



NATIONAL ASSEMBLY

7th PARLIAMENT

PARLIAMENTARY STANDING COMMITTEE ON NATURAL RESOURCES

**REPORT ON THE MOTION TO FIND SOLUTIONS TO THE DEVASTATING
EFFECTS OF THE INCREASING SEAL POPULATIONS ON THE SUSTAINABLE
HARVESTING OF FISH STOCKS IN NAMIBIA**

REPORT NO. 06/2025

ACRONYMS

FAO	Food and Agriculture Organization
FFF	Fish Farm
GRN	Government of the Republic of Namibia
MT	Metric Ton
MA	Marine Aquaculture
SSFF	Small Scale Fish Farmers
TAC	Total Allowable Catch
CSO	Civil Society Organisations
MFMR	Ministry of Fisheries and Marine Resources
OCN	Ocean Conservation Namibia
WTO	World Trade Organisation
CFA	Confederation of Fishing Associations

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1. Introduction and Background

The Motion on tabled in the House on 1 March 2023 by Hon Mike Kavekatora. The Motion was referred to the Standing Committee on Natural Resources on 3 March 2023 to deliberate and find a solution the devastating of the increasing seal population has on the sustainable harvesting of fish stocks. It is estimated that the region's seal population is estimated at around 2 million, of which 75% is in Namibian waters. The Motion is seeking for investigations to be carried out in order to find solutions to the devastating effects caused by the increasing seal population on Namibian fish stocks.

2. Cape Fur Seals

The Cape Fur Seal commonly known as the brown fur seal is the largest and most robust member of the fur seals.

The African fur seal lives around the southern and south-western coast of Africa from Cape Cross in Namibia and around the Cape of Good Hope to Black Rocks near Port Elizabeth . The African fur seal's diet is made of up to 70% fish, 20% squid, 2% crab and other species such as crustaceans, cephalopods and sometimes birds. The brown fur seal's main predator is the great white shark, although they are also preyed upon by various other animals, such as killer whales and vagrant southern elephant seals. Land-based predators include black-backed jackals, brown hyenas and occasionally lions on the Skeleton Coast in Namibia. Seagulls peck the eyes out of baby seals to render them helpless and disabled, and feast on their flesh.

Seals are a keystone species in helping maintain the balance in marine ecosystems across the world. From helping keep the food chain in line, feeding on various types of fish, squids and other marine animals, to providing the ultimate energy boost to larger predators such as orcas, polar bears and sharks. Seals, throughout their travels, explorations or even while they're out hunting for food, help generate, and spread nutrients to the far corners of the ocean which in turn help in feeding smaller marine life, growing vegetation (and homes for smaller fish), as well as spreading the organic materials to nutrient limited islands.

3. Seal Harvesting in Namibia

Seal harvesting is currently practiced in nine countries: United States (above the Arctic Circle in Alaska), Canada, Namibia, Denmark (in self-governing Greenland only), Iceland, Norway, Russia, Finland and Sweden. Most of the world's seal hunting takes place in Canada and Greenland. From 2005 to 2015, Namibia has exported nearly 400,000 seal skins. Along with Canada and Greenland, Namibia is one of the last places where seals are harvested for commercial purposes.

The country has set an annual hunt quota of 80,000 Cape fur seal pups and 6,000 bulls. Namibia is the only country in the Southern hemisphere where seal harvesting is still practiced, and has attracted criticism from animal rights groups. Namibia is the only country in the Southern Hemisphere still practicing seal hunting. In contrast harvesting of seals was outlawed in South Africa in 1990. The Ministry is resolute that Seal harvesting in Namibia is done in line with the provisions of the Constitution and the operations are governed by the Marine Resources Act. Seals are listed under Appendix II (CITES), which includes species not necessarily threatened with extinction, but in which trade must be controlled.

4. Regulatory Framework Fisheries Management - Namibia

Article 95: Promotion of the Welfare of the People, "The State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following:

(l) maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory.

Proclamation No 18 of 1922, which prohibited the pursuing, capturing or killing of seals except under a licence. Boats had to be registered and licensed. In 1949, the Sealing and Fisheries Ordinance No 12 of 1949 was passed which repealed Ordinance No 18 of 1922. In 1973, the Sea Birds and Seals Protection Act, No 46 of 1973 repealed Sealing and Fisheries Ordinance No 12 of 1973). On 19 February 1991, the Ministry of Fisheries and Marine Resources was established and the Namibian Government promulgated the Sea Fisheries Act, 1992 (No 29 of 1992).

The Marine Resources Act (2000) is comprehensive legislation conforming with international guidelines on sustainable, ecosystem-based fisheries management. The Marine Resources Act addresses all key drivers of overfishing: setting clear quotas (through Total Allowable Catches) and banning harmful fishing methods and gear, overcapacities from subsidies, bycatch and discards. The Act was amended in 2015 to clarify several key terms and redefine the mandate of the Ministry in charge of the Marine Resources Act in relation to determining a Total Allowable Catch (TAC) based on the best scientific evidence available. The amendment also stresses that the State of Namibia can utilise its marine resources to advance socio-economical, cultural or other objectives of the government for public interest. Namibia is a signatory to the following international instruments: The United Nations Convention on the Law of the Sea; The Rome Declaration on the Implementation of the code of conduct for Responsible Fisheries; The Reykjavik Declaration on Responsible Fisheries in the Marine Ecosystems and The Convention on the Trade in Endangered Species of Fauna and Flora (CITES).

5. International Ban on Seal Products

The European Union banned seal products in 2009 for reasons of welfare. The ban was a continuation of a sealskin ban by the European Economic Community imposed in 1983. Regulations of the European Union ("EU Seal Regime") generally prohibiting the importation and placing on the market of seal products, with certain exceptions, including for seal products derived from hunts conducted by Inuit or indigenous communities (IC exception) and hunts conducted for marine resource management purposes (MRM exception). Canada and Norway filed complaints before the WTO seeking to overturn the ban, but the ban was upheld.

EU has approved Inuit sustainable hunt and production recognized by WWF and Greenpeace. The European Commission issued the regulation on the Inuit exemption in 2009. Regulation (EU) No 1007/2009 of 16 September 2009 on trade in seal products sets out harmonised rules for placing seal products on the EU market. Regulation (EU) No 2015/1850 of 13 October 2015 laying down detailed rules for the implementation of Regulation (EC) No 1007/2009 of the European Parliament and of the Council on trade in seal products.

6. Objectives of the Investigations/Consultations

- 6.1. To understand legislations, policies and regulations governing Seal Curling in Namibia

- 6.2. Investigate if the legislations in place are in line with international protocols, treaties Namibia is signatory too.
- 6.3. To understand the methods used in the hunting of seals on why it's been widely criticised by animal welfare organisations
- 6.4. To obtain information on quotas allocated to seal hunting in relation to the estimated population
- 6.5. To understand the economics of seal hunting how they benefits the economy and impacts If seal hunting is stopped
- 6.6. Consult all relevant stakeholders in the fishing industry as well as animal rights organisations for their views, opinions and proposals on a way forward
- 6.7. To obtain conclusive scientific studies that shows seals are depleting fish stocks and in what manner
- 6.8. Verify if the Ministry has implemented recommendations made by the Ombudsman in 2012 on the harvesting of Cape Fur Seals
- 6.9. To prepare a comprehensive report with findings and recommendations for adoption by the House and onward implementation by the Executive

7. Methodology

Consultative meetings, interviews, visit to seal harvesting sites, written submissions from all the relevant OMA's, CSO, Animal Welfare Organisations, Fish Companies and their associations and seal processing companies. Consultations meetings were held in Lüderitz, Swakopmund, Walvis Bay and Henties Bay.

8. Composition of the Delegation

The Delegation comprised Hon. Tjekero Tweya (Chairperson of the Committee), Hon. Lucia Witbooi, Hon Diedrik Vries, Hon Sebastiaan Karupu, Hon Helaria Mukapuli, and Hon Hamata. The Members were accompanied by Mr. Albius Mutonga.

9. Purpose of the Report

The purpose of the report is to inform the National Assembly about the oversight visits to Stakeholders in Karas, Khomas and Erongo Regions on the Motion on the impact of seals on the sustainable harvesting of fish stocks in Namibia.

10. Stakeholders Consulted

10.1. Courtesy Call on the Governor – Karas Region

The Governor welcomed the delegation to the region and appreciated the Committee's efforts in undertaking oversight activities meant to improve conditions on the ground and keeping the Executive in check. She welcomed the consultations to be carried out in Lüderitz on the impact of the increasing seal population on harvesting of fish stocks in Namibia. It is imperative to ensure the populations of seals are kept in check to ensure the availability of fish as a protein source for Namibians.

10.2. Courtesy Call on the Mayor

The Mayor His Worship Benjamin Mc Kay welcomed the delegation to the coastal town of Lüderitz and wished the team successful meetings with all the stakeholders identified. He informed the delegation that seal skins have no market as a result they are piled up at seal factories. The only part of the seal having a market are the Genitals (sold to mostly China) and the oil which is mostly sold locally. The Mayor further stressed that most seal holders in Lüderitz struggle to complete the full quota allocated during the 6-month seal season due to bad weather and limited availability of Bulls.

He proposed the following as a possible solution; the ministry of fisheries and marine resources to provide a grace period of at least two to three month under a seal experimental/exploration rights to reduce the maximum total of seals (pups/bulls) to sustain fish stocks. The proposal if adopted is to be carried at each rights holder cost (similar to the deep sea rock lobster experimental right).

10.3. Ministry of Fisheries and Marine Resources (MFMR)

Namibia has 26 seal colony spread from the South (Lüderitz) to the North (Erongo Region). As depicted on the **chart 1** below there has been an increase in some colonies and decrease in majority of colonies since 1993 mainly attributed to migration from one colony to the other in search of food.

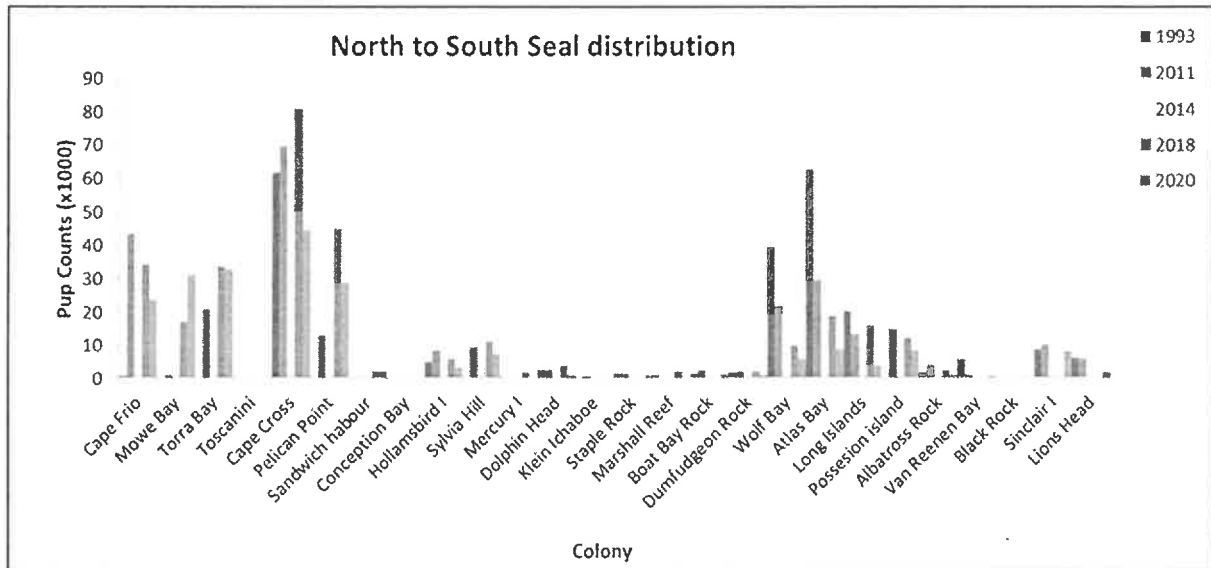


Chart 1

The Cape fur seal is an opportunistic predator of epi and meso-pelagic preys; their diet has been analysed through prey remains found in the scats. Studies have shown that a Cape fur seal consumes about 1.4 to 6.8 kg of food per day depending on the age, sex and reproductive status. The diet of seals as depicted in the graphs below (**Chart 2, 3**) show that the goby scientific name (Gobiidae) is their favourite food comprising in some instances up to 80% of their diet. Worth mentioning here is that goby is not a commercial fish species harvested by Humans for consumption. This means the analogy that Seals are depleting fish stocks is not complemented by scientific studies.

Central North

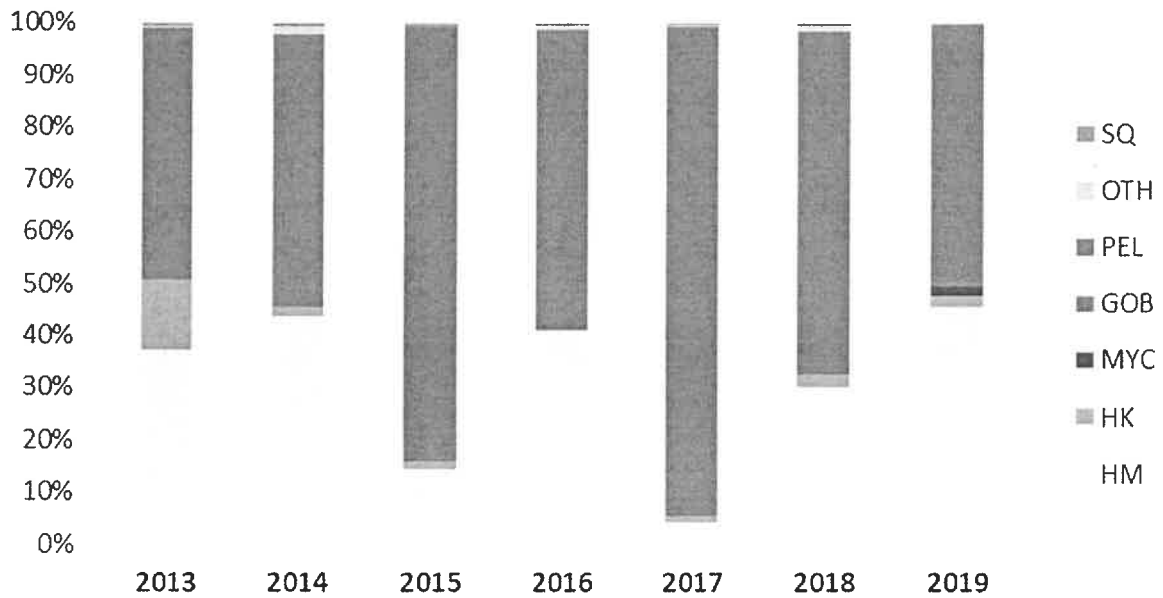


Chart 2

Far South

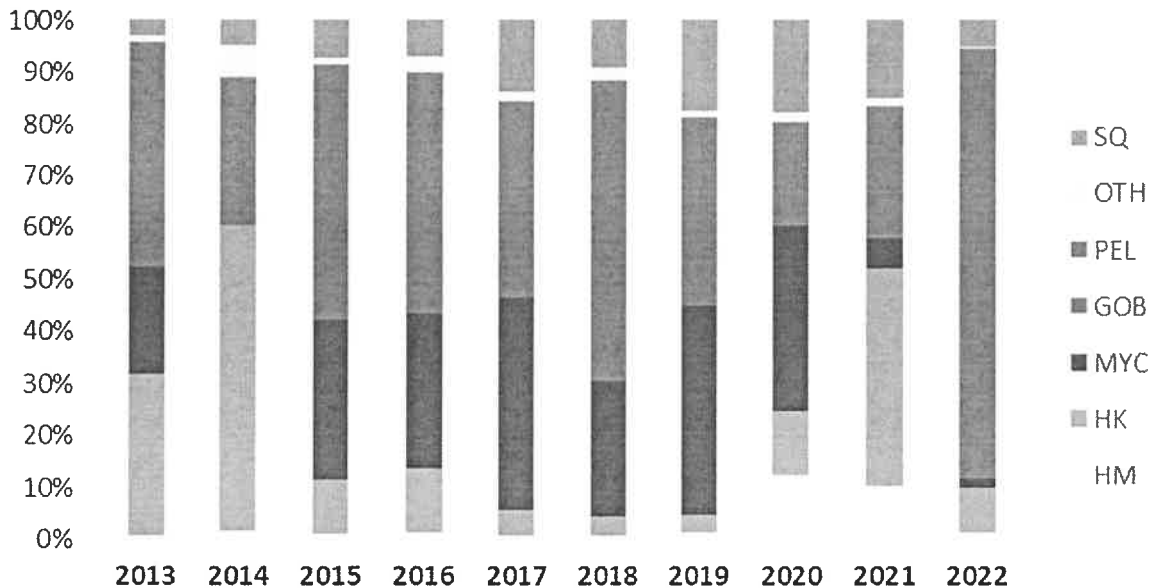


Chart 3

Seal population has increased over the years mainly due to the fact that seal quotas are not fully utilised due to varied reasons key among others being lack of a market to sell seal products. The numbers indicate that Namibia has about 1.6 million seal population as depicted in the graph (chart 4) below.

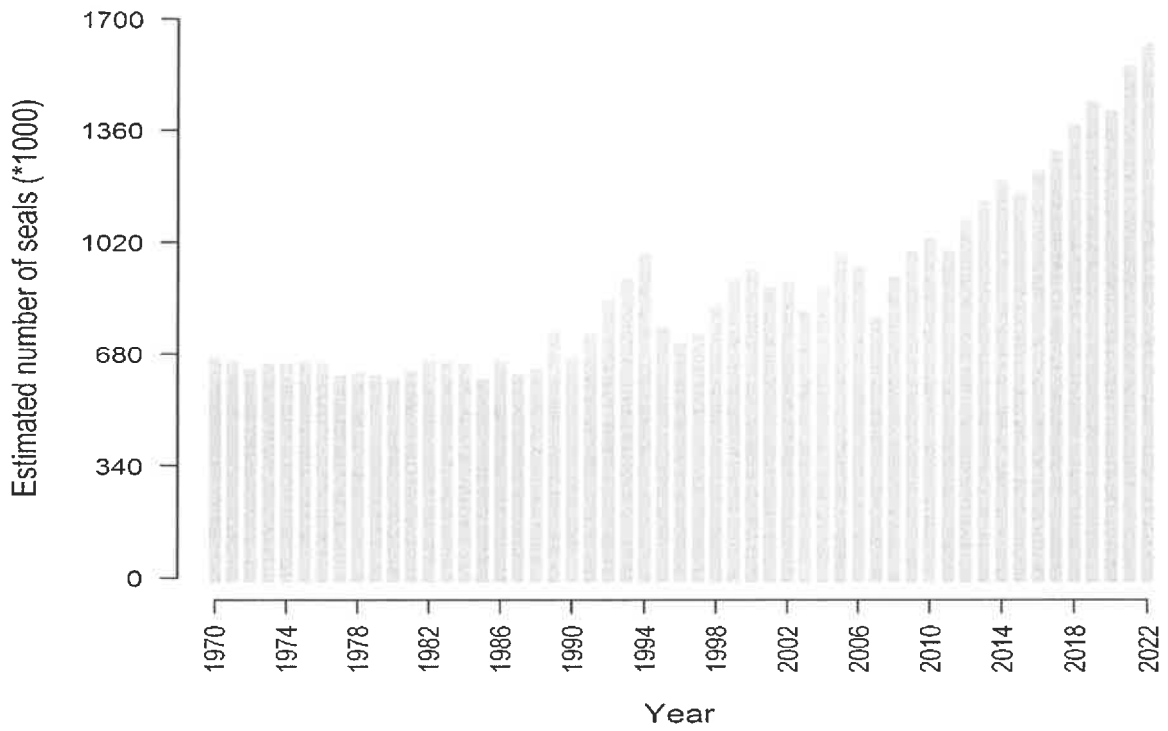


Chart 4

The harvesting of seal in particular pups has not been utilised to the fullest as shown in the graph below
Chart 5 and 6

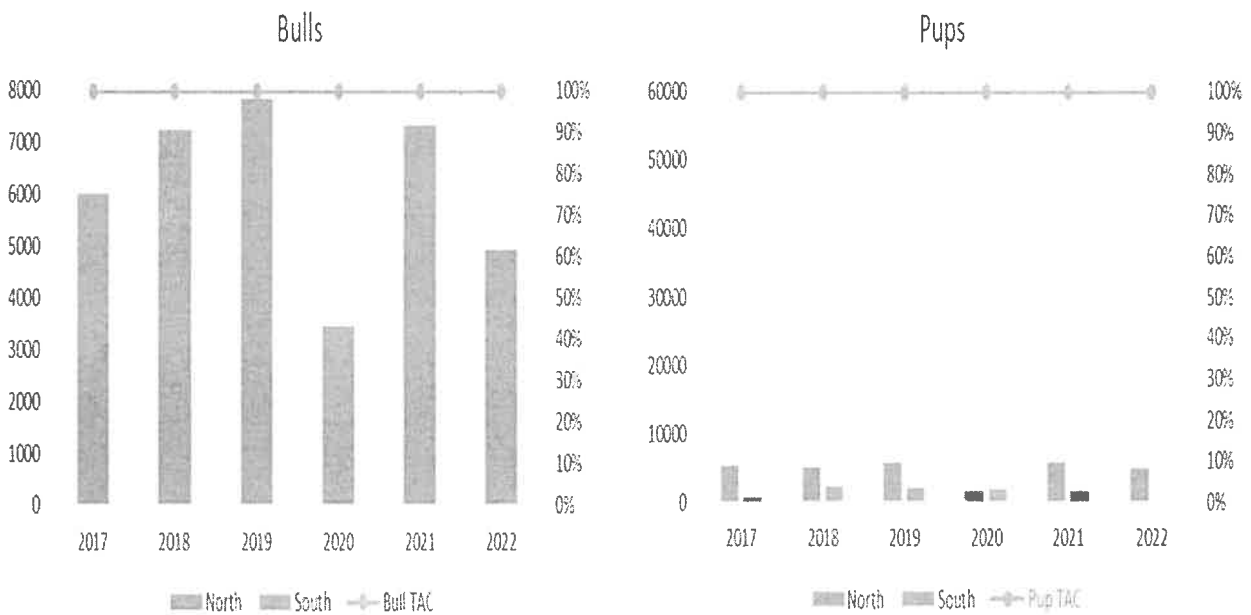


Chart 5

Chart 6

The impact of COVID 19 is visible during the period 2020 -2022, where quota holders were not allowed to harvest Seals owing to the restriction applicable at the time.

10.4. UUKUMWE SEAL PROCESSING COMPANY

Uukumwe was registered in 2009 as a Youth Consortium, 100% wholly owned by Namibians, to participate & benefit from the country's Marine Resources through fishing rights & quota allocation. In December 2011, the Company was awarded seven (7) years fishing rights by the Ministry of Fisheries and Marine Resources (MFMR). Uukumwe holds the right to harvest Horse Mackerel, Cape Fur Seal and Large pelagic. In regard to shareholding Bridgehead Investments (Pty) Ltd owns 40%, Mwetufayo Investments (Pty) Ltd 25%, Namcaribe Investments (Pty) Ltd 25%, Ofinox Investments Cc 4%, Local Economic Agency for Development cc 4% and Totie Jacobus Gurirab 2%. Staff comprises of 27 seasonal employees and 4 permanent employees, six (6) Females, Twenty - five (25) males, age range between 23 – 56 year, translates to 94% youth. The company trades in Seal Genitals, Seal Oil, Seal Skins and Seal Meat. Uukumwe acquired the following machinery for harvesting and operation purposes; Splitting Machine, Fleshing Machine, tanning drums, a water effluent treatment plant, hammer mill, drying containers and a boiler. The total allowable catch (TAC) of seals for the entire country is set at 60,000 Pups and 8,000 Bulls. The TAC is allocated in a proportion of 70:30 ratios, between the Northern and Southern colonies respectively. Uukumwe harvests from Atlas Bay and Wolf Bay colonies, which are part of the southern colonies.

In regard to Challenges faced in the Seal industry the major ones are; the market for the sale of seal products has been heavily impacted by COVID19, especially the sale of seal genitals; The machinery necessary for the production of Omega 3 tablets, which is a byproduct of seal oil is very expensive; local tanneries are not keen on supporting and guiding new market entries, there is no local market for seal meat, because it has not been certified by the necessary bodies and getting financial assistance from financial institutions is difficult, because they require collateral pledge which makes it especially difficult for startups with no assets to put up. The company recommended for the harvest season to be extended from the 15th November to the end of November to enable the harvesters to catch their full quotas as allocated, cognizant of the fact that Bulls only come to shore towards the end of September which at present only gives two weeks of harvesting. It was further recommended for the Ministry of Fisheries and Marine Resources together with Ministry of Industrialization and Trade to engage with Asian countries where Namibia has embassies, to look into promoting and opening up markets for the sale of Seal products from Namibia. The Ministry of Fisheries and Marine Resources to look into subsidizing the purchase of machinery required to make Omega 3 tablets or seal oil refining. The Ministry of Fisheries to look into increasing Bulls quota to 4000 as this will enable rights holders to harvest more bulls, in turn reducing the high consumption of fish by the bulls.

10.5. GREAT KARAS SEAL PROCESSING COMPANY

The company was established in 2012 to harvest seals at colonies in the Karas Region. The company has since enlisted a Chinese investor to assist in marketing seal products to China. The joint venture company bought a building within Lüderitz for 15 million dollars and renovated it to a seal processing factory capable of processing 8000 seals per hunting season. The factory started operating in 2016, to date have harvested and processed 5 721 Bulls and 34 746 pups. In 2021 the company could not harvest due to lack of a market and the difficulties in finding seals as they have migrated to other colonies such as Lions head and Van Rheunen Bay. The Company employs 3 staff in addition to 34 seasonal workers with an average salary of N\$ 5,500. The company have plans of becoming a renowned seal product supplier of choice by adding value producing shoes, briefcases, handbags and omega 3 quality oil. The challenge the company face is securing the machinery to produce the products, there is no capital to invest in the manufacturing arena. In addition, the unavailability of markets to sell seal products pose an even bigger threat going forward.

10.6. MARCO FISHING COMPANY

The MD of the company informed the meeting that they lose about 40% of their catch to seals on a daily basis. He estimated that about 2 million seals are roaming the Namibian waters which on average eat about 12 million tons of fish yearly the highest seal population in the world. The Company uses about 400-600 liters of fuel to get away from seals who often will follow the trawlers. He proposed seals be harvested sustainably with the meat sold locally in Namibia as a protein source through the Namibia Fish Consumption Trust given that there is no market for seal products except the genitals. The other alternative is to cull (kill for sake of reducing the numbers) even though the idea will generate a lot of resistance from animal welfare organizations worldwide. Adding value to seal products is also another option in consideration of the Ban in place in trading with seal products.

10.7. VISIT TO ATLAS BAY AND WOLF BAY SEAL COLONIES

The delegation together with the MFMR staff visited the two seal colonies to observe and document evidence of the exponential growth of seals in Namibian waters. The seal colonies are thriving, with no natural predators in the waters except on land where they are preyed on by hyenas, jackals and birds the population has grown tremendously. Since it was not breeding season, the delegation could only witness mostly pups, cows and juvenile bulls as alpha bulls only come onshore for breeding purposes. It was further observed that the rocky terrain at the two colonies was slippery thus making the harvesting much more challenging.

10.8. COURTESY CALL ON THE GOVERNOR – ERONGO REGION

The governor welcomed the delegation to the region. He emphasized the need to ensure a balance in the country's efforts to minimize the effects of seals on fish stocks, to be done in a sustainable manner. He underscored the imperative to add economic value to seal products by establishing a local market to promote and sell the finished products as a way to avert sanctions imposed on the sale of seal products as exports. The governor urged the Ministry of Fisheries and Marine Resources to benchmark on best methods to harvest seals to avoid the inhumane method as per the animal welfare organizations labelling.

10.9. PRINCES FISHING COMPANY

The Chairperson of the Wet Landed Horse Mackerel Association Jason and marketing manager at Princess Fishing informed the delegation that horse mackerel consist of freezer operations (onboard the vessel processing) and the wet sector (fish processed onshore in a factory). One thousand five hundred employees (1500) are employed in the wet sector with the freezer sector employing 400 on four vessels. On average two to three seals are caught in the nets which lead to damaged pumps. They are also present when casting the nets, up to 50 and more when the nets are reeled in feeding of the fish caught in the nets. The association attributes the increase in seal populations to the poor performance of quota holders who year after year fail to harvest their allocations. In addition, the ban placed on trade in seal products have negatively affected the harvesting due to lack of markets.

The fact that seals are protected by the Marine Act cannot be killed on encounters during fishing expeditions except for quota holders and limited to harvest season has also ensured the proliferation and continued loss to fishing companies. The association is of the view developing a local market will help the situation by making use of seal oil to produce omega oil, belts, jackets, shoes from seal skin and making use of Namibia Fish Consumption Trust (NFCT) to promote seal meat for human consumption.

Princess Brand Processing (PBP) through African Selection Group invested N\$310 million to set up flagship operations at Walvis Bay that consists of three units, namely the freezing plant, fishmeal plant and the cannery. The delegation visited the fishmeal factory and the cannery. The state of the art fishmeal factory opened in 2018 is not in operation since 2021 mainly due to low demand for fishmeal as soy is more preferred, rejected fish used for production now have a market thus no need to turn the fish into fishmeal. In addition, the factory is prohibited from selling fishmeal in Namibia thus cannot provide to aqua culture farms even if it was in operation due to the export only limitation. The cannery is expected to create about 450 additional jobs for the industry processing horse mackerel with a processing capacity of 15 metric tons of raw fish per hour.

10.10. HANGANA FISHING COMPANY

The company advocated for value addition as part of the solution to the increasing seal population. Even though it is a protected species a balanced equilibrium has to be reached to ensure their impact on fish stocks is reduced to a minimum. On average for every drag two to three seals will be caught in the nets trying to feed on the fish in the nets. There is a clear sign according to the company's observations that seals have moved to deeper waters too an indication they have been an exponential increase in numbers. Large pelagic vessels have since moved north to Angola due to limited fish stocks in Namibian waters attributed to seals. The company urged the Committee to recommend for a benchmark visit to Norway or Canada countries who are also facing the same predicament to learn about new strategies that can be used to resolve the dilemma.

10.11. QUEEN KALEINASHO FISHING

The company is a right holder to seal quotas since 2012 and has nine shareholders. In 2012, 2013 no harvest took place. The company gives its quotas to the seal factory to harvest on their behalf as they have the capacity to harvest 1000-1200 seals in a single day. All seal rights holders in Erongo offer their quotas to the seal company at a reduced cost, without other companies' holders are left with no option than take what is on offer. In 2014 harvesting was done though only half of the quota mostly bulls were harvested.

In 2016 only bulls were harvested in full as by then there was a market in Turkey which has now closed leaving a vacuum which exists up to now. The company mooted the idea of building another factory in 2014 but was rejected by the association rather they recommended to invest the money into enlarging the exiting factory in Henties Bay. In 2014 when business was booming, paps could fetch as much as 280 USD and bulls 350 USD per kilograms, with the ban on seal products by the WTO in 2009 seal products lost value due to less demand. The limited availability of the market has generated loses to the company that it could not even manage to pay its shareholders. The company has tried engaging government to use its bilateral and multilateral agreements to source a market for seal products since 2009, efforts are still continuing until a solution is found. Another option the company is seeking government to assist with is the local one through consuming of seal meat and value addition.

10.12. PESCANOVA FISHING COMPANY

The Nueva Pescanova Group is a leading multinational company specialized in the fishing, farming, processing and commercialization of seafood products that was created to revolutionize the fishing industry and bring the freshness of the sea to the customer's table. Novanam, the subsidiary of the Nueva Pescanova Group in Namibia, has become one of the first companies in the world and the first in Namibia to be awarded the *FISH Standard for Crew* certification, a recognition that certifies fair and ethical labour compliance on board its fishing vessels.

The entire Novanam fishing fleet (consisting of two freezer vessels and eight wet-fish trawlers, including the new Lalandii 1, Novanam One and Novanam Two) has obtained the *FISH Standard for Crew* labour certificate, FISH stands for 4 principles (Fairness, Integrity, Safety, and Health) and 28 criteria that ratify the correct compliance with international conventions and labour legislation on board. At its main base in Lüderitz the company employs about 2400 people. The CEO expressed concern over the exponential increase in the seal population over the years which has a potential to reduce fish stocks in Namibian waters. The harvesting of bulls, pups only will not help in reducing the population other alternatives should be considered including harvesting of seal cows. The adverse impact on the increasing seal population will lead to unemployment due to companies harvesting less fish and not able to operate profitably.

Considering the current Ban on seal products, it is best to create a manufacturing industry to support seal products for sale to SADC and the Continent as whole. Namibia Fish Consumption trust needs to be empowered to promote seal meat once the nutritional content is certified. Sensitisation and awareness campaigns are necessary to assure the public of the benefits of seal meat and the quality of its products.

10.13. TUNACOR

Tunacor has its footsteps as far back as 1958 when the company was first established as a pilchard cannery and fishmeal facility. In 2014 the company become 100 percent Namibian owned. It operates one of Namibia's largest fleets comprising of 8 wet fish trawlers and four freezer trawlers.

The MD impressed upon the need to ensure sustainability of the fishing industry by effectively reducing the number of seals which eats large amounts of fish consuming each 2-6 kg a day. Namibia is one of the countries struggling to control seal populations and uses seal harvesting to reduce the numbers the others being Canada, Norway, Finland and Greenland. There is a need to create a market at home in cognizant of the existing ban on seal products that is limiting the availability of external markets. The methods of killing the seals is main reason of ban as it is viewed as inhuman, thus he proposed the use of powerful guns that will instantly kill seals on contact as opposed to the current method of clubbing and stabbing. In addition, there is a need to train harvesters how to undertake the exercise and invite industry players to witness as a means to allays fears of inhuman killing methods.

10.14. FISHERIES OBSERVER AGENCY

Globally, fisheries observer agencies play an important role in either collecting scientific and biological data and/or report on compliance with fisheries legislation. In Namibia, the Observer Programme, as part of the Ministry Fisheries and Marine Resources (MFMR), the Monitoring, Control and Surveillance (MCS) programme, was established in 1991. The (MCS) programme had two components vis-à-vis the land-based inspectorate, responsible for control and surveillance, and the observer programme, the monitoring arm. Since its inception the Observer Programme deployed around 200 Observers (with around 40 females) to sea on board fishing vessels, from both stations in Walvis Bay and Lüderitz, covering about seven different fisheries types – ranging from trawler, line- to ring and trap fisheries. Initially, the objective of the Observer Programme was to monitor compliance with the fisheries legislation. However, in the mid 90's the programme was extended to incorporate the collection of biological and scientific data. The Operations manager noted that the observer coverage on vessels is hampered by manpower and lack of accommodation on-board the vessels. The observers have on several occasions witnessed seals been caught in fishing nets, predating on the catches especially long line fishing are more affected.

The Marine Resources Act 27 of 2000, regulation 18,1(a) in particular prohibits the killing of marine resources which includes seals.

The agency has data on the seals and how they affect TACs of fishing companies in line with its mandate to collect biological and scientific data. The agency does face challenges in enforcing its mandate key among those being lack of funding, limited workforce and violations by fishing vessels to existing regulations. There have been cases of observers being mistreated aboard the fishing vessels, in one incident an observer was tied up thereby restraining him from performing his duties and in violation of the MRA act. The captain was charged and paid N\$ 300 for the violation, a meagre figure the FOA was urged to revise to avoid similar incidences in future.

10.15. OCEAN CONSERVATION NAMIBIA

OCN is registered as a charitable trust in Namibia founded in 2020. In the US, we are registered under the name Ocean Conservation International as non-profit entity under chapter 501(c)3. Plastic waste, especially single-use plastics like bottles, bags, and packaging, is being discarded in vast quantities, often ending up in landfills, rivers, and oceans. The pollution poses a severe threat to ecosystems and natural habitats. This is where ocean conservation comes in to assist seals entangled in fishing nets, plastics and other ocean debris. Since 2013, the OCN team has rescued over 3500 entangled seals from certain death. Through direct action, exposure and education, OCN hopes to motivate individuals all over the world to change their own behaviour towards a sustainable future.

The conservation is not in agreement with the Motion were it says seals have exponentially increased as the reality is different seal population is thriving and numbers are healthy. Seals indicate availability of fish, a good indicator of a health marine ecosystem thus the notion of them depleting fish species is not backed up by scientific data. The harvesting of seals will negatively impact tourism who flock to Namibia to watch them. Figures have shown that Cape Cross seal colony was the third most visited in Namibia, should seals reduce or disappear so will the tourists. Seal watching OCN underscored generate more money compared to harvesting. The harvesters are targeting prime alpha males (instead of old males) which in the long run will affect the reproduction health of seals. Seals are keystone species of which their reduction or near elimination will have adverse impact on the overall marine ecosystem. Sustainability of the ecosystem should be a key factor in determining appropriate responses to the increasing effects of seals.

10.16. CONFEDERATION OF FISHING ASSOCIATIONS

The association informed the Committee that the most affected by the increasing seal population is the Hake long line sector in existence since 1991. Approximately 10% of the Hake TAC is landed by the sector which amounts to 15 400 tons for the current season. It generates annual revenues in the region of N\$ 750 million with a total investment of about N\$1 billion. The sector has 16 fishing vessels delivering to 5 onshore processing plants thereby creating 1101 direct jobs (233 offshore and 868 onshore).

The association is of the view that seal population explosion will create an imbalance in the availability of fish stocks which will lead to ecological disaster in marine resources. There is a need to gather all scientific evidence and industry knowledge on the matter to find a solution before the situation deteriorates further. Seals impact the Hake Long Line sector in twofold; (i) the increase in population decreases availability of fish stocks, statistics shows seals consume about 2,5 million tons of fish per year, the entire Namibia Hake Industry 154 000 tons per year which amounts to about 6.2% of the amount of fish consumed by seals, (ii) seals reduce the daily catches of hake long line vessels through direct predation, evasive action to avoid areas with seal concentration impacts on fishing efforts and increases operational costs (fuel).

The Association proposed that in the short term, the ministry should allow fisherman to protect their catches by scaring away seals using guns and fire crackers. In the long run the proposal is to appoint a task force comprising of all industry players. Commission an EIA to determine the true impact of seals on fish stocks, the findings of which must be used to support the necessary action required. The introduction of other methods of harvesting more acceptable to animal rights organisations should be explored to minimise clubbing as its viewed as cruel and inhumane. Commission a benchmark study with countries having similar problems with seals to learn and understand their solutions. Another solution is to allow local inhabitants (through licence issuance) to harvest seals for personal consumption, same manner as with angling permits. In addition, the association proposed for a brief research survey be undertaken to quantify the actual impact of seals in particular on Hake Long Line Sector. Two longline vessels to partake in the research over a period of 10-20 days with observers from the Ministry to monitor and document the observations. One vessel will harvest in the area where there are seals the other not at end of the day the catches are compared. Such a research survey will provide a quantification of the impact of seals on the operations of the HL sector.

10.17. HENTIES BAY MUNICIPALITY

The delegation had meeting with Henties Bay Municipality led by the Chairperson of the management council Hon Paulus Imbamba, the CEO and fellow council Members. Prior to the meeting the delegation visited a display of products made by local women from Seal Products, ranging from belts, oil, purse, handbags and many others. The Chairperson informed the delegation that seals are not only at the famous Cape Cross but stretches along the ocean all the way to Torra Bay and Mowe Bay. The harvesting of seals has provided employment to locals at peak during harvesting time up to 90 people are hired. The municipality due to the increase in seals have approved land for the construction of another Seal factory by a company called White Seals Investment to add to the existing one the Seal Products Company. The major setback is the non-availability of the market for seal products outside Namibia, only seal genitals have a small market mostly in China the rest meat, skin, oil have very limited to no market at all.

He expressed concern on the seal quota allocation given mostly to individuals not residing in the area, have no means to harvest except the use of third party in this case the seal factory to do everything on their behalf. Thus the councillors proposed rather the Seal Company be considered for quotas, they have the necessary equipment's, factory and the capacity to use all the quotas. In addition, the company in turn will provide employment to the locals, without the rights holders reaching agreements with the company factory remains closed with no employees. The other option is to give quotas to the Municipality to ensure community beneficiation of all Henties Bay residents. The municipality felt that the hunting season of 3 months is way too short to make an impact on the number of seals rather it should be extended to a full year.

10.18. SEAL PRODUCTS COMPANY

The Company employs about workers when the factory is in full operation, off season only a handful are returned to maintain the factory. The processing plant accommodates different processes needed to produce bulk products. Products produced stay in its primary form, but with added elements to diversify usage. For example, skins will be and/or are pelted then sold, oil from the blubber is made fit for human and animal consumption, as well as create biodiesel, the meat is usually processed and placed on the local markets and organ are processed and exported. The genitals used to sell for 60 000 – 100 000 p/kg before COVID 19, after the price dropped drastically to around 15 000 – 20 000 p/kg.

The factory does not get seal quotas, they instead enter into agreements with the rights holders to harvest, process and market the products. The company gets a share of the proceeds based on its operational costs, number of seals harvested and sold products.

The factory machinery alone is worth about N\$ 15 million. Monthly expenses on electricity is about N\$ 100 000, factory uses 60 000 litres of water and spends N\$ 700 000 on salaries. The current ban on trading in seal products has contributed to the company operating at a loss not able to harvest all quotas in particular pups since there is no market for them. The sale of meat and oil to locals has also come under scrutiny, as the Ministry of Health does not recommend seal meat for human consumption and the Ministry of Agriculture discourages the use of oil to feed livestock.

Promotion of a local market is fundamental to overcome the Ban in place. The factory has a capacity to handle maximum 5000 bulls, on average they handle about 360 bulls (harvesting) which takes one and half day to complete. The factory would be profitable and provide permanent jobs only if they were allocated quotas to harvest seals as opposed to buying from rights holders. The factory experimented using meat to make biltong, sausage but given the meat lacks nutritional classification its difficulty to sell it to everyone. The skins are sold locally to Nakara and oil to SA to use in manufacturing soft gel capsules of omega 3.

10.19. OVERBERG FISHING

The Managing Director Jose Ruiz informed the delegation that he will not be surprised if the seal population is more than 4 million due to the counting system used as it accounts only for seals on land. Seals are roaming free in huge numbers consuming 1/3 of their body mass a day in fish. The vast areas of uninhabited coastline are contributing to the increase in seal population and the absence of sharks, killer whales who feed on seals means they have no natural predators in Namibian waters. Therefore, he proposed the harvesting of seals be done throughout the year focussing mostly on Bulls also in consideration they are more economical and in demand. The concentration should be more on small colonies, to disturb and discourage the formation of new ones. It is a fact that seals cannot breed in water, thus constant disturbance of colonies on land to return to the sea will reduce the numbers.

Government to aid seal industry players by securing markets to export seal oil, omega capsules and other products to countries willing to trade in spite of the current ban. In addition, government should subsidise part of the industry in terms of constructing meat processing plants, seal shoe factory and fish pellet production. He informed the delegation that he has on several occasions alerted the Ministry of Fisheries on illegal fishing happening in Namibian waters, provided evidence in terms of drone pictures to date no action has been done. Such illegal activities he stressed is also a contributing factor to the depleting fish stocks in Namibian waters.

10.20. TRILLIANT AND LINEFISH ASSOCIATION

The Namibian linefish is a multisector industry comprising of, the commercial large vessel, commercial and recreational ski boat sector and recreational shore angling sector. The fish species the sector allowed to catch include silver kob, west coast Steenbras, snoek (mostly commercial large vessels), galjoen, black tail, barbell, spotted gully shark, copper shark, cow shark and smooth hound shark. There are four land based processing facilities producing salted snoek for wholesale and retail markets in South Africa, Mauritius and Reunion. In terms of direct employment larger vessels employ 350 and 100 for ski-boats.

The sector faces many challenges key of which include; restrictions and moratorium on Kob which has been in place for 17 years has reduced the sector to a seasonal snoek fishery operating 6-7 month a year; seal predation is another which is a top predator in the snoek

fishery, they scatter shoal and reduce catches to zero and often damage fish nets which costs a lot to repair. The association is of the view that massive overfishing by foreign fleets of the pelagic and hake resources during the 50, 60 and 70s coupled with negative environmental factors could be responsible for the sad situation country face of depleting fish stocks. Seals eat sardine, anchovy, hake, snoek among others as such the decline of fish stock will prevail as long as the seal population keep increasing. As long as seals don't have any effective predators such as sharks and whales in Namibia the population will keep on growing until a viable harvesting method is found, with curling not supported by Namibian legislations finding a solution will be challenging.

Given the ban in seal products trading by the WTO the only option is for government to aggressively find alternative markets, locally and continental as this will ensure rights holders harvest their quotas fully. The other option is to disturb the males during matting season to prevent them from matting if everything else fails, the laws should be amended to approve curling to control the population.

10.21. VISIT TO CAPE CROSS AND PELICAN BAY SEAL COLONIES

The delegation visited the two colonies to witness and experience the reality of the increase in seals and observe the positive impact seals have on tourism. Based on its observations on the sites there seem to be huge numbers of seals at the colonies. Pelican Bay in particular the number has grown exponentially due to the fact that there is no harvesting allowed it being a much more common tourist area all year around. In addition, the delegation observed a number of seals are dying mostly due to natural attrition with some predated by hyenas and birds especially the young and the weak and ill.

11. MAIN FINDINGS

- 11.1. The Cape brown fur seal's main predator is the great white sharks and killer whales, although they are also preyed upon by various other animals such as the vagrant southern elephant seals. Land-based predators include black-backed jackals, brown hyenas and occasionally lions on the Skeleton Coast in Namibia. Seagulls peck the eyes out of baby seals to render them helpless and disabled, and feast on their flesh.
- 11.2. Seals are a keystone species in helping maintain the balance in marine ecosystems across the world. They provide the ultimate energy boost to larger predators such as orcas, polar bears and sharks. Seals, throughout their travels, explorations or even while they're out hunting for food, help generate, and spread nutrients to the far corners of the ocean which in turn help in feeding smaller marine life, growing vegetation (and homes for smaller fish), as well as spreading the organic materials to nutrient limited islands.
- 11.3. Scientific data validates the Motion's assertion that the population of seals have increased to 1.6 million in comparison (see chart 4) in 1970 the population was at 680 000.
- 11.4. Namibia has about 26 seal colony spread from the South (Lüderitz) to the North (Erongo Region). As depicted (chart 1) there has been an increase in some colonies and decrease in majority of colonies since 1993 mainly attributed to migration from one colony to the other in search of food.
- 11.5. The Cape fur seals are opportunistic predators; their diet has been analysed through prey remains found in the scats. Studies have shown that a Cape fur seal consumes about 1.4 to 6.8 kg of food per day depending on the age, sex and reproductive status.
- 11.6. The diet of seals as depicted in the (chart 3 and 4) indicate that the goby scientific name (Gobiidae) is their favourite food comprising in some instances

- up to 80% of their diet. Worth mentioning here is that goby is not a commercial fish species harvested by Humans for consumption.
- 11.7. Based on the available data, the analogy that Seals are depleting fish stocks is not complemented by scientific studies as majority of their diet consist mainly of the Goby fish a non-commercial species.
 - 11.8. Seal Rights Holders have not been fully utilising their quotas as allocated, the harvesting has been primarily on Bulls (due to the value of the Genitalia) whereas there has been few to none harvesting of pups over the years.
 - 11.9. Seal population has increased over the years mainly due to the fact that seal quotas are not fully utilised due to varied reasons key among others being lack of a market to sell seal products
 - 11.10. The Ban by the WTO on the trade in seal products has impacted the harvesting of seals as there is no export Market except few local buyers of meat, skin and oil products.
 - 11.11. Companies allocated seal harvesting quotas have no means to harvest nor sell the products instead they sell their rights to the Seal Factory in Henties Bay to do the hunting, processing and marketing.
 - 11.12. The Henties Bay factory only survive on entering into agreements with rights holders to do business, it does not get any seal quotas thus limiting its operations. Henties Bay Municipality have approved for the construction of a second Seal Factory.
 - 11.13. Seal harvesting season runs from 1 July to November 15 yearly about 6 months, the period is not sufficient for rights holders to complete the full quota allocated mainly due to bad weather (case of Lüderitz) and limited availability of Bulls. Observations indicate Bulls start appearing in numbers towards the end of November which is past the harvest season.
 - 11.14. Animal rights organisations are against the harvesting of seals as they feel it will negatively impact tourism. Figures have shown that Cape Cross seal colony was the third most visited in Namibia for the purpose of seal watching. Thus should seals reduce or disappear so will the tourists and the revenue generated.
 - 11.15. Seals impact more the Hake Long Line sector in twofold; (i) the increase in population decreases availability of fish stocks, statistics shows seals consume about 2 million tons of fish per year, the entire Namibia Hake Industry is about 154 000 tons per year which amounts to about 6.2% of the amount of fish consumed by seals, (ii) seals reduce the daily catches of hake long line vessels through direct predation, evasive action to avoid areas with seal concentration impacts on fishing efforts and increases operational costs (fuel).
 - 11.16. Apart from seals consuming fish, there is also cannibalistic fish like Hake eating Hake and other species eating each other, this coupled with environmental factors such as climate change, overfishing and illegal fishing have also contributed to the depleting fish stocks in Namibian waters.
 - 11.17. There is limited value addition due to existing seal factories not having financial resources to invest in machinery required to produce products out of seal skin.

12. CONCLUSION

Seals are a keystone species, thus it is imperative to ensure that any steps taken to address the overpopulation is done in a sustainable manner. Scientific data shows that apart from seals depleting fish stocks climate change and overfishing by humans also contributes. Seals are keystone species of which their reduction or near elimination will have adverse impact on the overall marine ecosystem. Sustainability of the ecosystem should be a key factor in determining appropriate responses to the increasing effects of seals.

13. RECOMMENDATIONS

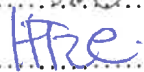
- 13.1. The Ministry of Fisheries and Marine Resources for the sake of public interest to annually publish data on the total number of the seal population, the size of the quotas and the actual number of pups and male seals harvested.
- 13.2. The Ministry of Fisheries and Marine Resources look into the possibility of extending the Harvest season to the end of November to enable the harvesters to catch their full quotas as allocated, cognizant of the fact that Bulls only come to shore towards the end of September which at present only gives two weeks of harvesting.
- 13.3. The Ministry of Fisheries and Marine Resources evaluate the possibility of harvesting of seals throughout the year considering they are more economical and in demand. This will once implemented reduce the numbers and ensure right holders harvest all given quotas.
- 13.4. Ministry of Fisheries and Marine Resources together with Ministry of Trade and Industrialization to engage with Asian countries and Canada where the market exist for seals products to Promoting the opening up of markets.
- 13.5. To encourage the Ministry of Fisheries and Marine Resources to do value addition through entrepreneurship on seal products (meat, oil and skin).
- 13.6. Ministry of Fisheries and Marine Resources to promote the sale for consumption of seal meat locally as a protein source through the Namibia Fish Consumption.
- 13.7. Ministry of Fisheries and Marine Resources Increase the quota holders/participants and quantity from 50 000 to 200 000 for a fixed period of time to reduce numbers to a sustainable level.
- 13.8. Ministry of Fisheries and Marine Resources should consider allocating quotas to the Seal Company in Henties Bay. They have the necessary equipment's and the capacity to use all the quotas. This will provide employment to the locals as without the rights holders reaching agreements with the company the factory remains closed with no employees.
- 13.9. The Ministry of Fisheries and Marine Resources is urged to review the Marine Resources Act to implement stiffer fines for Companies mistreating its staff on board fishing vessels.

MEMBERS SIGNATURES

Hon. Tjekero Tweya (Chairperson)

.....


Hon. Agnes Mpingana Kafula (Deputy Chairperson)

.....


Hon. Herlinde Tjiveze

.....


Hon. Vincent Joseph Mareka

.....

Hon. Bernadus Swartbooi

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