

MANAGEMENT AND UTILIZATION OF SEALS IN GREENLAND



**THE GOVERNMENT OF GREENLAND
MINISTRY OF FISHERIES, HUNTING & AGRICULTURE
REVISED APRIL 2012**

Foreword by Honourable Minister of Fisheries, Hunting & Agriculture, Mrs. Ane Hansen:

I have the clear opinion that challenges have to be taken on the spot and directly with the relevant partners by equal part dialogue and mutual understanding between the involved parties.



I have, in connection with meetings in the recent past, seen a great need for information on seals and seal hunting to authorities, merchants and consumers in Europe and other countries. There is very little knowledge about these topics in Europe. In this context, I propose that the European Union that have adopted the ban, with Inuit exemption will help us to form an information campaign so people can understand what the ban and the exemption for Inuit means.

As a Minister for Fisheries, Hunting and Agriculture, I have advocated intensively for increased sustainable use of all living resources in Greenland, based on sound biological advice. I have also advocated the importance of listening to what national, international organisations and unions have to say. I have listened to our Industry and hunters, who asked me to talk to the EU system and meet with partners.

Greenland is a country of contrasts. We have culture and traditions that go 4000 years back in time. The Greenlandic society is also part of the modern and developing world today, where we June 21st 2009 have gained Self Governance. It means for instance that we are and will be highly depending on our own natural resources, including the marine resources. It also means that we have to continue our focus on and to take care of the great nature and its richness on a higher level, so future generations can get benefit of these in a sustainable manner.

I would also like to stress the importance of a sound ecosystem based management of all living resources. The increasing numbers of seals in our seas are the biggest competitors to our fishermen and hunters.

I appreciate partners who bring scientifically documented decisions first. I refer to our good fisheries partnership agreement with EU. However, I am very worried about the EU ban on seal products with Inuit exemption, since this is based on emotion and not facts. This trend worries me deeply, because we have an increasing seal population in our and neighbouring waters. Currently the population is estimated to be between 15.2 to 17.2 million seals. I have received information from a reputable veterinarian who is deeply concerned about the risk of outbreaks of influenza in the seals. If that happens, then I would say that it will be a major and unintended cruelty. We as responsible citizens of the world must act balanced, so the ecosystem does not change significantly.

On top of that Greenland is also severely affected by decisions and domestic politics in the EU and other countries. The effect of the trade ban of seal products is one example. Even with the so-called Inuit exemption within the EU ban, the decision has already destroyed our sealskin market. Today there are stored about 300.000 sealskins due to a destroyed international sealskin market. The EU should in addition to the hearing 7 of February 2012 strongly consider the ban and that there will be a soon decision on the WTO cases which Norway and Canada has applicated for. The slow processing of these cases also blocked the market for our products.

I have stressed in my speeches that in our effort of implementing self-governance in Greenland full utilisation of all available resources is necessary, this of course includes all landed animals. All raw materials have to be utilised in an effective manner and at a high level so we can limit the import of western food, and in that way participate in the reduction of CO2 emissions. By a higher level of utilization and increased manufacturing of our own resources, we will also reduce and limit modern life style diseases that are occurring more often in Greenland.

Our traditional food has been evaluated by medical doctors and other scientists. The scientists recommended Inuit not to reduce or stop eating traditional food because these products are healthier than industrialised and imported food.

I would also like to express my understanding to our fishermen and hunters organization KNAPK and Inuit Circumpolar Council's (ICC) deep concerns that there might be violations of Indigenous Peoples' Rights, and particularly on the their economic and social development. The economics of seal hunting is very vulnerable. Our Cabinet *Naalakkersuisut* has decided to continue subsidizing the seal hunt so that sealers can continue with income from the catch, although the sale of sealskin in the world is destroyed. Sealing has a significant socio-economic importance for the whole of Greenland, which provides us with fresh meat and winter supplies.

It is proved that the Inuit exemption has not helped as intended. I have with regret observed the current development in Europe, Russia, Belarus and Kazakhstan, with the trade bans which are based on feelings not on facts. These initiatives have severe economical and socio-economical consequence with negative consequences for our hunters, their families and their livelihood.

Naalakkersuisut regrets deeply that the Inuit exemption has not helped as intended. Therefore, I am proposing that the EU supports us in an information campaign in our effort so that the ban policy does not spread further than we have already seen in non-EU countries. As I mentioned initially, I think it would be appropriate that the EU system, cooperates with us to inform about how to understand the ban and the Inuit exemption.

Ane Hansen
Nuuk, April 2012

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1. Summary

1. Species:

There are six different species of seals in the Greenlandic waters. Five of the species have been hunted for centuries, but today the catch is focused on the harp seal, ringed seal and hooded seal with great importance to the Inuit hunters. The seal populations hunted in Greenland's waters counts more than 12 million seals.

2. Sustainability and biological advice:

There are no quotas on seals in Greenland, as the harvest level is relatively low compared with the number of seals. The populations of harp and hooded seals have, however, also been subjected to commercial sealing by Canadian, Norwegian and Russian sealers, and their numbers and reproduction have, therefore, been monitored carefully for many decades. These species are now managed after an internationally-recognized, conservative cautionary approach within marine mammal management called Potential Biological Removal (PBR).

According to the Red List of Greenland (2007) none of the three species are endangered. The Red List's assessments are carried out by the guidelines of the international Red List; conducted by The International Union for Conservation of Nature (IUCN). Furthermore, in 2004, IUCN openly supported sustainable harvesting principles in relation to the abundant seal populations; rather than protection of these species.

Harp seal:

Harp seals are divided into three populations; one that breeds in the White Sea (Russia), one in the Greenland Sea (off Northeast Greenland) and one off Newfoundland (Canada). Most Greenland catches are from the population shared with Canada. The latest survey result for this population is from 2008, which found that 1.6 million newborn pups were born that spring, and that this corresponds to a total population of about 8 million. The population is believed to have increased further, so that it now counts more than 9 million seals. The current population might be at its highest level ever; hence, higher than before the commercial hunt began. This is possible because other components in the ecosystem, ex. cod and some of the large whales, are relatively smaller compared to what they have been. The total allowable catch (TAC) for Canada was set to 400,000 in 2011, but only 38,018 harp seals were taken. The Greenland catches has in the latest decade averaged 82,000/yr. harp seals.

Ringed seal:

The world population of ringed seals is estimated to be around 5-7 million seals. Approximately 50 % of the Greenland catch of about 78,000/yr. since 2000, is taken in Baffin Bay. The population of ringed seals in Baffin Bay and adjacent areas is estimated to be around 1.2 million seals (NAMMCO). Sustainability of the catch is assumed, because the ringed seal is widely and evenly distributed across most of the Arctic. They do not concentrate in breeding areas like the harp seals, and can, therefore, not be hunted in the same industrial way. The area, where they are hunted by the Inuit in Greenland and Canada, only constitute a tiny fraction of their habitat.

Hooded seal:

Close to all catches of hooded seals in Greenland, average of 4,600/yr., since 2000, is from the Northwest Atlantic population, which is estimated to be around 600,000 seals (ICES/NAFO). The Canadian TAC, which takes a free hunt in Greenland into account, is set to 8,200, but less than 100 has been taken in recent years.

3. Hunting methods in Greenland:

The catch of *harp seals* takes place all year round, but predominantly during summer and falls in *open water* and is a small-scale hunt. The hunter localizes the seal and shoots it with a rifle. In northern Greenland during the dark winter months *netting* is the prevailing method for the hunters to catch ringed seals. In spring, when *ringed seals* haul-out on the ice, hunters use white screens to *sneak up* to an appropriate shooting distance and shoot the seal dead in the head. In The European Food & Safety Agency's (EFSA) study, the rifle hunt is accepted as a humane hunting method.

4. The Greenlandic catch:

There are about 2,100 full time and 5,500 leisure time hunters in Greenland. Altogether, there are just under 8,000 hunters in Greenland. The full time hunters constitute almost 7 % of the work force (app. 32,000) in Greenland (2011).

5. Economy – household as well as national:

For the 2,100 professional hunters in Greenland, the income from the seal hunt is vital. The household economy for the hunter is mixed. The income from the seal hunt (from selling and/or giving the meat) serves as a subsistence supplement to the barter economy still existing in small communities dispersed in Greenland. It also serves as direct cash flow income for the hunter; namely the sale of the seal skin from which some hunters get approx. half of their cash income covered, in order to feed their families. Often, the hunter in smaller communities is the breadwinner of the family. The average income for a hunter's municipality (e.g. Qaanaaq in northern Greenland) is approx. 16,000 €(2010).

In terms of the national economy, the seal skin export has been steadily decreasing over the last couple of decades. It used to constitute an export item, besides the dominant export of fishery products, which account for 93 % (2011). An export hindrance would create social pressure on the national economy as hunters, relying on the cash flow income, would turn to social security benefits from the Greenlandic authorities. Furthermore, the seal skin processing has an intra-economic value, as different seal products are sold as handicrafts, clothing, national garments etc., some of which is sold to tourists.

6. Culture and tradition:

Seal hunting is an important part of the Inuit culture, tradition and identity in Greenland. Since the arrival of the first Inuit, seals have provided basic nutrition as food for humans and dogs. Furthermore, items (blubber and skin) have provided shelter, fuel, lightning, tools, covers for tents and kayaks, as well as, clothing. The seal also plays an immense role in Greenlandic mythology. Today, the Inuit in Greenland have access to the items of the modern world, but the seal is still hunted for food and clothing, and as part of a traditional legitimate leisure activity, in which all parts of the seal are used or consumed.

7. Rights of Indigenous Peoples:

The Inuit in- and government of Greenland call upon the declaration of the rights of Indigenous Peoples, which all EU Member States have signed. Relevant articles related to the hindrance of commercial seal hunting are:

- Indigenous Peoples have the right to freely pursue their economic [...] development (art. 3)
- Indigenous Peoples have the right to not be subjected to forced assimilation or destruction of their culture (art. 8).
- Indigenous Peoples have the right to be secure on the enjoyment of their own means of subsistence [...] and to engage freely in [...] economic activities (art. 20).
- States shall consult [...] in good faith with the Indigenous Peoples concerned [...] in order to obtain the free and informed consent prior to the approval of any project affecting their [...] resources (art. 32, §2).

8. Legislation - regulation, control and monitoring:

In Greenland, the law on hunting from 1999 and the law on protection of nature and wildlife from 2003 constitute the overall frame regarding wildlife regulation. From December 1st, 2010, a national executive order regarding the protection of seals and regulation of sealing came into force. The municipalities (four) set local regulation on seal hunting; but, as a rule of thumb, seals can be hunted all year around; provided that hunters have a permit. There are no quotas on the seals hunted; however, the permits are used to control and monitor the harvest, as hunters are required to report their annual catches.

9. International cooperation on seals:

Greenland cooperates with the International Council for the Exploration of the Sea's (ICES/NAFO) Working Group on Harp and Hooded Seals and, also, with the North Atlantic Marine Mammal Commission (NAMMCO), which has a task force covering the studies and monitoring of seal populations. Within NAMMCO, a Seal Management Committee has been established in 2006; chaired by Greenland.

10. International trade bans on seal skins and seal products:

The Marine Mammal Protection Act (MMPA) of the United States enacted on October 21, 1972. The Council Directive 83/129/EEC (European Economic Community) of 28 March 1983 concerning the importation into Member States of skins of certain seal pups and products derived therefrom. Regulation (EC) No 1007/2009 of the European Parliament and of the Council of 16 September 2009 on trade in seal products, including an exemption for Inuit. Commission Regulation (EU) No 737/2010 of 10 August 2010 laying down detailed rules for the implementation of regulation No 1007/2009.

Resumé

1. Arter

Der findes seks forskellige sælarter i de grønlandske farvande. Fem af disse arter har været jagede i århundreder, men i dag er jagten koncentreret omkring grønlandssæl, ringsæl og klapmyds, som har stor betydning for Inuit. De sælbestande, der jages i Grønland, tæller mere end 12 millioner individer.

2. Bæredygtighed og biologiske anbefalinger

Der er ikke fastsat kvoter for sælfangsten i Grønland, og antallet af fangster er lavt set i forhold til bestandenes størrelse. Bestandene af grønlandssæl og klapmyds har imidlertid været genstand for kommerciel fangst fra canadisk, norsk og russisk side, og deres størrelse og reproduktion har derfor været nøje overvåget i mange årtier. Disse arter administreres i henhold til internationalt anerkendte konservative principper inden for forvaltning af havpattedyr, der kaldes Potential Biological Removal (PBR).

Ifølge rødlisten for Grønland fra 2007 er ingen af de tre arter truede. Rødlistens fastsættelser sker på baggrund af anbefalingerne fra den internationale rødliste, der varetages af International Union for Conservation of Nature (IUCN). Herudover støttede IUCN i år 2004 åbent bæredygtige fangstprincipper i forhold til righoldige sælbestande frem for beskyttelse af disse.

Grønlandssæl

Grønlandssælen er opdelt i tre bestande: en, der yngler i Hvidehavet (Rusland), en i Grønlandshavet (ud for Nordøstgrønland) og en ud for Newfoundland (Canada). De fleste fangster i Grønland sker fra en bestand, der deles med Canada. Den sidste undersøgelse af denne bestand er fra 2008. Den viste, at der dette forår ud af en samlet bestand på 8 millioner individer fødtes 1,6 millioner unger. Bestanden menes at være øget yderligere, således at den nu udgøres af mere end 9 millioner sæler. Den nuværende bestand er måske på sit højeste niveau nogensinde og er derfor også højere, end før den erhvervsmæssige sælfangst begyndte. Dette skyldes andre komponenter i økosystemet f.eks. bestandene af torsk og nogle af de store hvaler er mindsket i forhold til tidligere. Den samlede tilladte fangstmængde, Total Allowable Catch (TAC), for Canada blev i 2011 sat til 400.000, hvoraf kun 38.018 blev udnyttet. De grønlandske fangster har i det sidste årti ligget på 82.000 grønlandssæler i gennemsnit pr. år.

Ringsæl

Verdensbestanden af ringsæl antages at ligge omkring 5-7 millioner sæler. Siden 2000 er ca. 50 % af de grønlandske fangster på 78.000 pr. år sket i Baffinbugten. Bestanden af ringsæl i Baffinbugten og tilstødende områder anslås (iflg. NAMMCO) til at bestå af 1,2 millioner sæler. Fangsten anses for at være bæredygtig, fordi ringsælen er jævnt og bredt udbredt over det meste af Arktis, og de samler sig ikke som grønlandssælen i bestemte yngleområder og kan derfor ikke jages på samme industrielle måde. Området, hvori de jages af Inuit i Grønland og Canada, udgør kun en lille del af deres habitat.

Klapmyds

Siden år 2000 er næsten alle fangster af klapmyds i Grønland med et gennemsnit på 4.600 pr. år sket fra den nordvestatlantiske bestand, som anslås at udgøre 600.000 individer (ICES/NAFO). Den samlede tilladte

fangstmængde (TAC) for Canada, som tager hensyn til den grønlandske fangst, er fastsat til 8.200, men i de sidste år er mindre end 100 blevet fanget.

3. Jagtmetoder i Grønland

Jagt på *grønlandssæl* foregår året rundt men fortrinsvis om sommeren og i efteråret på *åbent vand* og kun i mindre omfang. Fangeren finder sælen og skyder den med riffel. I de mørke vintermåneder i Nordgrønland er fangst af ringsæl med *net* den mest udbredte metode blandt fangerne. I foråret, når ringsælerne trækker op på isen, bruger fangerne hvide skærme til at *snige* sig ind på skudhold og skyder sælerne i hovedet. I et studie fra The European Food & Safety Agency (EFSA) anerkendes jagt med riffel som en human jagtform.

4. Jagten i Grønland

Der findes omkring 2.100 fuldtidsfångere og 5.500 fritidsfångere i Grønland. I alt er der lige under 8.000 fångere i Grønland. Fuldtidsfångere udgør næsten 7 % af den samlede grønlandske arbejdsstyrke (på ca. 32.000 i år 2011).

5. Privat- såvel som nationaløkonomi

Indkomsten fra sæljagten er af vital betydning for de 2.100 professionelle fångere i Grønland. Fångernes privatøkonomi er blandet. Indtægterne fra sæljagten (i form af salg og/eller som ernæring) tjener som et supplement til den bytteøkonomi, der stadig findes i de små samfund, der er spredt ud over Grønland. De tjener også som direkte kilde til kontante penge for fångeren - nemlig i form af salg af sælskind, hvorfra nogle fångere erhverver omkring halvdelen af den nødvendige indtægt til at underholde deres familier. I mindre fångersamfund er fångeren ofte ene forsørger for en familie. Gennemsnitsindkomsten for en fanger i en kommune som f.eks. Qaanaaq i Nordgrønland er omkring 119.000 kr. (for år 2010).

Set i nationaløkonomisk perspektiv har sælskindseksporten været støt faldende over de sidste årtier, hvor den tidligere udgjorde en eksportvare sammen med den altoverskyggende eksport af fiskeriprodukter, som i år 2011 udgjorde 93 %. En begrænsning i eksporten vil skabe et socialt pres på nationaløkonomien eftersom fångere, der er afhængige af deres kontante indtjening, vil skulle overgå til sociale ydelser fra de grønlandske myndigheder. Ud over eksporten har bearbejdning af sælskind intern økonomisk værdi og forskellige produkter af sæl sælges som kunsthåndværk, beklædning, nationaldragter osv., hvoraf nogle sælges til turister.

6. Kultur og tradition

Sæljagten er en væsentlig del af inuitkulturen, traditionen og identiteten i Grønland. Siden de første inuitter ankom, har sæljagt dannet fødegrundlag for mennesker og hunde. Hertil kommer at spæk og skind har givet ly, brændsel, lys, værktøj, telte og kajakovertræk tillige med beklædning. Sælen spiller også en umådelig stor rolle i den grønlandske mytologi. I dag har inuit i Grønland adgang til den moderne verdens bekvemmeligheder, men sæl jages stadig som kilde til føde og beklædning, og sæljagt er en legitim fritidsaktivitet, hvor alle dele af sælen bruges eller konsumeres.

7. Oprindelige folks rettigheder

Inuit og Grønlands Selvstyre påkalder sig Erklæringen om oprindelige folks Rettigheder, som alle EU's medlemsstater har tiltrådt. Relevante artikler i forhold til begrænsninger af erhvervsmæssig fangst af sæler er:

- Oprindelige folk har ret til [...] og kan frit udøve deres økonomiske [...] kulturelle udvikling (artikel 3).
- Oprindelige folk og enkeltpersoner har ret til ikke at blive udsat for tvunget assimilation eller ødelæggelse af deres kultur (artikel 8).
- Oprindelige folk har ret til at opretholde og udvikle deres politiske, økonomiske og sociale systemer [...] og til frit at involvere sig i [...] økonomiske aktiviteter (artikel 20).
- Staterne skal konsultere og i god tro samarbejde med de berørte oprindelige folk [...] for at indhente deres frie og informerede samtykke forud for godkendelse af ethvert projekt, der berører deres [...] ressourcer (artikel 32, stk. 2).
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8. Lovgivning - regulering, kontrol og overvågning

I Grønland udgør Landstingslov om fangst og jagt fra 1999 og Landstingslov om naturbeskyttelse fra 2003 den overordnede ramme med hensyn til regulering af dyrelivet. Den 1. december 2010 trådte Selvstyrets bekendtgørelse om beskyttelse og fangst af sæler i kraft. Kommunerne (fire stk.) kan regulere jagten på sæl lokalt, men som tommelfingerregel kan sæl jages året rundt, forudsat at fangeren har jagtbevis. Der findes ikke nogen kvoter for sælfangsten, dog bruges jagtbeviserne som overvågning, idet fangerne er forpligtede til at oplyse deres årlige fangster.

9. Internationalt samarbejde om sæler

Grønland samarbejder med International Council for the Exploration of the Sea (ICES/NAFO) i arbejdsgruppen vedrørende grønlandssæl og klapmyds og med North Atlantic Marine Mammal Commission (NAMMCO), som har en task force, der dækker studier og overvågning af sælbestande. I NAMMCO blev der i 2006 etableret en komite til forvaltning af sæler (Seal Management Committee) under formandskab af Grønland.

10. Internationale handelsbegrænsninger for sælskind og produkter fra sæl

Marine Mammal Protection Act (MMPA) (USA) af 21. oktober 1972. Rådets direktiv nr. 83/129/EØF (Det europæiske økonomiske Fællesskab) af 28. marts 1983 om indførsel i medlemsstaterne af visse sælungeskind og varer heraf. Europa-Parlamentets og Rådets forordning nr. 1007/2009 af 16. september 2009 om handel med sælprodukter, herunder en undtagelse for inuit. Kommissionens forordning nr. 737/2010 af 10. august 2010 om gennemførelsesbestemmelser til forordning nr. 1007/2009

Naalisagaq

1. Puisit assigiinngitsut

Kalaallit Nunaata imartaani puisit assigiinngitsut arfineq marluupput. Taakku ilaat tallimat ukiorpassuarni piniagaasimapput, ullumikulli piniagaanerusut Inuit piniartortaannut pingaaruteqarluartut tassaapput aataat, natsiit aammalu natsersuit. Puiseqatigiit assigiinngitsut piniagaasut Kalaallit Nunaata imartaaniittut 12 millioninit amerlanerupput.

2. Piujuannartitsisinnaaneq biologillu siunnersuuteqartarnerat

Puisit amerlassusiinut naleqqiullugit pisarineqartartut amerlagisassaangimmata Kalaallit Nunaanni puisit immikkut pisassiissutigineqarneq ajorput. Taamaattorli aataat natsersuillu canadamiunit, norgemiunit aammalu russinit iluanaarniutigalugu piniarneqartarmata taakku amerlassusii kinguaassiornerilu ukiorpassuarni malinnaaffigeqqissaarneqarsimapput. Puiseqatigiit pineqartut maanna imarmiunik mianersortumik aqutseriaatsit, Potential Biological Removal-imik (PBR) taaneqartartut, nunallu tamalaat akuerisaat najoqqutarlugit nakkutigineqarput.

Kalaallit Nunaanni uumasunik navianartorsiorsinnaasunik nalunaarsuiffik 2007-imeersoq naapertorlugu puiseqatigiit pineqartut arlaannaalluunniit navianartorsiuinngillat. Uumasunik navianartorsiorsinnaasunik naliliisarneq Nunat Tamalaat Pinnortitamik Allangutsaaliinermut Suleqatigiiffiannit IUCN-mit najoqqutassiarineqartut naapertorlugit pisarpoq. Najoqqutassat taakku naapertorlugit IUCN-ip 2004-imi puisit naammattumik amerlassusillit illersorneqarnissaannut taarsiullugu piujuannartitsineq tunngavigalugu piniarneqarnissaat ammassumik tapersersorpaa.

Aataat:

Aataat ataatsimoortukkuutaanut pingasunut avissimapput; ataatsit Ruslandip Avannaani qallunaatut Det Hvide Havimik taasami erniortuusut, ataatsit Tunup avannaata avataani erniortuusut ataatsillu Newfoundlandip (Canada) eqqaani erniortuusut. Kalaallit Nunaanni pisarineqartartut amerlanerit aataanit Canadamiittartunit Kalaallillu Nunaanniittartunit pisuupput. Taakku kisinneqarnerannit paasisat kingulliit 2008-meersuupput. Paasineqarpoq upernaq taanna aataavaqqat 1,6 millionit piaqqiarineqarsimasut, taakkulu naatsorsoraanni aataat tamarmiullutik 8 millionit missaanni amerlassuseqarsimassapput. Aataat taakku sulii amerleriaqqissimassasutut naatsorsuutigineqaramik maanna 9 millionit sinnerlugit amerlassuseqalersimassapput. Massakkut aataat taakku aatsaat taama amerlatigilersimassapput, aamma iluanaarniutigalugu piniagaanertik sioqqullugu amerlassuserisaminnit amerlanerulersimassallutik. Tamatumunnga pissutaasimasinnaavoq uumassusileqarfimmi suut allat (assersuutigalugu saarulliit aammalu arferit angisuut) qangaanut naleqqiullugu ikinnerulersimammata. Canadami aataat pisarineqarsinnaasut amerlanerpaaffissaat 2011-imi 400.000-inut amerlassusilerneqarsimagaluartut 38.018-iinnaat pisarineqarput. Kalaallit Nunaanni aataat pisarineqartartut ukiut kingulliit qulit ingerlaneranni ukiumut agguaqatigiissillugit 82.000-inik amerlassuseqartarput.

Natsiit:

Nunarsuatsinni natsiit 5-7 millionit missaanni amerlassuseqartut missingerneqarput. 2000-imiit ukiumut natsiit pisarineqartartut 78.000 missaanniittartut affaat Baffinimip Ikerani pisarineqartarput. Baffinip Ikerata imartallu tassunga atasut natsii 1,2 millionit missaanni amerlassuseqassangatinneqarput (najoqqutaq: NAMMCO). Pisat

ikiliartuutaangitsutut naatsorsuutigineqarput tassami natsiit Issittumi assigijaaamik siammarsimammata. Aataatulli piffimmi ataatsimi amerlasoorsuullutik piaqqiorneq ajorput, taamaammallu amerlasoorsuakkuutaarlutik iluanaarniutigalugu pisarineqassanatik. Kalaallit Nunaanni Canadamilu Inuit piniarfigisartagaat natsiit uumaffigisaata ilamineeraananguaraa.

Natsersuit:

Natsersuit Kalaallit Nunaanni pisarineqartartut 2000-miilli agguaqatigiissillugu ukiuumut 2000 missaanni amerlassuseqartartut, tamangajammik Atlantikup Kitaata avannaaneersuupput, taakkulu ICES/NAFO naapertorlugu 600.000 missaanni amerlassuseqarput. Canadamiut pisassat amerlanerpaaffissaannik aalajangigaat, Kalaallit Nunaanni killilersugaannginnerat ilanngullugu naatsorsorneqartartut, 8.200-inut amerlassusilerneqarput, taamaattorli ukiuni kingullerni 100-init ikinnerusut pisarineqartarput.

3. Kalaallit Nunaanni piniarnermi periaaserineqartartut:

Aataat ukioq kaajallallugu piniagaasarput, annermilli *sikuutinngu* aasakkut ukiakkullu piniarneqartarlutik, aamma amerlasuukaarlutik pisaqartoqarneq ajorpoq. Piniartup aataaq sumiissusersisarpaa qoorortuumillu aallaasarlugu. Kalaallit Nunaata Avannaani ukiukkut kaperlatsillugu *qassusersorneq* annermik piniartunit puisinniarnermi atorneqartarpoq. Upernaakkut *natsiit* qassimasalersillugit piniartunit taalutserluni uuttorniarnikkut piniarneqartarput. Europami Inuussutissalerinnermut Isumannaallisaaanermullu Suleqatigiiffiup (EFSA) misissuinerani qoorortoorsorluni piniarneq naalliutsitsinani piniarnertut akuerisaavoq.

4. Kalaallit Nunaanni pisarineqartartut:

Kalaallit Nunaanni inuussutissarsiutigalugu piniartut 2.100 missaanni amerlassuseqarput sunngiffimminnilu piniartartut 5.500 missaanni amerlassuseqarlutik. Kalaallit Nunaanni piniartartut katillugit 8.000 inulaarpaat. Kalaallit Nunaanni 2011-imi sulisinnaasut 32.000 missaanniittut 7%-iisa missaat inuussutissarsiutigalugu piniartuupput.

5. Aningaasarsiorneq – inoqutigiinni inuiaqatigiinnilu tamani:

Kalaallit Nunaanni inuussutissarsiutigalugu piniartunut 2.100 missaanniittunut puisinit isertitat pingaaruteqarluinnartuupput. Piniartukkormiut isertitaat assigiinngitsunit pisarput. Puisinniarnermi pissarsiat (tuniniaanikkut aamma/imaluunniit pajuttortarnikkut) Kalaallit Nunaanni inoqarfinni mikisuni siammarsimasuni pajuttortarluni inuussutissarsiornermi suli atuiffiusuni inuussutissaqaataalluurtarput. Aamma piniartumut toqqaannartumik aningaasarsissutaasarpog, ilaqtuutaasunut inuussutissaqartitsiniarnermut atorneqartarlutik – annermik puisip amia isertitsissutaasarpog, ilaatigut piniartut isertitaasa affaasa missaaniittarluni. Amerlasuutigut nunaqarfinni mikisuni piniartoq ilaqtariinnik inuuniarnikkut pilersuisuusarpog. Aqutsiveqarfinni piniartoqarfiusuni (soorlu Kalaallit Nunaata Avannaani Qaanaami) piniartup isertitai ukiumut 119.000 kr.-it missaanni amerlassuseqartarput (2010).

Nunap tamarmi aningaasarsiornera eqqarsaatigalugu puisit amii avammut nioqutigineqartartut ukiut kingulliit qulikkaar ingerlaneranni ikiliartorsimapput. Avammut tunisanut annermik aalisakkanit tunisassiaasunut, avammut tunisat 93%-erisartagaannut, puisit amii tapertaasaraluarput. Avammut nioqquteqarnerup ajoquserneqarnera nunap aningaasarsiornera eqqarsaalugu inuttut ajornartorsiortitsilissaaq tassami piniartut aningaasanik pisariaqartitsisarnertik pissutigalugu Kalaallit Nunaanni pisortaniit isumagininnermi

ikiorsiissutinik isumalluuteqalersussaammata. Avammut tunisassiornermut ilanngullugu puisit amiinik suliareqqiisarneq immi immikkut naleqalersarpoq kiisalu puisinit pissarsiat assigiinngitsut sanalukkatut, atisatut, kalaallisuutut nioqqutigineqartarput ilaatigut takornarianut tunineqartarlutik.

6. Kulturi ileqqutoqqallu:

Puisinniarneq Kalaallit Nunaanni Inuit kulturiannut, ileqqutoqaannut kinaassusaannullu pingaaruteqarpoq. Inuit tikeqqaarmatali puisit inunnt qimminullu ulluinnarni inuussutaasimapput. Taakku saniatigut puisinit pissarsiat allat, orsua amialu, oqqiffissaqartitsisarsimapput, kiassaataallutik, qaammaqutaallutik, sakkugineqarlutik, tuperni qalerarineqarlutik qaannanilu amerineqartarlutik atisarineqartarlutillu. Puisit aamma Kalaallit Nunaanni oqaluttuatoqqani pingaarutilissuupput. Ullumikkut Kalaallit Nunaanni Inuit sunik nutaalianik pissarsisinnaagaluartut taamaattoq puisit nerisassatut atisassatullu sulii piniarneqartarput kiisalu sunngiffimmi sammisaqaataasarlutik, puisilu tamarmi atorineqartarluni nerineqartarluniluunniit.

7. Nunap inoqqaavisa pisinnaatitaaffii:

Kalaallit Nunaanni Inuit Naalackersuisullu, Nunat Inoqqaavisa Pisinnaatitaaffii EU-mut ilaasortat tamakkerlutik atsiogataaffigisimasaat matumuuna innersuussutigaa. Tassani aalajangersakkat ilaat puist iluanaarniutigalugu piniarneqarnerannik akornusersuinerneq tunngasuupput:

- Nunat Inoqqaavisa pisinnaatitaaffigaat nammineq aalajangersaanissaq. Pisinnaatitaaffik tamanna kiffaanngissuseqarlutik piorsarsinnaallugu namminneq aningaasarsiornikkut, [...] aamma kultureqarnikkut ineriartornissartik (aalajangersagaq 3).
- Nunat inoqqaavi inuiaat inuillu ataasiakkaat pisinnaatitaapput inuiannut allanut pinngitsaaliissummik ilanngutivitsitaannginnissamut imaluunniit kultureqarnermik aserunnginnissaannut (aalajangersagaq 8).
- Nunat inoqqaavisa pisinnaatitaaffigaat namminneq naalackersuinikkut, aningaasarsiornikkut aamma inooqatigiinnermi aaqqissukkatik imaluunniit suliffisik attatissallugit [...] aamma kiffaanngissuseqartumik qangaaniit kingornussatik allallu pissaqarniarnikkut suliat atorsinnaassallugit (aalajangersagaq 20).
- Naalagaaffiit pisussaapput siunersiuissallutik aamma ajunngitsussamik siunertaqartumik nunat inoqqaaviniq pineqartunik taakkua [...]kiffaanngissuseqartumik aamma paasinnilluni akuersineq anguniarlugu suliniummik sumilluunniit [...] isumalluutinilluunniit allanik attuisumik akuersissuteqannginnermi (aalajangersagaq 32 imm. 2).

8. Inatsisit – malittarisassaqaartitsineq, nakkutilliineq malinnaaviginninnerlu

Kalaallit Nunaanni piniarnermjud inatsit 1999-imeersoq aammalu pinngortitap uumasullu illersorneqarnissaannik inatsit 2003-imeersoq uumasut nujuartat pillugit malittarsissiornermi tunngavilliisuupput. 2010-imi decemberip aallaqqaataani puisit illersorneqarnissaat puisinniarnullu malittarisassaqaartinneqarnissaa pillugu nalunaarut atuutilerpoq. Kommunit (sisamaasut) puisinniarneq pillugu malittarisassiorsinnaapput, taamaattorli piniartut piniarnermut akuersissuteqarsimappata nalinginnaasumik ukioq kaajallallugu puisinniartoqarsinnaasarluni. Puisinniarneq killilersuiffigineqanngilaq, taamaattorli piniartut akuersissummik pissarsissagunik ukiumut pisaminnik nalunaarsuisussaataammata akuersissutit atorlugit pisat nakkutigineqartarput malinnaavigineqarlutillu.

9. Puisit pillugit nunat tamalaat akornanni suleqatigiinneq

Kalaallit Nunaat, Imartat misissuiffigineqartarnerat pillugu Nunat Tamalaat Siunnersuisoqatigiiffianni (ICES/NAFO) aataat natsersuillu pillugit suleqatigiissitamut kiisalu Atlantikup Avannaani Miluumasut Imarmiut pillugit Ataatsimiititaliamut (NAMMCO), puisit misissuiffigineqartarnerannut malinnaavigineqarnerannullu suligasuartartoqatigiinnut suleqataavoq. NAMMCO-p iluani Puisit pillugit Aqutsinermut Ataatsimiititaliaqarpoq 2006-imi pilersitaasumik Kalaallillu Nunaanniit siulittaasuuffigineqartumik.

10. Puisit amiinik puisinillu pissarsianik nunat tamalaat nioqquteqaqqusiunnaarnerat

USA-mi Miluumasut Imarmiut Illersorneqarnissaannik Inatsit 1972-imi oktoberip ulluisa 21-ianni atuutilerpoq. Europamiut Siunnersuisoqatigiiffiata/EU-p peqqussutaa 83/129 1983-imi marsip 28-ianneersoq puiseeqqat amiinik taakkunanngalu nioqqutissianik nunanut ilaasortaasunut eqqussuinnermut tunngasoq. Europa-Parlamentip malittarisassiaa (EU) nr. 1007/2009-imeersoq kiisalu Europamiut Siunnersuisoqatigiiffiata malittarisassiaa 2009-imi septemberip ulluisa 16-iaanneersoq puisinit tunisassianik nioqquteqarnermut tunngasoq, Inuit tunisassiaasa eqqugaannginnissaannut tunngasortalik. EU Kommissionip malittarisassiaa nr. 737/2010 2010-mi augustip ulluisa qulinganneersoq malittarisassap nr. 1007/2009-imi qanoq atortinneqarnissaanik sukumiisunik najoqqutassiorfiusoq.

2. Introduction

In June 2009 Kalaallit Nunaat / Greenland obtained status of Self-Government with a population still dependent on subsistence hunting. It has a population of 56,600 people living in 18 towns and 60 settlements. The area in Greenland is 2,166,086 square kilometres, covering an area from Norway to Sahara and with a coastline of 44,087 kilometres. Inuit is about 90 % of the total population, and has maintained a lifestyle connected to the sea and the harsh nature and environment. Greenland faces a paradox created by its traditional image in the world and its need for economic sustainability and development.

The hunting of seals is a vital component of everyday life and culture in Greenland. It provides a significant amount of nutritious food and income to families living in remote coastal communities. Harp, ringed and hooded seals are the three most important species; they are hunted in every settlement through the year as a one man activity from small boats or by the use of sledge dogs. The skin is used as a part of the national suit and for hunting equipment. The fur is also used as a beautiful part of modern clothing and design.

Therefore, sealing and Greenland are inseparable. Until a couple of decades ago, sealing was the principal occupation in the winter-ice areas. There are still parts of Greenland where sealing is the most important component of peoples livelihood, combined with other forms of hunting. Seal hunting acts also as a supplement to fishing activities and is an economic buffer for families when no other income sources are available. It is documented that seal meat and other seal products such as organs and blubber are a vital source of proteins and omega-3 fatty acids. So what may not be so obvious for everyone is that consuming seal meat has huge advantages for the protection of the environment and for the health of Kalaallit / Inuit in Greenland.

Archaeological investigations and discoveries have shown that the Greenlandic culture always has been based on the harvest of ringed and harp seals in addition to three other seal species. The introduction of fisheries in certain winter-ice areas has not weakened the importance of seal hunting in any significant way, particularly not in remote coastal communities. Yet, for many hunters the main source of income has shifted from sealskin to Greenland halibut for instance, but the importance of the seal as the dominating daily dish remains unchallenged. Seal meat is also indispensable as food for sledge dogs, which power the sledges from which ice-fishing takes place.

Through a traditional way of life for many generations the Inuit have developed an in-depth knowledge of the ecosystems in which they live. As hunters, they become part of the same ecosystems as their prey and accurate observations and interpretations about wildlife behaviour, weather patterns and other environmental factors are essential for survival. Aside from hunting, Inuit have traditionally spent hours observing and discussing the animals, the sea and the land. Lessons were learned and the knowledge base became fine-tuned through direct experience of a subsistence lifestyle. The respect for wild animals educated Inuit on how to use and preserve the wildlife resources for future generations.

Among the problems the Inuit face are the lack of understanding of the Arctic way of life, resulting in the seal ban with the Inuit exemption in the EU and the on-going climate changes in the Arctic regions. Weather and ice conditions are changing and attempts are made at both local and national level to adapt to what seems to be severe and lasting changes in the Arctic environment. Hunters are forced to change practice and invest in new equipment. The traditional use of dog sledge is in many areas no longer possible for several months of the year as the ice conditions have changed profoundly. The behaviour of the ice is completely unpredictable compared to a few years ago.

The Inuit of Kalaallit Nunaat would deeply appreciate your understanding and your support to protect our way of life and culture. Qujanaq



Box 1: Hunting seals – a daily activity

Income earned from wage occupations in the areas of services, administration, construction and mining, supplements the native domestic economy. However, most Inuit consider themselves to be hunters on either a full-time or part-time basis, balancing casual or seasonal wage employment with hunting. To those Inuit employed full-time as wage earners, weekend and part-time hunting remains an important means of supplementing their food supplies with preferred kinds of meats. Hunting is valued for its contributions to independence, self-esteem and respect from others, traditions, and a healthy lifestyle.

3. Seals in Greenlandic waters

Six different species of seals are found in the waters surrounding Greenland. These are Harp Seal (*Phoca groenlandica*), Ringed Seal (*Phoca hispida*), Hooded Seal (*Cystohora cristata*), Harbour Seal (*Phoca vitulina*), Bearded Seal (*Erignathus barbatus*) and Grey Seal (*Halichoerus grypus*). The five first species have been hunted for centuries, and today, especially the catch of harp seal, ringed seal and hooded seal are of great importance to the Inuit hunters and their families. However, harp seals and ringed seals are without doubt the two most important species in relation to income and food supply. These two species comprise about 98 % of the total catch in 2009.

The presence of grey seal in Greenland was documented for the first time in August 2009 near Cape Farewell at the south tip of Greenland. The current status of this species remains unknown.



Figure 1. Daily scene of newly caught seals and other animals being made ready for sale at the local open air market “Kalaaliaraq” in Nuuk.

Harp seals give birth to their offspring in late February –early April on dense pack ice concentrations in three regions: in the White Sea in Northern Russia, in the Greenland Sea around Jan Mayen and by Newfoundland. After their annual moult, which occurs in about the same areas as where the young are born, harp seals disperse out over the northern Atlantic Ocean. Harp seals from the whelping



their heads up for breathing and spying “amisut”.

grounds off Newfoundland arrive in Southwest Greenland in large numbers in May-June and later during the summer and autumn disperse along the coasts northward. In late autumn, harp seals leave the northern regions and most go back to the breeding sites, some, however, primarily young animals, winter in the waters of the Arctic.

Figure 2. A group of harp seals with

Ringed seals are widely distributed in Greenland waters and do not occur in dense concentrations, but are dispersed over large areas. They are hunted year round by various methods, none of which appear to exercise a significant pressure on the population. Ringed seals depend on ice-cover to make lairs for hauling-out and pupping. They are able to maintain open holes in fast ice up to 2.6 m thick. Especially in Northwest and East Greenland, ringed seals are very abundant due to their preferred habitat in areas with dense ice conditions. This also makes them a preferred prey to polar bears.



Figure 3. A ringed seal on an ice floe.

Hooded seals give birth to their offspring at the end of March on pack-ice concentrations in three regions: in the Greenland Sea around Jan Mayen, in the middle of the Davis Strait and by Newfoundland. Hooded seals from the latter two breeding sites migrate to West Greenland and Southeast Greenland and the Denmark Strait. In mid-summer, from the middle of June to the end of July, hooded seals gather on pack ice to complete their annual moult. There are two known moulting areas: one north of Jan Mayen and one in the Denmark Strait. Hooded seals from Jan Mayen usually remain east of Greenland and existing data suggest that the hooded seals caught in Greenland almost exclusively originate from Newfoundland and the Davis Strait, and not from the Jan Mayen population.

Box 2: Abundant seal populations

Harp seal: Advice on sustainable use on harp seal is given by a working group under the International Council for the Exploration of the Sea (ICES/NAFO). The working group consists of scientist from Norway, Canada, Greenland and Russia. The stocks are surveyed by estimating pup production. The total number of seals in the stock is calculated by estimating the number of pups, and data on age-distribution in the stock, age of sexual maturity and the rate of adult females reproducing.

For the first many years the working group calculated quotas no higher than the stock would continue growing. The working group is now working on introducing new principles of advice, which also permits the different countries to manage the seals from an ecological or socioeconomic perspective.

For example depending on sealskin prices the quota can increase or decrease, as long as the stock is not reduced to less than 70 % of the maximal stock size. If the stock gets below 70 %, of the maximal size, a management plan should be initiated with the purpose of increasing the stock above 70 % again. If the stock gets below 50 %, further protection measures should be initiated, and if the stock gets below 30 % all hunting should be stopped. This type of management should only be used for stocks with reliable and plenty data.

ICES/NAFO working group on harp and hooded seals estimated the population in the Northwest Atlantic to be approximately 9.1 million seals in 2010. This is likely higher than before the commercial hunt began. The stock is viewed as possibly being unnatural high, which can be because other components in the ecosystem (for ex. cod and some of the large whales) are relatively smaller compared to what they have been. The Canadian quota was 280,000 in 2009. Following a new assessment the total allowable catch (TAC) for Canada was increased to 330,000 in 2010 and 400,000 in 2011. Canadian catches have steadily declined since 2006 when 354,867 catches of harp seal was reported. In 2009, Greenland caught about 73,000 harp seals while Canada caught about 77,000 harp seals. A combination of low prices, poor ice conditions, reduced effort and alternate fisheries resulted in a Canadian catch of only 38,000 in 2011, less than 10 % of the TAC

Box 2: continued...

Ringed seal: The total number of ringed seals is still unknown, but is estimated to 6-7 million. Among them, approx. 1 million are of the subspecies *Pusa hispida ochotensis*, while the other three southern subspecies together only constitute in the region of 10,000 individuals. The estimated density of Arctic ringed seals is about 5 million.

Hooded seal: ICES/NAFO working group on harp and hooded seals estimates the current population in the Northwest Atlantic at 600,000 seals, which is an increase from 478,000 in 1965. In 2009, Greenland caught 1,986 hooded seals, while Canada caught 10 hooded seals. The population is not considered endangered.

4. Historical exploitation of seals in Greenland

Since the arrival of the first Inuit, seals have provided the basic nutrition for Inuit families living in Greenland, especially during winter when other prey migrate south or to open water areas. In addition to food and nutrients for humans and dogs, seals have provided the Inuit communities with necessities such as clothes, fuel for lighting and heating, dog harnesses, lashes, floats for hunting, and covers for tents and kayaks.



Figure 4. A traditional made “qajaq”.

Inuit were traditionally nomadic, travelling in winter by dog team and in summer by foot, “umiaq” (family boats) and by kayak in search of caribou, seals, whales, fish, and walrus. As a general rule, families dispersed from their larger coastal winter campsites in the spring to hunt seals on the ice. During the ice-free months, they often moved inland to fish at lakes and to hunt caribou. At the beginning of winter, family groups would converge and return to the sea-ice to hunt seals again. This pattern varied from region to region, depending on the seasonal distribution of wildlife.

For the Inuit who have lived and travelled for centuries along the coasts of East and West Greenland, the ringed seal or “natseq” is of profound importance. Without constant supplies of ringed seal products, Inuit cultures would have had far greater difficulties inhabiting the Arctic. Ringed seals can be hunted year-round, even during the dark months, and they have therefore always been the most reliable source of daily necessities for the lives of Inuit in Greenland. Even the means of transportation to hunting grounds has been facilitated through the use of ringed seal products. Skins from ringed seals and bearded seals is used to cover the frames of kayaks, and was also formerly used to cover the “umiaq’s” that were used for transportation of whole families, while seal meat is still essential “fuel” for the dogs that pull the sleds.

Box 3: Annual cycle of hunting ringed seals

Several methods are used to catch ringed seals, depending on the season. During the open-water season in summer and autumn, most ringed seals are shot from boats. Netting in open water is most effective in October-November when the seals are unable to see the net due to decreasing light intensity and when the sea-ice has not yet formed. During winter, most ringed seals are caught in nets under the solid ice. Some ringed seals are also shot at their breathing holes, quickly followed by the use of a harpoon, which will ensure a swift kill. In spring when the seals haul out on the ice to bask, they are easy targets for experienced hunters who use white covering screens to sneak up on the seal to an appropriate shooting distance. When the ice breaks up, seals are shot along the ice edge or in cracks.

The harvesting of seals and other marine mammals is an integral part of the livelihoods and culture of Inuit communities. In Greenland, dog sleds are widely used for travelling to hunting and fishing grounds. Seals are used extensively for clothing for people who hunt or fish on the sea ice. Throughout the Arctic, seal meat is considered a delicacy and is a fundamental component of the human diet in hunting communities. Sealskins are traded and exported to international markets. Blubber lamps, skin covered tents and “umiaqs” are no longer used, except during cultural events, but skin covered kayaks, sealskin trousers, anoraks and kamiks are still important equipment for hunters and fishermen in Greenland and as part of the national suits thus part of the traditional heritage.



Figure 5. For cultural events and happenings the female national suit is often worn.

5. Biological advice on seals in Greenland

Obtaining biological knowledge on marine mammals in the Arctic environment is often a difficult, expensive and long-term process since the seals are distributed over vast areas. In addition, extreme weather conditions, remote location, and high expenses to cover logistics and transportation may limit the biological knowledge that can be obtained from a particular population. Thus, lack of data leads to recommendations that often create controversy between the scientific community and the hunters, since the hunters have accumulated traditional ecological knowledge for decades, and therefore often finds it difficult to understand and accept the term “data poor”. Still, many efforts are made to ensure a sustainable utilisation of the marine mammals, which is why Greenland is involved in several institutions and organisations delivering biological knowledge on the current status of our marine mammals. This engagement will be described later on.

Harp seal

Recent research indicates that the current population of harp seal in the West Atlantic might be at its highest level ever. This population, which is the target of the hunt in both Canada and Greenland, was estimated at 9,1 million animals in 2010 (ICES WGHARP report 2011). The most recent survey to detect all seal concentrations began in February 2011 with the analyses still on-going.

The Canadian authorities have adopted a multi-year management plan specifying that as long as the population observed constitutes at least 70 % of the maximum population size (70 % of 9.1 million harp seals), the sealing is considered to be biologically sustainable. The Canadian total allowable catch (TAC) for 2011 was 400,000 (ICES WGHARP report 2011), and the catches were 38,018 animals. When the Canadian authorities recommend the annual catch quotas, the catches in Greenland and Nunavut (territory Canada) are also included, since both countries harvest from the same populations.

Ringed seal

In 1996 a working group established by The North Atlantic Marine Mammal Commission's (NAMMCO) Scientific Committee concluded that Greenland's current take of ringed seal was sustainable. Three substantial arguments for this conclusion were that the current hunting pressure has been maintained for a number of years without visible signs of a decline in the population, that Greenland's take is particularly made up of males and very young individuals and that the ringed seal's very wide and even distribution across most of the Arctic limits large-scale overexploitation. Even though ringed seals are widely dispersed and apparently capable of surviving under very severe ice conditions, they are considered vulnerable to sudden changes in ice coverage.

Hooded seal

Thorough studies on hooded seal numbers in the West Atlantic was carried out in the early 1980s. Back then the population was estimated to be around 600.000 seals. The commercial catches were much larger back then, but in 1987 Canada changed its seal management policy to prohibit the commercial hunting of whitecoats (the name of the pelage of harp seal pups the first 2 weeks of their life) and bluebacks (the name of the pelage of hooded seal pups the first 1½ year of their life) from large (>65 ft) vessels (this became effective in 1988). This had a major impact on the Canadian seal hunt and catches on both species dropped significantly. In the last part of the 1990s, however, commercial sealing of harp seals by large vessels was reinitiated, because sealers discovered that harp seal pups stay where they are born in a couple of weeks after they have shed their long white lanugo hair and changed from being white coats to become beaters. Hooded seal pups, however, lose their lanugo hair as foetuses and they are bluebacks for the first 1½ year of their life.

In Canada the TAC on hooded seals older than bluebacks has been at 8,200 seals since 2008. It is, however, mainly the blue back skin that is of interest for the sealers and in recent years less than hundred hooded seals have been caught annually in Canada. No hooded seals were reported taken in 2010 and according to the preliminary estimates for 2011 only one hooded seal was taken. Similarly, the number of hooded seal caught in Greenland has decreased by over 70% since 1993 and the 2009 catch was the lowest catch since 1962 (ICES WGHARP report 2011). The average catch in Greenland

was 5,900 hooded seals per year during 1993-2009, but only 1.624 were taken in 2009 (ICES WGHARP report 2011).

The lack of interest from commercial sealers has also put a stop to the very expensive surveys on hooded seals numbers. The low catch at present is known to be very small compared to the population size. If commercial sealing on hooded seals ever starts up again the management will follow the new precautionary approach, which also is in use for harp seals. The harp seal population, however, is categorized as a "data rich" population because the population has been monitored closely for several decades. The West Atlantic hooded seals on the other hand will be categorized as a "data poor" population until an extensive research has been carried out and until then quotas will be set after a much more conservative and risk-adverse approach.

6. Hunting methods in Greenland waters

Different hunting methods are used according to season, location and ice conditions.

Open water hunting

Hunters in small boats shoot seals found in open water. Mostly the hunting of harp seal for instance is a one man activity. When the hunter reaches an area where he expects to find seals, he stops the engine of his boat or slows down the speed while systematically searching the area. Too high speed involves noise from the engine and will make the hunt more complicated, since it will scare away the seals and make any judgement of their movements difficult. Experience, good eyesight and excellent hunting skills are therefore required to spot a seal and shoot it from a small boat.

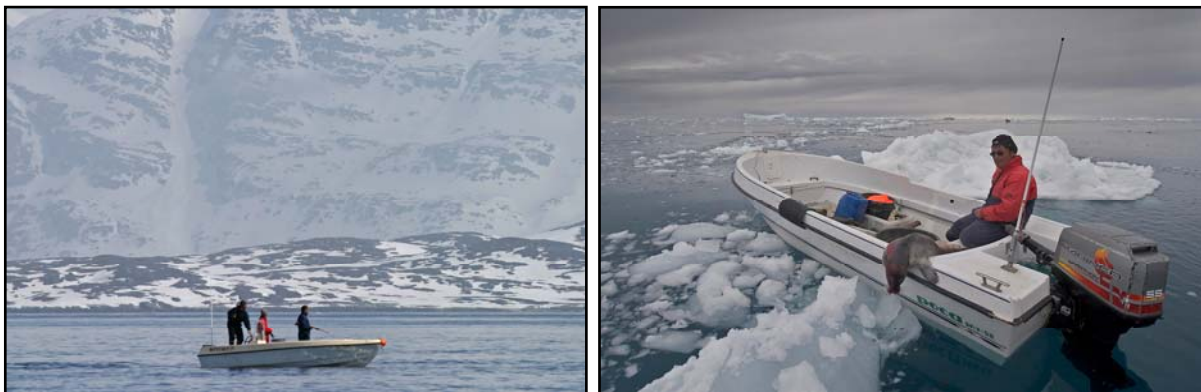


Figure 6 + 7. Open water seal hunt from a small boat with a successful hunt.

Thus, hunting of harp seals occurs exclusively from small boats with riffles. After having shot the seal, the hunter will, as fast as possible try to reach the seal before, it sinks. However, there are without doubt seals that sink before they can be hauled up. This is especially true in the pre-summer period in the months of May and June when harp seals are very lean. Consequently, during the first few weeks of the open water hunt, the loss due to sinking is slightly higher than during the remainder of the open

water season. Hunters report that this is due to the physical condition of the seals and the lower salinity of the water due to melting ice and snow.

Box 4: The struck and lost issue

Hunting of harp seals occurs exclusively from small boats with riffles. The shooting of seals at substantial distances is the cause of most hunting losses. A proportion of seals will sink before they can be hauled up. This is especially true in the pre-summer period when harp seals are very lean. Harp seal moulting begin in early April each year, starting from adult males, to immature and followed finally by adult females. During moulting animals refrain from eating and lose more than 20 % of their body weight mainly in the form of fat. The loss rate due to sinking varies primarily according to seasonal changes in the specific gravity of seals (i.e. their fat content) and the salinity of the surface water. In May and June, struck and lost rates for harp seals may be as high as one third depending on hunting experience, but when the major harvest takes place in the autumn, the amount of harp seals lost is heavily reduced due to an increase in blubber thickness. Locality is also a factor, since seals shot close to river deltas are more likely to sink because of the relative freshness of the water there. Ringed seals are fattest and the water most saline in the winter, which means that the animals are much more prone to float at that season than they are during spring and summer.

Hunting seals with nets

From October to the end of March, netting is the prevailing method since it is impossible to use any other technique during the dark winter months. The use of nets for catching ringed seals seems to have been introduced in Greenland by Europeans a few hundred years ago. Especially in the northern parts of Greenland, where most ringed seals are caught, netting constitutes an important method to catch ringed seal during winter due to the dark periods and ice conditions. In North Greenland using nets under the ice constitutes about one third of the total harvest of ringed seals in the area, and two thirds off all net catches takes place in this area, table 1. Using rifles is not an alternative since it is completely impossible to see the seals in the dark. However, hunting with nets becomes less effective relative to the increase in light during the spring. The success of netting under the ice also depends on the duration and stability of the firm ice cover, the amount of snow, and the frequency of strong wind, all of which influence the possibilities for setting and tending the nets.



Figure 8 + 9. The hunt of ring seals using seal nets is a specialised way of hunting and requires much skill with its use of the “tooq” and in finding the right location for the net.

“Uuttoq” hunting (sneaking)

In spring, when ringed seals come up through the breathing holes to haul out on the ice to bask, they are easy targets for experienced hunters who use screens to sneak up on an appropriate shooting distance. Hidden behind the canvas, the hunter crawls towards the seal. When he is at close range, he shoots the seal through its head. If the shot misses the head, the seal may manage to disappear down through the breathing hole and it will be lost to the hunter. The method can only be used in the period when there still is a stable ice layer.

Hunting from the ice edge

Another type of hunting in which riffles are used takes place from the edge of the ice in springtime. In this type of hunting the main target are ringed seals. Seals may also be caught through small cracks in the ice, at the edge of the permanent ice or from a drifting ice floe. The hunter will then bring along a kayak or a small boat on his dog sledge.



Figure 10. Seal hunt from the ice edge.

Table 1. The table shows in percentage the distribution of the hunt of ringed seals by use of nets or riffle within the specific region, between the regions and in total for Greenland per region for the years 1993-2009.

Regions	Distribution of catches with nets / riffle within the region	Distribution of catches with nets / riffle between the regions	Distribution of total catches between the regions
North Greenland	37 % / 63 %	69 % / 50 %	56 %
Disko Bay	23 % / 77 %	13 % / 19 %	17 %
West Greenland	22 % / 78 %	6 % / 9 %	8 %
South Greenland	10 % / 90 %	2 % / 6 %	5 %
East Greenland	22 % / 78 %	11 % / 17 %	15 %

Source: APNN Piniarneq database

7. Current catch levels

Being a full time hunter in Greenland is an occupation and lifestyle, which is characterized by great variability, insecurity and unpredictable conditions regarding weather and ice. Perfect weather and ice conditions at the right time of the year can result in high harvest levels regarding harp and ringed seals. On the other hand, stormy weather during autumn may have devastating consequences for households depending on the harvest of harp seals. If the weather does not allow any hunting activities to take place, only few alternative income sources are available in small settlements located in remote coastal areas. In addition, being a hunter is physically hard labour and considered a dangerous occupation in relation to security. Finally, the money earned is not always enough to provide for the wellbeing of a family, which is why many adult hunters advice their sons not to rely on hunting. Still, the number of paid full time hunter’s licenses has been stable on app. 2,100 over the last five years, while the number of paid leisure time hunter’s licenses has stabilized around 5,500.

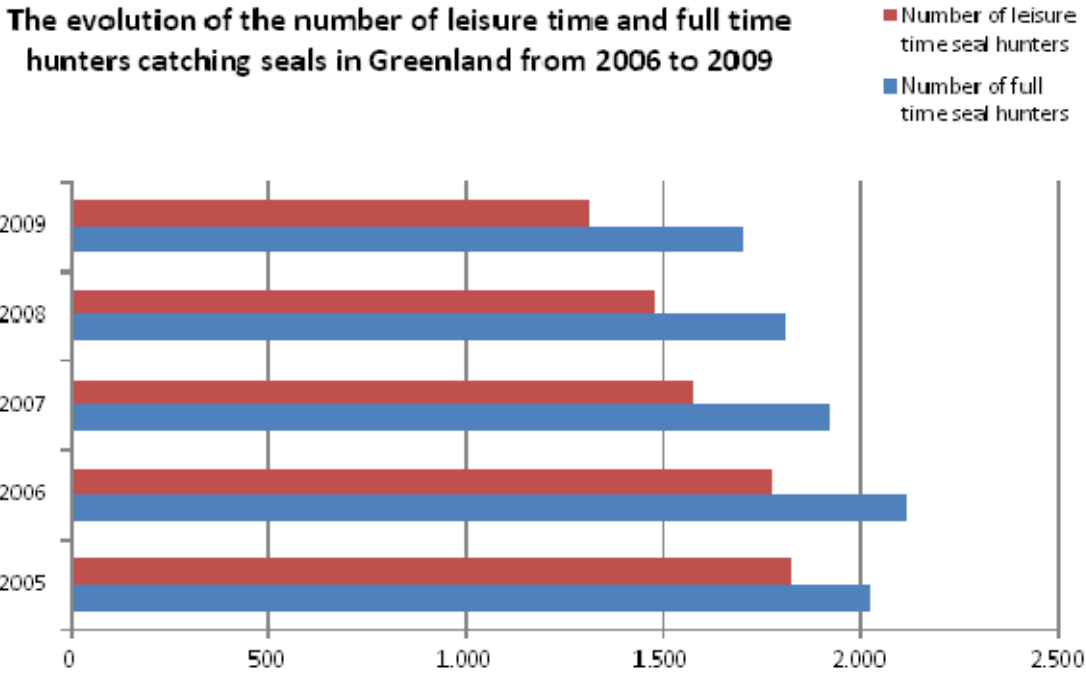


Figure 11. The evolution of the number of hunters catching seals from 2006 to 2009.

Source: APNN Piniarneq database

The number of both full time and leisure time hunters hunting seals show a gradually decrease of 25 % in the years 2006-2009, figure 11. In Greenland we do not use the distinction “full time seal-hunter” and “part time seal-hunter” because most hunters rely on both fishing and hunting of different animal species. Since 2009 a hunter has to have a license as a full time hunter in order to qualify for selling the skins to the tannery Great Greenland A/S. A large number of the hunters use the possibility to sell skins to the tannery in total a couple of months a year. It is for many hunters a very important secondary income. Approximate 100 hunters make more than € 10,000 yearly on sealskins.

From table 2 below, it is obvious that harp and ringed seals are the most important seals to the hunters in Greenland. These two species account for about 98 % of the total harvest in 2009. Where the catch of ringed seals seems to be quite stable over the years, the amount of harps seals caught is much more fluctuating. Previously, ringed seal was the most important species in relation to food supply and income, without any doubt. However, the demand from the fur industry has now made it more attractive to hunt harp seals since Greenlandic hunters in some years were offered a slightly better price for sealskins from harp seals compared to sealskins from ringed seals, as prizes are fixed while the skins are subsidized by the Government of Greenland. The increasing numbers of harp seals have also played an important role in the choice of hunting method.

Table 2. The annual catches of seals in Greenland from 1993-2009.

Year	Ringed seal	Harp seal	Hooded seal	Bearded seal	Total
1993	77.154	56.886	6.982	1.808	142.830
1994	72.824	57.893	8.142	1.974	140.833
1995	79.160	63.263	7.179	2.020	151.622
1996	89.939	74.676	9.891	2.132	176.638
1997	80.207	69.591	7.492	2.339	159.629
1998	78.748	82.217	6.335	2.349	169.649
1999	83.345	95.017	7.455	2.334	188.151
2000	80.302	99.801	5.844	2.694	188.641
2001	78.437	86.763	6.514	2.350	174.064
2002	82.504	67.725	4.806	1.965	157.000
2003	80.646	67.607	6.353	1.716	156.322
2004	77.429	72.245	5.853	1.366	156.893
2005	92.063	93.494	4.156	1.454	191.167
2006	86.274	95.954	4.842	1.792	188.862
2007	71.269	84.275	3.294	1.568	160.406
2008	70.536	82.187	2.606	1.437	156.766
2009	65.676	73.431	1.986	1.258	142.351
Total	1.346.513	1.323.025	99.730	32.556	2.801.823

Source: APNN Piniarneq database

The annual harvest of both seal species varies from year to year, especially due to severe fluctuations in ice and weather conditions, but changes in distribution or localized abundance may also have an effect. As opposed to ringed seals, which primarily are caught in Northwest and East Greenland, the majority of harp seals are caught along the entire west coast of Greenland.

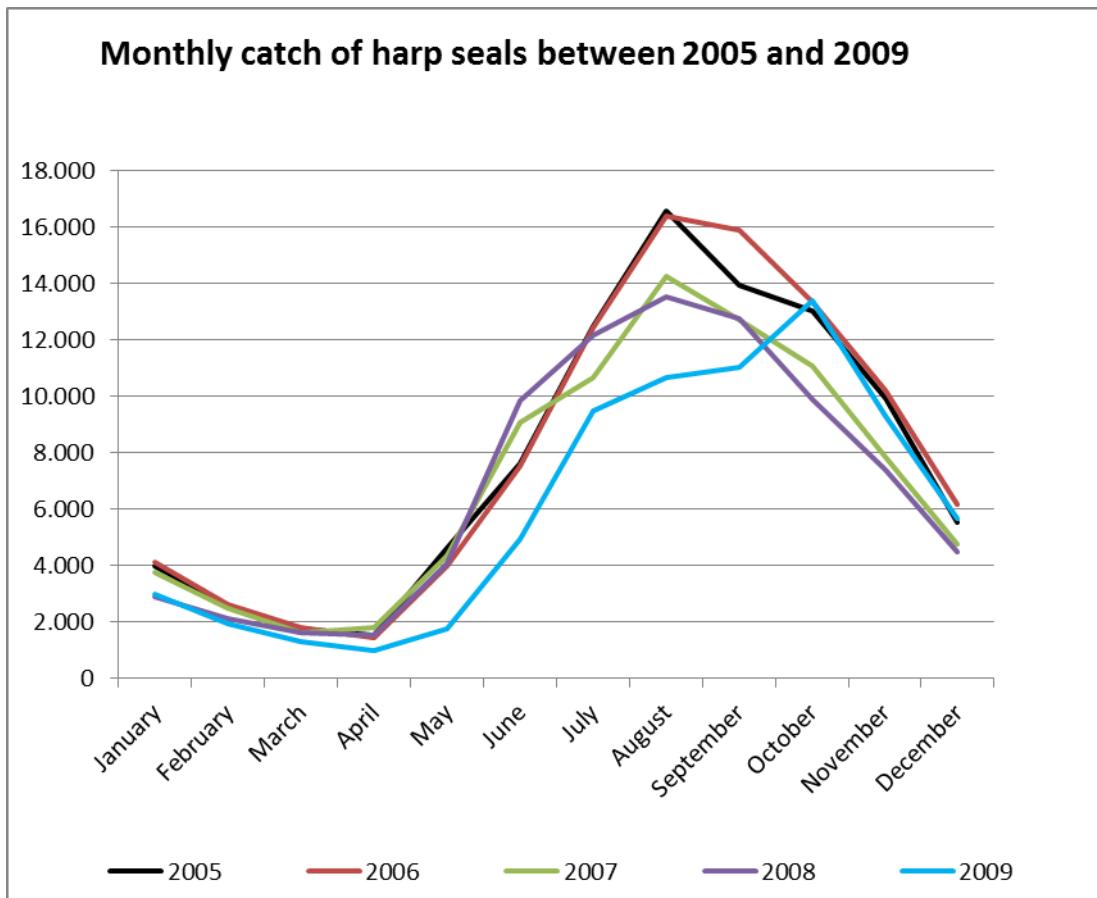


Figure 12. The major harvest of harp seals occurs in the months from July to November – a busy time for the sealers on the west coast of Greenland. Source: APNN Piniarnek database.

The major harvest of harp seals occurs in July to November, where they have dispersed along the entire west coast of Greenland and to the southeast as well, figure 12. During the months of September to November, harp seals have gained a thick layer of blubber why the struck and lost at this time of the year is much lower than during spring and early summer.

Regarding ringed seals, for all regions in Greenland, great inter-annual variability is also found, but not to same extent as the harp seal. The inter-annual variation in the catch of ringed seals is also related to the actual weather and ice conditions. For instance, the weather and ice conditions in late April-June will determine the chances of hunting seals basking on the ice or seals occurring at the ice edge. Figure 13 shows how the catch of ringed seal varies during the different seasons.

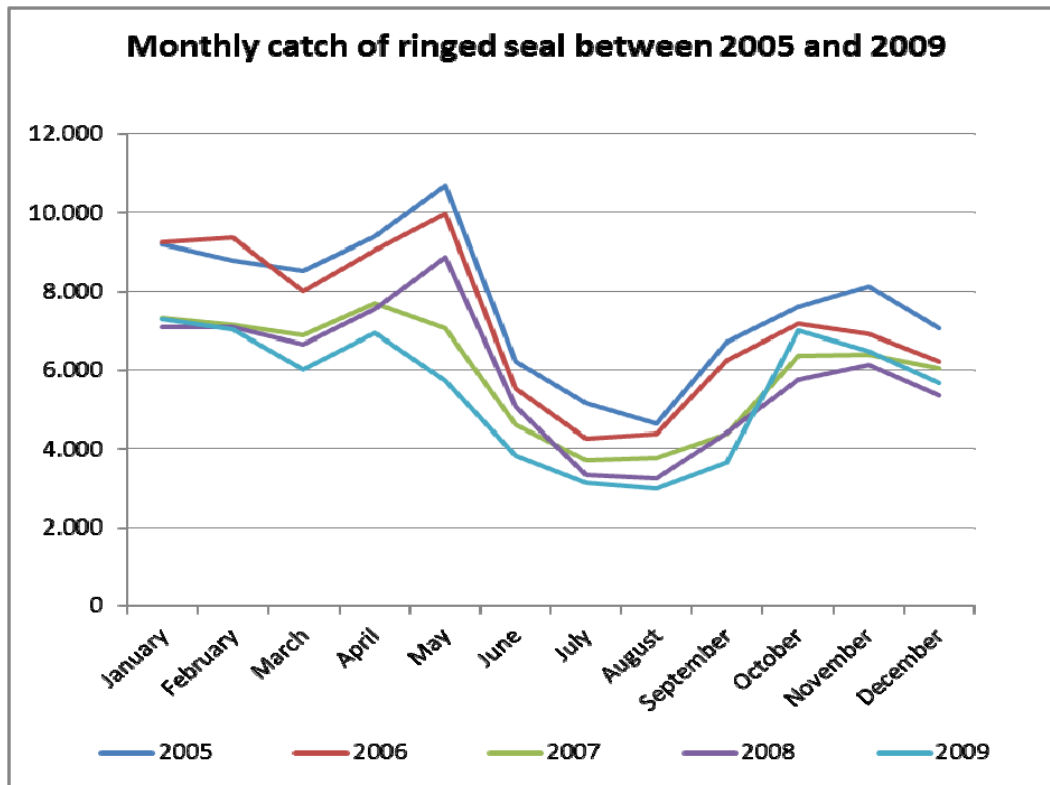


Figure 13. As opposed to the hunt of harp seals, the hunting of ringed seals is spread more equally throughout the year – providing a steady supply of meat. Source: APNN Piniarneq database.

The peak season for the catch of ringed seal varies between regions. For Greenland as a whole, most ringed seals are taken from November to May, which reflects the peak season in the northern regions (where the major part of the catch is taken), while catches are relatively small during the open water season. In the southernmost region, however, the majority of ringed seals are caught between May and August, when ringed seals come to the area with drift ice from the east coast.

In the period from 1993 - 2009, Greenlandic hunters caught in average about 5,900 hooded seals per year of which about 99% originate from the Northwest Atlantic populations in The Gulf of St. Lawrence, The Front of Newfoundland and the Davis Strait. The remaining percentage of hooded seals caught by Greenlandic hunters is considered to originate from the Greenland Sea population. These seals are caught by hunters in the remote settlement of Ittoqqortoormiit on the Northeast coast of Greenland.

Looking at the catch of all seals in the period from 1993 to 2009, catches by leisure time hunters account for 13-23 % of the annual catch, figure 14. Hunting of seals continues to be an important part of everyday life and culture in Greenland. Even though people could afford to buy seal meat at the local open air market “Kalaalaraq”, for some it is almost considered an obligation to be self-sufficient with seal meat. Taking expenses to gas, ammunition and time spend on the hunt into consideration, it may be cheaper to buy the meat at local market, but some people prefer hunting the seals on their own and prepare it as they like.

Catches of seals by full time and leisure time hunters between 1993 and 2009

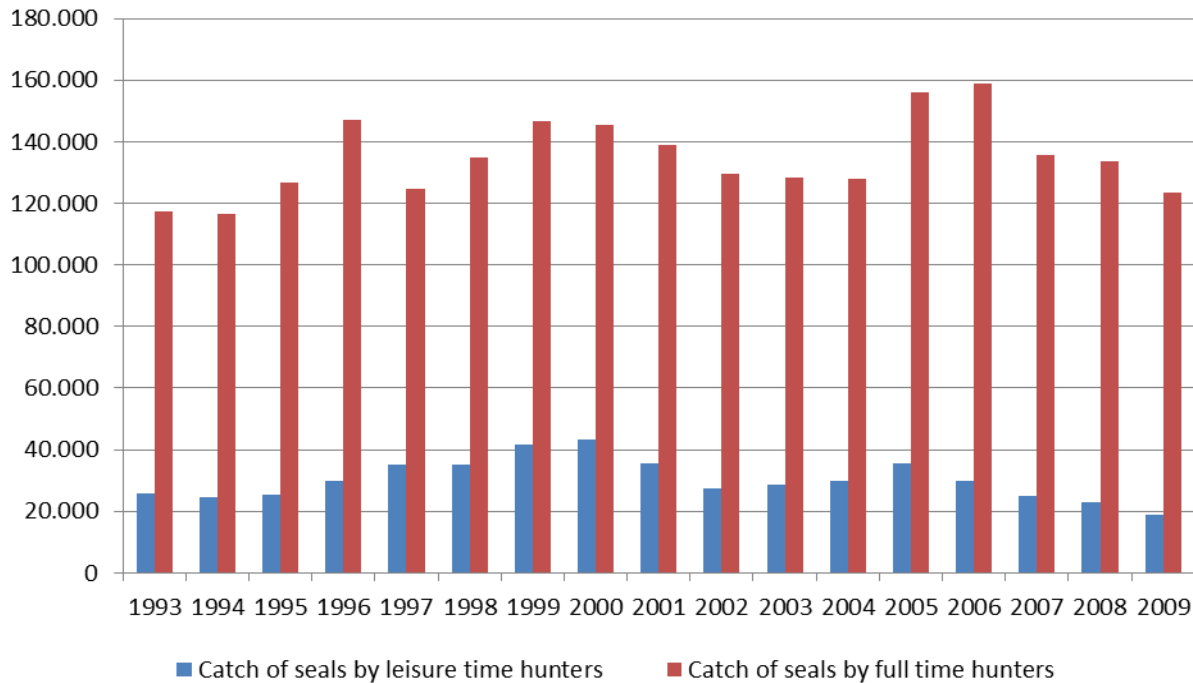


Figure 14. In most years, leisure time hunters account for about 1/5 of the harvest of ringed seals in Greenland, which underpins the cultural and socio-economic importance of hunting seals.

Source: APNN Piniarneq database.

8. The commercial trade of sealskins in Greenland

The harvesting economy has changed a great deal over the past century. Perhaps the most significant change has been the introduction of cash as a necessary resource for the operation of the system. Harvesting is now a mixed economy, with subsistence and monetary elements coexisting. Today, hunting seals is not economically viable without a subsidy. However, harvesting provides the basic food supply for most communities. If harvesting were to decline as the major source of food, traditional food would have to be replaced by expensive imported food; this could actually result in higher levels of subsidies to support the nutritional needs of the people. In addition, we do not know the consequences if local people were to eat more western food, as there is not sufficient studies on this relevant issue.

The skins from just over half of all caught seals are sold by the hunters to the tannery of Great Greenland A/S (a share-holder company), located in Qaqortoq in South Greenland. The Government of Greenland is the owner of the tannery and it is today a modern facility using state of the art technology in the processing of sealskins. For decades, local knowledge on tanning sealskins have been accumulated at the tannery and it is currently one of the world’s leading in producing high

quality furs and leather from sealskins. Hides from caribou, sheep and arctic winter fox are also processed at the tannery, but only to a minor extent.

In 2011, 37 people were employed at the tannery - making it one of the largest companies in South Greenland. Due to the economically restrains the company has reduced its employees from 50 in 2008. In addition, the tannery operates 46 trading stations all over the country, making it possible for hunters in small communities to sell their sealskins. Having 46 trading stations spread all over the country is only possible through the government subsidies paid to the Inuit hunters, which is administrated by the tannery. In the 1990-ies the company operated about 70 trading stations. Since the anti-sealskins campaigns in 1980's, it has been necessary to subsidy the hunters in Greenland since world market prices collapsed as a result of the campaigns.

During the end of the 1990s world market prices became more favourable and the tannery was able to offer better prices to the hunters. As a result of the positive development, the Government of Greenland intended to reduce the subsidies. Yet, the result of the written declaration 0038/2006 together with regulations no 1007/2009 and no 737/2010 on banning of import and export of sealskins in the EU quickly showed it-self.



Figure 15. Sealskins being stretched before tanning.

Since 2008, the Government of Greenland had to give an annual capital grant of 8 mill. DKKR (1.06 EURO) to Great Greenland A/S due to the crisis in the sealskin industry. It is also expected that the Government will be forced to increase future subsidies again in order to ensure reasonable prices and living conditions for families living in remote coastal communities and to avoid closure of a company that employs about 37 persons.



Figure 16. An employee at the tannery working on the sealskins.

An initiative in 2007 lead by 70 local hunters opening up a local tannery in North Greenland focusing on the use of the whole seal were closed in 2009 due to very big economical problems, even with governmental subsidies to hunters delivering sealskins.

In 2008, with a service contract on 25,6 mill. DKKR between the Government of Greenland and Great Greenland A/S 20,5 mill. DKKR were paid directly to the commercial hunters in subsidies – corresponding to about 7,500 DKKR / 1,000 EURO to each and every commercial hunter in Greenland. This may sound like an insignificant amount, but it makes it possible for the hunters with this money to invest in new equipment, tools, ammunition, maintenance and so on. The subsidy in 2012 is 25,7 mill. DKKR with 16 mill. DKKR to the hunters. The ratio of the service contract amount to the tannery has increased since 2009 due to the more and more severe economic situation of the tannery. Since 2009 Great Greenland A/S has not been able to pay for the skins them self, so any trading is solely based on the subsidy from the Government via the service contract.

As mentioned earlier, extreme weather fluctuations may prevent the Inuit from hunting in long periods, and as a consequence of the poor weather conditions in for example the period from 2002 to 2004, the catch decreased and so did the commercial trade of sealskins in Greenland, which was much lower than usual. Due to the low supply from local hunters, the tannery of Great Greenland A/S found it necessary to import raw sealskins from Canada to make best possible use of the capacity at the tannery, and thus also able to continue to offer local Inuit hunters reasonable prices for their sealskins and avoiding laying off local workforce. After the catch returned to the same level it has not been necessary to import further from Canada. This development is summarised in table 3 below.

Table 3. Probably due to bad weather conditions and changes in ice conditions, the number of harp seals, ringed seals and hooded seals caught in Greenland decreased from 2001 to 2004. However, in 2005 and 2006 the catch reached almost the same level as in 2000 due to favourable catch conditions. Since 2007, a slight decrease of the catch is again observed, probably due to changes in trading conditions with the tannery.

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Number of seals caught	188,765	174,144	157,187	157,046	157,697	191,605	188,939	160,493	156,874	142,384
Number of sealskins traded	102,646	80,481	61,848	75,309	83,754	115,742	109,201	85,468	81,580	77,143
Percentage of sealskins sold to the tannery	54 %	46 %	39 %	48 %	53 %	60 %	58 %	53 %	52 %	54 %
Number of sealskins imported	0	0	1,500	51,935	44,100	45,000	0	0	0	0

Source: Great Greenland A/S

From table 3 it is clear that on average 87,000 skins or 47 % of the annual total harvest is not sold to the tannery, but used for private purposes or disposed of. This indicates that the seal hunt in Greenland is both subsistence oriented and a commercial activity. Seals are hunted primarily for their meat and skin, but the production of handicrafts, clothes and traditional artefacts are important by-products of

the hunt. In addition, a 2006 questionnaire survey carried out by the Ministry of Fisheries, Hunting and Agriculture shows that 34 % of the hunters report struck and lost as an ordinary catch when reporting their annual harvest, which also can explain the difference between the seal catch and the number of sealskins traded. The preliminary results of this questionnaire survey was presented at a NAMMCO-workshop in November 2006 in Copenhagen focusing on struck and lost in relation to marine mammals. A NAMMCO-workshop on the issue of best practices in hunting and killing of seals with invited experts were held in February 2009.

Local knowledge accumulated for generations on tanning sealskins, has been used in the processing of both Greenlandic and Canadian sealskins. In this way, Greenland’s Inuit hunters profit from the commercial Canadian seal hunt since the tannery has been able to continue its maximum production capacity and thus also able to offer hunters reasonable prices when buying their skins at the trading stations. The commercial skin trade in Greenland reached almost 116,000 sealskins in 2005, but has decreased in 2009 to 77,000 skins and an estimated 61,000 skins in 2012.

Over the last few years, Greenland has been able to improve the quality of skins through education of hunters, traders and a modernization of the tannery, while at the same time working on a reduction in the government subsidies from app. 30 mill. DKKR in the beginning of 2000 to app. 25 mill. ten years later.

Great Greenland A/S depending on Inuit delivered sealskins sold less than 600 skins (554) at the international auction house in Kopenhagen Fur in 2008 and just under 8,300 skins in the 3 year period to2011 (8291, average 2764 skins). If not subsidised by the Greenland Government, the hunter families in Greenland will once again be the first victims by the trade ban. The EU ban even with the Inuit exemption is ruining an important economy for Greenland – one based on the sustainable use of an abundant renewable resource, table 4.

Table 4. The data illustrates how the trade of sealskins in EU is experiencing a huge reduction, indicating that the proposed ban is already having an effect on the market.

Year	EU	Outside EU	Number of sealskins sold	Value in 1.000 DKKR
2004	71 %	29 %	115.723	45.477
2005	69 %	31 %	108.372	54.399
2006	66 %	34 %	91.026 s	59.681
2007	43 %	57 %	45.043	20.889
2008	16 %	84 %	31.307	11.132
2009	22 %	78 %	19.602	5.201
2010	26 %	74 %	23.167	5.760
2011	36 %	64 %	Not available	Not available

Source: Great Greenland A/S

9. Regulations on seals in Greenland

The Greenland Government manages hunting by species, by regions and by a dual permit system, regulated by two ministerial orders allowing for both full time and leisure time hunting. Tourists can acquire a short-term permit for trophy hunting or fishing.

Permits for full time hunters are based on a number of criteria. The applicant must be a permanent resident of Greenland, having lived here for a minimum of two years over the last decade, and must establish that hunting is a primary source of income. At least 50 % of the applicant's income must be based on hunting and small-scale fishing. The licences are issued by the Ministry of Fisheries, Hunting and Agriculture. Permits for leisure time hunting are also issued by the ministry, but only two criteria apply; the applicant must be a resident of Greenland and must be at least 12 years of age. No test or training is needed for any of the permits, but permits must be renewed each year.

In Greenland, the law on hunting from 1999 and the law on protection of nature and wildlife from 2003 constitute the overall frame regarding wildlife regulation. From December 1st 2010 a national executive order regarding the protection of seals and regulation of sealing came into force. Furthermore, hunting of seals is regulated in the wildlife sanctuary in Melville Bay and the national park in Northeast Greenland. In most municipalities, seal hunting is restricted by area, season or method through bylaws. For instance, in several fjords it is prohibited to use snowmobile and even motor boats in order to protect seals and traditional hunting methods. Yet, in most municipalities, seals can be hunted year round by all Greenlandic citizens, provided they have a hunting permit.

The Government of Greenland has from 1 December 2010 completely protected the harbour seal and grey seal until biological advice indicates that it is again safe to hunt any of these species. For the other seal species found in Greenlandic waters, there are no quotas set on them but permits are used to control the harvest. As a hunter, you are bound each year to submit your catch report to the Ministry of Fisheries, Hunting and Agriculture. This makes it possible to monitor and evaluate the catch levels of the four different species of seals, both at local and national levels.

A draft guideline on *Import and export of seal products in Greenland to The European Market* giving guidance to the exporters is ready for final approval by the Ministry.

10. International co-operation

With a culture and economy based on wildlife harvesting, Greenland's Inuit have the greatest stake in protecting arctic ecosystems. Hundreds of years ago, Inuit environmental and economic strategies were based on Inuit customary law and reflected the nomadic lifestyle that both linked and separated social groups. These regulations stipulated the use and management of many of the natural resources and preserved social and economic order among the Greenlandic Inuit. Today, strategies to sustain the resources upon which the Inuit depend for their survival and their livelihood require the participation of local, regional, national, and even international interests.

In the 1950's and 1960's, there were hardly any international organisations and formalised scientist groups in relation to management of seals. Today, the International Council for the Exploration of the Sea ICES/NAFO working group on harp and hooded seals and the North Atlantic Marine Mammal Commission (NAMMCO), which was established in 1992, have special biological and science task forces which study and monitor seal populations. Canada and Norway also have well-established seal scientists who collaborate with our biologists in Greenland.

In 1995, the Greenland Institute of Natural Resources was founded in Nuuk, the capital of Greenland, with the primary purpose to provide scientific background data regarding management and exploitation of living resources in Greenland. The institute is an independent research institute under the Government of Greenland.

Under the auspices of NAMMCO, a Seal Management Committee has been established 2006 and since chaired by Greenland. The task of the committee is to set out administrative recommendations and organise the seal research and monitoring coordinated in the NAMMCO countries. Canada has a permanent observer-status in NAMMCO and will participate in this work. In addition to the Seal Committee, NAMMCO already hosts a Committee on Hunting Methods with the primary purpose to provide advice on hunting methods for marine mammals relevant to NAMMCO member countries.

For the above-mentioned reasons there is no reason to worry that sealing will get out of control. On the contrary, there is a widespread collaboration on research, monitoring as well as experience and knowledge exchange. Animal welfare organisations substantiate their opposition against sealing and in particular sealing of young seals with reference to what happened in the 1950's and 1960's when the seal population is thought to have been reduced to 2/3 of the population in the North Atlantic. Lessons have been learned and this will not happen again.

11. Regulations on seals in the EU

Culture consists of unique characteristics, sometimes / often endemic to a certain locality, region or nationality. Culture can be hard to understand. For example, many outside the Arctic region have difficulty understanding and appreciating the great importance in Inuit culture of harvesting local wildlife, whether the harvesting is conducted for cultural reasons, subsistence purposes or to generate the cash income required in the modern economic system. Such a lack of understanding contributed to objections by protest groups regarding the killing of wild animals, especially the use of what were sometimes viewed as inhumane killing techniques.



Figure 17. Whole skinned seals stored for dog food.

During the 1970's and 1980's, harp seals and hooded seals were often on the front pages because of an intense debate concerning the commercial harvesting of seal pups at the Canadian whelping patches. Partly because of this debate and the following decreasing demand for sealskins, and partly because of management decisions leading to catch regulations, the commercial catches of these seals decreased dramatically.

The animal rights campaigns of the 1980's had devastating impacts on Inuit communities, which were earning significant amounts of their income from seal hunting at the time. The 1982-1983 sealskin ban by the European Economic Community (EEC) basically destroyed the sealskin market, and the value of sealskins dropped significantly. The anti-sealing campaigns unintentionally pushed away the Inuit from the resources that they had customarily depended on for their cultural independence. Even if it will not rectify the damages done, some environmental organizations have defended indigenous harvesting, and others have retracted their positions opposing. One of them is Greenpeace, which expressed an official apology to the Inuit communities for the damages Greenpeace have caused with the anti-sealskin campaigns. However, later campaigns and activities by Greenpeace have shown a continued lack of understanding of Arctic living conditions.

The Written Declaration 0038/2006

In September 2006, the Greenland authorities became aware of the fact that the European Parliament adopted the Written Declaration 0038/2006 - requesting the Commission to draft a regulation to ban the import, export and sale of all harp and hooded seal products. The same request are to be found in the European Parliaments comments on the Commission Communication on a Community Action Plan on the Protection and Welfare of Animals 2006-2010. Greenland expressed its concern on the Written Declaration - together with a comprehensive and detailed analysis of the issue - in a letter

sent to each member of the Parliament and stated the same concern to the Commissioners in the Commission responsible for different aspects of this file. Greenland was extremely worried about the fact that the written declaration was based on poor argumentation and somewhat inaccurate documentation. E.g. in the period from 2000 to 2004, the traditional hunt of harp seals in Greenland accounted for 21 % of the harp seals caught, and not merely 3 % as mentioned in the Written Declaration 0038/2006. Misinformation of this severe kind could have lead members of the European Parliament to vote in favour of the written declaration.

EU Commission proposal of 23 July 2008 to the EU Parliament

The EU Commission put forward a proposal to the EU Parliament and the Council banning the import, transit and export of sealskins from Europe of seal products. The proposal was the Commission's reply to the declaration from September 2006 from the Parliament on introduction of an import stop for seal products with the exemptions of Inuit hunt and derogation on humane killing.

The proposal was based on article 95 in the treaty on harmonisation of member states and article 133 on common trade policy, hence with the purpose of better harmony in the EU legislation and to stop the trade to and in the EU of seal products. The purpose with the suggested legislation was to make sure that seal products would not come from animals having experienced unnecessary pain.

The Commission referred to animal welfare and protection with the Commission Communication on a Community Action Plan on the Protection and Welfare of Animals 2006-2010. The Action Plan was initiated to secure a more coordinated and consequent effort for animal protection and welfare across the political areas of the Commission, while also considering the aspects of the socio-economic impact.

The proposal furthermore referred to a risk analysis from 6 December 2007 on seal hunting and animal welfare (Animal Welfare Aspects of the Killing and Skinning of Seals - Scientific Opinion of the Panel on Animal Health and Welfare), made by The European Food Safety Authority (EFSA). The analysis was based on data on seal hunting and expert statements. The conclusion was that seals can and normally is killed in a quick and effective manner, without causing unnecessary pain. It was also shown that the killings methods and effectiveness varies.

Finally, the proposal referred to an analysis of consequence of 6 April 2008 (Assessment of the Potential Impact of a ban of Products Derived from Seal Species), by the Consultancy firm COWI. The conclusion of the analysis was that a ban will have a negligible economic influence in the member countries with the exception of Denmark and Italy. The main socio-economic impact will be in countries with an Inuit population.

Regulation (EC) No 1007/2009 of the European Parliament and of the Council of 16 September 2009 on trade in seal products

Through the regulation no 1007/2009 of the European Parliament and of the Council of 16 September 2009, a ban on import of seal skins to the European Union or bans on the processing and manufacturing of seal products in member countries was imposed, and entered into force on 20

November 2009. The regulation followed a proposal presented by the European Commission on 23 July 2008. Although this ban contains a specific exemption for seal products from Inuit hunting, it has a severe impact on the global sealskin market.

Commission Regulation (EU) No 737/2010 of 10 August 2010 laying down detailed rules for the implementation of regulation No 1007/2009

On 10 August 2010, the Commission adopted an implementing of regulation no 1007/2009 and as the ban itself, it entered into force on 20 August 2010. The implementing regulation sets out the conditions for the placing on the EU market of seals products.

Because of the Inuit exemption sealskins from Greenland can still be exported to the EU and placed on the market if the skins are certified according to regulation no 737/2010. The tannery Great Greenland A/S sends to the Ministry of Fisheries, Hunting and Agriculture a filled out certificate accompanied by a list of batch numbers for all the concerned seal products. The Ministry controls and signs it before it is returned to the tannery again. The Ministry keeps a record in hard copy and digitally of all signed certificates, table 5. Any Greenlandic sealskin products with a certificate number can be followed on a webpage made by the industry www.soulforseal.dk

Table 5. Number of signed certificates from Greenland in accordance with regulation No 737/2010 from August 2010 to April 2012.

Year	Number of certificates	Number of sealskins exported from Greenland
2010	2	4.712
2011	22	27.125
2012	9	12.432

The position of the Government of Greenland about regulations on seals in EU

Greenland would like to highlight its discontent with the results of both above mentioned reports in general and especially about the paragraphs regarding Greenland and other items. Greenland was invited to contribute and did this to a high extend. However, the given information was poorly used and some forwarded important copies of documents were not included in the review or list of documents. Greenland therefore had serious concerns in respects to what the reports could lead to, and today we can see the result presented as a ban with Inuit exemption and request of labelling and certification.

In addition, the declaration and the ban ignore the realities of the international marketplace, which is highly integrated. Greenlandic hunters depend on the income derived from the sale of their seal products to support their traditional subsistence hunting activity. Closing the European market and now also the Russian market to seal products will most certainly lead to another global collapse in prices and demand of seal products, similar to what happened after the 1983 EEC Directive, which also included an exemption for Greenlandic products and which proved to be entirely inappropriate. Since then, the subsistence hunting of seals in Greenland has had to be heavily subsidized in order to ensure reasonable income for Inuit hunters dependent on selling sealskins.

Furthermore, the countries in which a ban on seal products is imposed are also members of the International Union for the Conservation of Nature (IUCN) – the world’s largest conservation organization - and all have adopted its principles of sustainable use of the world’s abundant renewable resources as government policy. In 2004, an overwhelming majority of the governments and non-government member organizations adopted a resolution on conservation and sustainable use of seals stating the following:

“URGES IN PARTICULAR IUCN members to put their sustainable use principles into action by not introducing new legislation that bans the importation and commercialization of seal products stemming from abundant seal populations, provided that obligations and requirements under other international conventions such as CITES are met.”

The hunting of harp, ringed and hooded seals in the Northwest Atlantic is based on sustainable management principles, closely monitored by international organisations such as the International Council for the Exploration of the Sea (ICES/NAFO) and the North Atlantic Marine Mammal Commission (NAMMCO). Seals do not belong to endangered species neither under the Convention on International Trade in Endangered Species (CITES) or the International Union for Conservation of Nature (IUCN). There is no sound biological or any other evidence to justify the introduction of restrictions on trade with seal products from abundant and healthy populations. There is, therefore, a contradiction between the resolution and the decision of these countries to ban seal products.

About 9 mill. harp seals can have an impact on the fish resources in Greenlandic waters, even if the relation is not fully understood by the scientist. Marine resources are of high importance both as a local and a global food supply and are Greenland’s most important export goods. The world’s need for food is not showing signs of diminishing and Greenland reserves its right to protect and have a sustainable harvest from its marine resources.

Effective and humane killing methods

It seems that the main goal of Regulation no 737/2010, 1007/2009 and the Written Declaration 0038/2006 is to prevent cruelty against animals.

Restrictions and bans on seal products are promoted by extreme animal activist groups and are fuelled by eco-colonialism. They do not take into account that traditional Greenlandic sealing has always used hunting methods which minimize seals pain and suffering. As a permanent member of the Committee of Hunting methods of NAMMCO, seal hunting methods in Greenland are continuously evaluated and improved.

The hunting of seals in Canada is also subject to strict and extensive control measures, which have led to the use of effective and humane killing methods. The Canadian authorities are constantly working on ensuring that all seals are killed as humane as possible. Reducing the competitiveness of the hunt is one of the efforts currently being implemented in the Canadian seal hunt. The Canadian Government, when announcing the Atlantic Seal Management Plan (2006-2010) in March 2006, stated that new

management measures have been introduced in 2006 to reduce the competitive nature of the hunt and secure the effectiveness of the killing, thereby improving the humaneness of the hunt. This plan has been followed by the 2011-2015 Integrated Fisheries Management Plan for Atlantic Seals.

Box 5: Myoglobin and swimming reflexes

Seals may show swimming reflexes long after having been killed. This is due to a high content of myoglobin (red blood cells) in the blood, which is characteristic for marine mammals that can stay under water for a long period of time. Hence reflexes may continue for up to several minutes after the seal has been killed. This has been used in anti-sealskin campaigns to present Canadian sealing as inhumane where it is alleged that seals in many cases are skinned alive. Thus, the rhetoric in the sealskin discussion is often characterised by resting on incorrect arguments and not on objective documentation and facts.

When it is mentioned in the Written Declaration 0038/2006 that up to 42 % of the seals in Canadian sealing may be skinned alive, it is based on a study carried out by IFAW (International Fund for Animal Welfare), an organisation which has been refused membership of IUCN (International Union for Conservation of Nature) due to their militant working methods. The Canadian authorities have also rejected the allegations from IFAW as being completely wrong. Other studies carried out by recognised veterinarians in the field show that this problem may concern less than 2 % of the total catch, which is not killed humanely. As late as in January 2006 and again in February 2009, NAMMCO announced that the applied catching methods in Canada, both the use of hakapik and riffle, are efficient and humane and that the allegations that seals should be skinned alive are incorrect. Likewise the EFSA report stated that the use of hakapik is when used correctly a fast and efficient way of killing.

12. Sealskin and trade barriers:

The ban of seal products in the European Union and in the Customs Union of Belarus, Kazakhstan and the Russian Federation

On 6 January 2012, the Government of Greenland received information from the Government Adviser in Moscow via the Danish Ministry of Foreign Affairs. The Customs Union stated that a ban had been issued in Russia, Belarus and Kazakhstan against imports of skins of harp seal and harp seal pups as well as products produced from such skins. The information was given in the form of a notice on the entry into force of a resolution proposed in June 2011. The information was indeed a big surprise because no official or diplomatic notification concerning the draft formulated had been given to the Kingdom of Denmark.

In the documents received and in the decision, no consideration seems to have been given to sealskin from hunts conducted by Inuit in the Arctic regions in the manner of the so-called *Inuit exemption* set out in the EU regulation banning seal products of 20 August 2010 (Commission Regulation (EU) No. 737/2010).

A letter of response was sent from the Minister of Fisheries, Hunting and Agriculture to the Russian Government stating: "In that connection, in my capacity as responsible minister, I would like a detailed assessment of the ban and whether it applies generally to all countries or whether background documents allow for an Inuit exemption? I will also further investigate the consequences

it may have for Greenland's Russian market. Consequently, I will shortly ask for additional information about the ban and its background". The Government of Greenland is still waiting for an answer from the Russian Government.

The trade bans of seal products in the European Union and in the Customs Union of Belarus, Kazakhstan and Russian Federation have created new barriers to trade. Most EU member countries and organisations in the world work hard to promote trade in order to benefit from liberalisation, not least the EU. It is thus the policy of the EU to promote a responsible free trade not only in the World Trade Organisation Doha Development Agenda (WTO-DDA) negotiations, but also in relation to the African, Caribbean and Pacific (ACP) countries and the countries and areas covered by the Overseas Countries and Territories (OCT) arrangement, to which Greenland belong. The idea is to integrate vulnerable economies into international trade in a responsible way, which means that the EU is opening up for trade from developing economies.

The ban on the import of sealskins and the breaking of international agreements on Technical Barriers to Trade is a clear contravention of the trade policy foundation of the EU. Greenland, even with Self-Governance, receives more than 60 % of its budget in developing assistance and is still economically in a post – colonial development mode.

According to the rules of the World Trade Organisation (WTO), an import ban on seal products is a clear violation of international agreements and cannot be justified as an exemption of these rules. The ban is also not in accordance with the United Nations (UN) adopted decisions regarding the Rights of Indigenous Peoples to use their natural resources. Seals do not belong to endangered species and a measure is not justifiable in relation to international law or even common sense.

13. Conclusions

"Inuit", "subsistence" and "traditional hunting"

Greenland is very concerned about the increasing numbers of bans and especially on the interest from foreign countries to define "Inuit", "subsistence" and "traditional hunting". During the process of the EU ban initiative and in the increasing numbers of circulated documents in relation to the proposal, Greenland noted with concern that several EU committees and EU member countries wished to define "Inuit", "subsistence" and "traditional hunting". It was and still is the view of the Government of Greenland that EU should abide by definitions already adopted by the UN and that other not defined terms should be defined in the relevant fora with the participation of relevant indigenous peoples and governments.

The sincere concerns are raised due to risk of misinterpretation and unintended consequences of definitions by a party that is not directly related to Inuit societies. The definitions could lead to further limitations and misunderstood debate on our way of life, culture and dependence of seal resources.

It should also be stressed that the ban, even with the Inuit exemption breach the Declaration adopted by the UN on the Right of the Indigenous Peoples from September 2007.

Every party is interested in securing the welfare aspects of targeted wild animals, whether you support harvest or not of wild animals. Greenland is very aware of the general support for the Inuit exemption. Alongside the sustainable harvest, respectable regulations and the importance of seal to Inuit, the hunting in Greenland is humane. All this implied that Greenland would not be harmed by the ban and Inuit exemption, which unfortunately does not seem to be true. Greenland suffered severely from the 1983 EEC Directive and again with the 2009 EU-regulation, even with the Inuit exemption. With the new ban of harp sealskins by the Union of Belarus, Kazakhstan and Russian Federation, the world market for seal products is going to be destroyed and economic means of many harp seal hunters will be threatened.

Again we see a ban on sealskins with no basis in biological evidence, which can destroy the fundament of life for many Inuit, while at the same time be in violation with international trade policy. It took more than two and a half decades to re-establish an economic viable production of sealskins, which collapsed again in 2008, mostly as a consequence of the EU ban initiative. If all these bans are maintained, we expect in the coming years the destruction of the global market for sealskins and not just certain parts of the market. Consumers cannot see the difference between sealskins provided by Inuit hunters and skins provided by others even if labelling and certification of origin assurance are introduced.

The fur industry already had a labelling system called Origin Assured (OA), introduced in 2006, where Canada, Norway, USA and Greenland are voluntary parts. OA, likewise the tannery Great Greenland A/S has a very recognizable logo and bar code. This should have had a protective effect on the products; however, what has been observed especially since 2008 is a negative outcome harming the Greenlandic trade. Hence showing that certification and labelling is not protecting the trade with its Inuit exemption.

However, The Government of Greenland is taking all possible measures to comply with regulation no 1007/2009 and 737/2010. As a consequence of the EU requirement, Greenland introduced a certificate system in august 2010. In this context, a guideline on import and export of sealskins from Greenland to the European Union has been elaborated to ensure that seal products from Greenland fulfil the conditions required by the Inuit exemption. In addition, a process is still on-going in the European Commission concerning the Greenlandic Ministry of Fisheries, Hunting and Agriculture being a recognised certifying body of seal products.

Every year, the established certifying system has to be evaluated by the EU and whether Greenland fulfils the requirements. Furthermore, EU is the main body to declare if the established certifying authority - Ministry of Fisheries, Hunting and Agriculture can be approved by the EU system, even after the Government of Greenland has declared the Ministry as THE certifying authority.

More important though, Greenland needs time to examine the total impacts of such a system, especially on the overall costs, control, monitoring and administration burden. It was suggested that the industry covers the costs. It is our preliminary evaluation that the industry, which is in a crisis, will not be able to cover the costs. Greenland needs more than one year of existence of the system before a full evaluation is possible.

Starting with the adopted Declaration from 2006, we saw severe negative effects and consequences of the proposal at that time. After the adoption, Greenland fears that societies outside Greenland and a Union which Greenland is not part of, may destroy our way of life and disturb the diversity of culture. Greenland also feared other non-EU countries would introduce similar bans, and by January 1st, 2012, we saw 3 new countries imposing a ban, without an Inuit exemption. Thus, Greenland cannot accept further restrictions on trade with sealskins, promoted by extreme animal activist groups and eco-colonialism. Furthermore, it is our sincere evaluation that it is not going to help the EU to have a ban on a vital renewable resource while wishing to be involved in Arctic policy. The EU ban, even with the Inuit exemption and Arctic policy do not comply well and are seen as counterproductive.



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