

Ms. Jessika Roswall
Commissioner for Environment, Water Resilience
and a Competitive Circular Economy
European Commission
B-1049 Brussels

Re: REFIT EU Regulation on Trade in Seal Products

Brussels, 12th November 2025

Dear Commissioner Roswall,

On behalf of the undersigned organisations, we are writing with regard to the Fitness Check of the EU rules on trade in seal products, which was launched in May 2024.

To date, only a summary report of the public consultation has been published, which clearly evidences the continued support of EU citizens for Regulation (EC) No 1007/2009 on trade in seal products and a lack of consumer interest in purchasing seal products of any description, from any origin.

We are concerned that, thus far, no detailed Fitness Check Report or Commission Staff Working Document has been published. Moreover, we are alarmed about the possibility mentioned in some recent Commission's written answers to MEPs that the Commission may be considering amending the legal framework to once again allow products from small-scale seal hunts conducted for marine resource management purposes to be placed on the EU market.

In short, this would fly in the face of citizens' concerns about seal welfare, jeopardise the EU's credibility at the WTO and have implications for the EU's future trade policy. Lastly, it would also discourage innovative solutions to seals-fisheries conflicts.

EU consumers support the current EU seal regime

We want to draw your attention to the fact that the Commission's own public consultation (published in October 2024) indicates that there is little appetite among EU consumers for seal products. 98% of respondents said that they would not purchase seal products of any kind.

Specifically with regards to seal products from Marine Resource Management (MRM) hunts, the survey found that only 3% of respondents would consider buying "products from hunts intended to protect fishery activities." Similarly, only 4% said that they would buy seal products intended to support local communities in the coastal areas of the EU Member States around the Baltic Sea.

This suggests that the market for even the small-scale sale of handicrafts made using the pelts of seals killed incidentally under the terms of the Habitats Directive would be extremely limited. It would be disproportionate to reinstate any provisions to permit the placing on the market of such products given the lack of consumer interest in them.

Beyond reduced interest for seal products, EU consumers also support the current legislation. A survey conducted in 2024 in 13 Member States found that 80% of citizens support the EU ban on the trade of seal products derived from commercial hunting and 68% said it should not be weakened in any way. 4 in 5

respondents also agreed that the legislation remains important to protect ethical concerns of EU citizens and animal welfare.

Upholding the EU's position at WTO

The WTO decision on the EC-Seal Products case remains a landmark legal ruling. The EU successfully brought to the WTO the connection between public morals and animal welfare. During the WTO case, the EU's position - which was not disputed - was that the "moral concern regarding the protection of animals is a value of high importance in the European Union". The exact same public moral concerns apply to seal hunting today. Although the scale of commercial seal hunting is much smaller and less competitive, there remain concerns about the inherent cruelty in commercial seal hunting, as pointed out by several veterinary studies. Veterinary experts have concluded that "generally accepted principles of humane slaughter cannot be carried out effectively or consistently in the commercial seal hunt".

As the Commission is very well-aware, the WTO Appellate Body ruled the Marine Resource Management (MRM) exception in Regulation (EC) No 1007/2009 violated WTO core principles. They found that this derogation was neither justified nor necessary.

Indeed, the WTO Appellate Body maintained that this exception was not rationally connected to the EU's objective, which is the protection of seals. Moreover, it argued that only a few dozen seal products had ever been traded under the original MRM exemption and, at that time, only one Member State, Sweden, had established a recognised body to certify derogated seal products, with very few certificates actually having been issued.

The MRM exemption was, of course, deleted in its entirety when the seal regime was amended in 2015 to bring it into line with WTO rules. **It would be unconscionable** for the Commission to attempt **to reintroduce such a derogation**, as it would have implications for broader EU trade policy in connection with animal welfare.

The European Commission has announced that future legislative proposals on animal welfare should also apply to imported products. This has been welcomed by animal protection organisations and farmers alike. However, any attempt to dilute or repeal Regulation (EC) No 1007/2009 would undermine the EU's credibility as a global leader in promoting higher animal welfare standards and is likely to weaken its ability to justify restrictions on trade in other animal products for the protection of EU public moral concerns.

Mitigating seals-fisheries conflicts

Lastly, there is the question of whether the 'protective hunting' of seals in the Baltic Sea, or elsewhere is actually necessary. We note that seals are not the primary reason why fish populations in the Baltic Sea – and elsewhere - are under threat. Overfishing and environmental factors, such as habitat degradation, eutrophication, pollution and climate change, are key reasons for the depletion of fish stocks. Seals, while they can cause damage to fishing gear, are a convenient scapegoat for the broader problems faced by the fishing industry.

However, we maintain that killing seals is not an effective method of dealing with seals-fisheries conflicts. The primary solution to tackling the problem of damage to fishing gear is to ensure that it has been adequately seal-proofed. There are various technological innovations that have been developed to either to prevent seal depredation on catches, and/or damage to fishing gear. For example, modifications to fyke nets, such as increasing mesh sizes, and altering the design to prevent seals from entering into fish traps have been found to reduce interactions with seals and damage to gear.

It is vital that mitigation measures are adopted - and that sufficient funding is available to fishers to implement them – in order to achieve coexistence with seals in the Baltic Sea. While the grey seal population in this region



has indeed significantly recovered in terms of numbers during the past 125 years, scientists are still concerned about the future of this species.

Indeed, it has been argued that environmental pressures, such as warmer winters and reduced prey availability due to overfishing, are likely to have an impact on the health and fecundity of Baltic grey seals. Continued hunting – combined with environmental degradation – could lead to serious problems for this species.

In conclusion, we strongly urge the Commission to resist pressure from a small group of Member States and to fully uphold the Regulation on trade in seal products. Weakening this legislation would not only jeopardise the EU's broader commitments to animal welfare and its trade policy ambitions, but also disregard the deeply held moral convictions of millions of EU citizens that led to its adoption.

Please do not hesitate to get in touch if you require additional information, or would like to arrange a meeting with us to discuss this issue in greater detail.

Yours sincerely,

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Also supported by the following organisations:



cc. Olivér Várhelyi, European Commissioner for Health and Animal Welfare

Maroš Šefčovič, European Commissioner for Trade and Economic Security; Interinstitutional Relations and Transparency

Sabine Weyand, Director General, DG TRADE

Eric Mamer, Director General of DG Environment

Nils Behrndt, Deputy Secretary General.