

# COMMISSION OF THE EUROPEAN COMMUNITIES

COM(83) 71 final

Brussels, 11th February 1983

## COMMUNICATION FROM THE COMMISSION TO THE COUNCIL

concernant the prohibition of importations into the Community of  
certain baby sealskins and derivatery products

---

COM(83) 71 final



## 1. INTRODUCTION

- a) In their Resolution of 5 January 1983 (1) with regard to sealpups the Council and the representatives of the governments of the Member States called upon the Commission to examine further, in collaboration with the authorities of the countries concerned, the methods, circumstances and scientific aspects of the killing of pups of harp and hooded seals as well as the possibilities of identification by marking. The Commission was also called upon to pursue exploratory talks with the countries concerned in order to evaluate the possibilities inherent in the proposals put forward by Canada, to evaluate national measures taken pending any decision about action of Community level and in the light of the foregoing, to consider the possibility of proposing the additional action to be taken at Community level on the basis of the relevant provisions of the Treaty.

The Council undertook to examine the Commission's communications and proposals on the subject, notably the proposal for a Regulation on an import ban already submitted, and to adopt not later than 1 March 1983, as part of its review, all appropriate measures on the basis of all the necessary background information, while fulfilling the Community's obligations, in particular in the field of international trade.

- B) The present report is based on the results of the relevant examinations and on exploratory talks with Canada and Norway since the adoption of the Resolution concerned. Such meetings have taken place bilaterally with Canada on 25 and 31 January, with Norway on 18 January and trilaterally with Canada and Norway in Ottawa from 31 January to 1 February.

## 2. THE METHODS AND CIRCUMSTANCES OF THE ANNUAL COMMERCIAL HUNT OF HARP AND HOODED SEALS

It is clear that it is not the methods and circumstances of the hunt of baby seals that is at the root of Parliament and public objection - it is the fact of the hunt itself. Nevertheless it is also important to consider the methods and circumstances in some detail.

- (i) The objections to the killing of "baby seals" are a combination of all of the following aspects : the slaughter of (1) defenseless, newborn, (2) wild animals (3) on a massive scale (4) under not sufficiently controllable circumstances, (5) with clubs and hakapiks, that can be misused, (6) bleeding and pelting on the ice (7) in many cases in the presence of the mother (8) for trivial, luxury purposes.
- (ii) It is an established fact that the stunning and exsanguination method used in the killing of sealpups is technically humane and similar to methods used in slaughterhouses.

. / .

(iii) As regards the way in which the hunt is in practice carried out two main questions arise:

(a) the extent to which the method is properly applied

(b) whether females are indifferent to the killing of their pups.

ad (a)

The evidence, available from reports by members and experts of the government appointed Committee on Seals and Sealing (COSS), clearly demonstrates that it is still not possible to guarantee that the sealing operations can be carried out humanely and under effective supervision. Indeed, the possibilities of effective supervision and enforcement have repeatedly been questioned. Official observers' reports demonstrate that in spite of the considerable efforts that have undoubtedly been made a number of inhumane practices and violations of regulations in all categories of the hunt still occur.

ad (b)

Sealing regulations recommend that no pups which their mothers defend should be taken. It has repeatedly been confirmed that within a few days of whelping and lactating the maternal-pup bond is undoubtedly well established. Immediately after the lactating period which lasts for about 10 days, this, however, ceases.

(iv) Although the development and introduction of alternative visually more acceptable stunning and killing instruments is one of the aims of the Canadian government, it must be seriously doubted whether this would change public opinion as it would not address the objections to the killing of "baby seals" as such.

Apart from that it must be noted that the long history of the development of a sealing pistol is not very encouraging. The use of the pistol is still fraught with problems such as cost, safety and efficiency under difficult working conditions.

(v) The moral status of the sealhunt of course heavily depends on its human benefits, both economic and sociological compared to the non-human costs involved.

Few would object to the taking of animals where this formed part of an established subsistence pattern, large scale commercial hunting for essentially luxury purposes is seen as altogether different.

- (vi) The available statistical information on the socio-economic aspects of the seal hunt in Canada, most of which dates back to 1976 (the year in which the most recent extensive survey was carried out), shows that the income from the hunt is very unevenly distributed in favour of the commercial sealers. Sealing makes only a minor marginal contribution to Newfoundland (less than 0.5% of the value added by goods-producing industries.

for fishermen in It was, however, underlined during the exploratory discussions, that remote coastal communities with few or no alternative occupations and high unemployment rates during winter, sealing makes an important contribution to their annual income and the maintenance of their way of life.

Although there is little information on the Norwegian economics of the harp and hooded seal hunt, it is obvious that both its primary and secondary sector depend heavily on whitecoats and bluebacks for the hunt to be economically viable.

- (vii) There is as yet no scientific evidence to support the claim that the hunt is necessary to maintain or to restore the balance of the ecosystems concerned and therefore the question whether a government supervised scientific cull is necessary or not cannot yet be answered.
- (viii) The prevailing market situation has seriously affected both the primary and the secondary sector of the sealing industry: large unsold stocks and much lower prices. It may therefore be expected that the takes in the coming sealing season will be much lower than in previous years.

The recommendation of the Norwegian Sealing Council not to take any whitecoats and bluebacks in 1983, although not yet confirmed by the Norwegian Government, clearly illustrates the present market situation.

- (ix) More generally the "baby seal" issue also appears to be adversely affecting the fur industry as a whole.

The analysis of the circumstances of the annual commercial harp and hooded seal hunt and in particular the considerations enumerated above, thus leads to the conclusion that it is in every respect still fraught with problems. It also shows that the increasing public objection to the killing of "baby" seals must be taken seriously.

### 3. SCIENTIFIC ASPECTS AND CONSEQUENCES FOR THE MANAGEMENT OF HARP AND HOODED SEAL STOCKS

- (i) Recent scientific evidence, provided in 1982 successively by the UK Nature Conservancy Council, the Northwest Atlantic Fisheries Organization and the International Council for the Exploration of the Sea, demonstrates the present uncertainty about the current status of the harp

seal and <sup>of</sup> the hooded seal in particular. (A summary of the main scientific conclusions is given in Annex I).

- (ii) There have been different interpretations of the ICES report and its degree of agreement with the NCC study.

the  
It is considered opinion of the Commission that both reports reach virtually identical conclusions about hooded seals: there are no reliable estimates of the size and status of the Northwest Atlantic stock. On harp seals the ICES report seems more hopeful but the opinions are not as different as they first appear as both NCC and ICES (and also NAFO) conclude that a slight stock decline cannot be ruled out.

- (iii) On the basis of the ICES study which is the latest available the Canadian Government has proposed a reduction of the total take of hooded seals in 1983 in the Northwest Atlantic by Canada, Greenland and Norway from about 17,500 to 12,000.

The Canadian authorities have indicated that in their view this would constitute a satisfactory safety margin. The International Union for the Conservation of Nature and Natural Resources (IUCN), however, reiterated its previous position that the quotas should be significantly reduced and that the hunt should perhaps even be ended.

It did not consider a 20 % reduction of the New foundland take an adequate response to the increased emphasis on the severity of the situation implied by the ICES findings. The Canadian authorities indicated that they would be ready to consider a further reduction based on scientific grounds and renewed their request that a meeting be held as soon as possible with the Community and Norway on this subject and on a joint research program.

- (iv) The Canadian Government proposed a joint 5 years research program on hooded seals as from 1983 (see Annex II) and invited both the Community and Norway to participate.

- (v) There seems little doubt that the status of particularly the hooded seal requires intensified research to allow the data base to improve and it is likely that immediate action to reduce quotas would be prudent. However, as the Commission has consistently pointed out in European Parliament, in the Council and in talks with third countries the conservation issue should not be confused with the objections to the killing of "baby seals" and should be dealt with separately.

- (vi) It must also be clear that, as conservation measures and research in that field do not touch on the "baby seal" problem, even a substantial reduction of takes which would continue to involve "baby seals" would not contribute to the solution of that problem.

On the other hand a reduction of the take resulting from import restrictions will of course contribute to the conservation of the species concerned.

4. EVALUATION OF THE POSSIBILITIES INHERENT IN THE PROPOSALS PUT FORWARD BY CANADA (see Annex III)

(i) International panel of experts to report on the seal hunt

A similar proposal was already put to the Commission shortly after the adoption of the European Parliament's resolution on seals and rejected at the time. As has been pointed out earlier, the hunting methods are not the central issue in the "baby seal" question. Moreover, participation by the Community in such an examination would imply condoning a continuation of the hunt of "baby seals". For these reasons the Commission maintains its position that there should be no Community participation in such action. However, it is of the view that if the Canadian authorities would take steps for an objective expert examination of killing methods for the information of both sides this could have merits.

(ii) Research programme on hooded seals

This proposal has already been considered in point 3 (iv) to (vi)

(iii) Reduction of hooded seal catches

In addition to point 3 (iii), (v) and (vi) it must be noted that the existing uncertainty about the current status and future prospects of harp seal stocks may also require a reduction of the present exploitation level to ensure future securing of the stocks. IUCN stresses the necessity to give new emphasis to proper actions to attain conservation goals in the light of uncertainty about population status and believes that actions should be based on deliberately pessimistic assumptions and that catch quotas for harp seals should be set more conservatively than heretofore until such time as the status and trends in the population can be more firmly established.

(iv) International Sealing Convention

The Canadian government has proposed that an international organization should be set up to deal with the management of all seal stocks in the North Atlantic, in particular those in the 200 mile exclusive economic zone of the Parties (including of course Canada). Such an organization could be established on the model of existing fisheries organisations, namely with a Scientific Council delivering recommendations to a Commission in charge of management. This Commission would be responsible for making recommendations to the Contracting Parties, regarding management requirements, taking account of the scientific advice received, ethical considerations and all other relevant matters.

At present, two international organizations already deal with questions relating to seals : ICES and NAFO, respectively for the North East and North West Atlantic.

ICES is a scientific organization and the Community is not a member of it. NAFO, in which the Community participates as a member, is competent for the management of species that are in the Convention's regulatory area. However, in the 200 mile zone, NAFO can only deliver an opinion as the management of stocks is the exclusive competence of the coastal State that exercises jurisdiction in that zone (or of the coastal States in case of joint stocks).

Creating a new organization would therefore raise on the one hand the problem of its competences in relation to existing organizations, and on the other hand the problem of the policy of the Community as regards sealing.

If the competence of the organization cover only the scientific aspects, then the organization will overlap with ICES or NAFO.

The exploratory talks on this issue showed that the Canadian authorities are open to negotiate all relevant aspects of a Convention and are ready to submit their exploitation of seal stocks in their 200 mile zone to management involving third parties. They stressed the desirability of joint management of joint seal stocks and of commitments of the parties involved to coordinated research, which would therefore have to be amongst the central objectives of the proposed convention. In their opinion the Convention would solve the problem that management decisions taken by Canada on its own right are claimed to be biased because of the commercial interests involved.

In the trilateral discussions in Ottawa, the Norwegian delegation indicated that, whilst considering that existing arrangements were perfectly satisfactory, they could consider participation in such organization - but only if it dealt solely with seal stocks in the North West Atlantic, and not in the North East Atlantic.

The Commission for its part is extremely reserved about the Canadian proposal since it considers that to create a new organization in charge of the management of the seal stocks would not help solve the ethical problems raised by the baby seal problem, even if a Management Commission were required to take account of ethical considerations. Moreover, it would involve direct Community responsibilities for the commercial hunt in all its aspects.

Moreover since the only hunting of seals in Community countries is subsistence hunting in Greeland (which does not in any event involve baby seals) it seems inappropriate for the Community to be involved in a Management Commission dealing with what is essentially a Canadian problem relating to their exploitation of a natural resource.



5. EVALUATION OF NATIONAL MEASURES TAKEN TO PREVENT THE IMPORTATION OF SEALSKIN PRODUCTS LISTED IN THE ANNEX TO THE COUNCIL RESOLUTION (A summary of legislative national measures is given in Annex V)

(i) Six Member States (DK, FRG, F, IT, NL, UK) have informed the Commission of measures already existing or envisaged concerning the importation of seal pup skins and products derived therefrom. One Member State (B) has informed the Commission that such measures do not yet exist within its territory but does not exclude that they might still be taken.

The remaining three Member States (GR, IRL, LUX) have not informed the Commission since the adoption of the Council Resolution. As far as the Commission is aware, no measures exist in these Member States.

(ii) The measures taken (or envisaged) can be summarised as follows :

- in three Member States (F, FRG and UK) agreements have been reached by the Fur Trade, either with or without participation on behalf of public authorities, to voluntarily ban imports of the products concerned (UK : for 1 year from 1 March 1983)
- one Member State (IT) has taken measures to prohibit imports of seal pup skins
- one other Member State (NL) has taken measures to prohibit imports of all seal skins
- three Member States (F, UK and FRG) have taken surveillance measures
- one Member State (UK) has required all seal products to be labelled as such, including where the seals were taken
- one Member State (DK) has just announced that its authorities are taking steps to prevent imports of the products concerned without giving any indication as to the nature of such measures.

(iii) The information available to the Commission at the moment does not yet allow a definitive evaluation of all aspects of these measures. However, it should already be noted that, since not all Member States have taken measures, imports can still take place in some Member States. This clearly risks creating artificial barriers within the Community, as products which are in free circulation can not enter into Member States where measures have been taken.

Such measures would therefore in principle be contrary to Article 30 of the Treaty.

They might be justified on the basis of Art. 36 or for reasons of consumer protection but it is observed that the question whether such measures are proportionate to the objective pursued inevitably arises.

As far as voluntary measures are concerned it should furthermore be stressed that they can all be changed at any moment and, in fact, that the agreement reached in the United Kingdom only applies to one hunting season.

For all these reasons the only way to arrive at a quick and effective solution, which will not lead to artificial barriers within the Community appears to be a binding instrument laying down a uniform rule for the whole of the Community.

(iv) The Commission has given further thought to the possibility inherent in marking systems for seal skins and products derived therefrom. This has also briefly been discussed with the Canadian and Norwegian authorities, which reacted more favourably to the idea of such a system than to that of an import ban. According to the available experience such systems are technically feasible although there would be considerable difficulties regarding certificates of origin, identification, control and scope of application. Moreover, even the adoption of harmonised system at Community level would do little to remove the uncertainties of the market and clearly would only respond in part to the concern of Parliamentary and public opinion.

For these reasons the Commission has been forced to conclude that the introduction in the Community of a compulsory labelling system would not in practice allow to solve the problem.

6. Conclusions

- i. The Commission considers that recent conversations with Canada and Norway have not introduced elements which would enable the doubts expressed by public opinion on the baby seal hunt to be dissipated.
- ii. The Commission shares the opinion that it is necessary to intensify the scientific efforts on conservation problems for the species concerned and has the intention of pursuing with Canada and Norway discussions leading to a substantial reduction in the take of hooded seals.
- iii. On the other hand the Commission would underline that the reinforcement of scientific work and of measures leading to an improved management of the stocks (in particular by a reduction of the quotas of hooded seals) are not such as to deal with the problems which are the object of the preoccupations expressed by public opinion. But the Commission considers that measures tending to reduce substantially the baby seal hunt will also contribute to improving the conservation status of the species concerned.
- iv. Having carefully examined the Canadian proposals concerning the conclusion of an international convention relating to the management of the seal populations in the whole North Atlantic (or limited to the North West Atlantic) the Commission considers that such a Convention would not solve the problem of the baby seal hunt and that, on the other hand, the conservation questions can appropriately be dealt with in the other existing international bodies (NAFO, ICES, CITES). Therefore it does not recommend to the Council to enter into negotiations with a view to the conclusion of such a Convention.
- v. Moreover, the Commission does not believe that it would be useful to participate in a panel on hunting methods such as has been suggested by the Canadians because such a panel would not address itself to the Community's main problem.

- vi. The Commission has examined the national measures taken or envisaged and is of the opinion that they can in the main be justified so far as concerns the provisions of the Treaty.
- vii. However, the Commission is of the view that:
- these measures are very disparate and their comparative evaluation is for this reason very difficult;
  - the maintenance of the present situation risks provoking distortions and discriminations
  - this unclear situation cannot overcome the uncertainties bearing upon the fur trade as a whole which have led it to come down in favour of a clear ban.
- viii. The Commission accordingly considers that there is an obvious need for harmonisation.
- ix. In the light of the available experience the Commission does not consider that the introduction in the Community of a compulsory labeling system would be the appropriate solution for the problems raised by the hunting of baby seals.
- x. Taking account of the above observations the Commission is led to the conclusion that it should maintain as it stands the proposal transmitted to the Council on 19 October 1982.

ANNEX I

SUMMARY OF THE MAIN SCIENTIFIC CONCLUSIONS CONCERNING THE STATUS OF HARP AND HOODED SEALS.

NCC - May 1982

HARP SEAL

In the NW Atlantic management has halted the previous dramatic decline to less than half the unexploited size. On the available evidence, it is uncertain whether this stock - for which the range of current estimates is 1-2 million animals - is increasing or decreasing although any change in size can only be small.

HOODED SEAL

The position of the hooded seal is in every respect more serious. On the available evidence management measures appear to have only reduced the rate of decline rather than halted it. Although it is apparent that major declines have occurred, there is at present no reliable method for estimating the population size of for monitoring the status of stocks.

NCC advice to the Commission concerning both species :

Present uncertainty about current status and future prospects : Commission to take all action within its competence to reduce level of exploitation and to ensure future securing of these populations. A particularly relevant measure would be to impose a ban on trade in hooded seal products until scientific evidence shows the ban to be no longer necessary.

---

NAFO - June 1982

HARP SEAL

The rapid decline in population size prior to 1971 was halted, with the imposition of quotas in 1971. Although calculations of stock size and replacement yields could be taken as implying that the NW Atlantic stock can sustain a quota considerably in excess of the current one, this is likely not the case.

It is not possible to say with certainty that the population is increasing under recent catches.

---

ICES, October 1982

HARP SEAL

Population estimates : late 60's 1,2-1,6 million - 77-80 1,5-2,0 million. 1977-80 were The Working Group concluded that the pup production and 1 + population prior to whelping in/ likely to have been higher than in the late 1960's but that the possibility of no increase or a slight decline is not negligible.

HOODED SEAL

The Working Group concluded unanimously that the analyses of available data are insufficient to provide reliable estimates of current pup production, stock size and vital rates and hence to determine population trends on that basis. This conclusion also applies to the evaluation of the present management measures.

---

IUCN, December 1982

HARP SEAL

Actions should be based on deliberately pessimistic assumptions, with broad safety factors to allow for uncertainties. Catch quotas should be set more conservatively than heretofore, until such time as the status and trends in the population can be more firmly established.

HOODED SEAL

In recognition of the unique circumstances and the much more dangerous level of uncertainty surrounding the status of the hooded seal populations it is recommended to significantly reduce quotas, perhaps even a cessation of the hunt.

It is noted that a 20% reduction proposed by the Canadian government cannot be considered an adequate response.

---

## Research on Hooded Seals in 1983

Fisheries Research Branch  
Department of Fisheries and Oceans  
St. John's, Newfoundland

Survey of pup production of hooded seals at the Front

- a) A systematic aerial survey using black and white vertical photography will be conducted to estimate the number of pups born at the Front during March 1983. This survey will be conducted from March 17 to 27. The strategy will be to locate patches of breeding seals (using a systematic search pattern and/or information from other aircraft, research activities, and sealing vessels), to delineate these patches as to size and location, and then to photograph them from 1000 ft altitude. Either complete coverage or systematic sampling will be carried out, depending upon the size of these patches and logistical constraints. Each patch of whelping seals will be marked both with colored dye and a radio transmitter to allow identification and repeated estimates of the same groups.
- b) Concurrent with the above-survey, an effort will be made to collect "ground-truth" data which will be used to correct photographic estimates of pup production. The exact details have not yet been worked out but a helicopter will likely be used to mark out areas on the pack ice within which low altitude counts (by helicopter) will be made of pups and adults. These marked areas will simultaneously be photographed by the survey aircraft from 1000 ft. With this approach it may be possible to determine the visibility bias for pups as well as the fraction of females which have whelped; both factors are required to satisfactorily calibrate the photographic survey.

Incidental to this ground-truth data collection effort, an attempt will be made to tag some hooded seal pups. It is expected that perhaps 100 pups may be tagged.

Possibilities for joint research between Department of Fisheries and Oceans and the European Economic Community include:

1. Biological studies on hooded seals in the Davis Strait, March 1984.
  - a. Ground-truthing of whelping patches to complement the DFO aerial photographic census of pup production. Correction factors for visibility bias and proportion whelped are required.
  - b. Tagging of bluebacks in the whelping sites.
  - c. Biological sampling of 1+ animals at the whelping patches, to determine sex and age composition and maturity and fertility rates. Up to 1000 males and 500 females will be taken in this scientific sampling program.

This proposed research will require one large ice-strengthened vessel with helicopter garage and one or two helicopters. The study will last about 10 days with an addition perhaps of 10 days of transit time, and will require 6-8 scientific personnel and a total budget of about \$200,000.00.

## 2. Biological Sampling at Greenland

It is proposed that 2-3 scientific personnel collect biological data and specimens from hooded seals taken by local residents of southern and southeastern Greenland, during the period May to September 1984. Catch statistics and other information about the hunt could be collected. Main bases of operation would be the Julianehab and Angmagssalik districts and a total budget of about \$75,000.00 would be needed.

Canada - EC Understanding on  
the Seal Hunt

1. Canada and the EC decide to establish a Preparatory Commission on the seal hunt. Norway is invited to be a Member of the Preparatory Commission.
2. The Preparatory Commission is charged with the following mandate:
  - (a) to establish an international panel of experts to report on the seal hunt; to select its members; to determine its terms of reference which shall include a report on the harvesting methods employed and on such ethical considerations which members of the Preparatory Commission bring to its attention or which are raised by expert members of the panel; to provide for its financing and the production of its report.
  - (b) to report on the economic significance of the hunt to communities dependent upon it.
  - (c) to prepare the draft of an International Sealing Convention whose mandate shall be to propose regulatory measures for seal stocks in the North Atlantic; to provide a forum for consultation and cooperation between parties and to recommend programs of scientific research. All species of phocid seals in the Convention area would be within the competence of the Convention.
  - (d) to establish a new research program aimed at improving the scientific information on the stocks of hooded seals and to provide for its financing.
  - (e) to consider a reduction of the catch of the Northwest Atlantic hooded seal stock in order to permit this reduction to take effect for the 1983 hunt.
3. The Preparatory Commission shall take account of public and parliamentary opinion in the Parties to this Understanding in all aspects of its work.



4. The Preparatory Commission shall begin its work at the earliest practical date and in any case before (Date).
5. The Preparatory Commission shall report to the Parties to this Understanding by (Date) and thereafter as the parties decide.

Independent panel of experts to assess the humane aspects of currently approved techniques for the harvesting of seals in the Northwest Atlantic seal hunt.

Objectives: The panel will be charged with the following specific responsibilities:

1. To consider published reports on and to observe current methods of slaughter used in the commercial hunt for young seals on the ice, from pre-slaughter stunning until death occurs and skinning is completed, and to assess for humaneness.
2. To provide an opinion on the extent to which methods used in the commercial hunt for young seals meet recognized criteria for "pre-slaughter stunning", "humane slaughter", and "humane death" as defined in a) Federal legislation relating to humane slaughter of food animals in Canada; b) recommendations of the Federal-Provincial Wildlife Conference Committee for Humane Trapping; c) existing legislation relating to humane slaughter of animals in Europe.

Composition:

2. Members of the panel will have a background in veterinary or human medicine and internationally recognized competence in one or more of the following fields:
  - a) Euthanasia
  - b) Neurology
  - c) Slaughter-house practice
  - d) Ethology

Conditions:

1. The competence and objectivity of the nominees must be recognized by each nominating party.
2. The panel will meet with and be briefed by the Humane Practices Committee of the Canadian Veterinary Medical Association as well as the Committee on Seals and Sealing, to ensure familiarization with particulars of marine mammal physiology.
3. Representatives of the above named Committee of the CVMA will accompany the panel in its travel to sealing operations and will be available for consultation during the deliberations of the panel.

4. The entire group is to be provided with its own independent means of transportation from field operations headquarters to the sealing operations.

Canada submits the following names for consideration as potential members of the independent panel of experts, having taken care to suggest candidates who are unlikely to be biased with respect to sealing. Canada invites the EEC to comment, or as appropriate, to make alternative suggestions for mutual consideration.

It is recommended that a list of at least nine mutually acceptable candidates be compiled. Consequently, the EEC Commission should submit additional names for mutual consideration. Agreement should then be reached as to the priority to be assigned to each in terms of the final list of six panel members, as some of the individuals proposed may not be available to participate in this assessment.

Dr. T.M. Leach  
Agriculture Research Council  
Meat Research Institute, University of Bristol  
Lower Landford  
Bristol

Prof. Dr. G. von Mickwitz  
Klinik für Kleine Klauentiere  
und forensische Medizin  
Tierärztliche Hochschule, Hannover

Leach and von Mickwitz are co-authors of Report No. 30 of the Directorate-General for Agriculture of the Commission of the European Communities, entitled "Review of pre-slaughter stunning in the E.C."

Dr. Roger Eubank, Scientific Director  
Universities Federation for Animal Welfare  
8 Hamilton Close  
South Mimms  
Potters Bar  
Herts, England ENG 3QD

Dr. Eubank has wide experience with large animal behaviour.

.../2

Dr. W.T. Jackson  
(Secretary, Veterinary Ethology Society)  
Min. Agriculture, Fisheries and Food, U.K.  
Medwyn House  
Mount Field Road  
Lewes, East Sussex  
England  
EN7 2XP

Dr. Jackson is familiar with regulatory programs  
and experienced in large animal slaughter techniques.

Temple Grandin  
Livestock Handling Consultant  
Tempe, Arizona, U.S.A.

Ms. Grandin has wide experience in large animal handling  
and slaughter house operations. She is a private con-  
sultant and has designed several important abattoirs.

J.R. Geraci, V.M.D., Ph.D.,  
Professor of Wildlife Diseases, Department of Pathology  
Ontario Veterinary College,  
University of Guelph.

Specialist in Marine animal patho-physiology and diseases  
Member of the Committee of Science Advisors of the U.S.  
Marine Mammal Commission  
Past President, IAAAM (International Association for  
Aquatic Animal Medicine)  
Author of over 60 scientific papers on marine mammal  
medicine and physiology.

LEGISLATIVE NATIONAL MEASURES TAKEN TO  
PREVENT THE IMPORTATION OF SEALSKIN PRODUCTS

---

- In the Netherlands a voluntary ban by the furtrade since 1970 was followed by General Administrative Order n° 454 of 4 September 1980, which brought Section 3 of the Endangered Exotic Animal Species Act of 8 January 1975 into force for amongst other things dead specimens and recognizable parts (skins and parts of skins) of all phocid seals, trade in which is prohibited without a licence. The Netherlands Government justified this measure on species conservation grounds.
  
- By Ministerial Decree of 8 June 1978 the import of phocid sealskins and products thereof into Italy was submitted to ministerial authorization. Trade in skins of adult seals which are not considered to be threatened under international conventions, will be authorized. Skins under 50 cm in length with a hairlength of more than 2.5 cm, however, may not be imported. Although the Decree is based on conservation grounds, the policy of not licensing the import of skins of newborn seals is based on grounds of public morality.
  
- In the United Kingdom the Trade Descriptions (Sealskin Goods) (Information) Order 1980 requires that sealskin goods first imported into, or made in, the United Kingdom on or after 1st January 1981 shall be marked when advertized or supplied to retail customers. The information must be sufficient to convey to persons acquiring the goods that they are sealskin goods and in what country or geographical location the relevant seals were taken.