

Discussion Paper

Acknowledging and Addressing the Absence of Greenlandic Input into the EU's 2024 Public Consultations on the Fitness of its Trade in Seal Products Regulations

Authors: Danita Catherine Burke and Erik Kielsen

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Summary:

This discussion paper is an introductory piece that aims to spark a discussion about the European Union's (EU) approach to consultations on the fitness of its trade in seal products regulations. Our preliminary review of statistics released by the EU on its 2024 public consultation process suggest that there are no contributions to the EU's review on its seal product regulations from members of the Greenlandic public. The absence of Greenlandic public input is particularly relevant in this instance as Greenland is one of only three recognised bodies with permission to export seal products into the EU. This paper includes insight from seven Greenlandic seal hunters based in Narsaq, Nanortalik and Qaqortoq as part of an early effort to help reopen the discussion on the fitness of the EU seal product regulations and highlight the need for Greenlandic inclusion. Our interviews expose a lack of public awareness about the 2024 public consultations amongst fishers/hunters who would have been a key demographic for contribution to the EU regulatory fitness check process. As of October 2025, the EU has yet to publish its final report on its fitness check review. The recommendations of this paper are that the EU takes additional time before completing its report so that it can re-open its public consultation in Greenland in tandem with a targeted engagement strategy developed in consultation with local rightsholders and stakeholders. By taking additional time to focus on engaging Greenland, the EU can raise awareness about the purpose and opportunity for the Greenlandic public to contribute their views on the EU trade in seal products regulations so they can help inform the EU's consideration of changes to its rules. The paper is embedded in the project "Seals, Stigma and Survival: Finding Solutions to the EU Stigmatization of Seal Hunting" a Nordic Arctic Programme funded project. Additional financial support was provided by Innovation South Greenland for engagement with local communities.

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Authors:

Danita Catherine Burke, Senior Research Fellow at the Center for War Studies and International Politics International and Regional Politics Group, University of Southern Denmark

and

Erik Kielsen, Consultant at Innovation South Greenland and Founder of Kielsen Coordination

With Team Support from:

Kristina Svelds, Senior Researcher at the Natural Resources Institute Finland (LUKE) and Associate Professor at Åbo Akademi University

Helena Gonzales Lindberg, Senior Researcher at Nordland Research Institute

Jim Winter, Founding President of the Canadian Sealers Association and retired CBC journalist

Special thanks to:

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Abbreviation Key:

EEC – European Economic Community

EU – European Union

IFAW – International Fund for Animal Welfare

KNAPK - Kalaallit Nunaanni Aalisartut Piniartullu Kattuffiat/ The Association of Fishermen and Hunters in Greenland

PETA – People for the Ethical Treatment of Animals

WTO – World Trade Organisation

Introduction:

In May 2024 the European Union (EU) began a process of global public consultations on the fitness of its trade on seal products regulations; regulations that effectively ban seal product imports and sale as of 2009 on the EU market, with some limited exceptions for recognized Indigenous bodies such as the Government of Greenland. According to the European Commission the purpose of the 2024 fitness check initiative would “assess if the rules in place remain fit for purpose, focusing on their socio-economic impact and their impact on seal populations” (European Commission, 2024b). However, on a different European Commission webpage which summaries the EU trade ban, the EU stresses that “[t]he Fitness Check findings will inform the Commission as to whether any amendments to the current legal framework are needed. The Commission does not intend to weaken the protection level currently given to seals” (European Commission, n.d.).

The report intended to be informed by the fitness check’s public consultations is expected sometime “after summer 2025” (European Commission, 2024b). As of October 2025, the report has not been published.

Presently the raw data of individual submissions to the public consultations and statistics on the consultation contributors are available, which includes information such a breakdown of the countries of origin of contributors. The public consultations had two components: an open opinion submission (for which there are reported 13749 instances of unique feedback received) (European Commission, 2024c) and a structured questionnaire (for which there are 3598 instances of unique contributions) (European Commission, 2024d). In both instances there appears to be no submissions from members of the public in Greenland/ Kalaallit Nunaat.

The lack of Greenlandic/Kalaallit input into the EU public consultations on the seal product regulations is significant as Greenland is one of the three Indigenous bodies with recognized status under the Inuit Exception which is technically intended to provide special consideration for Indigenous rights within the trade ban (European Commission, n.d.). Greenland is a country where seal hunting is practiced extensively for both personal use and commercial purposes as it is an integral part of the Inuit hunting season and the renewable economic and cultural practices of many coastal communities (Nuttall, 1990; Hennig, 2015; Burke and Kielsen, 2025b; Surviving Sealing Stigma, 2025).

Background on the EU’s seal product ban:

In 2009 the EU implemented a ban on the trade of seal products, justified on the basis of a moral objection to seal hunting. The view that sealing is morally objectionable developed within Europe as a response to decades of lobbying and anti-sealing activism which caught the global imagination starting in the mid-20th century. Organisations like the International Fund for Animal Welfare (IFAW), People for the Ethical Treatment of Animals (PETA), Sea Shepherd Conservation Society and Greenpeace have been prominent international animal rights and environmental non-governmental organisations that campaigned extensively against sealing with major media-focused work to portray seal hunting and sealers in a negative light (Allen, 1979; Burke, 2023). IFAW in particular has been extensively involved with the European Economic Community (EEC) and EU lobbying against seal hunting (IFAW, n.d.).

The ban prohibits the sale of seal products on the EU market (European Commission, n.d.). This ban built upon a ban implemented by the EU's predecessor the EEC which banned "the importation and sale of whitecoat and hooded seal pups in the European Union" (Parliamentary Assembly, 2006). In both instances, the seal product bans had devastating consequences for Indigenous and non-Indigenous fishers/hunters across the Circumpolar North, with communities in the High North being particularly hard hit by the presentation of sealing as an immoral activity and resulting loss of market access and demand (Burke, 2023; Hennig, 2015; Svendsen et al., 2025). The 2009 EU ban was challenged by Canada and Norway at the World Trade Organisation (WTO), but ultimately the WTO, in an unprecedented conclusion, upheld the EU's right to make a product ban based on a moral objection (World Trade Organization, 2015).

The EU, however, has two core exceptions to the importation of seal products imports: (1) the Inuit Exception (also known as the Indigenous Exception); and the (2) personal use exception. The Inuit Exception is presented by the EU as an acknowledgement of Indigenous traditional hunting rights and cultural practices, permitting the import of seal products based on what the EU frames as traditional subsistence hunting only. Importing Indigenous products into the EU is only permitted for recognised bodies, for which there are presently three: the governments of Greenland, Nunavut (Canada) and the Northwest Territories (Canada). The personal use exception permits people travelling into the EU to bring seal products with them for personal use, or use by immediate family, only.

Internally, EU also permits limited small scale hunting of seals within some EU nations, such as Finland and Sweden, primarily for population management reasons (European Commission, n.d.; 2020; 2023). EU member states are prohibited from the sale of seal products within their own countries and within the EU, but are permitted to import seal products from a recognized Indigenous body through the Inuit Exception. As of 2023:

Denmark and Estonia were the only Member States to report that seal products were placed on their market, based on the conditions set out in the "Inuit or other indigenous communities" exception. The Danish customs recorded seal product imports from Greenland for a total value of DKK 8 347 944 (= EUR 1 122 337 with the exchange rate of 17.01.2023) and a total volume of 32 109 kg, in comparison with the 10 502 kg reported for the previous period, which covered three years instead of four. For the first time, Estonia reported seal product imports from Greenland for a total value of EUR 1 555.67 and a total volume of 34.16 kg (European Commission 2023).

In acknowledging the limited usefulness of the Inuit Exception, in 2020, for example, the Government of the Northwest Territories – one of the three recognized bodies – informed the EU that "the direct benefits of the exception have been very limited" (European Commission 2020, p. 14), with all three recognised Indigenous bodies having called for the EU to amend its approach to seals and seal imports with little success to date (European Commission, 2020).

Consultations: A preliminary overview

The public consultations processes provided an opportunity to answer a questionnaire and provide an open submission on views about sealing and the EU regulations. Further details on the statistics referenced in this section are available from:

- Questionnaire: "Trade in seal products – fitness check of EU rules: Public consultations - About this consultation" (European Commission, 2024d)

- Questionnaire: “Factual Summary Report of the public consultation and call for evidence on “Trade in seal products – fitness check of EU rules”” (European Commission, 2024a)
- Open submissions: “Trade in seal products – fitness check of EU rules: Statistics” (European Commission, 2024c)

There was significantly less participation in the questionnaire compared to the open submissions based on instances of unique feedback received: 3598 instances for the questionnaire compared to 13749 for the open submissions option. But in both instances respondents from five countries dominated participation: France, the Netherlands, Belgium, Germany and Italy. These five countries rounded out the top five countries where participants to the consultations are based.

Chart 1 - Percentage of Participants - Questionnaire

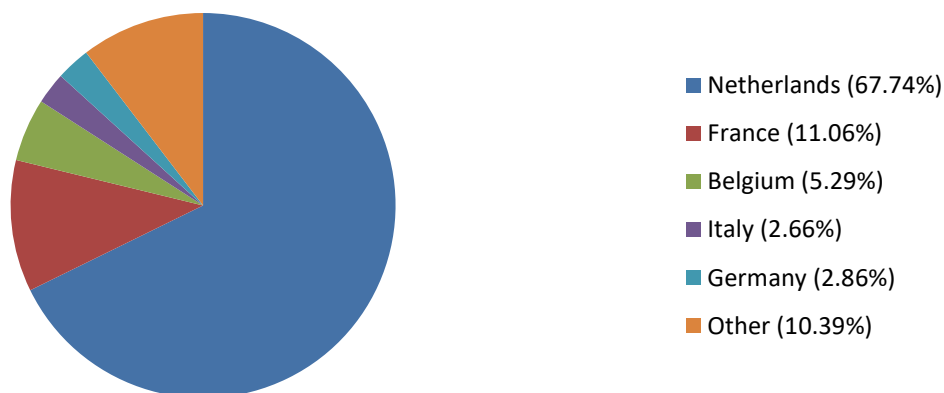
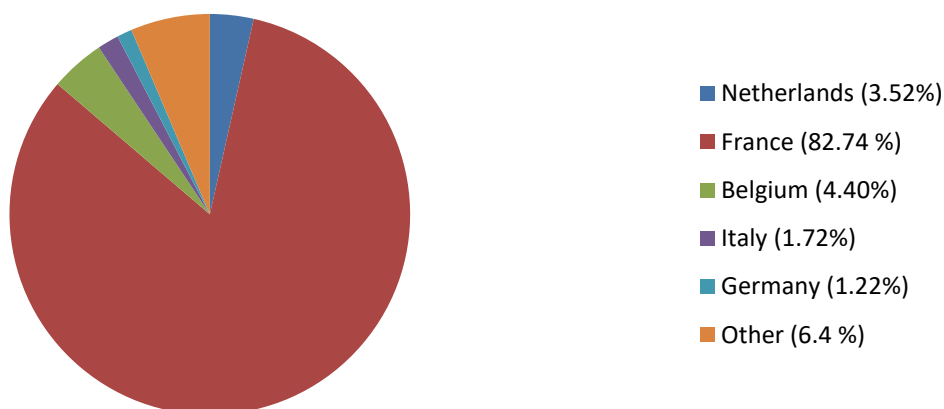


Chart 2 - Percentage of Participants - Open Submissions



A preliminary review of the data provided on the questionnaire and open submissions suggest that there are no submissions for participants based in Greenland and very limited sealer and Indigenous engagement in general. To the questionnaire, information in the “Factual Summary Report” state that of the self-identification of respondents, out of 3598 responses there were:

- 18 people who identified as a sealer (0.5 percent)
- 8 who identified as a fisher (0.2 percent)
- 7 on behalf of an organisation dealing with seal hunting (0.2 percent)
- 4 representatives of an Inuit or other Indigenous community (0.1 percent)
- 2 on behalf of an organisation dealing with processing/trading seal products (0.1 percent)

The Factual Summary Report states that of respondents to the survey 50 percent believe that there is a total ban on seal products in place for the EU market.

There is the possibility – which we are unable to confirm at this time – that given Greenland’s status as a part of the Kingdom of Denmark that the EU could have potentially classified submissions from Greenlandic participants as participants from Denmark, or that people who are Greenlandic but presently based in Denmark may have selected Denmark as their country of identification in the consultations; using residency rather than origin. Though limited, there was consultation participation from participants who selected Denmark as their country.

- Questionnaire: 12 participants (0.30 percent)
- Open submissions: 11 participants (0.08 percent)

At present, however, there appears to be no public participation from Greenland based on the preliminary statistics of the public consultation engagement provided by the European Commission sources.

Background on Interviews in Greenland:

The interviews included in this paper were conducted in a hybrid in-person/online way by Erik Kielsen and Danita Catherine Burke as part of the project “Seals, Stigma and Survival: Finding Solutions to the EU Stigmatization of Seal Hunting”. Seven interviews were completed in the South Greenland communities of Narsaq, Nanortalik and Qaqortoq between July and October 2025. Kielsen coordinated and provided translation services for all interviews, attended them in person and participated in the questioning and discussion. Burke attended and conducted the interviews remotely. All sealer/hunter interviewees received an honorarium for their participation in acknowledgement of their role as traditional knowledge holders and practitioners.

Kielsen worked with Burke, and Jim Winter, to design the core question list for all sealers/hunters who participants in interviews for the project. Kielsen and Winter have experience seal hunting and together brought an Indigenous and non-Indigenous hunter perspective to the sealer/hunter interview question list design. For more information on the interviews in Greenland, please visit the project website: www.survivingsealingstigma.com (Burke and Kielsen, 2025a)

Views on the Ground:

Table 1: Interviewees in Greenland	
Names	Dates
Kasper Motzfeldt	July 11, 2025
Hans Kaspersen	July 11, 2025
Ole Jørgen Davidsen	July 11, 2025
Thor Eugenius	July 30, 2025
Peter Jakobsen	July 30, 2025
Gerhardt Jakobsen	October 3, 2025
Otto Ole Noahsen	October 13, 2025

Seven interviews were conducted between July and October 2025 with interviewees from three communities based in South Greenland: Narsaq, Nanortalik and Qaqortoq. All seven interviewees are professional fishers/sealers/hunters. During their interviews participants were asked whether they knew about the 2024 EU fitness check on its trade in seal products regulations. In every case they expressed that they did not know about the fitness check and the interview was

the first time that they had heard about it. The following information reflects interviewee responses to two questions¹:

1. In 2024, the EU opened public consultations on the fitness of its regulations banning the trade of seal products. Were you aware of these consultations?
2. If you were advising EU politicians about the trade ban on sealed products, what advice would you give?

Ole Jørgen Davidsen, for example, is a hunter based in Narsaq. Davidsen is also the local KNAPK community representative. KNAPK is the Association of Fishermen and Hunters in Greenland. Davidsen stated that:

This is the first time I'm hearing about it. From you. It's a very interesting issue. It would have been very important for the EU to have us have a say in these processes, and I would have had something to say, to include, if I had known it was happening but I'm just hearing about it now. But this is something worth investigating and learning more about.

Thor Eugenius, like Davidsen, also represents KNAPK but is based in Nanortalik. Eugenius was equally unaware of the consultation process and expressed concerned that the national fishermen and hunters association was in the dark about it. He stated: "I hadn't heard that [the fitness check consultations]. I also don't even know if the KNAPK has heard about it."

Gerhardt Jakobsen noted that "I haven't heard about it at all". Similarly Peter Jakobsen was equally uninformed about the opportunity to express their views to the EU, but was also concerned about whether the EU engaged KNAPK, and if they did and informed them about the public consultations, why KNAPK did not tell its members.

It could be that the national hunters and fishers association [KNAPK] headquarters had received that information but I'm not sure. If they have, they should have brought this to the local departments [branches in the communities] attention. I hadn't heard out this before so maybe KNAPK didn't know. Maybe the hearing hasn't arrived in Greenland.

Jakobsen was not the only hunter who expressed concerned about the relay of information from KNAPK to members in the communities.

When asked about his awareness of the consultations Otto Ole Noahsen, for example, said:

¹ The exact wording of the questions may have had some variation in the interviews reflecting the flow of the respective conversations. In some instances the interviewees naturally provided the answer to a question during the interview which negated the need to explicitly articulate the question.

No. I'm a member of the local fisherman hunting organization KNAPK. KNAPK is obligated to spread the messages in that case. I haven't heard anything about it.

Awareness of the process to submit to the consultations should have been spread to the locals and the locals chairman should have spread these to its members. But us here, we haven't heard anything.

The conversations with KNAPK representatives Eugenius and Davidsen are suggestive that KNAPK were not informed by the EU about the consultations. There is also the possibility that the EU did reach out to KNAPK but did not do adequate follow-up to ensure their participation or to verify that information on the consultations was received by the appropriate association representatives so that information could be shared with the organisation's members.

In the interviews there was a real sense that change is needed especially with the EU's approach to sealing. This desire for change in the EU-Greenland relationship emphasizes why the absence of Greenlandic input into the EU's public consultations in the fitness check of the trade in seal product regulations is so significant and detrimental to the quality and representativeness of the processes that the EU instigated.

Kasper Motzfeldt, for example, expressed that regulatory restrictions are central to the challenges he and others are facing so he would advise for change in this area.

I would change how they have regulated the hunt and use of seals. It should be that all kinds of seal skin for all species should be possible to sell to Great Greenland and use all the meat. Simply put, it should be possible to use all the seal. That's the way I would like to see things change.

When asked the follow up question of "what's stopping you now in your opinion?" Motzfeldt replied: "EU rules... The EU and European don't even think about it. If we didn't have the regulations there or if they were created using the logic of Greenland and Inuit people, I would have been very wealthy. The prices would have been up there with better possibilities".

Jakobsen would also advise the EU to open up if he had the chance to participate in the 2024 consultations processes: "my advice to them would be to be open to imports so we don't have to keep them here and have a lot of waste from not selling them abroad. So that it's, my key advise, open up." He went on to stress that he would advise the EU to "Let us have a higher price for seal skins because like all other people we need income, too. It should pay off to hunt seals and sell seal skins."

In the interviews there was also a sense that the European public, and EU officials, largely are unaware of the realities of living in the High North. Noahsen, for example, said that if he had a chance to advise EU politicians he would "invite them to see the realities, how we hunt them, how we use the meat and skin. See our culture directly. Let them see the realities."

This invitation to experience the realities of local culture and life connects to another theme that came through in the advice expressed by participants, and there was advice for the EU to listen to hunters as much as they listen to activists. As Eugenius emphasized:

Listen more to us, the hunters. EU officials should have more interest in our words, our thoughts because we are dependent on the seal, by its meat and its skin. More information that we are dependent on the seal itself.

But a sense of deafness to Greenlandic voices and an unwillingness to treat Greenland as their equal was noted in the interviews, too. Davidsen, for example, stated that he would advise the EU: “That we should have the rights of other countries. They have signed a document to treat us like other countries, so why don’t they do that?”

Hans Kaspersen echoes similar sentiments as expressed by other hunters and he elaborated that if he had a chance to speak to the EU said that he would stress that:

EU should be much better than it is. At the moment they take our fish, but they should do more to buy our fish rather than have their quotas on our coastlines. It’s way too easy for the EU to take fish from our waters, to land fish from our sea. They get too much out of our fishery and can sell them for a good price. It would be higher price if we were still fishing them from our sea. It seems to me that they need to give and not just take; give something back. I would prefer if there was more of a dialogue between us and them that would end up in a win-win.

Kaspersen went on to point out that if it was up to him he would loosen the EU ban:

It can’t be unbanned 100% because also other countries have something to say. You have to see the globe to make those kind of changes make balance. We should work together to make the same work, all countries. We live in the same world.

Kaspersen’s perspective is one of many that the EU does not currently have as part of its data collection and analysis about its approach to regulating seals and its impact on peoples and communities across Greenland, and the Circumpolar North more broadly. With the EU public consultation questionnaire, for example, having only participation from 18 self-identified sealers – approximately 0.5 percent of respondents – and zero participants in both the questionnaire and open submissions from Greenland it begs the question of how useful their consultations are especially as the EU has disclosed that “[t]he Commission does not intend to weaken the protection level currently given to seals” (European Commission, 2024b).

Recommendations:

The final report from the EU’s 2024 fitness check is pending as of October 2025. As such, our recommendations are for the EU to:

1. Pause the finalization of its report until Greenlandic engagement is conducted;
2. Identify and engage rightsholders and stakeholders in Greenland to receive guidance on how to connect with Greenlandic communities and peoples;
3. Design and implement a public consultation engagement plan with rightsholders and stakeholders targeting the Greenlandic public;
4. Make engagement strategy and consultation materials accessible in Greenlandic, English and Danish to maximize public engagement;
5. Incorporate Greenlandic views on the EU trade in seal products regulations and their implications for local fishers/hunters into their final review of the regulations and consideration of amendments.

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