About you

I am responding on behalf of:
The Department of Environment, Government of Nunavut (Canada)

My name:
My email address:

Attesting documents

1) Have you issued any attesting documents over the reporting period?
   Yes
   1 (a) see attached spreadsheet

2) Would you like to report any issue in relation to the attesting documents?
   Yes (2000 character response max)

There are some issues with the attesting documents. They are outlined below:

1) One product can be made of several pelts, or one pelt can be made into several products. Some craft makers purchase pelts from other Recognized Bodies and combine these with Nunavut pelts to make products. Our system is currently set-up to only issue certificates for individual pelts.
   a. Would it be acceptable to the EU to issue a single certificate for multiple pelts?
   b. Would it be acceptable to the EU to issue a certificate to a Nunavut crafter who attests to only using seal pelts resulting from hunts by Inuit in their work? The GN would commit to tracking these individuals and requiring a traceability element to ensure compliance.
   c. The current certificate format requires we include the country the product will be placed on the market. We request this be changed to a blanket entry into the EU. In some circumstances the product may enter the EU, exit, and then re-enter; in others we may not know where the final product will be placed on the market.
   d. In some circumstances we issue certificates for individual products, this has been done manually thus far. We would like to automate this process but until we can resolve the issue outlined above and receive guidance from the EU we will not know exactly how to do this.
   e. Upon entering the EU, if an individual has both products for sale and personal items made of seal pelts, there seems to be some confusion at the point of entry and can be onerous for the person entering the EU to navigate. In a few of these circumstances we have issued a letter to the individual in the hope that this would suffice customs. But we would be interested in finding a better solution.
f. We would be interested in exploring other possible means of proving attestation other than a physical certificate. Would the EU be open to such discussions? 
Examples of solutions include:
   i. A tattooed stamp on pelts indicating origin
   ii. Use of small tags with the QR code

3) Please describe how you monitored compliance with the requirements set out in Article 3(1) of the Regulation on trade in seal products.

   (4000 characters max)

In accordance with the Regulation (EC) No 1007/2009 of the European Parliament and of the Council the Government of Nunavut attests that:

- Article 3.1 (a): Inuit have harvested seals traditionally and historically in Nunavut.
- Article 3.1 (b): All seal harvests in Nunavut are subsistence in nature. There are no commercial licences issued to Inuit in the Territory.
- Article 3.1 (c): The Nunavut Wildlife Act stipulates in regards to humane treatment:
- Article 3.1a. The Government of Nunavut, Department of Environment, has issued certificates for all certifiable seal pelts and products that qualify under the Indigenous Communities exemption as outlined in Article 3 paragraph 1 of the regulation.

Territorial regulations are also in place under the *Wildlife Act* that is enforced by Conservation Officers, the same individuals who are the point of contact with harvesters and purchase pelts from them, which are then tracked through the Fur Tracking System. Specific sections outline: “Any person harvesting a wild animal shall respect the principles of *Iliijaqsuittailiniq/Kimaitailinik* and *Sirliqsaaqtittittaitliniq/Naklihaaktitihuiluhi.*”

- *Iliijaqsuittailiniq/Kimaitailinik*, which means that, even though wild animals are harvested for food and other purposes, malice towards them is prohibited;
- *Sirliqsaaqtittittaitliniq/Naklihaaktitihuiluhi*, which means that hunters should avoid causing wild animals unnecessary suffering when harvesting them

Three main principles of sealing guide Inuit and the Government of Nunavut towards:

- Sustainable harvest: Resource protected from over-harvesting and managed to maintain the place of seals within the total ecosystem.
- Complete use: The meat provides food; the pelts are used or clothing and the oil is a rich source of omega-3 acids.
- Humane Harvest: Seals must be treated with respect and hunted only for what is needed. The kill itself is clean and quick.
4) Have you encountered any cases of non-compliance?
No. All certificates issued are for pelts or products which originated within Nunavut, harvested by Inuit primarily for subsistence, and conducted according to the rules and regulations concerning humane harvesting, which is observed by conservation officers in the communities. We have not been approached to issue certificates for pelts or products that do not qualify under the exemption.

5) Would you like to report any issue in relation to compliance monitoring?
No. We have not had any issues in relation to compliance. There are a small group of crafters involved in EU market activities and everyone has made efforts to ensure they are following the rules to access the market. In addition, we have distributed educational materials within the territory and to key areas/groups outside of Nunavut to provide clarity around the process of certification and our contact information.

6) Have you been audited during the reporting period?
Yes. The Government of Nunavut is audited on an annual basis. Random audits are conducted by the Government of Nunavut’s internal auditor and by the Office of the Auditor General (federal), at least once annually, and full audits are conducted if issues were to arise.

7) Have you drawn up any annual activity reports over the reporting period?
Yes. We provide quarterly briefings to the Minister on the status of all programs, projects, activities and initiatives related to seal pelt use.

B. Processing of data

8) Do you use any electronic system for the exchange and recording of data contained in the attesting documents?
Yes. We use the Fur Tracking System for information on the origin of pelts, and for issuance of certificates for seal pelts.

9) Would you like to report any issue in relation to the protection of personal data when processing attesting documents?
No. There have been no issues in relation to protection of personal data. The Fur Tracking System is in part a financial system, and thus contents are confidential. We have not had any issues of personal data being leaked in any way.
C. QR Code

10) To ensure the proper functioning of the "Inuit or other indigenous communities exception", a QR code can be placed on seal products attested by the recognised bodies. This QR code links to an EUA webpage providing information on the EU seal regime. Do you use this QR code? Yes. We place the QR code on seal pelts and also product tags which artisans and craft makers use.

D. Overall Assessment (each 4000 characters max)

11) Please provide your general assessment of the functioning (i.e. ability to perform its regular function) of the "Inuit or other indigenous communities exception" on your territory.

It is our belief that the “Inuit or other indigenous communities exception” functions properly as it is written. There have been some practical issues in relation to issuing the certificates which we would like to resolve; ideally working with the EU to find solutions.

Issuing certificates has been cumbersome for products primarily, as we are unsure what method exactly would be best to reduce the number of certificates an individual needs for their products. If pelts are already certified we would prefer to have that certificate follow the life of any products made from that pelt, without creating redundancy by issuing further certificates. In addition, simplifying the certificate itself to reduce the information a manufacturer needs to provide us with (ex. country of placing on the market), and perhaps even reducing the certificate to small tags with a QR code.

We look to the EU for collaboration and help in finding solutions that work for both jurisdictions. Specifically on being able to:

- Issue a single certificate for multiple pelts.
- Issue a certificate to an individual Nunavut crafter who attests to only using seal pelt resulting from hunts by Inuit in their work. The GN would commit to tracking these individuals and requiring a traceability element to ensure compliance.
- Issue certificates with a blanket entry into the EU rather than pre-conceiving the countries of destination.
- Upon entering the EU, if an individual has both products for sale and personal items made of seal pelts, there seems to be some confusion at the point of entry and can be onerous for the person entering the EU to navigate. In a few of these circumstances we have issued a letter to the individual in the hope that this would suffice customs. But we would be interested in finding a better solution.
- Accept a tattooed stamp on pelts indicating origin and therefore certification. Only pelts that have been tracked and attested to by the GN would have this tattoo mark.
• Accept tag with QR code and GN Embossed Stamp as certification on products. These tags can only be issued from the GN and the embossing makes it nearly impossible to fabricate.

12) Please provide your general assessment of the effectiveness (i.e. capacity to produce a desired result) of the "Inuit or other indigenous communities exception" on your territory. The exemption could be effective in providing a means by which Inuit from Nunavut can access the European market if the challenges noted are addressed, potentially bringing much needed opportunities for Inuit living in remote communities and under great financial and food security burdens; particularly women and girls. This remains difficult as certification requirements have imposed an undue burden and disincentive on Inuit producers and EU buyers. In addition, it remains difficult to connect Inuit in Canada with purchasers in the EU, due to a lack of familiarity with the existence and functioning of the exemption among people living in the EU.

We believe that in addition to the efforts we have been making to expand into the European market, that help from the EU to undertake outreach activities with manufacturers, museums and retailers would support our efforts. We want to support our partners in the EU in ensuring that Indigenous Rights, food sovereignty and poverty reduction are achievable, and addressable, by the legislation that has been enacted.

13) Please provide your general assessment of the impact of the Regulation on the socio-economic development of Inuit or other indigenous communities on your territory (for example, changed market for seal products, impact on subsistence, etc).

Overall, Inuit women from Nunavut largely market their goods locally, within their community, and do not export their products to the EU despite being fully compliant with the regulation. Primary reasons include a fear to sell to EU countries (most are so terrified of the consequences, thanks to the ban), barriers to trade which have resulted from the ban itself (loss of interest from buyers, lack of connections with potential buyers), lack of knowledge working with an international scope (crafters in Nunavut are primarily part of a cottage industry), confusion about certification of pelts vs products from certified pelts. This industry, if enabled by a better functioning regulation, has the potential to support women economically, provide them with greater independence, and promote gender equality in Nunavut.

In Nunavut, the harvest, consumption, design and sale of seal products has been a long-standing component of Inuit society, cultural expression, and economic livelihood. It is an activity that occurs year-round and remains an important factor for the socio-economic well-being of Inuit, particularly the sale of seal pelts since the introduction of the cash economy. As
yet, the regulation has not made a positive impact on the socio-economic development of Inuit. The regulation has opened a door, but remains seen as a policed activity.

14) Please provide your general assessment of the impact on the Regulation on seals on your territory (for example, impact on animal welfare, on the way the hunt is conducted, on the seal population, etc).

There has been no impact on seals in Nunavut as a result of the regulation. The harvest was and continues to be conducted according to harvest regulations and Inuit values, as stated above in the response to question 3), prior to the regulation and continues to be conducted in this manner. There has also been no increase in harvest that can be attributed to the Exemption.

Final Remarks

If you wish to add further information or comments, please feel free to do so here:

All survey questions should allow space for comment.

Seal harvesting has been a vital part of Inuit culture, clothing, nutrition, and survival in the Arctic for centuries. Inuit today depend on seals for food security and income in a Territory with the highest prices on store bought food and limited employment opportunities. Seal harvesting enables Inuit to maintain their connections with the land, and pass on traditional knowledge and skills to younger generations.

Our goal is to educate people on the harvest of wild caught food and how traditional and contemporary ways of living can support food security and respect culture and the Inuit way of life. We work with artisans and the Nunavut Arts and Crafts Association (NACA) to promote the sustainable, traditional, and contemporary economy of Nunavut. We invite people around the world to value the seal as we Nunavummiut (people of Nunavut) do and celebrate with us this tradition of seal harvesting that has ensured the survival of Inuit for generations.

In holding with the intention of the Joint Statement by Canada and the European Union on Access to the European Union of Seal Products from Indigenous Communities of Canada we invite the European Commission to meet with the Government of Nunavut, the other Recognized Bodies and other implicated stakeholders to discuss ways to better operationalize the requirements of the regulation in order to maximize the benefit of the exemption for Inuit in this changing world. We may be doing more harm to Inuit by allowing the status quo to continue. Ultimately, supporting the sealing industry helps to promote the equal economic independence of both men and women in Nunavut.