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August 7, 2024

**Re: Trade in seal products – Fitness check of EU rules**

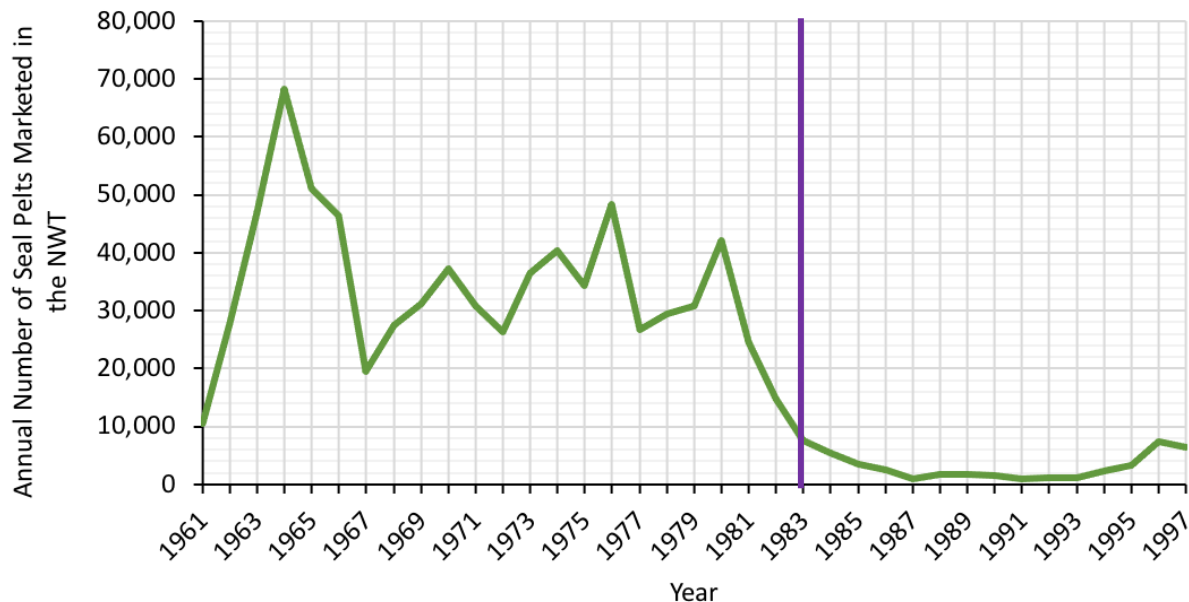
Dear European Commission,

Please accept this letter as our joint submission to the call for evidence for a fitness check on the EU regulations on trade in seal products. Together we are the central governance bodies for the Inuvialuit, the Inuit of Canada's Western Arctic [1], the Inuvialuit Regional Corporation and the Inuvialuit Game Council; also, signatory is the Fisheries Joint Management Committee (FJMC), the Inuvialuit-Canada co-management board responsible for fish and marine mammal management in the Inuvialuit Settlement Region (ISR) [1]. Collectively, we represent the 3,895 Inuvialuit beneficiaries that reside in the six ISR communities, Aklavik, Inuvik, Paulatuk, Sachs Harbour, Tuktoyaktuk, and Ulukhaktok, Northwest Territories, Canada.

There are two species of seal endemic to our region, the ringed seal and the bearded seal. Both species are extremely important to our people, having cultural, economic, subsistence, and nutritional significance. Seal hunting remains deeply intertwined with our identity and our resilience. Recognizing this multifaceted importance is crucial to understanding the paramount position and role of the seal in Inuvialuit society, ancestral traditions, and our way of life.

**Perspectives from the Inuvialuit Settlement Region**

We are opposed to the suite of actions imposed by the EU on the trade of seal products, including the 1983 Seal Pup Directive and the 2009 ban (harp and hooded seals), despite the implementation of exemption measures in 2015. The market for seal products from the Northwest Territories plummeted in the 1980s, after the implementation of the Seal Pup Directive (Figure 1). This resulted in a 94.3% drop of the total value of seal pelts marketed from the Northwest Territories, from an annual average of \$586,531.69 (1973-1982) to \$33,549.18 (1983-1992).



*Figure 1. Government of the Northwest Territories fur sales records from 1961 to 1997. This includes the territory that is now Nunavut, which separated from the Northwest Territories in 1999. The vertical purple line indicates the timing of the 1983 EU Seal Pup Directive.*

The market for seal products has remained at a low level ever since, even as the ban in 2009 included only harp and hooded seals (which are not present in our region) and the well-intentioned exemption for Inuit/Indigenous Peoples was implemented in 2015. The total value of seal pelts marketed from the Northwest Territories increased slightly following the 2015 exemption, with the average annual value increasing to \$16,740 (2016–2020) from \$8,866 (2011–2015). However, this remains a small fraction of the total value of marketed pelts during the 1970s and early 1980s.

The 2015 exemption outlined that economic and social interests of Inuit and other Indigenous communities should not be adversely affected, in accordance with the UN Declaration on the Rights of Indigenous Peoples. However, products from all seals were and are still viewed as banned by most EU consumers and beyond. Even Inuit largely do not attempt to export seal products to the EU; they would be eligible to do so, but fear breaking EU seal product regulations. There is rampant confusion about the certification system, a lack of experience with international trade amongst the general public, and artisans are disconnected from EU buyers as a result of the ban. This impact is felt even more in small communities where economic opportunities are already extremely limited.

In the Inuvialuit Settlement Region (ISR), the present number of seals harvested has been reduced by an order of magnitude since the anti-sealing campaigns of the late 1970s, and very few present-day Inuvialuit artisans and designers have been able to develop and maintain even small businesses using seal fur and leather as a sustainable material. Others have been able to make, use, and sell seal product handicrafts locally, but only on a small-scale, at craft fairs and in local shops. Inuvialuit artists celebrate and showcase the natural patterns and colours of each seal pelt. Seal products are lightweight, warm, durable, versatile, biodegradable, and resistant to wind and water. Artisans make accessories, clothing, footwear, home décor, and much more out of seal fur and skin [2].

### **Status and Trend of Seal Populations in the Inuvialuit Settlement Region**

Inuvialuit and our ancestors have been harvesters and stewards of the local seal populations for hundreds of years. We have a particularly vested interest in monitoring changes in the seal populations and are fully integrated and actively engaged in the co-management of seals in our region, in partnership with Fisheries and Oceans Canada. As Inuvialuit, animal welfare is of great concern to us, we ensure that harvests are humane, and respect the seal by making use of all of the parts from the animal [3].

The status and trend of both populations of seal in the region are not a conservation concern or in a state of decline. Harvesting and the commercial sale of seal products in the region has not decreased because of any reduction in the number of seals. In fact, ringed seals, the species more commonly harvested in the ISR, are the most abundant, widespread species of seal in the Arctic. Both the seal harvests of the 1960s – 70s, and present-day harvests, are a small proportion (0.6% and 0.1% respectively) of the estimated 0.65 million seals in the Beaufort Sea and Amundsen Gulf [4].

Spanning the last 50 years, we have conducted extensive monitoring of the seal populations and harvests [5] [6] [7] [8]. Our own evidence suggests that the while ISR ringed seal population fluctuates naturally, it is stable across decades and has been so since monitoring began in the early 1970s, with no sustained downturns in abundance or productivity detected. This pattern is largely due to productive regional conditions and geography which promotes development of extensive stable fast ice in Amundsen Gulf. These ISR populations tend to be less vulnerable to sea ice declines than in southern parts of their range.

### **Recommendations to improve the regulation and exemption for Inuit:**

To reiterate, we are opposed to the 2009 EU ban on trade in seal products, despite the implementation of exemption measures in 2015. Contrary to the spirit and intention behind the 2015 exemption, the situation has continued to negatively affect Inuit people. Therefore, we recommend that:

1. The regulations be restructured substantially, to ensure that all seals harvested by Inuit and Indigenous peoples are recognized as compliant, regardless of origin and species.
  - a. At the very least, the original 2009 regulation should be rewritten to clearly include the details of the exemption for Inuit and Indigenous Peoples; and note specifically that only harp and hooded seals are included in the ban.
2. The EU must also correct past misunderstandings and mount an extensive education campaign amongst EU citizens to raise awareness on the legality of trade in products from seals hunted by Inuit and Indigenous Peoples, to restore consumer confidence.

If the current ban and exemption system is maintained, then existing issues and burdens related to the attestation/certification process must be rectified:

1. The EU should meet with the involved and implicated stakeholders, including the Inuvialuit, to determine better ways to operationalize and streamline application of the exemption.
2. An improved system should be implemented on the ways for artisans and vendors to clearly identify for the consumer the species and the origin of the fur or leather (e.g., labelling as Inuvialuit/Inuit/Indigenous).

- a. In addition, artisans often use different pelts and different seal species in the same piece. Since the attestation process is for individual pelts, this becomes very problematic. A more flexible attestation process is necessary.

The overall outcome that we seek is for seal products, using materials sustainably sourced in our region, to be welcomed for sale in EU markets, without the constraint and burden of public misunderstanding or administrative processes, to provide and ensure viable economic opportunities for our seal harvesters, seamstresses, artisans, and designers.

Sincerely,



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*Duane Smith*  
**Inuvialuit Regional  
Corporation**  
*Chair and Chief  
Executive Officer*



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*Dean Arey*  
**Inuvialuit Game Council**  
*Chairperson*



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*Herb Angik Nakimayak*  
**Fisheries Joint  
Management Committee**  
*Chairperson*

## References

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