



The Maritime Fishermen's Union (MFU) represents over 1,300 inshore owner-operator fishermen in New Brunswick and Nova Scotia, Canada. Since its inception in 1977, the MFU's mission has been to represent, promote and defend the interests of inshore fishers and their communities in eastern Canada.

Our organization strongly encourages the European Commission to open the European market to seal products from harvests which uphold high standards of animal welfare and environmental sustainability, including Canada's. Attempts by the Commission to respond to the World Trade Organization's rulings in 2015 have been woefully inadequate, and ignore the voices of rural, remote and Indigenous coastal communities. Only a solution which provides meaningful access to the European market, based on both traditional and local knowledge as well as contemporary veterinary science will allow coastal communities who have relied on seal hunting for hundreds or thousands of years to continue to steward their environment responsibly.

Many seal species are harvested across Canada, including harp seals, grey seals, ringed seals, hooded seals, and bearded seals, as well as walrus. Canada is home to the world's largest populations of harp seals and grey seals, both of which have recovered from numbering in the low thousands in the 1960s to their current levels of over 7 million harp seals and over 350,000 grey seals. Despite continued misinformation campaigns, the commercial harvesting of "whitecoat" and "blueback" seals, juvenile harp and hooded seals respectively, has been outlawed since 1987.

Today's seal harvest produces humane fur and leather products, high-quality omega-3 fatty acids for nutritional supplementation, healthy meat products, and research continues on innovative full use of the animal. The process for the humane harvest of a seal in Canada, as enshrined in the Marine Mammal Regulations, was developed by a panel of international veterinary experts, convened by the World Wildlife Fund. This ensures the highest possible animal welfare outcomes for seals harvested in Canada's commercial harvest. This process was evaluated by the European Food Safety Authority in 2007, which found the process to be humane.

In 2006, the landed value of sealskins in Canada was \$34.1 million CAD. The European ban in 2009, combined with ensuing bans in other important markets like Taiwan have reduced that value significantly, to less than \$1 million annually in recent years. This reduction in value is felt directly by harvesters and the communities which rely on them. It also caused reductions of employment in the seal processing sector and in the production of sealskin garments and accessories. In the early 2000s, as many as eight seal processing facilities operated in Canada. Today there is only one such facility.

Beyond the direct socio-economic impacts, the decline in the seal market brought about by the Commission's ban on seal products has also had a severe impact on marine management and biodiversity in the Northwest Atlantic. The decision to completely close the mackerel and the southern Gulf of St.-Lawrence Spring herring fisheries in March 2022 greatly raised the profile of the seal predation issue amongst our fishermen members. This same problem exists for most groundfish species in the Gulf of St. Lawrence where the most recent scientific publications clearly show that seal predation is the main reason for the decline and maintenance in the critical zone of these species (Southern Gulf of St. Lawrence Cod, White Hake, American Plaice, Yellowtail Flounder and Winter Skate). The fishermen we represent are the first in contact with the ecosystem that is currently disturbed by the overabundance of pinnipeds in our marine environment.

Together, the various seal populations in Canada total over 10 million animals. A number of estimates for the amount of fish consumed per animal exist, ranging from 1.2 metric tons a year for the average harp seal to 3.2 metric tons a year for a grey seal. Based on these estimates, approximately 30 million tons of fish are eaten by seals in Eastern Canada each year. By comparison, the Atlantic Canadian commercial fishing fleet landed 560,484 tons in 2019. This means seals are consuming approximately 53 times more fish than the commercial fishing fleet.

This significantly constrains the management options that are available to fisheries managers in Canada. As we face climate change, changes to sea ice, ocean acidity and salinity levels, as well as changes to the species of fish found in Canadian waters as southern species move North, this will lead to a Northwest Atlantic food web which is much less resilient to the impacts of predation by millions of flexible apex or near-apex predators. As populations of seals grow, they are also expanding their range, in search of additional food resources and habitat. Recent years have seen northward and southward expansion of grey seal range, approaching the sensitive ecosystems of the Arctic while also impacting commercial fisheries in the USA.

In summary, we recommend strongly to the Commission that the trade regime for seal products be amended to reflect the high standards of animal welfare in the Canadian seal harvest, the severe socioeconomic impacts of the bans as currently implemented, the looming biodiversity crisis that Canada will face without the ability to effectively manage seal populations with the support of the commercial market, as well as the long history and commitment to free and fair trade between Canada and the European Union.

#### **Reference material:**

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Grey seal reduction scenarios to restore the southern Gulf of St. Lawrence cod population  
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