Marine Ingredients Denmark

Trade in seal products – fitness check of EU rules

This feedback is provided on behalf of Marine Ingredients Denmark (MID). Our value chain relies on the responsible harvesting of forage fisheries to produce fishmeal and fish oil, essential components of animal feeds. A critical aspect that reflects the functionality of our value chain is a science-driven approach underpinning evidence-based decisions regarding quota allocation. The current management system is grounded in scientific advice from the International Council for the Exploration of the Sea (ICES).

To ensure sustainable fisheries, scientists and ICES emphasize the importance of precautionary measures in forage fishing. These measures include catch quotas based not only on maximum sustainable yield but also on sophisticated ecosystem modelling to ensure the broader ecological balance is maintained. A fundamental objective of the scientific models is to balance prey availability and predator populations, ensuring that fishing activities do not lead to starvation or other negative effects on the ecosystem. However, concerns have arisen within our value chain regarding an increasing imbalance in predator populations, particularly an increase in seals, which complicates the judicious implementation of scientific advice. This predator-prey imbalance poses challenges to implementing sustainable fishing practices and requires further scientific investigation and potential management interventions to maintain ecosystem stability.

In the Baltic region, the decreasing stocks of fish add another layer of complexity. Seal populations have shown significant increases in recent years, leading to controversy among fishermen and other stakeholders within seafood value chains. They claim that seals negatively affect commercial fish stocks, catch yields, product quality, and the economic viability of fisheries. Depredations and damage to fishing gear and fish farms caused by some seal species are well documented.

Conversely, many scientists and conservationists highlight the lack of understanding regarding the role of seals in the ecosystem. Although seals are known to feed on commercial fish species, research on their impact on fish size, age distribution of prey populations, and overall stock size is incomplete. There is a substantial gap in our fundamental knowledge of the role and holistic effects of seals in the ecosystem. Given that some seal populations are still recovering from historical hunting, decisions on seal management must be well-founded. Ongoing initiatives aim to fill these knowledge gaps, but many results are still pending.

Recent preliminary calculations by Matis (2024)[i] indicate that certain seal species in the North Atlantic and adjacent waters require a daily consumption of prey biomass equivalent to 4-6% of their body weight for sustenance. With estimates suggesting a population of approximately 14 million seals in the North Atlantic, their annual biomass consumption could be as high as 36 million tonnes. In comparison, human fishing activities in the North Atlantic zone account for an estimated annual removal of 10 million tonnes of fish, according to the FAO. This substantial predation by seals underscores the urgent need for comprehensive research to elucidate their ecological role and the potential impacts on fisheries management. Developing a holistic

management plan for seal populations is essential to balance conservation efforts with sustainable fishery practices.

As it stands today, some EU member states regulate seal populations in accordance with Regulation (EC) No 1007/2009, where seals can be hunted for population management purposes but restricting the sale of seal products. Thus, the regulation allows for the sustainable management of seal populations but places strict limitations on the commercial use of any derived products. Seals are valuable sources of protein, fat, omega-3 fatty acids, and essential trace elements such as selenium, all of which are crucial for global food security. Given these nutritional benefits, it is unethical to prevent the use of such valuable materials, especially when they are already being regulated and managed by certain countries. This waste contradicts principles of resource efficiency and ethical consumption.

We recommend that the European Commission use the opportunity of this fitness check to revise the legislation by allowing the valorisation of products from seals hunted for population management purposes, for example in the feed and food sectors.

[i] https://doi.org/10.5281/zenodo.11655013

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