

Issue/Title of the evaluation: Trade in seal products – Fitness check of EU rules

Lead DG - Responsible Unit: ENV.F.3 - Global Environmental Cooperation and Multilateralism

Statement Issuer: Finnish Fur Breeders' Association FIFUR

Finnish Fur Breeders' Association FIFUR thanks European Commission from the Call for Evidence for an Fitness Check regarding trade in seal products.

FIFUR 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. The Commission's attempts to close the European market to seal products in 1983, 2009 and 2015 have not only ignored the impacts on seal hunters in Canada, Greenland, and Namibia, but also the impacts on seal hunters, fur manufacturers and furriers in Europe including Finland. There continue to be customers across Europe who are interested in buying seal products but are unable to due to the complexity of the "exemptions" to the current ban. Only a solution which provides meaningful access to the European market, while ensuring that high levels of animal welfare are maintained to the level expected by consumers, will truly address the issues created by the Commission.

Finland has allowed limited grey seal hunting according to national annual stock management plan in its regional waters since 1998, but unfortunately sustainable hunted seal products cannot be utilized within the present regulations. According to the present Finnish Governmental Programme, Prime Minister Petteri Orpos' Government will advocate commercial utilisation of seal products:

<https://valtioneuvosto.fi/en/governments/government-programme#/> Chapter 6.6: "The hunting of seals in marine areas will be intensified to protect migratory fish populations and improve the operating conditions of commercial fishers. The Government will advocate actively in the European Union so that a derogation will be granted to Finland concerning the commercial utilisation of seal products."

Sealing has taken many forms through the years: from early subsistence harvesting dating to prehistoric times around the world, including in the Mediterranean and Baltic Seas, through the perilous high-seas harvests by vessels from around the world from the early industrial period to the mid-20th century in search of seal oil for light and power, to today's harvests which centre sustainability, humane harvest, and full utilization. Today's seal harvests produce humane fur and leather products, high-quality omega-3 fatty acids for nutritional supplementation, healthy meat products, and research continues on innovative uses for many parts of the seal.

Many seal species are harvested around the world, with seal populations in Canada, Greenland, and the Baltic Sea having bounced back significantly from very low population numbers in the mid-20th century, each being major conservation successes.

By limiting the trade in sealskins on the European market, the Commission has not only reduced employment in garment manufacturing in Canada, but also in Europe, where sealskin products were previously manufactured as well, with Finland, Germany and Denmark all being major importers of sealskins from Canada and Greenland before the 2009 ban.



Many consumers of seal products and other fur products are encouraged by the fact that their purchase is an environmentally-responsible choice, avoiding plastic or other synthetic fabrics, and supporting wildlife management.

Seals in many parts of the world, including the Scandinavian and Baltic states, Canada, and Namibia, are an important predator of endangered and commercial fish species. By restricting access for seal products to the European market, the Commission is increasing the chances of nations killing seals simply to reduce their populations, instead of those seals being used to make useful, humane, sustainable and fashionable garments and accessories.

The “Inuit and other Indigenous communities” exemption created after the 2015 ruling by the World Trade Organization has been wholly ineffective at supporting the lifeways of Indigenous Peoples who rely on seal harvesting or providing the number of sealskins needed by European manufacturers and furriers. The certification process for products is complex and imposes a significant administrative burden on the harvester, the certifying body, and the entire supply chain. As a result of these deep design flaws, the number of sealskins and seal products imported to Europe since the creation of the exemption is minuscule compared to pre-ban imports.

Only a liberalization of the trade regime on seal products will allow for Indigenous-harvested seal products to effectively position themselves as a specialty product in the European market, along with a critical mass of seal products from non-Indigenous harvesters to support marketing, promotion and de-stigmatization of these products.

In summary, we recommend strongly to the Commission that the trade regime for seal products be amended to accept products which uphold the high standards of animal welfare in seal harvests, the sustainability of science-based wildlife management, and the natural and bio-degradable nature of sealskin products.

On behalf of the Finnish Fur Breeders' Association FIFUR
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