



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

DIRECTOR GENERAL

Brussels,  
D3/ADV ARES (2018)

Baltic Sea AC  
Mr Steve Karnicki (Acting Chair)  
Mr Andrzej Bialas (Vice chair)  
Axeltorv 3, 6<sup>th</sup> floor  
DK-1609 Copenhagen V

**Subject: The BSAC proposes an amendment to the Regulation (EC) 1007/2009 2018/47 on trade in seal products**

*Your ref.: Your letter BSAC/2018\_2019/8 of 28 June 2018*

Dear Mr Karnicki, Dear Mr Bialas,

Thank you for your letter regarding the problematic of the trade of seal products.

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.

Regulation (EU) 2015/1775 however mentions that the removal of the exception relating to the sustainable management of marine resources may create problems in Member States where carcasses derived from legal seal hunts have been used as material for seal products which have been placed on the local markets occasionally and in small quantities.

It also mentions that it is appropriate for the Commission to include information made available to it on the implementation of the amended Regulation in those Member States in its assessment of the functioning, effectiveness and impact of the Regulation.

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 for your cooperation and constructive input. I look forward to our continued cooperation and invite you to take contact with Ms Pascale Colson (pascale.colson@ec.europa.eu; +32 2 29 56273) should you have any question on this reply.

Yours sincerely,

  
F. LEINEMANN

p.o. - João AGUIAR MACHADO

c.c.: Ms. Veits, Roller, Kirchner, Colson, de Diego de la Vega  
Messrs. Rambaud, Nunes