

To BALTFISH Presidency  
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By e mail

Ref: BSAC/2018\_2019/11

Copenhagen Thursday 16<sup>th</sup> August 2018

**Subject: BSAC statement on seals at the BALTFISH Forum**

At the last BALTFISH Forum you were informed about the letter of 28th June 2018 sent by the BSAC to Director General João Aguiar Machado of the European Commission, and which proposed to consider an amendment to the Regulation (EC) 1007/2009 on trade in seal products. In that letter we wrote:

“...The amendments made to the EU seal trade ban made it illegal to make commercial use of seals derived from hunts conducted for the sustainable management of marine resources. We are therefore in a situation where seals can and are being legally hunted in the Baltic Sea, but the catch can only be used in the hunter’s own household. We have an ethical sustainability issue.

The conflicts between seals and fisheries are growing year after year. Seals will be hunted for management reasons round the Baltic Sea in the future as well. However, a valuable resource has been turned into waste since most of the catches end up on dump sites, where the hunter must even pay in order to dispose of his/her catch. In a world where we are aiming for a circular economy and zero waste, this is unacceptable.

We therefore want to address the Commission with this problem that needs to be solved urgently. Therefore, the majority of BSAC members see the need to amend the EU legislation on trade in seal products. Products from small scale ethical seal hunting carried out in the Baltic Sea for the sustainable management of a marine resource must be made legal for trade in a way which is accepted by the WTO as well”

Letter attached. ./.

In the reply sent to the BSAC on 31<sup>st</sup> July 2018 the Commission informed the BSAC that:

““Let me first remind you Regulation (EU) 2015/1775 of the European Parliament and of the Council of 6 October 2015, which amends Regulation (EC) No 1007/2009 on trade in seal

products and repeals Commission Regulation (EU) No 737/2010. This Regulation removed the exception to the placing on the market of seal products where the hunt is conducted for the sole purpose of the sustainable management of marine resources.

It was considered that such an exception should no longer be provided for as, in practice, distinguishing hunts conducted for the purpose of the sustainable management of marine resources from the large-scale hunts conducted primarily for commercial reasons may be difficult...”

The letter ends with:

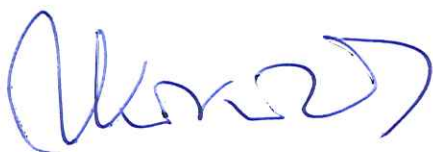
“The Commission has to report on the functioning, effectiveness and impact of the Regulation by end 2019, based on reports submitted by the Member States to the Commission by the end of 2018. This reporting exercise is the framework within which the Member States will have the opportunity to formulate their concerns. **I therefore invite you to transmit the concerns of your members to their respective Member States, who will submit their reports on the impact of this regulation.**”

Let me thank you in advance for your cooperation and **constructive input.**”

Letter attached ./.

Given the above, we want to draw the attention of BALTFISH, which is the representation of the Member States in the Baltic region to this exchange of information and encourage you **to consider the BSAC proposal** in the light of the reporting to be submitted by Member States by the end of 2018.

Kind regards,



Steve Karnicki

Acting Chair BSAC Executive Committee

Copied to all Baltic Member States and DG Mare