

Factual Summary Report of the public consultation and call for evidence on “Trade in seal products – fitness check of EU rules”

Disclaimer: This document should be regarded solely as a summary of the contributions made by stakeholders on the public consultation. It cannot in any circumstances be regarded as the official position of the Commission or its services. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

1. Introduction

This report provides a factual summary of the results gathered from the public consultation and the call for evidence conducted by the European Commission as part of the fitness check on EU regulations concerning the trade in seal products. These consultations were available on the "Have Your Say" portal for 12 weeks, from 15 May to 7 August 2024.

The public consultation aimed to gauge public awareness and opinions on this policy issue while giving stakeholders an opportunity to contribute to the assessment of the legislation governing the trade in seal products in the EU. The public consultation was based on the five key criteria of a fitness check: effectiveness, efficiency, coherence, relevance, and EU added value of the EU legislation. The questionnaire was open to all, including EU and non-EU citizens, public authorities, civil society organisations, businesses, trade unions, NGOs, and academic or research institutions. It consisted of 20 mandatory multiple-choice questions, supplemented by free-text boxes for additional comments.

2. Overview of results from the public consultation

2.1. Overview of participants

A total of 3 989 replies to the questionnaire were received. Out of these, 6 duplicates were removed, and 385 contributions were identified as campaigns (see Section 2.2) and analysed separately from the **3 598 unique contributions** analysed in Sections 3, 4 and 5. 17 respondents provided additional written comments to the public consultation survey. An analysis of these comments will be presented in the Synopsis Report in annex to the Fitness Check Report.

The survey received responses from a diverse range of stakeholders, with the vast majority being EU citizens, accounting for 95% of the replies, or 3 355 out of 3 598 total replies. Non-EU citizens comprised 92 responses (3%), followed by NGOs with 35 responses (1%) and other stakeholders at 26 responses (1%). Less than 1% of replies came from companies/businesses (8), environmental organisations (9), public authorities (8), academic/research institutions (3) and business associations (3). A further breakdown in stakeholders' sub-categories is presented below.

Table 1. Breakdown of stakeholders by sub-category

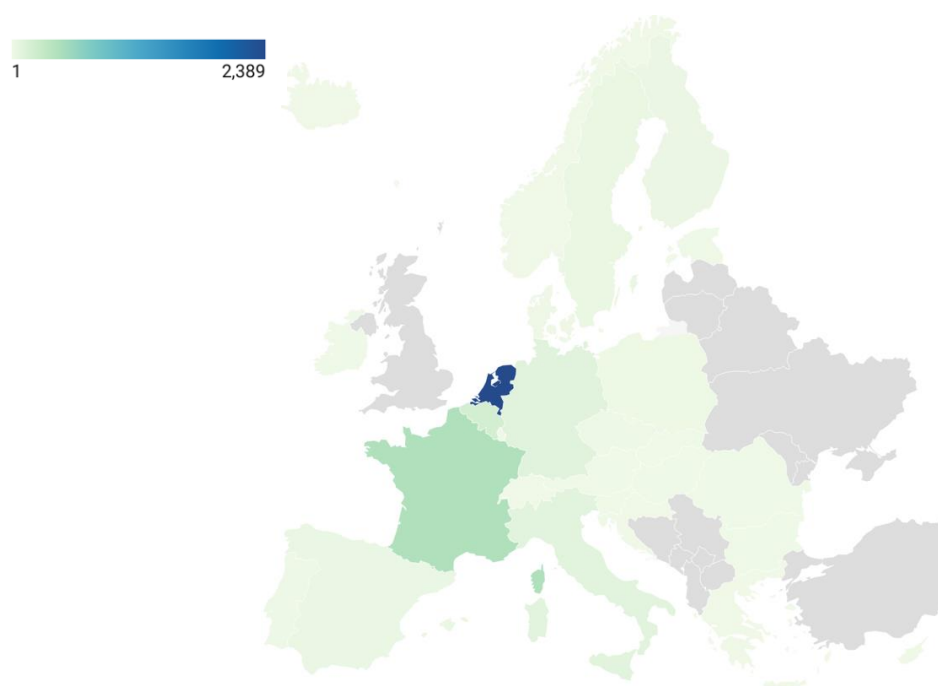
Sub-categories	Number of respondents	Share of respondents out of the total 3 598
As a citizen (or none of the other sub-categories)	3 444	96%
On behalf of an animal welfare NGO	65	2%
As a seal hunter	18	0,5%
On behalf of an environmental NGO	17	0,5%
On behalf of a public administration responsible for environment, biodiversity and/or nature conservation	14	0,4%
On behalf of an organisation (company/association/federation/trade union) dealing with fisheries	8	0,2%
As a fisher	8	0,2%
On behalf of an organisation (company/association/federation/trade union) dealing with seal hunt	7	0,2%
On behalf of a university or a research institute	7	0,2%
On behalf of a public administration responsible for trade and/or fisheries	4	0,1%
As a representative of an Inuit or other indigenous community	4	0,1%
On behalf of an organisation (company/association/federation/trade union) dealing with the processing and/or trade of seal products	2	0,1%

Among EU Member States and EFTA countries (see figure below), most replies came from the Netherlands (66% or 2 389 out of 3 598)¹. France also had a relatively high number of participants, with 434 replies (12%), followed by Belgium (5% or 193), Germany (3% or 108) and Italy (3% or 96). Additionally, several replies came from third countries; most notably Canada (1% or 53), the United Kingdom (1% or 28) and the United States (0.3% or 11)².

¹ This is also the result of campaigns ran by animal welfare organisations and political parties in the country (see Section 2.2).

² Other replies came from: Australia (3), Åland Islands (2), Réunion (2) and 1 reply from Antigua and Barbuda, Azerbaijan, Colombia, Gibraltar, Japan, India, Indonesia, Mexico, Moldova, Montserrat, Nepal, South Africa, Sri Lanka, Taiwan and Venezuela.

Figure 1. Respondents from EU and EFTA countries



Note: Visual created with DataWrapper.

Source: Own elaboration based on survey replies.

2.2. Campaigns

The table below summarises the campaigns identified together with the number of responded affected. In total 385 replies (around 10% of the 3 983 valid responses) to the public consultation survey were related to those four campaigns based on the analysis of closed-ended questions. The trends within the campaigns identified are consistent with those of the sample without the campaigns. Nearly all the respondents gave their contribution as EU citizens (96% or 369 out of 385) or non- EU citizens (3% or 11) and only 1.3% of the respondents (5) gave their contribution as another type of stakeholder (mainly NGO – 1% or 4). Most of the respondents came from the Netherlands (80% or 308), followed by Belgium (5% or 18) and Sweden (3% or 12). The responses submitted as part of these campaigns were analysed separately and excluded from the main analysis in Sections 3, 4 and 5. The analysis of these responses will be presented in the Synopsis Report in annex to the Fitness Check Report.

Table 2. Campaigns identified on closed-ended questions

#	Organisation	Geographical scope	Responses affected (%)	Links
1	IFAW	Cross-country	8 (0.2%) replies fully comply with the template for closed questions.	Link ; template
2	Eurogroup for animals	Cross-country	91 (2%) replies fully comply with the template for closed questions.	Link ; template
3	Bont Voor Dieren	Mainly in the Netherlands	62 (2%) replies fully comply with the template for closed questions.	Link ; template
4	Partij voor de Dieren	Mainly in the Netherlands	187 (10%) replies fully comply with the template for closed questions; 37 (1%) replies mostly comply with the template ³ .	Link ; template

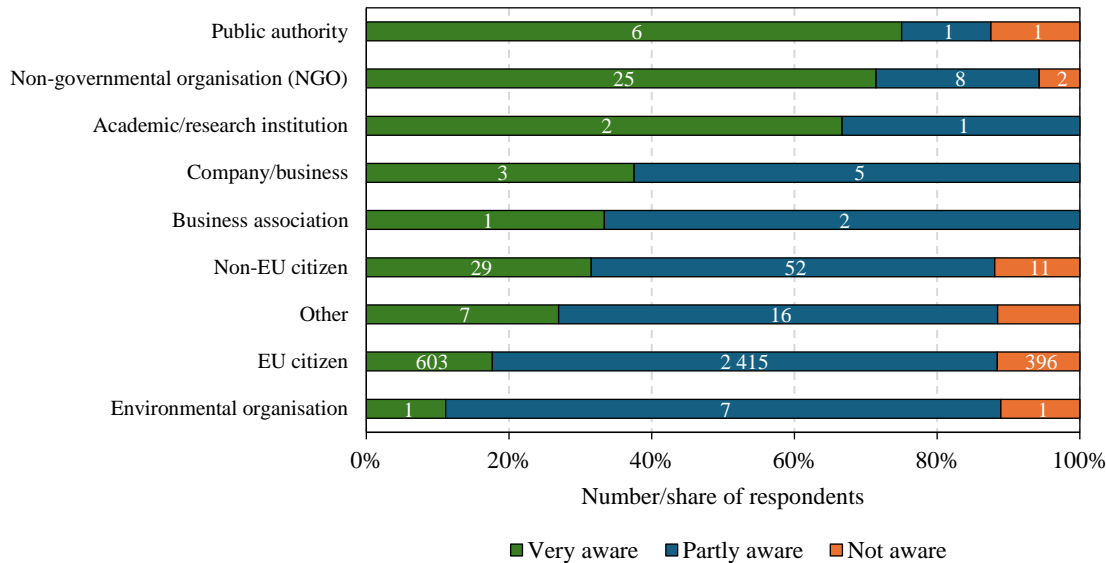
³ Only one answer to one of the questions slightly differs from the template.

3. Awareness and understanding (excluding campaigns)

The first section of the questionnaire explored the level of awareness and understanding stakeholders have of the legislation.

In general, 70% (2 057 out of 3 598) indicated they are partly aware of the legislation, 19% (677) reported being very aware, and 12% (414) stated they are not at all aware. Public authorities, NGOs, and academic/research institutions had the highest percentage of respondents aware of the legislation (see figure below).

Figure 2. Are you aware of the EU legislation on trade in seal products? (N=3 598)



Source: Own elaboration based on survey replies.

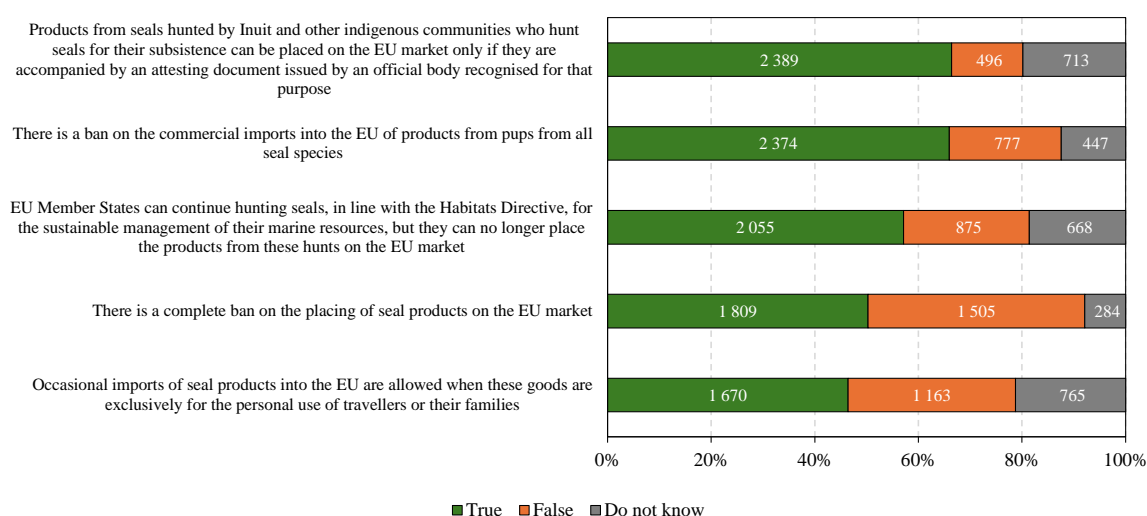
When it comes to the understanding of the legislation, half of the respondents believe that there is a complete ban on the placing of seal products on the EU market (50% or 1 809 out of 3 598)⁴, that EU Member States can continue hunting seals for the sustainable management of their marine resources (57% or 2 055), that there is a ban on the commercial imports into the EU of products from pups from all seal species (66% or 2 374)⁵ and that products from seals hunted by Inuit and other indigenous communities can be placed on the EU market only if they are accompanied by an attesting document (66% or 2 389). Less than half of respondents believe that occasional imports of seal products into the EU are allowed when these goods are exclusively for the personal use of travellers or their families (47% or 1 670)⁶.

⁴ There are disparities across stakeholder groups. Most of the academic/research institutions (100% or 3 out of 3), environmental organisation (67% or 6 out of 9), non-EU citizens (66% or 61 out of 92), NGOs (77% or 27 out of 35) and public authorities (88% or 7 out of 8) believe that the statement “there is a complete ban on the placing of seal products on the EU market” is false. In contrast, most of business associations (67% or 2 out of 3), companies/businesses (75% or 6 out of 8), EU citizens (51% or 1 758 out of 3 414) and other stakeholders (54% or 14 out of 26) believe that the statement is true.

⁵ There are disparities across stakeholder groups. Most NGOs (60% or 21 out of 35) believe that the statement “there is a ban on the commercial imports into the EU of products from pups from all seal species” is false. There is more variety in answers for business associations (33% or 1 out of 3 believe it is true, false or do not know) and non-EU citizens (16% or 16 out of 92 do not know; 41% or 37 believe it is false; 43% or 39 believe it is true).

⁶ There are disparities across stakeholder groups. Most of the academic/research institutions (67% or 2 out of 3), business associations (100% or 3 out of 3), non-EU citizens (61% or 56 out of 92), NGOs (86% or 30 out of 35) and public authorities (88% or 7 out of 8) believe that the statement “occasional imports of seal products are allowed when these goods are for personal use” is true. In contrast, more variety in answers is shown for companies/businesses (25% or 2 out of 8 do not know; 50% or 4 believe it is false; 25% or 2 believe it is true), environmental organisations (56% or 5 out of 9 do not know; 11% or 1 believe it is false; 36% or 3 believe it is true), EU citizens (21% or 728 out of 3 414 do not know; 33% or 1 129 believe it is false; 46% or 1 557 believe it is true), and other stakeholders (19% or 5 out of 26 do not know; 42% or 11 believe it is false; 39% or 10 believe it is true).

Figure 3. What is your understanding of the EU seal regime? (N=3 598)



Source: Own elaboration based on survey replies.

4. General opinions on seal hunting and trade in seal products (excluding campaigns)

A second part of the questionnaire was dedicated to understanding respondents' attitudes and purchasing behaviours towards seal products and their opinions on various ethical and regulatory aspects of seal hunting.

2% (56 out of 3 598) of respondents expressed a willingness to buy seal products regardless of their source, while 98% (3 542) would not buy them⁷. 8% (279) of respondents are willing to purchase seal products originating from Inuit or other indigenous communities, while 92% (3 319) remain opposed. Similarly, products from hunts intended to protect fishery activities would be considered by 3% (116) of respondents, with 97% (3 482) against. 4% (138) of respondents would buy seal products intended to support local communities in the coastal areas of the EU Member States around the Baltic Sea, while 96% (3 460) would not buy such products⁸. 2% (62) of respondents are willing to purchase seal products made from seal pups and 98% (3 536) are opposed⁹.

When it comes to attitudes (see table below), 85% of respondents (3 043 out of 3 598) fully agree that seal hunting raises animal welfare concerns, regardless of the hunting method used. Conversely, 8% (303) (fully) agrees that seal hunting does not raise significant moral concerns if it is conducted with due regard to animal welfare.

Regarding the import and placing of seal products on the EU market, 69% (2 497) fully agree that no seal products at all should be allowed. Similarly, 67% (2 428) fully agree that the import and placing of seal pup skins and derived products should be forbidden for all seal species, even if they come from Inuit and other indigenous communities.

⁷ Replies from business associations and public authorities differ from the averages with 67% or 2 out of 3 and 50% or 4 out of 8, respectively, willing to buy those products irrespective of their origin.

⁸ A higher willingness was shown by academic and research institutions (67% or 2 out of 3 willing to buy those products if coming from Inuit or other indigenous communities or from hunts to protect fishery activities or to support local communities in coastal areas), business associations (100% or 3 out of 3), and public authorities (88% or 7 out of 8).

⁹ Replies from academic/research institutions and business associations differ from the averages with 67% or 2 out of 3 each willing to buy those products made from seal pups.

3% (125) fully agree that small-scale sale of seal product handicraft by local communities 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. In contrast, 73% (2 521) of respondents strongly disagree. Similarly, 3% (108) fully agree that products from seal hunts to protect fishery activities should be allowed for sale on the EU market, with 85% (3 065) strongly disagreeing.

Table 3. To what extent do you agree with the following statements? (N=3 598)

	Fully agree	Agree	Neutral	Disagree	Strongly disagree	No opinion
Seal hunting raises animal welfare concerns, regardless of the hunting method used	85%	8%	1%	2%	4%	0%
Seal pup hunting raises more moral concerns than adult seal hunting	20%	13%	9%	15%	42%	1%
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	5%	3%	2%	14%	75%	0%
No seal products at all should be allowed for import and placing on the EU market	69%	8%	4%	7%	8%	4%
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	67%	8%	4%	7%	10%	4%
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	18%	12%	7%	14%	45%	5%
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	2%	4%	5%	10%	79%	1%
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	27%	13%	11%	7%	35%	7%
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	4%	9%	11%	15%	60%	1%
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	3%	5%	8%	13%	70%	1%
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	3%	1%	2%	9%	85%	1%
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	3%	1%	1%	8%	86%	0%
Occasional imports into the EU of seal products for the personal use of travellers or their families should be allowed	2%	2%	8%	12%	75%	1%

Source: Own elaboration based on survey replies.

5. Evaluation criteria (excluding campaigns)

The last part of the questionnaire asked more specific questions on the different evaluation criteria.

5.1. Effectiveness

According to the survey, 36% of respondents (1 306 out of 3 598, out of which 1 232 EU citizens) believe the legislation has been very successful in regulating the import and placement of seal products on the EU market, with an additional 32% (1 156, out of which 1 100 EU citizens) finding it partly successful. 7% (259, out of which 231 EU citizens) disagree, and 24% (877, out of which 851 EU citizens) are unsure. 20% of respondents (715 out of 3 598, out of which 676 EU citizens) indicated that the legislation has been very successful in allowing the import and placement of seal products from Inuit and other indigenous communities, and 22% (782, out of which 744 EU citizens) find it partly successful. However, 49% (1 754, out of which 1 681 EU citizens) are unsure, and 10% (347, out of which 313 EU citizens) believe the legislation has not been successful in this regard. Lastly, stakeholders feel the legislation has partly or fully addressed public moral concerns related to seal hunting, with 43% (1 556 out of 3 598, out of which 1 484 EU citizens) and 29% (1 053, out of which 1 013 EU citizens), respectively. 12% (414, out of which 401 EU citizens) are unsure, and 16% (575, out of which 516 EU citizens) believe the legislation has not addressed these concerns.

31% of respondents (1 116 out of 3 598, out of which 1 037 EU citizens) mentioned factors that may have hindered the effective implementation of the legislation.

When it comes to impacts, the responses to the survey questions reveal varied perceptions. Concerning the socio-economic interests of relevant stakeholder groups, such as Inuit and other indigenous

communities, fishers, and seal hunters, 34% (1 207 out of 3 598, out of which 1 124 EU citizens) believe the legislation had an impact, while 26% (928, out of which 888 EU citizens) disagree. 41% of respondents (1 463, out of which 1 402 EU citizens) are unsure. Regarding the impact on seal populations, 68% (2 459 out of 3 598, out of which 2 349 EU citizens) believe the legislation had a positive impact. 2% (87, out of which 77 EU citizens) think there was no impact, 8% (284, out of which 251 EU citizens) perceive a negative impact, and 21% (768, out of which 737 EU citizens) are unsure. When it comes to changes in seal hunting practices in terms of animal welfare impacts, opinions were more divided with 45% of respondents (1 623 out of 3 598, out of which 1 572 EU citizens) indicating that the legislation had changed hunting practices, 32% (1 140, out of which 1 041 EU citizens) disagreeing, and 23% (835, out of which 801) being unsure.

Lastly, 21% of respondents (760 out of 3 598, out of which 681 EU citizens) identified other impacts of the legislation, including unexpected or unintended ones¹⁰.

5.2. Efficiency

Regarding costs, 66% of respondents (2 373 out of 3 598, out of which 2 270 EU citizens) believe that the direct and indirect costs of the legislation are justified given the results achieved within and outside the EU. Conversely, 6% (203, out of which 172 EU citizens) feel that these costs are not justified, while 28% (1 022, out of which 972 EU citizens) remain unsure. In terms of the potential for simplification and/or cost reduction of the legislation, most respondents (63% or 2 267 out of 3 598, out of which 2 167 EU citizens) are uncertain, while 12% (445, out of which 406 EU citizens) believe there is potential for such measures, and 25% (886, out of which 841 EU citizens) think there is no potential for simplification or cost reduction.

5.3. Coherence

Concerning internal coherence, approximately 39% of respondents (1 411 out of 3 598, out of which 1 358 EU citizens) are unsure of the coherence of the EU Regulation on Trade in Seal Products and the Seal Pups Directive, while 24% (871, out of which 824 EU citizens) fully agree that the pieces of legislation are coherent with one another. A similar proportion, 25% (898, out of which 848 EU citizens), believe they are partly coherent, and 12% (418, out of which 384 EU citizens) do not find them coherent at all.

Regarding the alignment of the legislation with other EU policies and priorities, such as the EU Habitats Directive or the EU Marine Strategy Framework Directive, 45% of respondents (1 602 out of 3 598, out of which 1 540 EU citizens) are unsure. About one-quarter (24% or 767, out of which 870 EU citizens) fully agree that the legislation is coherent with these policies, while 25% (924, out of which 729 EU citizens) believe it is partly coherent, and 12% (305, out of which 275 EU citizens) disagree.

For the coherence of the legislation with the work of international organisations like the North Atlantic Marine Mammal Commission (NAMMCO) or the Baltic Marine Environment Protection Commission (HELCOM), 62% of respondents (2 225 out of 3 598, out of which 2 118 EU citizens) are unsure. Only 11% (394, out of which 382 EU citizens) fully agree that there is coherence, 21% (754, out of which 711 EU citizens) partly agree, and 6% (225, out of which 203 EU citizens) disagree.

5.4. Relevance

The survey responses on the relevance of the legislation's objectives show strong support for their continued importance. 63% (2 273 out of 3 598, out of which 2 180 EU citizens) fully agree that the

¹⁰ In contrast, 62% of respondents (2 239, out of which 2 153 EU citizens) do not know if there were any such impacts, and 21% (599, out of which 580 EU citizens) do not see any other impacts.

objectives are still relevant. Additionally, 13% (450, out of which 419 EU citizens) partly agree with this observation. On the other hand, 16% (588, out of which 565 EU citizens) of respondents are unsure, and 8% (287, out of which 250 EU citizens) believe that the objectives are no longer relevant.

5.5. EU Added Value

79% of respondents (2 830 out of 3 598, out of which 2 703 EU citizens) believe that EU-level action provides additional benefits. Meanwhile, 17% of respondents (596, out of which 557 EU citizens) are uncertain, and a small fraction of 5% (172, out of which 154 EU citizens) do not see added value in EU-level intervention.

6. Overview of results from the call for evidence

6.1. Overview of participants

The Call for Evidence received 14 161 contributions in total (including 73 attachments). Out of these, 157 duplicates and entries with missing information were removed¹¹, and 11 842 were identified as campaigns or coordinated replies¹² and analysed separately from the **2 162 unique contributions**. The analysis of all responses will be presented in the Synopsis Report in annex to the Fitness Check Report.

Out of the 2 162 unique contributions, 1 810 or 84% of the total sample were submitted by EU citizens (see table below). The second biggest group of contributions includes non-EU citizens (10% or 208 of 2 162).

Table 1. Number of contributions by stakeholder group (excluding campaigns and coordinated replies)

Category	Number of respondents	% out of total 2 162
EU Citizens	1 810	84%
Non-EU Citizens	208	10%
NGOs (incl. environmental organisations)	52	2%
Other	39	2%
Company/business	21	1%
Public authority	12	0.6%
Business association	11	0.5%
Academic/research institutes	9	0.4%

Most unique contributions to the Call for Evidence among EU countries stemmed from France, with 63% of the total number of respondents (1 366 out of 2 162), followed by submissions from the Netherlands (7% or 157 out of 2 162) and Finland (5% or 115 out of 2 162) (see table below). The significant number of responses from France can be attributed to the extensive attention the issue received in the public and political arenas¹³. This heightened visibility prompted many individuals to submit their opinions, including in a coordinated or campaign-like manner (see Section 6.2 below). When it comes to EFTA and non-EU countries, Canadian respondents were relatively numerous (81),

¹¹ Duplicates also include multiple replies from the same organisation, which were consolidated into a single comprehensive reply due to their similarity.

¹² Out of those, 397 were identified by the EU Commission software. See Section 2.2 for more information.

¹³ The issue was raised by political parties such as «La France Insoumise (LFI)» as well as several NGOs (e.g., PETA France, Sea Shepherd France, Fondation Brigitte Bardot) especially on social media platforms such as X and Facebook.

followed by Swiss (52), British (51) and American (13) stakeholders, each representing less than 5% of total unique replies.

The majority of respondents across most countries are citizens (see table below). However, in Canada, Finland, the United Kingdom and Sweden, a broader range of other types of stakeholders also participated, including business associations, companies, NGOs, and public authorities.

Table 2. Number of contributions by country (excluding campaigns and coordinated replies)¹⁴

EU Member State	Number of respondents	Share out of total 2 162	Share of citizens out of total respondents in the country	EFTA and third countries	Number of respondents	Share out of total 2 162	Share of citizens out of total respondents in the country
France	1 366	63%	96%	Canada	81	4%	73%
Netherlands	157	7%	98%	Switzerland	52	2%	98%
Finland	115	5%	77%	United Kingdom	51	2%	86%
Belgium	98	4%	92%	United States	13	1%	100%
Sweden	94	4%	89%				

6.2. Campaigns and coordinated replies

In total, **11 842 replies** were influenced by campaigns or took the form of coordinated replies. Responses influenced by campaigns mostly came from EU citizens (99%), following the patterns of the overall set of contributions, as shown by the table below.

Table 3. Number of contributions to campaigns and coordinated replies by stakeholder group¹⁵

Category	Number of respondents	% out of total 11 842
EU Citizens	11 754	99%
Non-EU Citizens	50	0.5%
Other	17	0.1%
Company/business	7	0.1%
NGOs (incl. environmental organisations)	4	0.03%
Academic/research institutes	3	0.03%
Business association	2	0.02%
Public authority	1	0.01%

The country representation follows to some extent the same proportions as the overall average, with France accounting for the largest part (87%), followed by Belgium (4%), the Netherlands (3%), Italy (2%) and Germany (1%). All other Member States accounted for less than 1%. Canada and Switzerland

¹⁴ Other EU Member States that responded to the Call for Evidence and have a relatively high number of respondents are Italy (22) and Germany (20). Other EU Member States that have less than 10 respondents are: Poland, Portugal, Denmark, Czechia, Estonia, Spain, Ireland, Austria, Luxembourg, Greece, Hungary, Slovakia, and Romania. Other EFTA and third countries that responded to the Call for Evidence and have less than 10 respondents are: French Polynesia, Russia, Åland Islands, New Caledonia, Brazil, Colombia, French Guiana, Iceland, Martinique, Serbia, Monaco, South Africa, Dominican Republic, Guadeloupe, Norway Saint Barthélemy, Peru, Belarus, South Georgia and the South Sandwich Islands, Israel, Greenland, Mexico, Australia, Andorra, and Kazakhstan.

¹⁵ It should be noted that several respondents also mentioned the #freePaulWatson movement. However, since these mentions appeared organically within their broader contributions, this was not classified as part of a coordinated campaign.

are at the top participating EFTA and third countries, each accounting for 0.2% of the total (see table below).

Table 4. Number of contributions to campaigns and coordinated replies by country

EU Member State	Number of respondents	Share out of total 11 842	Share of EU citizens out of total respondents in the country	EFTA and third countries	Number of respondents	Share out of total 11 842	Share of non-EU citizens out of total respondents in the country
France	10 269	87%	100%	Canada	25	0.2%	92%
Belgium	513	4%	100%	Switzerland	18	0.2%	83%
Netherlands	339	3%	100%				
Italy	211	2%	100%				
Germany	149	1%	100%				