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FFAW | UNIFOR
Fish, Food & Allied Workers

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Subject: Response to the EU Commission Call for Public Feedback on Seal Product Ban

Dear Members of the European Union Public Consultations & Feedback,

The Fish, Food and Allied Workers' Union (FFAW-Unifor) represents over 14,000 working people in the Canadian province of Newfoundland and Labrador. Newfoundland and Labrador is located on the northeastern Atlantic coast and being a primarily coastal settlement, relies on the health and sustainability of adjacent marine resources.

We write to you as part of this consultation process to emphasize the unnecessary harm the ban on seal products has caused on our economy, the health of our marine resources, and importantly our culture.

The Crisis of Seal Overpopulation

Our ocean ecosystem is facing an unprecedented crisis due to the exponential growth of seal populations. For instance, grey seals, which dominate the Gulf of St. Lawrence and the west coast of Newfoundland, have seen their numbers skyrocket from an estimated 8,000 in 1960 to more than 400,000 today—a 50-fold increase (Fisheries and Oceans Canada). With each adult grey seal consuming up to two tonnes of prey annually, the current population now consumes around 800,000 tonnes of fish every year. To put this in perspective, in 2019, all of Atlantic Canada landed just 560,000 tonnes of seafood—much less than what grey seals alone consume. This consumption has severe repercussions on fish stocks, including the threatened extinction of Atlantic cod.

Similarly, the harp seal population, the largest in the world, has grown to approximately 7.6 million. In 2008, it was estimated that harp seals consumed 4.2 million tonnes of prey, including 1.26 million tonnes of capelin and 565,000 tonnes of Atlantic cod (Fisheries and Oceans Canada). The scale of consumption far outweighs the commercial harvesting figures, raising concerns about the future of these vital fish species and the survival of our coastal communities who rely on them.

Until very recently, the Government of Canada chose to ignore this growing disaster, influenced largely by vocal animal rights groups. However, the Government of Canada is finally recognizing the impact seal populations are having on our marine ecosystems. In 2023, the bipartisan House of Commons Standing Committee on Fisheries and Oceans released a report to “draw the attention of DFO, relevant departments and the Canadian government to important observational and empirical evidence that the overpopulation



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of pinnipeds on Canada's three coasts is having a significant and damaging impact on the health and conservation of fish stocks and is creating an imbalance in our marine ecosystems."

The report made 17 recommendations that among others, include the importance of a sustainable, humane and ethical pinniped harvest; the development of the infrastructure necessary for an increased pinniped harvest; and the promotion and marketing of seal products both in Canada and internationally.

Impact on Industries and Livelihoods

The unchecked growth of seal populations poses a direct threat to the sustainability of our fisheries, which are crucial for the livelihoods of millions and contribute significantly to our economy. Contrary to popular belief, it is not the strictly managed commercial fisheries that are depleting our fish stocks, but rather the uncontrolled seal populations.

The federal government has neglected to conduct adequate scientific assessments of seal populations and their impacts on prey species. A lack of data allows the government to avoid addressing the problem, a stance influenced heavily by political considerations rather than scientific evidence. Various scientific studies are now underway to better understand the severity of overpopulation. It is clear, however, that a sustainable and humane seal harvest is possible, and increasing market availability is an eco-friendly and sustainable approach.

The landed value of seal products was \$723,000 in 2021, and it was \$11.4 million back in 2007, which was two years prior the EU ban. This is a significant value for a small, coastal-based economy that relies on a sustainable marine industry.

Misguided Perceptions and Realities

Animal rights groups continue to use outdated and misleading information to garner support, portraying seals as endangered species despite the fact that harp seals are the most abundant marine mammals in northeastern Canada. This has led to policies, such as the EU's ban on seal products, which do not reflect the ecological reality and instead serve a misguided agenda.

Our historically sustainable and humane seal hunt has been vilified inaccurately since the 1960s, leading to its significant decline. The public has been misled by campaigns that fail to acknowledge the traditional and sustainable nature of the seal hunt, diverting attention from the real ecological issues beneath the ocean's surface.



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Seal harvesters are highly trained professionals who use humane and sustainable methods to harvest their catch. Sealers are required to complete two training courses: Humane Harvesting and Quality Handling. There is also a professionalization process in place that requires an assistant sealer to gain knowledge and experience from a professional sealer in order to become a professional sealer. Recent advancements in animal welfare practices have been fully adopted, ensuring that the methods used are the most modern and up-to-date veterinary science available (Seals and Sealing Network). The Government of Canada monitors the seal harvest closely and enforces the Marine Mammal Regulations to the fullest extent. According to the department's own data, there have been over 3,000 fishery officer inspections in the seal industry over the last five years, with a 96% compliance rate ([Ensuring the seal harvest is humane \(dfo-mpo.gc.ca\)](http://Ensuring%20the%20seal%20harvest%20is%20humane%20(dfo-mpo.gc.ca))).

According to the Fur Institute of Canada, the seal industry has made generational advancements and has developed a range of diverse products, from fur to meat to oil, marketed successfully to consumers around the world.

Call for Reversal of the Ban

We therefore respectfully ask you to reverse the EU ban on seal products and begin reversing the harm that this ban has caused in Atlantic Canada. The Canadian seal industry has the potential to become a model for the global Blue Economy, supporting coastal and remote communities while contributing to the food security and sustainability goals of the broader international community.

Sincerely,

Greg Pretty