Guidance to participate to the Public Consultation on the evaluation of the EU Seal regime

The European Commission is currently conducting an evaluation to assess whether the legislation restricting the trade in seal products in the EU (EU Seal regime) remains fit for purpose. This historic legislation is at risk. We therefore ask you to participate in the public consultation and emphasise the need to keep this landmark legislation for the protection of animals.

The deadline is 7th August.

For each question, you are given the opportunity to contribute further comments. You can add further elements based on your knowledge, research, and/or documents that we developed and can be found on our websites. You can also upload relevant documents to your submission.

* Question 1. Are you aware of the EU legislation on trade in seal products?
  - Not aware
  - Partly aware
  - Very aware

Question 2. Your understanding of the EU seal regime is that:

<table>
<thead>
<tr>
<th></th>
<th>True</th>
<th>False</th>
<th>Don't know</th>
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</thead>
<tbody>
<tr>
<td>There is a complete ban on the placing of seal products on the EU market.</td>
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<tr>
<td>EU Member States can continue hunting seals, in line with the Habitats Directive, for the sustainable management of their marine resources, but they can no longer place the products from these hunts on the EU market.</td>
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<tr>
<td>Products from seals hunted by Inuit and other indigenous communities who hunt seals for their subsistence can be placed on the EU market only if they are accompanied by an attesting document issued by an official body recognised for that purpose by the European Commission.</td>
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<tr>
<td>Occasional imports of seal products into the EU are allowed when these goods are exclusively for the personal use of travellers or their families.</td>
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<td>There is a ban on the commercial imports into the EU of products from pups from all seal species.</td>
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Question 3. If seals products (such as meat, oil, omega-3 capsules, fur skins, garments or leather goods) were available on the EU market, would you buy them?
Yes

No

Irrespective of their origin

If they are from Inuit or other indigenous community origin

If they are from hunts to protect fishery activities

To support the local communities in the coastal areas of the EU Member States around the Baltic Sea

If they are made from seal pups

<table>
<thead>
<tr>
<th>Question 4. To what extent do you agree that:</th>
<th>Strongly disagree</th>
<th>Disagree</th>
<th>Neutral</th>
<th>Agree</th>
<th>Fully agree</th>
<th>No opinion</th>
</tr>
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<tbody>
<tr>
<td>Seal hunting raises animal welfare concerns, regardless of the hunting method used.</td>
<td>☐</td>
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<td>Seal hunting does not raise significant moral concerns if it is conducted with due regard to animal welfare, e.g. by using hunting methods which guarantee instantaneous death.</td>
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<td>Seal pup hunting raises more moral concerns than adult seal hunting.</td>
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<td>All seal products should be allowed for sale on the EU market, provided these products originate, for the EU, from hunts conducted in line with the Habitats Directive.</td>
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<td>Products from seals hunted by Inuit and other indigenous communities should be allowed on the EU market, because seal hunting is an integral part of their culture and identity, and contributes to their subsistence.</td>
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<tr>
<td>Products from seals hunted by Inuit and other indigenous communities should be accompanied by an attesting document to allow them to be placed on the EU market.</td>
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<tr>
<td>Occasional imports into the EU of seal products for the personal use of travellers or their families should be allowed.</td>
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<tr>
<td>A small-scale sale of seal product handicraft by local communities from the coastal areas of the EU Member States around the Baltic Sea should be allowed, to contribute as a source of income and showcase their creativity and traditions, provided hunting is carried out in line with applicable legislation, such as the Habitats Directive.</td>
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<tr>
<td>Products from seal hunts to protect fishery activities should be allowed for sale on the EU market, as long as these hunts are in line with the Habitats Directive.</td>
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</table>
The import and placing on the EU market of seal pup skins and derived products from whitecoat pups of harp seals and blue-back pups of hooded seals should be allowed if they come from Inuit and other indigenous communities.

The import of seal pup skins and derived products should be forbidden for all seal species, unless they come from Inuit and other indigenous communities.

The import and placing on the EU market of seal pup skins and derived products should be forbidden for all seal species, even if they come from Inuit and other indigenous communities.

No seal products at all should be allowed for import and placing on the EU market.

* Question 5. In your opinion, how successful has the legislation been in regulating the import and placing on the EU market of seal products?

☑ Very successful
☐ Partly successful
☐ Not successful
☐ Don’t know

* Question 6. In your opinion, how successful has the legislation been in allowing the import and placing on the EU market of seal products from Inuit and other indigenous communities?

☑ Very successful
☐ Partly successful
☐ Not successful
☐ Don’t know

* Question 7. In your opinion, has the legislation addressed the public moral concerns related to seal hunt?

☑ Yes, fully
☐ Yes, partly
☐ No
☐ Don’t know

* Question 8. In your opinion, are there factors that may have hindered the effective implementation of the legislation?

☑ Yes
☐ No
☐ Don’t know

If yes, please indicate which ones.

*DO NOT COPY-PASTE. The exemption of Regulation 1007/2009 allowing the placing on the market of by-products of hunting that is regulated by national law and conducted for the sole purpose of the sustainable management of marine resources (MRM) on a non-profit basis was repealed following WTO ruling, delaying the proper implementation of the legislation.*
* Question 9. In your opinion, has the legislation had an impact on the socio-economic interests of the relevant stakeholder groups (e.g. Inuit and other indigenous communities, fishers and seal hunters)?
   - Yes
   - No
   - Don't know

* Question 10. In your opinion, has the legislation had an impact on seal populations within or outside the EU?
   - Positive impact
   - Negative impact
   - No impact
   - Don't know

* Question 11. In your opinion, has the legislation changed seal hunting practices in terms of their animal welfare impacts?
   - Yes
   - No
   - Don't know

* Question 12. In your opinion, has the legislation had any other impacts (including unexpected or unintended)?
   - Yes
   - No
   - Don't know

* Question 13. In your opinion, are the direct and indirect costs of the legislation justified, given the results it has achieved, within and outside the EU?
   - Justified
   - Not justified
   - Don't know

* Question 14. In your opinion, is there any simplification and/or cost reduction potential for the legislation, within or outside the EU?
   - Yes
   - No
   - Don't know

* Question 15. In your opinion, are the Regulation on Trade in Seal Products and the Seal Pups Directive and their requirements coherent with one another?
   - Yes, fully
   - Yes, partly
   - No
   - Don't know
* Question 16. In your opinion, is the legislation coherent with other EU policies and priorities, such as the EU Habitats Directive or the EU Marine Strategy Framework Directive?
   - Yes, fully
   - Yes, partly
   - No
   - Don't know

* Question 17. To your knowledge, do other (non-EU) countries regulate trade in seal products?
   - Yes
   - No
   - Don't know

* Question 18. In your opinion, is the legislation coherent with the work of international organisations such as the North Atlantic Marine Mammal Commission (NAMMCO) or the Baltic Marine Environment Protection Commission (HELCOM)?
   - Yes, fully
   - Yes, partly
   - No
   - Don't know

* Question 19. In your opinion, are the legislation’s objectives still relevant?
   - Yes, fully
   - Yes, partly
   - No
   - Don't know

* Question 20. In your opinion, is there added value for EU level action compared to national or regional action?
   - Yes
   - No
   - Don't know