

Position Paper on Trade in Seals Products: Commission's reply to WTO ruling on seals does not provide a useful answer

The proposed amendments, put forward by the European Commission to Regulation (EC) No 1007/2009 on trade in seal products will, if adopted, create more problems than solutions.

The Commission has proposed the elimination of the marine resource management (MRM) exemption to seal hunting. At present, this exemption allows for non-profit use of seal products which are derived from hunts conducted exclusively for the purpose of resource management and sustainability. The revocation of this exemption would compromise the sustainable management of marine resources and leave national governments without an instrument to regulate an increasing over-population of seals. Doing away with the MRM will also neglect the ethical aspects of animal use by discarding dead animals as waste. In light of the EU's commitment to sustainability, we believe the European Commission should support, and not delete, the use of MRM.

The Commission is also proposing to reform the exemption, known as the Inuit exemption (IC), which applies to Inuit and other indigenous communities. The IC allows for the sale of seal products derived from hunts, which traditionally have been conducted by Inuit and other indigenous communities. The European Commission maintains the exemption but propose to add a condition stipulating that the placing on the market of Inuit seal products is conditional on the hunt being "conducted in a manner which reduces pain, distress, fear, or other forms of suffering of the animals." No one, least of all the Inuit hunters, would disagree with this. However, the Commission itself recognises that this requirement will be very difficult to enforce. Furthermore, the Commission is proposing to insert an article "contributing to the subsistence of the (Inuit) community and is not conducted primarily for commercial reasons". However, it is not clear how the Commission envisage such a distinction to operate. Rather than addressing the real problem, namely the complete collapse of the market for Inuit seal products caused by the original regulation, the Commission's proposals creates a lot of new confusion. The demand to the legislators to grant the Commission further powers to implement the Regulation through delegated acts further increased the uncertainty for all stakeholders.

Fur Europe insists that:

- **The Commission maintains the MRM and introduces an incentive system for placing seal products, stemming from MRM, on the market.**
- **The traditions of the Inuit and other indigenous communities, which have historically relied on seal hunting, must be respected**
- **The economic hardship of Inuit communities, due to seal hunting restrictions, must be acknowledged and remedied**
- **The scope of this regulation not be overextended by the inclusion of the Commission's power to implement delegated acts.**