

Response to the call for evidence:

Trade in seal products – Fitness check of European Union (EU) rules

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14031-Trade-in-seal-products-fitness-check-of-EU-rules_en

https://environment.ec.europa.eu/topics/nature-and-biodiversity/trade-seal-products_en

Presentation by:

The Official Opposition (Progressive Conservative) Caucus, Newfoundland and Labrador (Province of Canada) Legislative Assembly

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Who We Are

We are the Caucus of the Official Opposition of the Legislative Assembly of the Canadian province of Newfoundland and Labrador, Canada's easternmost province, with a coastline extending 17,542 kilometres along the Northwest Atlantic from 46 to 60 degrees latitude. An independent country until 1949, Newfoundland and Labrador has a commercial fishing history extending back hundreds of years to a time not long after European explorers landed here in 1497, and discovered the Indigenous peoples who had been living here for millennia. Newfoundland and Labrador has proportionately large Indigenous populations, including the Inuit of Labrador (Nunatsiavut), the Innu of Labrador (Innu Nation), the NunatuKavut Inuit of Labrador, the Mi'kmaq of Newfoundland (Miawpukek and Qalipu), and formerly the Beothuk of Newfoundland, and their forebears. The continental shelf of Newfoundland and Labrador has long been one of the richest fishing grounds on Earth, with resources that have benefitted numerous European (and other) jurisdictions, most recently under the oversight of the Northwest Atlantic Fisheries Organization (NAFO). The vital Northern cod fishery of this region was shut down by the Government of Canada in 1992 because relentless overfishing had brought the stocks to the brink of commercial extinction, and that commercial fishery remained closed until this year, when it was controversially reopened at a small scale. Seal predation is reported by fish harvesters to be among the great threats to the recovery of these and other important fish stocks.

Our Caucus is the Progressive Conservative Party, which governed the province of Newfoundland and Labrador for 29 years of its 75-year history (1971 to 1989, and 2003 to 2015) and aspires to govern again in 2025. Our philosophy is socially and environmentally progressive, and fiscally conservative. We believe our natural resources should be developed by and for the benefit of the people, under rules that respect the principles of sound stewardship and conservation. Proper joint management of our ocean resources (including seals) and free trade in ocean products (including seal products) have long been among our highest priorities. We have been actively seeking opportunities to grow trade opportunities under the Canada-European Union Comprehensive Economic and Trade Agreement and hope to remove unfair barriers to trade, including the EU ban on the trade in seal products, which we believe is a ban grounded on sentiment, not science.

Our Argument

It really does come down to this. Why do so many Europeans have a visceral reaction to seal hunting – a reaction that most do not have to cattle, pig, sheep and chicken harvesting, or to deer, boar, bear and goose hunting? Even the overfeeding and harvesting of geese for French fois gras does not spark a visceral reaction in many Europeans the way seal hunting does. Even bull running and bullfighting are considered more tolerable. Why is that?

Is it because seal hunting is particularly brutal and inhumane? – because scientifically, it is not. Not when compared to the harvests in Europe of such hunted animals as chamois, ibex, mouflon, red deer, moose, reindeer, wild boar, sika deer, wolves, Eurasian brown bears and numerous species of birds. And not under the strict seal harvesting rules that have been scientifically developed to minimize suffering.

Is it because seal hunting is ecologically unsustainable, putting seal populations at grave risk? – because scientifically, it is not. The industry is tightly regulated with science-based quotas that harvesters are not even close to meeting. Even the EU acknowledges the harvest does not endanger seal populations.

So why the visceral reaction, then?

The reason is not hard to untangle. For decades, animal rights organizations have singularly targeted the seal harvest in their global marketing efforts. Incendiary advertising campaigns waged relentlessly across the multimedia spectrum have singled out the seal hunt for vilification, not based on science, not based on fact, not based on manifest cruelty or unsustainability, but based on sentiments stirred by the evocative power of propaganda. These agitprop campaigns have raised the profile of such organizations as the International Fund for Animal Welfare, Greenpeace and PETA, bloating their coffers with donations on which they thrive.

We acknowledge that there are some people who are genuinely opposed to the use of any animals for meat or other purposes. Laboratory testing. Circuses and zoos. Bull running and bullfighting. Even dairy, egg and wool production. Even as domesticated pets, in some cases.

People are free to have these views and even to espouse them and campaign for them politically, but they are not free to go unchallenged for hypocritically targeting a single industry for selective vilification while camouflaging their underlying beliefs and intentions, which are broader than that. Let animal rights advocates state their full objectives plainly, and then let Europeans decide on the basis of all the factual information whether these are political objectives to which they are willing to subscribe as a European community.

Do most Europeans generally oppose the hunting and harvesting of animals for food and other commercial products?

No.

Here are the facts.

Fact number one: It is demonstrably true that the vast majority of Europeans have no problem with the humane, sustainable harvesting of mammals and other sentient animals for food and various commercial products. Less than 10% of Europeans are vegetarians or vegans. They eat their sausages, steaks and stews without showing a trace of moral culpability. They purchase genuine leather footwear and down-filled pillows and parkas without ever feeling they have done something morally reprehensible.

Fact number two: Today in Newfoundland and Labrador, seals are harvested in the wild under the strictest of laws in ways that scientists have determined are humane and sustainable, according to objective, universally recognized standards grounded in science. Seal harvesting is no less humane and no less respectful of animal welfare than any of the other harvests and hunts supported by the EU and the people the EU represents.

Since these two facts are manifestly true, then the EU's selective ban on products generated from the harvesting of seals is unfairly discriminatory.

The EU's ban has been upheld under reasons that are irrational and justifications that are unjustifiable.

Ironically, the EU itself and many Europeans have no problem supporting the trade of seal products harvested by communities they define as Indigenous.

Why is that the case, if seal hunting is supposedly inhumane? Selectively affirming Indigenous practices while deeming them to be abhorrent and uncivilized for nonindigenous communities is not a sign of respect. It is a kind of condescension on Indigenous cultures – patronizing and ultimately demeaning. It

should be noted that among the bodies recognized for this Indigenous recognition are Greenland, Nunavut and the Northwest Territories of Canada, but not Newfoundland and Labrador, with its huge self-governing Inuit region of Nunatsiavut and its other Indigenous communities. In Newfoundland and Labrador, seal harvesting is traditional in Indigenous and nonindigenous communities alike, reaching back centuries and providing important sustenance to families often living at the economic margins. In Newfoundland and Labrador, where countless families may have some degree of Indigenous lineage after centuries of intermingling, it seems strange that selected communities are applauded for doing the very same thing their neighbours are vilified for doing.

Ironically as well, some European countries – not unlike ours – have faced the ecological catastrophe of unrestrained growth in seal populations following the ban on seal harvesting, and have received permission to cull seals.

Along the European coast, just as along our own, seals without natural predators have overpopulated local ecosystems, putting wildlife stocks, fishing gear and aquaculture facilities at risk. Many Europeans have pleaded for culls to reduce seal numbers. But in an era when seal products are banned, the culled animals are then destroyed, without any value whatsoever being derived from the pelts, oils and proteins they could supply. As proof of this, we cite your own Call for Evidence, which states: “some EU countries around the Baltic Sea reported increasing seal populations causing damage to fish stocks and fishing gear. These countries consider that the regulation has a negative socio-economic impact on their territory, in particular since the exception was removed that allowed the sale of seal products resulting from culls conducted for the sole purpose of sustainably managing marine resources.”

In a hungry world, destroying protein to avoid flouting a sentiment-based irrational ideology beggars belief. Approving population-controlling culls while claiming moral outrage over population-controlling harvests is the height of duplicity. There is no moral difference between the two, except that culling is less ecologically responsible.

So, in this Age of Reason and Era of Enlightenment, what is to be done? What should the EU do? What is the right thing for you to do, when your trade law is irrationally based and unfairly discriminatory?

Conclusion

We call on Europeans

(1) to recognize that the prevailing public sentiment on seal harvesting is the product of decades of calculated Machiavellian manipulation that has not been fairly or rationally applied to animal harvests,

(2) to check those irrational, unscientific prejudices at the door of reason and science, and

(3) to acknowledge what fairness demands: that if the humane, sustainable harvesting of any mammal or other sentient animal species for the making of consumer products is permissible within the EU, then the humane, sustainable harvesting of seals and the sale of seal products must be permissible as well.

We urge the EU to choose reason over prejudice and science over sentiment, and end the ban on the sale of seal products originating from regions such as Newfoundland and Labrador.

That is the right thing for the EU to do, and now is your opportunity to get it done.

More information is provided below, from the sources indicated.

Background

Yes, Seal Product Trade Is Humane

To establish that the Canadian seal harvest is conducted humanely under the strictest of laws, we draw your attention to the following document from the Government of Canada, dated March 6, 2023.

Ensuring the seal harvest is humane

Canadian harvesting practices are among the best in the world. They are guided by rigorous animal welfare principles that are internationally recognized by independent observers.

Promoting animal welfare in Canada's seal harvest

The Government of Canada has strict science-based regulations, which are reviewed regularly, to ensure a humane harvest. In 2009, a number of amendments to the *Marine Mammal Regulations (MMR)* came into force to further enhance the humaneness of the Canadian seal harvest. The amendments were developed based on recommendations from the Independent Veterinarians Working Group, with members from Canada, France, the United States, the Netherlands, and the United Kingdom, and in consultation with provincial and territorial governments, the sealing industry, and others. The *MMR* stipulate the proper technique and specific types of tools to use that ensure seals are harvested humanely.

The three-step process

Canada's science-based, three-step process ensures that animals are harvested quickly and humanely. Developed and implemented based on the recommendations from the Independent Veterinarians Working Group, the three-step process is as humane – if not more so – than most other methods of dispatching wild or domesticated animals in the world.

All harvesters wishing to participate in the commercial seal harvest must have completed training on the three-step process for harvesting seals, as set out in the [Marine Mammal Regulations \(MMR\)](#) in order to renew their licence.

Licensing policy requires a commercial harvester to work under an experienced harvester for two years to obtain a professional licence. In addition to the two-year apprenticeship program for new harvesters, governments, industry and other stakeholders deliver comprehensive information workshops in advance of each season.

The three-step process also applies to harvesters with personal use licences. The three steps are:

1. **Striking** — the seal harvesters must shoot or strike animals on the top of the cranium, with either a firearm or a hakapik or club.
2. **Checking** — the seal harvesters must palpate both the left and right halves of the cranium, following striking (either with a firearm, hakapik or club), to ensure that the skull has been crushed. This ensures the seal is irreversibly unconscious or dead.
3. **Bleeding** — the seal harvester must bleed the animal by severing the two axillary arteries located beneath the front flippers and must allow a minimum of one minute to pass before skinning the animal. Bleeding ensures the seal is dead.

Despite the suggestions by anti-sealing groups, seals are not skinned alive, as concluded by independent international veterinarians and European Food Safety Authority (EFSA) experts. Sometimes a seal may appear to be moving after it has been killed because seals show muscle

activity, referred to as a swimming reflex, even after death. This reflex gives the false impression that the animal is still alive, similar to the reflex seen in chickens when killed.

Tools used for harvesting seals

The *Marine Mammal Regulations (MMR)* stipulate that only high-powered rifles, shotguns firing slugs, clubs or hakapiks may be used in the seal harvest. A hakapik is a tool designed to harvest the animal quickly and humanely. Changes in 2009 to the *MMR* prohibit the use of the hakapik as the instrument for the initial strike of seals over the age of one year.

Sealers in the Magdalen Islands, the Quebec North Shore and in Western Newfoundland, where about 30 percent of the harvest occurs, use both rifles and hakapiks (or clubs). Sealers on the ice floes on the "Front" (in the waters east of Newfoundland), where 70 percent of the harvest occurs, primarily use rifles.

Harvesting young seals

Young harp seals provide the most valuable pelts and market demand is generally stronger for this type of pelt. There is also increasing interest in meat from both harp and grey seals. Full use of the animal is encouraged for pelt, meat and oil.

The harvesting of harp seal pups, known as whitecoats, and hooded seal pups, known as bluebacks, is illegal in Canada and has been since 1987. The seals that are harvested are self-reliant, independent animals. Harp and grey seal cannot be legally hunted until they have moulted their first fur and are living independently. These seals are not usually harvested until they are 25 days or older. Hooded seals cannot be harvested until they are 2-3 years of age, which is when they lose their blueback pelage.

Enforcing a humane harvest

The Government of Canada monitors the seal harvest closely and it is committed to enforcing the *Marine Mammal Regulations (MMR)* to the fullest extent of the law. Changes to the *MMR* in 2009 further enhance the humaneness of the annual seal harvest and include the three-step process. The *MMR* also stipulate that only seals that have reached the age of self-sufficiency can be harvested.

Since changes to the *MMR* in 2009, the Department has made considerable efforts to verify the high level of professionalism and commitment to humaneness of the Canadian sealing industry. Based on approximately 3,000 fishery officer inspections over the last five years, the sealing industry maintained a 96 percent compliance rate with the *MMR*.

Link: <https://www.dfo-mpo.gc.ca/fisheries-peches/seals-phoques/humane-sans-cruaute-eng.html>

Yes, Seal Product Trade Is Sustainable

Even the EU acknowledges the sustainability of the seal harvest in its brief on the trade in seal products, which states: "Seals are hunted in various parts of the world for commercial, subsistence and cultural reasons. In general, this does not endanger their populations."

https://environment.ec.europa.eu/topics/nature-and-biodiversity/trade-seal-products_en

To further establish that the Canadian seal harvest is sustainable, we draw your attention to the following excerpts from the Government of Canada Department of Fisheries and Oceans "Report of the Atlantic Seal Science Task Team" (April 2022). <https://www.dfo-mpo.gc.ca/science/documents/mammals-mammiferes/atlantic-seal-phoque-atlantique/appendix5-annex5/ASSTT-Final-report-English.pdf>

- The Atlantic Seal Science Task Team (ASSTT) was announced on March 5th, 2020 to gather input on the Department of Fisheries and Ocean's (DFO) science activities and programs related to seals and their role in the Northwest Atlantic ecosystem. The ASSTT is a direct response to the concerns raised by commercial fish harvesters in Eastern Canada about the impact seal predation is having on fish stocks.
- The ASSTT acknowledges and appreciates the support provided by DFO in arranging seal science presentations describing the Department's research activities pertaining to grey seals, harp seals and related interactions with fish stocks. In addition, at the request of the Task Team, DFO arranged presentations with Norwegian researchers on seal research and management in Norway. The Task Team also invited perspectives from industry and Indigenous groups. Due to the COVID- 19 pandemic, the Task team held all meetings virtually.
- The ASSTT recognizes the scientific work DFO has done in estimating the population size of harp and grey seals. However, the ASSTT considers the food, feeding and migration data for the harp and grey seal populations in Atlantic Canada [*For the purpose of this report, Atlantic Canada refers to Quebec, NB, NS, NL and PEI.*] to be woefully inadequate to accurately determine the role seals play in the Northwest Atlantic Ecosystem and the impacts on other ecosystem components.
- In response to longstanding evidence from the fishing industry that seals are having significant impacts on groundfish stocks, pelagic stocks, shellfish and salmon, and with the exception for some groundfish species in NAFO zone 4T, the response from DFO Science has been that there is no scientific evidence that seals are having any measurable impact on fish populations. The ASSTT believes that the lack of current comprehensive data collection on feeding, diet and migration throughout the seasonal and spatial range of seals, especially the harp seal population, is likely contributing to the lack of credible scientific evidence.
- It is the view of the ASSTT members that the high population abundance of grey seals and harp seals, which are at or approaching historic levels, are having a serious impact on the ocean ecosystem in Atlantic Canada. The extent of the impacts cannot be determined with the limited information held by DFO Science.

Key conclusions:

- **There is no conservation concern for grey seal or harp seal populations.**
- All seal populations must be included in the effective management of ocean ecosystems.
- Studies on hooded seals, harbour seals, bearded seals and ringed seals also need to be conducted by DFO and industry. The 2001 Eminent Panel on Seal Management (<https://wavesvagues.dfo-mpo.gc.ca/Library/260100.pdf>) recommended that priority be given to the assessment of the Hooded Seal population, as well as additional diet sampling work

(particularly in the offshore area), due to the fact that they may be consuming large quantities of northern cod in Divisions 2J3KL.

- **The grey seal population has increased from around 15,000 in the 1960's to 424,300 animals in 2016.** [DFO. 2017. Stock assessment of Canadian Northwest Atlantic Grey seals (*Halichoerus grypus*). DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2017/045.] **This is the largest population of grey seals in the world** [<https://nammco.no/topics/grey-seal/>] **and has been expanding its geographic range throughout Eastern Canada.**
- **The harp seal population has increased from approximately 2 million animals in the 1970's to 5.5 million in 2001 to an estimated 7.6 million in 2019.** [DFO. 2020. 2019 Status of Northwest Atlantic Harp Seals, *Pagophilus groenlandicus*. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2020/020.] **This is the largest harp seal population in the world and is the largest Northwest Atlantic harp seal population in recorded history.**
- **Total prey consumption by harp seals in 2J3KL during 2014 was estimated to be approximately 3.2 million metric tonnes** (95% CI 2.1 mt – 4.9 mt). [NAFO. 2015. <https://www.nafo.int/Portals/0/PDFs/sc/2015/scs15-19.pdf>] **The same year, all commercial landings in Newfoundland and Labrador totalled around 256,000 tons.** [<https://www.dfo-mpo.gc.ca/stats/commercial/land-debarq/sea-maritimes/s2014aq-eng.htm>]
- Groundfish stocks in Atlantic Canada are at or near the lowest level ever observed and are experiencing very little recovery due to very high levels of unexplained natural mortality which has been attributed to seals in some regions, but not in other regions.
- Commercial finfish fisheries are at an all time low, driven by low stock productivity resulting from, in part, high rates of unexplained natural mortality.
- Similarly, Canada's Atlantic salmon populations are at or near their historic low levels, despite having been under commercial fishing moratorium for more than 30 years, resulting in reduced access for Indigenous fishers and significant restrictions for recreational fishers. Significant restrictions resulted in lack of access. Additionally, significant investments in salmon conservation by the federal government, First Nations and conservation organizations have not been successful in recovering the species.
- The current level of food requirements and feeding studies is not adequate to determine the diet of harp or grey seals throughout the year and/or throughout their habitat range.
- The importance of a full understanding of the diet and feeding patterns of seals (grey seals) is best seen in the southern Gulf of St Lawrence cod stock where a focused research program reshaped the perspective of the impacts of seal consumption on the productivity of the population.

Seal management considerations - although the following considerations are not within the scope of the ASSTT mandate, members felt it was important that they be conveyed:

- Clear management objectives need to be established and followed by both Government and industry for all seal species in Eastern Canada.
- Where science gaps have been addressed and levels of impact have been quantified, resource managers must be willing to move forward with seal population reduction strategies aimed to rebuild impacted stocks.

- **The Government of Canada must consider seals as a resource and support the development of new opportunities and markets for seals. This needs to be prioritized in partnership with industry, Indigenous groups and provincial governments.**
- **Similarly DFO, along with Global Affairs and International trade need to work to open markets and reduce trade restrictions for the species.**
- DFO should review recommendations of the Eminent Panel on Seal Management and specifically re-evaluate and implement the concept of seal exclusion zones as proposed by the Eminent Panel on Seal Management in 2001.
- DFO should support capacity development of stakeholders to improve their understanding and ability to engage in science advisory processes and improve stock assessment science.

To further establish that the Canadian seal harvest is sustainable, we draw your attention to the following excerpts from the Senate of Canada publication “Seal the Future: A Call to Action”, published in May 2024. https://sencanada.ca/content/sen/committee/441/POFO/Reports/2024-05-23_POFO_SS-3_Report_Final_e.pdf

Misinformation / Disinformation	Facts
Seal harvests on Canada’s East Coast deplete seal populations / Canada’s seal harvest is unsustainable	Canada’s commercial seal harvest is managed sustainably by Fisheries and Oceans Canada and guided by an integrated fisheries management plan. Canada has not reached the total allowable catch established for commercial grey and harp seal fisheries in recent years. Between 2018 and 2022, only 1% and 7% of the total allowable catches were reached for grey and harp seal harvests, respectively.

- The committee learned that the Northwest Atlantic harp seal population (estimated at 7.6 million seals in 2019) is currently deemed to be recovered from its pre-hunt levels and that populations of other seal species are also said to have stabilized.
- The committee learned that the Northwest Atlantic grey seal population continues to increase, although this increase has slowed in recent years. In 2021, Fisheries and Oceans Canada estimated the size of this grey seal population to be 366,400 seals.
- Fisheries and Oceans Canada confirmed that it has not set a commercial total allowable catch (TAC) for seals since 2016 because the harvests have not achieved the previously set TACs. Between 2018 and 2022, only 1% of the TAC was landed for the grey seal harvest and only 7% of the TAC was landed for the harp seal harvest.
- The committee heard from Fisheries and Oceans Canada that an adult seal will consume approximately 1,000 kilograms of fish and seafood per year, although this statistic varies with various factors, such as the seal’s species, maturity, and diet. The background information that the department provided the Atlantic Seal Science Task Team noted that grey seals consume 1,500 to 2,000 kg of food annually, with prey species varying by geographic area.
- Dion Dakins (Carino Processing Ltd.) explained that “[e]xisting [Fisheries and Oceans Canada] harp seal science tells us that, since the population has risen above 5.4 million, females are on average 20 kilos lighter in February, a critical point in the gestation cycle, and 1.7 centimetres, about 0.67 inches, shorter in body length; females are on average two years older before they

have their first pup; and late-term abortions have risen by 200 per cent. Furthermore, ice-dependent seals like harp seals are more susceptible to the effects of climate change when their populations are higher.”

- Robert Hardy (Fisheries Consultant and member of the Atlantic Seal Science Task Team, appearing as an individual) stated that the “fishing industry and the public, for many years, have pointed to record seal populations and [their] predation [on cod] as the possible cause” for the cod stock collapse and subsequent lack of recovery.
- Morley Knight (appearing as an individual) quantified the impact seals are having on fish stocks by explaining that, in his opinion, “22 times as much fish is eaten by seals as is harvested by the commercial fishery.” Based on Morley Knight’s (appearing as an individual) “experience and observations after talking to thousands of fish harvesters, [Fisheries and Oceans Canada] employees and others from all over Eastern Canada” he believes that “seals are consuming a huge amount of commercial species of fish as well as important prey species like herring and capelin. Unless some action is taken to mitigate the impact of seals, there is no way to effectively manage important fish species using the precautionary approach. The seals will continue to eat them before they get to the level where they can be commercially fished. Seals are everywhere in the ecosystem and eating whatever species of fish they can find.”
- In the southern Gulf of St. Lawrence, Fisheries and Oceans Canada has confirmed that grey seals are known to be negatively impacting groundfish stock recovery.
- Following a survey of their membership, the Halifax East Fisheries Association recommended that, given the growth of the harp and grey seal populations, Fisheries and Oceans Canada should “act quickly to address the seal problem. While seals have enjoyed a strong recovery from the mid 20th century, their prey species have not. Many fisheries remain at critically low levels and a growing seal population significantly decreases their probability of recovery.” The committee also heard that, in Atlantic Canada, although seals may not be preying on vulnerable fish stocks, they may be in direct competition for food sources, therefore impacting their recovery more indirectly.
- Harvesting the total allowable catch for grey and harp seals would, from what the committee heard, be sustainable and would continue to encourage the full utilization of the animal. This increase is not meant to reduce the seal population per se, it is meant to help protect important fish stocks and ecosystem balance that Canadians and the world rely on to maintain the global food supply.

Yes, the EU Trade Ban on Seal Product Trade is Harming People and Opportunities

To establish that the European Union ban on trade in Canadian seal products is harming people and opportunities, we draw your attention to the following excerpts from the Senate of Canada publication “Seal the Future: A Call to Action”, published in May 2024.

https://sencanada.ca/content/sen/committee/441/POFO/Reports/2024-05-23_POFO_SS-3_Report_Final_e.pdf

- The seal harvest and seal products industry have been of great importance to many remote, coastal, and Indigenous communities. Both the traditional and commercial seal harvests and the resulting products have brought prosperity to many communities, where the availability of other types of economic opportunities are limited.
- According to Fisheries and Oceans Canada, “[t]he total value of seal landings [(i.e., the number of seals harvested)] has been decreasing since 2006, when it was valued at over \$34 million and sealers received over \$100 per pelt. Significant drops in both the quantity and value of harvested pelts, punctuated by large fluctuations in pelt prices, mainly accounted for this trend.” The department also noted that “Canada has been the largest global exporter of seal products for decades.” Seal pelts, seal meat and seal oil have been and continue to be exported to various countries. However, the implementation of various bans on the importation and sale of seal products, such as those instituted by the European Union and the United States, continue to weaken the industry to this day.
- The Hon. Céline Hervieux-Payette (appearing as an individual) said that “[o]ur Canadian sealers deserve considerable support because they have suffered very serious harm.”
- The committee heard from the Atlantic Canada Opportunities Agency and the Canadian Northern Economic Development Agency that seal export markets have not rebounded since the implementation of the various seal product bans and that the Indigenous Exemption does not seem to be enabling Indigenous peoples to export their seal-based products to the European Union. This concern was also voiced by many other witnesses.
- Darren Halloran (Always in Vogue) noted that citizens from countries that have banned seal products have shown genuine interest in purchasing them; retailers unfortunately have had to explain that the bans prohibit such sales.
- Gil Theriault (Intra-Quebec Sealers Association) stated that, over the past 30 years, “the story of the sealing industry” has been a story of bullying and foreign interference.
- The committee heard that the source of much misinformation and disinformation has been certain animal welfare organizations, both when bans on Canadian seal products were being considered and even today. Many of these groups (in Canada and abroad) are registered charities or non-profit organizations (NPO), pursuant to the Income Tax Act, and raise funds with campaigns that may perpetuate false information about Canada’s seal harvest and industry.
- Bruno Vinhas (Craft Council of Newfoundland and Labrador) explained that: “[W]e need to understand that a lot of the traditional knowledge in seal has been at risk of disappearing because of the taboo in the industry [and the fact] that people cannot work with the material and cannot export the products that they make.”
- In Newfoundland and Labrador, the committee heard that Carino Processing Ltd. is the only facility in the province that buys seals. However, while visiting the Carino Processing Facility in South Dildo, senators learned that the facility has the capacity to process many more seals and store much more seal oil than it has in past years. Soft markets and the risk management of its capacity were said to be the reasons why the facility’s full processing potential was not reached.

- The committee heard that traditional knowledge about seals is also at risk of being lost due to the stigma associated with the seal products industry. This stigma stems from the misinformation and disinformation that was discussed earlier.
- Gil Theriault (Intra-Quebec Sealers Association) explained how the use of seal bait for crustacean fisheries was tested and that the results were positive. Fisheries and Oceans Canada highlighted that due to the United States' Marine Mammal Protection Act, fisheries that used seal-based bait would not be able to export their products to that country.
- Inuit-sourced exemptions have failed to counteract the negative impacts of trade bans on the practices, lifestyle and livelihood of Nunavut Inuit." Similarly, Global Affairs Canada noted that it "has been made aware of concerns regarding the administration of the Indigenous Exemption of the [European Union] Regulation on Trade in Seals Products. The issues identified include onerous reporting requirements imposed by the [European Union's] certification process (e.g., lack of automatic recognition, using more recent technology, like QR codes, instead of attesting paper documents)."
- Canada's commercial harvest has been minimal, well below the total allowable catches set by Fisheries and Oceans Canada. If Canada is to develop and grow its seal products industry, it must take actions to help revitalize the harvest. In order to kick-start the industry, it must be an economically viable endeavour for harvesters, which it is not at present.
- The committee heard that there is space in the market for additional seal products, both domestically and internationally, and the committee believes that the development of domestic markets would be a logical place to start.
- The committee heard that reversing seal product bans would be an extremely difficult task since many were based on emotional campaigns and not necessarily on facts and scientific data. The committee is supportive of efforts to try and reverse seal product bans and a long-term approach must be taken in order to achieve this goal.
- The role of women in the crafts industry was highlighted by witnesses and the committee heard that there is an openness and a willingness to expand this part of the industry if markets could be identified and the availability of seal pelts can be increased. In fact, Zoya Martin (Government of Nunavut) estimated that 100% of those producing seal products for export or for purchase by tourists in Nunavut are women. The committee also heard that a not-for-profit group in Iqaluit, Nunavut has organized a sewing group to make kamiks (i.e., sealskin boots). It was noted that these boots are very difficult to make, yet highly sought after. The program helps reverse the loss of tradition and is primarily organized and supported by women within the community.
- Jenny Brake (Qalipu First Nation) noted that "[m]any Indigenous communities are striving to reclaim and revitalize their traditional food systems and artisanal practices as they are essential for cultural identity, health and wellbeing."
- While at the Carino facility in Newfoundland and Labrador, the committee learned about Omega-3 seal oil products produced for pets. According to Agriculture and Agri-Food Canada, in 2020, Canada's pet population was 27.9 million pets and retail sales of pet food totalled \$4.2 billion. Pet food sales are projected to reach \$5.3 billion by 2025, making it one of many interesting potential domestic markets for the seal products industry.
- Seal meat was often described by witnesses as an excellent source of protein and a healthy traditional food.

- Greg Pretty (FFAW-Unifor) explained that few people understand the seal harvest and that the seal products industry was once thriving. He added that, if other Canadian industry exports (e.g., the beef industry) had been affected as the seal products industry had been when various import bans were introduced, the federal government reaction would have been very different. Greg Pretty therefore recommended to the committee that a national champion for the seal harvest be considered.
- Government of Nunavut officials spoke to the Indigenous harvest exemption and the personal use exemption to the European Union's ban on seal products. The latter, Zoya Martin (Government of Nunavut) explained, "is for tourists, which is the one nobody knows about. We are working with our tourism sector, under Mr. Kunuk's guidance, to make sure that our tour companies and our artists are aware that they can inform the travellers when they come. ... It is having those regulations posted and readily available. For tourists, you don't need the verification of how it was harvested. If it's for your personal use, you're allowed to bring it back into your country." Exemptions such as these must be well known, well understood, and communicated to retailers and the tourism sector by Fisheries and Oceans Canada, the Canada Border Services Agency and other relevant departments and agencies. The industry will not flourish in the short-term without the communication and utilization of such exemptions.
- Global Affairs Canada explained that it "engages in targeted advocacy abroad to support the seal products industry as a whole. Advocacy messaging in support of seal products exports has been delivered in a number of markets by various means, including via public events, local media and during closed-door discussions with foreign governments." Unfortunately, however, when Canada hosted the 19th Canada-European Union Leaders' Summit in St. John's, Newfoundland and Labrador in November 2023, Canadian seal products were not included in the original agenda. The committee believes that, at present, Fisheries and Oceans Canada, and by extension the Government of Canada, is not doing enough to encourage and promote Canada's seal products industry at home or abroad.
- Paul Irngaut (Nunavut Tunngavik Inc.) suggested that Inuit organization representatives, along with federal government officials, could travel to countries to help educate their decision makers about Inuit seal harvests and the positive impacts they can have on individuals and communities in an effort to change their minds about Canada's seal harvest. Paul Irngaut also suggested proactively visiting countries that are considering seal product bans because it is difficult to reverse them.
- Canada could also coordinate efforts with like-minded countries. For example, Greenland has also harvested seals and could work with Canada to help expand international markets for seal products. These collaborations could be bilateral or could take the form of global cooperation forums where best practices regarding industry expansion can be shared. Longer-term goals could include marketing seal meat to countries suffering from protein shortages and developing seal products that would be appropriate to fill these nutritional gaps.
- Canadian embassies must be better utilized to market and promote Canadian seal products to international partners. This type of work could help normalize the consumption and use of seal-based products internationally and promote the sustainability, and the health and ecological benefits of Canadian seal products. More of this work must be undertaken by Canadian embassies and ambassadors.
- The Minister said that she wants to ensure that Canada's seal harvest remains eco-responsible and sustainable, goals the committee wholeheartedly supports. The committee is hopeful that Minister Lebovillier's commitment as a "staunch ally" of Canada's seal industry will generate results and will also be shared by other government ministers, now and well into the future, to ensure this industry reaches its full potential.

- For over a year, committee members learned about Canada's seal populations, about their abundances, their diets, their distribution, how their roles within complex ecosystems are mostly unknown, and how the impact seals have on Canada's fisheries cannot be quantified due to a lack of scientific evidence. The committee was also fortunate to have gained a true appreciation of the social and economic perspectives surrounding Canada's seal harvests and products industry, of how the implementation of international seal product bans has had devastating economic and social impacts on remote, coastal, and Indigenous communities and individuals across Canada, and how misinformation and disinformation have negatively affected those involved in this industry. The committee also heard practical suggestions about how these issues can be addressed and remedied. The Government of Canada must consider these suggestions and take immediate action to implement them, as appropriate.
- The cultural and economic significance of Canada's seal harvest for remote, coastal, and Indigenous communities cannot be overstated. In certain regions, seal harvesting is one of the only industries in which community members can participate. As such, moratoriums on seal product imports have disproportionately impacted these remote, coastal, and Indigenous communities. Misinformation and disinformation have played an important role in the implementation of these bans, the shaping of public opinion, and the marked decline of the seal products industry over the past two decades.
- The revitalization of the seal products industry could help strengthen local economies and sustain families. For this revitalization to take place, the development and implementation of a comprehensive and effective anti-misinformation/anti-disinformation campaign must be undertaken by the Government of Canada without delay. Indigenous communities, provincial and territorial governments, commercial seal harvesters, and other stakeholders must be included in the development and delivery of this campaign.
- Finally, a strong and sustained federal political commitment must be made and sustained to ensure that measures taken persist and the seal harvest and seal products industry are once again vibrant and positively contributing to the economies of remote, coastal, and Indigenous communities.

[Recent news article published by the Canadian Broadcasting Corporation \(CBC\), included here for research and evidence purposes because of its relevance and timeliness](#)

EU seal ban causing more harm than good, says Swedish researcher:

Scientist Sven-Gunnar Lunneryd says increased seal populations are causing depleted fish stocks



[Abby Cole](#) · CBC News · Posted: August 05, 2024 6:00 AM NDT

Link to the original source for the definitive version:

<https://www.cbc.ca/news/canada/newfoundland-labrador/eu-ban-seal-1.7272710>



Scientists say seal populations are growing since the EU banned the import and sale of seal products, causing depleted fish stocks. (Jonathan Hayward/Canadian Press)

A Swedish researcher says the European Union's ban on the import and sale of all seal products has caused more harm than good, and now is the time to lift the 15-year-old ban.

Sven-Gunnar Lunneryd, who researches aquatic resources at the Swedish University for Agricultural Sciences, says ending the ban would help seal hunters and restore depleted fish stocks.

His research demonstrates that in the Baltic Sea, where the grey seal population has recently increased rapidly, having a negative impact coastal fisheries in the region.

"We maybe need to half the seal population to get the chance for depleted fish stocks to recover," said Lunneryd.

Lunneryd said seal hunters can help decrease the seal population and that lifting the ban would give them a financial incentive to do so.

He also said it's unethical to hunt seals and throw out the carcass, so it's important that seal hunters can sell their catch.

"Seal hunting is not an easy task. It costs a lot of money to perform," said Lunneryd. "There needs [to be] some economic compensation to the hunters for doing the hunt in [an] efficient way."

The anti-sealing movement

In 2009, the EU was motivated by animal welfare groups to ban the import and sale of seal products, including oil, meat and furs.

Danita Catherine Burke, author of the book *Cultural Violence, Stigma and the Legacy of the Anti-Sealing Movement*, said that the anti-sealing movement has been detrimental to Newfoundland and Labrador.



Danita Catherine Burke is the author of the book, Cultural Violence, Stigma and the Legacy of the Anti-Sealing Movement and researches the harm caused by the anti-sealing movement to the seal fishery. (Submitted by Danita Catherine Burke)

She said misrepresentations of the seal-hunt in documentaries in the 1960s spearheaded the anti-sealing movement. For example, the biggest misconception is that seals were skinned alive, she said.

"It's left a sour taste and a negative legacy that's lasted to this day," said Burke. "We cannot seem to get past that monumental piece of misinformation."

Burke said it's important to talk about the impacts of the anti-sealing movement right now.

"Newfoundland and Labrador is such a unique place with all of this wind energy talk for the first time, and as long as I can remember we have leverage with the European Union and the European market," Burke said.

"They need us. So we should be asking for something in return. And I think an easy and first fundamental step would be asking them to withdraw from their moral outrage."

Seal and Inuit culture

Lunneryd said the Inuit in Greenland and Canada are suffering because of the ban.

Inuk elder Danny Pottle said he saw the impacts of the anti-sealing movement in his community while growing up in Rigolet.

"It had a devastating impact, really, on our community and our society in general," said Pottle. "Inuit relied on the sealing industry and the sale of seal products, namely the pelts, to supplement our income."



Danny Pottle is an Inuk elder, who experienced first hand the impacts of the anti-sealing movement growing up in Rigolet, Labrador. (Danny Pottle/Facebook)

He said bans on seal products meant they no longer had a market for their products.

"People don't hunt like they used to anymore," said Pottle. "There's not a market anymore and because it's not promoted and accepted as a sustainable human harvest."

Pottle said that the anti-sealing movement created a falsehood that white-coat, or baby seals, were hunted. However, he said, he was taught by his elders to never hunt young seals and to also utilize every part of the seal out of respect for the animal.

"You waste nothing, you utilize every part of the seal," said Pottle. "You should always adhere to your values and your belief systems and that we're here to take care and utilize the resources of seals in particular, to help nurture us, to help feed us and sustain us."

The Indigenous exception

European Parliament press officer Enrico Lampitella said that the European commission has noted concerns "by some member states around the Baltic Sea and by the recognised bodies in Canada, regarding the socioeconomic impact of the regulation on their territory."

As a result, the commission launched a fitness check of the seal product trade ban and is calling for evidence in its Have Your Say portal until Aug. 7. The commission will also consult the public, states impacted, Greenland, Canada and stakeholders.

European commission environment spokesperson Adalbert Jahnz said there is an exception for products harvested by Inuit or other Indigenous communities. According to the commission's website, seal products with documents attesting they benefit Indigenous communities are allowed to be traded.

He also highlighted a recent report on the implementation of the Trade in Seal Products regulation, that states "the exports of seal products from Canada to the EU are insignificant," despite that "recognised bodies" in Canada consider the EU's regulation as a total ban on the trade of seal products and say that the Indigenous community exception is not well known, therefore the ban still impacts communities.

"Greenland continues exporting seal products to the EU, mainly to Denmark. A small number of imports from Greenland and Canada were not reported by the relevant EU competent authorities," reads the report.

[end of CBC article]

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