. Recommendations from the Independent Veterinarians Working Group, which included experts from France, the Netherlands, and the United Kingdom, were considered in the development of these amendments. Canada's science-based, three-step process ensures animals are harvested quickly and humanely, often surpassing the humaneness of other methods used for dispatching wild or domesticated animals worldwide, and this process was incorporated into the MMR in 2009.

The Government of Canada monitors the seal harvest closely and has committed to fully enforcing the MMR. The professionalism and commitment to humane practices within the Canadian sealing industry are verified. DFO employs a balanced enforcement program with DFO Fishery Officers being responsible for enforcing the MMR. Other law enforcement agencies, the Canadian Coast Guard and at-sea and dockside observers often play a supporting role in enforcement activities. Different tools and surveillance methods are used to monitor the seal harvest. These include, but may not be limited to aerial surveillance, remote monitoring cameras, vessel monitoring systems, random at-sea patrols and inspections, and dockside inspections. In 2023, it was determined that approximately 3,000 federal fishery officer inspections had been conducted since 2018, and the industry maintained a 96 per cent compliance rate of the MMR. Additional inspections are conducted at buyer and processor facilities by the Government of Newfoundland and Labrador.

All harvesters participating in the commercial seal harvest must complete training on the three-step process outlined in the MMR to obtain a licence. The Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (FFA) has partnered with the Professional Fish Harvesters Certification Board (PFHCB) and the federal government to implement this training. To date, over 4,500 sealers have completed this training.

### **Seal Populations Impact on the Recovery of Northern Cod Stocks:**

Seal populations have grown significantly, resulting in major concerns regarding the impact on other fisheries including the Northern cod stocks. There are an estimated 7.6 million harp seals and 366,400 grey seals in Atlantic Canada. Some estimates approximate that the seal population in Canada consumes roughly 30 million tonnes of fish each year, correlating to 53 times more fish than the entire Atlantic fishing fleet

harvests. There is evidence that many Canadian fish stocks are declining, and the resulting pressures affect commercial fisheries and coastal communities. The Canadian fisheries and ocean economy is estimated to create 350,000 jobs and generate \$31 billion each year. Controlling the seal population will help reduce stress on important fish stocks, like Northern cod, that are fundamental components of the Newfoundland and Labrador fishery.

## EU Seal Product Ban

### Negative Economic Impact on NL Sealing Fishery:

Some of the finest quality seal products in the world are produced in Canada. In many remote coastal and northern communities, the seal harvest is a way of life and provides a source of income.

Since the early 2000s, the seal fishery has faced an economic downturn. In 2006, 296,600 seals were harvested in the Newfoundland and Labrador region, and the fishery was valued at over \$30.2 million. In recent years, the landings and value of the seal harvest has been very low. In 2023, 39,709 seals were harvested with an approximate value of \$1.0 million. The value per animal has dramatically reduced from more than \$100 per animal in 2006, to less than \$30 per animal in 2023.

As shown in Figure 2, there has been a downward trend in the number of commercial seal license holders in NL. In 2023, approximately 463 people participated in the NL seal harvest. This number is significantly lower than 2009, which reported 1,354 active participants. The dramatic decline reflects the significant negative economic impact of international market restrictions and the direct impact to the NL sealing industry.

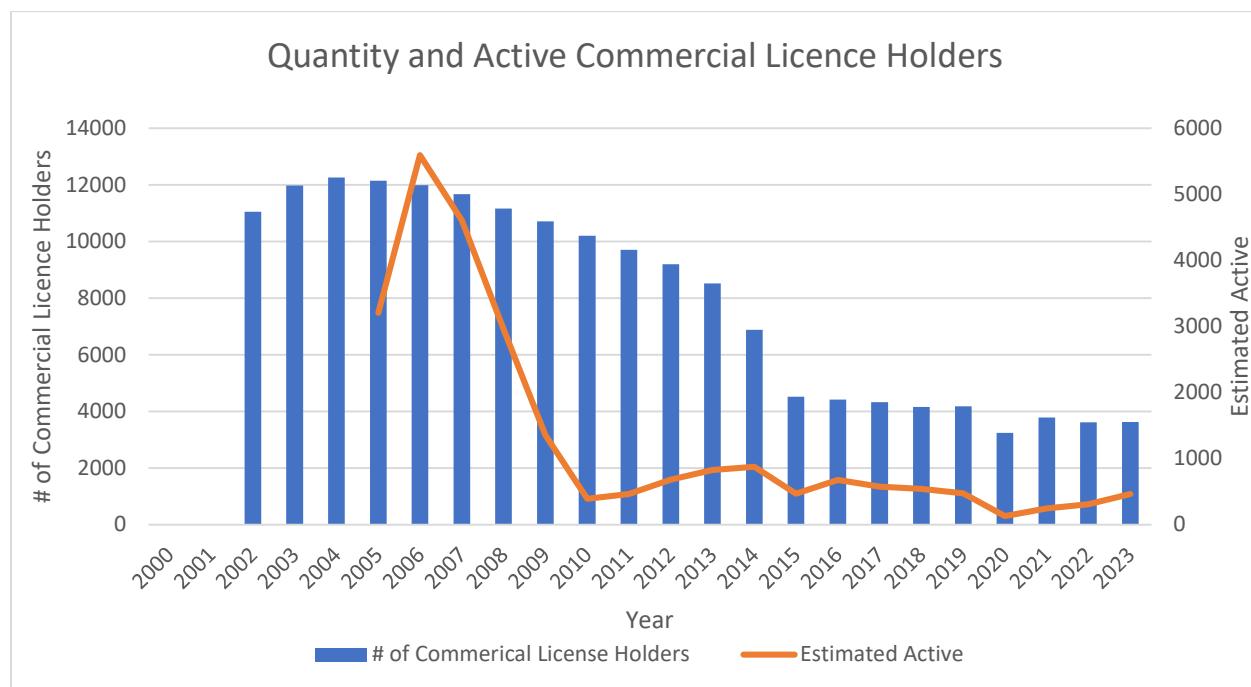


Figure 2: Quantity and Active Commercial Licence Holders in NL

The Government of Newfoundland and Labrador estimates that there are 50 individuals currently employed in seasonal seal processing jobs in NL, this number is considerably lower than before the EU ban on seal products. In 2008, there were approximately 260 people employed in the province's seal processing industry.

The Government of Newfoundland and Labrador works closely with seal processing and marketing companies to develop international markets for seal products. The Province recognizes the importance of the seal harvest not only as a commercial industry, but as a management tool, and as a social and cultural element of NL's coastal communities. The Government of Newfoundland and Labrador continues to advocate for the seal industry, by encouraging the Government of Canada to work on the re-opening of priority international markets for Canadian seal products and eliminating trade barriers.

### **EU Members Support Lifting the Ban on Seal Products:**

Estonia, Finland, Latvia, and Sweden have all reported negative impacts from the EU seal product ban. The reduction in seal harvesting has led to increased damage to fishing gear, a rise in seal worm infections, and decreased fishery catches. Consequently, all four nations have expressed a desire for removal of the 2009 EU ban on seal products.

## **Benefits of the Sealing Industry**

### **Sealing Supports the Economy of Coastal Communities:**

It is estimated that the Canadian seal population consumes over 53 times more fish than the entire Atlantic Canadian fishing fleet's annual seafood harvest. In 2022, the hunt alone saved the fishery \$226 million in fish resources that would otherwise have been consumed by seals. If the full seal quota in Canada were harvested, the value saved would amount to \$2.44 billion.

### **Sealing Supports the Blue Economy:**

In 2021, Canada's Federal Government launched the Blue Economy Strategy to grow and modernize the ocean sectors sustainably. The ocean is a significant component of the economic, social, and cultural fabric of Canada. It is a source of food, jobs, transportation, and recreation. Canada's ocean economy accounts for \$31.7 billion annually in gross domestic product and almost 300,000 jobs in fisheries, aquaculture, energy, shipping, tourism, and recreation.

One of the main pillars of the Blue Economy Strategy is improving access to foreign markets and attracting new foreign direct investments. Promotion of the health benefits and sustainability of seal products could help expand market access of the NL seal industry.

Canada's Blue Economy Strategy aims to explore opportunities to generate increased value of wild capture fisheries through improved environmental performance and by promoting a sustainable, high-quality, safe, and equitable industry that appeals to consumers in Canada and foreign markets. The Blue Economy Strategy continues to

advance strong resource management, governance, enforcement, and regulatory frameworks that focus on preserving the health of fish stocks and marine ecosystems, while also examining opportunities to support the development of a sustainable seafood traceability system. Sealing is a well-regulated and sustainable fishery in NL, indicative of a blue economy. Sealing aids in the protection of marine biodiversity by supporting a balanced ecosystem and creates a marketable and diverse product that is a sustainable source of food, textile, and omega-3 oils.

## Government Initiatives

### **Fisheries Advisory Council:**

In 2023, the Government of Newfoundland and Labrador announced the development of the Fisheries Advisory Council (FAC) in conjunction with industry stakeholders. The objective of the FAC is to pursue short and long-term actions to address opportunities and challenges to generate sustainable socioeconomic benefits from NL's wild fishery resources.

The FAC developed an action plan that represents a collaborative and strategic approach by Newfoundland and Labrador's fisheries stakeholders to advance the industry. The plan pursues actions focused on resource sustainability, seal management, market access and development, innovation and diversification, and human resources and labour. The plan also focuses on opportunities for collaboration on fisheries science, climate change impacts on the fisheries and marine ecosystems, strategies to address market access for seals, new product development and solutions to recruitment and retention for fisheries related occupations.

The FAC has committed to identify and collaborate on scientific research on the impact of seals on the marine ecosystem and the inclusion of seal impacts in management strategies for commercial fish species as well as identify strategies to address market access issues for seals, including opportunities for Indigenous products.

## Conclusion

The Government of Newfoundland and Labrador works closely with seal processing and marketing companies to develop new products and help expand market access for seal products. The Government of Newfoundland and Labrador continues to advocate for the seal industry, by encouraging collaborative work on the re-opening of priority international markets for Canadian seal products and eliminating trade barriers.

The EU ban on seal products has been economically detrimental to communities within NL. Escalating seal populations from unfulfilled harvests threaten the stability of critical fish stocks, jeopardizing the broader marine ecosystem of the region. Lifting the EU ban will support a blue economy by creating market access, fostering sustainable practices, and enhancing the livelihoods of families dependent on this industry. The reassessment of the EU seal product ban is essential for promoting a balanced and sustainable marine environment, while restoring the economic health of Indigenous and coastal communities in NL.

## References

[Blue Economy Strategy Engagement Paper \(dfo-mpo.gc.ca\)](#)

[Publications - Fisheries and Aquaculture - Fisheries, Forestry and Agriculture \(gov.nl.ca\)](#)

[Seals and sealing \(dfo-mpo.gc.ca\)](#)

[Welcome to Canadian Seal Products Home Page | Canadian Seal Product](#)

[What is sustainable fishing | Marine Stewardship Council \(msc.org\)](#)