

International Fur Trade Federation (IFTF)

EU Seal Trade Regulation – Opening Remarks

The IFTF would like to make some comments on the implementing guidelines for the EU seal trade Regulation, which we hope will contribute towards a workable implementation of the EU's regulation, thereby avoiding any further unjustified distortion to trade. We wish to make it clear that we are totally opposed to the EU's seal trade ban, which is not based on good animal welfare nor on science, and is a tool for discriminating between human beings.

IFTF position on implementing measures

Old stocks: this is an important IFTF concern regarding the implementing guidelines. There are several companies in the EU (Denmark, Estonia, Germany, etc) that have legally imported seal products (garments and skins) in the past. It will no longer be possible to sell on the EU market, but it must be possible to sell outside the EU. We therefore urge the Commission to foresee “ex-post” transit papers to be issued to these companies. This is entirely justified under the Regulation, as article 3 states “*These conditions shall apply at the time ... of import for imported products*”. Clearly the time of import is in the past, and therefore the conditions did not apply. Still in order to stay within the spirit of the Regulation, as stated in article 3, these products can no longer be placed on the market in the EU – re-export must therefore be allowed. As Article 3 only bans the placing on the market, this should not be a problem.

Labelling: the Regulation states in (12) of the preamble that “*requiring manufacturers, distributors or retailers to label products that derive wholly or partially from seals would impose a significant burden on those economic operators, and would also be disproportionately costly in cases where seal products represent only a minor part of the product concerned*”. We therefore urge the Commission to keep any labelling scheme as simple and as transparent as possible. In particular:

- If transparency is the issue, there should be only one label – the objective should be to guarantee the consumer that the seal product originates from a hunt that benefits from the exemption, ie that is legal in the EU. This should be a simple iconogram.

- Greenland is benefiting from the European Development Fund (EDF) in order to prepare compliance with an EU labelling scheme. The fact that other countries and regions eligible for an exemption under the Regulation are not benefiting from the EDF should not justify several labels. DG Sanco or DG Enterprise should coordinate the scheme, co-funded from other EU funds if need be.

- *“disproportionately costly in cases where seal products represent only a minor part”*: the USA have a labelling requirement for all fur products that exempts products under \$150 – such a *de minimis* rule could also be applied in the EU and therefore keep labelling requirements proportional.

Traceability: If the Regulation is not intended to harm trade in Inuit and other permitted seal products, the EU must not introduce complicated and costly compliance requirements. Traders should be allowed to work with existing forms and customs procedures. All necessary information should be provided on the invoice. Export invoices can be certified as coming from an eligible provenance by a competent body appointed by the government of the sealing country concerned.

Inspection: Seal skins are easily identified and if a clear label or mark exists the consignment is easily checked at customs. This is routine work for customs, and invoice papers follow all customs papers. Regarding inspection of labels in the retail area that are seen by consumers, EU rules are already very stringent: any mislabeling is illegal under EU rules. So, once a label or mark for eligible seal products has been agreed, it will be covered by EU rules, without need for new additional legislation on inspection, supervision, etc. If labelled or marked seal products enter the EU market, further inspection should not be required.

Trans-shipment: trans-shipment is a routine procedure in international trade. Since goods are not “being placed on the market” in the Community, existing practice of allowing goods to pass through the Community via Helsinki or Frankfurt etc. should be allowed to continue without undue interference. In addition, shipping seal skins between non-EU countries while invoicing a fur broker in the UK (for example) should be allowed to continue since no goods are placed on the Community market. For the same reason, sending seals from a non-EU country to an EU member state for ‘added value’ (for example, dressing or some form of transformation) before forwarding on to another non-EU country should be considered acceptable.

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