



Honourable Barbara Creecy  
Minister of Forestry, Fisheries  
and the Environment  
[minister@environment.gov.za](mailto:minister@environment.gov.za)  
[llevendal@environment.gov.za](mailto:llevendal@environment.gov.za)  
[nleontsinis@environment.gov.za](mailto:nleontsinis@environment.gov.za)  
[jbuitendag@environment.gov.za](mailto:jbuitendag@environment.gov.za)

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Dear Honourable Minister Barbara Creecy,

**SEVERE NEGATIVE IMPACT OF NAMIBIA'S DECISION TO KILL 86 000 CAPE FUR SEALS FOR COMMERCIAL PURPOSES ON THE WELL-BEING OF THE OCEAN AND AQUATIC BIODIVERSITY IN SOUTH AFRICA**

The decision has been taken by the Namibian government to slaughter 86000 Cape fur seals despite a decrease in demand for seal pups and the mounting opposition from conservationists. The brutal financially motivated killing of Cape fur seals in Namibia should be of concern to us all, because of the potential negative cascading effects on South African marine ecosystems.

One such negative effect relates to sharks. The International Union for Conservation of Nature (IUCN) has warned that 37.5% of the 1 200 known species of sharks are threatened with extinction. South Africa is a Party to the Convention on the Conservation of Migratory Species of Wild Animals, also known as the Convention on Migratory Species (CMS) with the objective to conserve migratory species throughout their ranges, including sharks that are listed in CMS Appendix I and II; according to CMS's Article 2 and 2(2) and 2(3), (Parties) must take action,

*"whenever possible and appropriate [...] paying special attention to migratory species the conservation status of which is unfavourable and taking individually or in cooperation appropriate and necessary steps to conserve such species and their habitat [...] to avoid any migratory species becoming endangered; [...] shall endeavour to provide immediate protection for migratory species included in Appendix I and [...] shall endeavour to conclude agreements covering the conservation and management of migratory species included in Appendix II.*

Namibia is one of a few countries that are "participating non-parties" to the CMS which implies that they are party to one or more of the agreements, and/or have signed [one or more of the MOUs](#), for example, they have signed an MOU for the protection of the Atlantic Turtle.

The members of the Wildlife Animal Protection Forum South Africa ([WAPFSA](#)) recently prepared [comments](#) which were delivered to the South African Department of Forestry, Fisheries and the Environment (DFFE) on the [Shark Biodiversity Management Plan](#), drafted in order to protect sharks. In direct contrast, Namibia's Ministry of Fisheries [approved a quota](#) for the harvesting or culling of 80 000 seal pups and 6000 seal bulls to commence from the 1<sup>st</sup> of July 2023 and to continue till November. The Cape fur seal is one of the primary sources of food for many large sharks including the great white shark.

On the 11<sup>th</sup> of July 2023, WAPFSA [issued a public statement on the planned killing of seals](#) in Namibia (see also Annexure I). The statement questioned the non-transparent and unscientific decision-making process with regard to this cruel and unacceptable slaughter.

Two colonies of seals will be targeted during the planned slaughter period, the Cape Cross colony and the Walvis Bay colony, both near Swakopmund. Of further concern is that both of these areas have a [history](#) of Cape fur seal mass mortality. In [2020](#) and [2022](#), the phenomena of die-offs of the most common apex predator concerned local and international experts.



The Cape Cross seal colony – Credit: [Seals of Nam](#)

## AN UNJUSTIFIABLE MASSACRE

According to [scientific articles](#), the exploitation of seal body parts for trade in Southern Africa is a colonial relic dating back to the 17th century. Seals were slaughtered indiscriminately by sailors, for skins, meat and oil and for three centuries until 1899.

The slaughter in the modern day continues even though it is socially unacceptable and highly contested. The actual slaughter, paradoxically, takes place inside nature reserves; before sunrise, away from eyewitnesses, while the beaches are closed.

The Cape fur seals, who are not nocturnal mammals, are surprised in the dark or predawn. Terrified pups are rounded up, forcibly separated from their mothers, and violently beaten to death while the mothers watch from a short distance, and helplessly exchange mother–pup vocal highly distressed calls.

Scientific [research](#) has indicated that these marine mammals are sentient, alert and able to discriminate calls with high acoustic similarity and identify their offspring even in extremely large and numerous colonies. The call is the primary identification signal between mother and pup. Labourers are employed to [club the pup to death](#) or kill them with pick handles or shoot them. Pups get so terrified that they vomit their mothers' milk in fear. Once the slaughter for the day is completed, the seal carcasses are piled up, taken away from the area by trucks and the blood is cleaned and removed before the oblivious tourists arrive.



Namibian sealers - Footage credit: [Earthrace Conservation](#)

## CONCLUSION

The Cape Fur Seal, and associated predators, range across the oceans of Southern Africa. The Cape fur seal massacre in Namibia is promoted by short-sighted economic agendas, and it represents a threat to fragile local and extended ecosystems as well as to endangered species which are endemic to South Africa.

The unjustified massacre of the Cape fur seal raises huge ethical, animal and human welfare, well-being and environmental concerns.

The undersigning members of WAPFSA urge the DFFE Ministry to examine its objectives in terms of NEM:BA, to call for the protection of the Cape fur seal and to take all possible actions to halt stop this barbaric, unscientific and irresponsible massacre now, and to encourage long-term agreements to prevent this from happening in the future.

Yours faithfully,



**Stefania Falcon**  
**WAPFSA Coordinator**  
[stefania@wapfsa.org](mailto:stefania@wapfsa.org)  
 Mobile: +27 (0)73 3012107  
<http://wapfsa.org/>

## SIGNING MEMBERS OF THE WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA

AllRise	Director	Attorney Kirsten Youens
Animal Talk Africa	Founder	Wynter Worsthorne
Ban Animal Trading	Director	Smaragda Louw
Beauty Without Cruelty (South Africa)	Chairperson	Toni Brockhoven
Betty's Bay Baboon Action Group	Co- Founders	Renee Bish and Peter Oxford
Centre for Animal Rehabilitation and Education	Director	Stephen Munro
CLAW	Founder	Cora Bailey
Co-Operative and Policy Alternative Center	Co-Founder and Board Chair	Prof Vishwas Satgar
Dzomo La Mupo	Founder-Director	Mphatheleni Makaulule
EMS Foundation	Executive Director	Michele Pickover
Four Paws (SA)	Director	Fiona Miles
Future 4 Wildlife	Co-Founder	Stefania Falcon
Gifted for Good	Env. Education	Jabu Myeni
Global White Lion Protection Trust	CEO Founder	Linda Tucker

Institute for Critical Animal Studies (Africa)	Director	Les Mitchell
Monkey Helpline	Co-Founder	Steve Smit
Panthera Africa Big Cat Sanctuary	Co-Founders	Liz Cornwall and Catherine Nyquist
Parliament for the People	Reg Farming	Vivien Law
Rhinos in Africa	Founder	Megan Carr
South Peninsula Khoi Council	Senior Chief	Stephen Fritz
Southern African Fight for Rhinos	Director	Lex Abnett
Vervet Monkey Foundation	Founder	Dave Du Toit
WildAid Southern Africa	Director	Guy Jennings

## ANNEXURE I

### THE WILDLIFE ANIMAL PROTECTION FORUM SOUTH AFRICA CONDEMNS THE NAMIBIAN GOVERNMENT'S DECISION TO CULL EIGHTY-SIX THOUSAND CAPE FUR SEALS IN 2023

#### STATEMENT

The *Wildlife Animal Protection Forum South Africa* ([WAPFSA](#)) is a community of twenty-five South African-based organisations that share certain values, knowledge and objectives and that collectively comprise a body of expertise from different sectors including but not limited to scientific, environmental, legal, welfare, rights, social justice, indigenous and public advocacy backgrounds.

Namibia's Ministry of Fisheries has issued a quota for the harvesting or culling of 80 000 seal pups and 6000 seal bulls. Romeo Muyunda spokesperson for the Namibian Environment Ministry [said](#): *"If you let the seal population grow, they will consume the commercial amounts of fish."*

The Namibian Ministry has said that the harvesting of seals contributes to state revenue for national development programs. *"Namibia's seal population has increased to the point where they exceeded by far the carrying capacity of the environment therefore it is humane to curb the unrestricted seal population to a level where they can be sustained by the environment,"* the government [said](#) in a statement.

#### THE CAPE FUR SEAL

The Cape Fur Seal is the most [common](#) seal species to be found in southern African waters. They occur from the Namibian west coast to East London on the east coast of South Africa. Their food consists mainly of shoaling pelagic fish such as pilchard, hake, Cape mackerel and snoek. They also eat squid and crustaceans. Cape Fur Seals are generalist feeders catching a wide variety of prey and are expected to feed on locally abundant prey species. Cape fur seals forage within 220km of their colony.

The uncontrolled exploitation of the Cape Fur Seal led to a serious reduction in population numbers. In 1983 they were protected by an Act of the Cape Parliament and harvesting was controlled until 1990 when it was finally prohibited. The protection of the seals and the halt to all sealing activities resulted in the recovery of the populations. Sealing continues in Namibia where it is still permitted. The effect of declining pelagic fish stocks on seal populations is a [concern](#) and the subject of several current research projects.

Every year quotas are set for the commercial "harvesting" or culling of the Cape Fur Seal in Namibia. Namibia is the [only](#) country in the Cape Fur Seal's range in which commercial hunting is permitted. Sealing occurs on two mainland colonies, Cape Cross and Wolf/Atlas Bay.

#### THE SEAL HARVEST INDUSTRY

Seals are killed for their fur which was traded globally however there is a marked reduction in demand due to the European market ban on seal imports.



The Namibian harvesting season officially opened on the 1<sup>st</sup> of July 2023. Namibian seal products are now mainly exported to Asian markets after twenty-seven countries, including the European Union, the United States of America, Mexico, and South Africa have banned the import of all seal products.

The main [market](#) for Namibia's seal cull has shifted to China. Seal penis is a delicacy enjoyed in China and seal fat is used in beauty products. According to a 2014 published [report](#) titled *Grey Seal Management: Commercial Use Opportunities and Challenges*, Asian consumers, particularly athletes, consume a beverage called *Dalishen Oral Liquid* that is made from seal penis and testicles which they believe to be energizing and performance enhancing. The report also suggests that seal meat could be processed as meatballs, sausages, pate and an infinite range of entrees targeting gourmet food and wine clubs.

According to an [article](#) published in National Geographic in 2016, the oil derived from the blubber of the Cape Fur Seal advertised online as rich in Omega-3 fatty acids and allegedly is more readily absorbed by the human body given its mammalian source than fish oil. Since 2005, Namibia exported 33 000 gallons of seal oil, a third of which was exported to China.

Hatem Yavuz, the Namibian Honorary Consul to Turkey in 2012 was the [main](#) fur trader and buyer of seal skins from Namibia. According to an [article](#) published in 2014 he controlled 82% of the world's seal fur trade.

The Hatem Yavuz Group is based in Turkey and Australia, it represented, according to an article [published](#) in 2016, the largest trade of any mammal out of Africa. An estimated 400 000 seal pelts from 2005 to 2015. According to Seven Network in Australia, the Yavuz Group controls 60 per cent of the global market in seal products.

In 2020 and 2021 the brutal [slaughter](#) of the Cape Fur Seal was put on hold because of the global COVID-19 pandemic.

## **DON'T IGNORE THE SCIENTIFIC WARNINGS - OUTCRY**

In 2022 it was [reported](#) that hundreds of Cape Fur Seals had washed up dead on a stretch of Namibian coastline. Hundreds upon hundreds of dead seals littered the beaches at Pelican Point, a 5km colony situated in Walvis Bay. Scientists from Stellenbosch University and [Sea Search believed](#) the cause of the death of these seals was linked to biotoxins namely domoic acid, produced by certain types of algae. The seals did not die of malnutrition, pollution, or exposure to noise according to the [Namibian Dolphin Project](#).

In 2020 thousands of Cape Fur Seals died in what was termed an [abortion storm](#). An unusual mortality event among one of the world's largest seal colonies caused great concern among scientists. More than 5000 aborted Cape Fur Seal fetuses washed up on Central Namibia's Pelican Point shore over a period of a few months.

The spike in deaths was far higher than normally witnessed a phenomenon that worried local and international experts. *"If you are seeing die-offs of the most common apex predator in that ecosystem, we should not just be concerned about the seals, we should be concerned about the ecosystem and this event should be flashing big warning lights"*.

*Ecocide* was [defined](#) as “Unlawful or wanton acts committed with knowledge that there is a substantial likelihood of severe and widespread or long-term damage to the environment being caused by those acts”.

Naude Dreyer, co-founder of [Ocean Conservation Namibia Environmental Trust](#) has [expressed](#) dismay over the lack of scientific research and decision-making based on demand. He has emphasized the potential disruption to the ecosystem caused by the removal of seal bulls.

[Seals of Nam](#), a Namibian non-profit founded in 2010 with the goal of [ending](#) the country’s sealing industry is still hopeful that the ever-shrinking markets for seal products because of the global outcry against the mass killing of seals will eventually kill the industry.

[Seal Protection Namibia](#) a non-governmental organization is still seeking a ban on seal hunting on the grounds it is illegal and immoral.

[Footage](#) of the seals being clubbed to death has enraged animal rights campaigners for years. Terrified pups are rounded up, separated from their mothers, and violently beaten to death. The clubbing begins every morning at 6h00 am; then, at 9h00 am, the beaches have already been cleaned before the tourists arrive.

In 2012 Captain Pete Bethune founder of [Earthrace Conservation](#) witnessed the cull, and [said](#): *“It remains the most harrowing thing I have ever witnessed.”* 2015 The Seals of Nam partnered with social media experts from the Seal Army in a global outcry against the annual Namibian seal hunt.

United Kingdom animal rights activist Ricky Gervais has [joined](#) other celebrities including George Lopez, Brigitte Bardot, Paul McCartney, Sara McLachlan, and Pamela Anderson who have condemned seal hunts in both Namibia and Canada. [People for the Ethical Treatment of Animals](#) has [stated](#) that the argument used by the Namibian government, protecting the fisheries because there is an issue of seal overpopulation, is invalid: *“Studies have shown that **overfishing** is to blame”*, with overfishing being the practice of fishing beyond what is allowed by permits, either at [a rate that does not allow repopulation](#) of species or by fishing [untargeted species](#) (bycatch) that are protected or threatened with extinction.

[Studies](#) indicate that overfishing is the primary cause of marine defaunation, while Illegal, Unreported, Unregulated fishing ([IUU](#)) is widely indicated by scientists as the cause of biodiversity loss, fish depletion and increased risks of shark and other endangered species extinction.

The Director of the conservation organization called, [International Fund for Animal Welfare](#) in South Africa, Jason Bell, [commented](#) on the proposed 2023 Namibian seal hunt *“There is no justification for the killing, this is a purely political and economic issue, with very little concern for animal welfare.”*

[Seal Alert SA](#) has expressed [concerns](#) about nursing seal pups being killed illegally. Namibia is the only country in the world that allows the killing of nursing seal pups. Seal Alert SA launched a bid in 2022 to interdict the seal cull. The Ombudsman’s office said that Seal Alert SA did not have a mandate to make recommendations to the Namibian government.

## MOUNTING OPPOSITION



Despite a decline in demand for seal pups and the mounting opposition from conservationists, the Namibian government has decided to continue with the annual cull.

WAPFSA Members hereby lend their unwavering support to all the organizations and individuals who have and continue to tirelessly defend the right to survival and the end to the abhorrent mass killing of the Cape Fur Seals in Namibia.

WAPFSA was initiated in 2017 as a collaborative network representing the interests of wild animals as a vehicle with which to engage governments on animal protection, ethical and compassionate conservation, welfare, and biodiversity loss issues amongst others.

The Cape Fur Seal, as well as its direct predators' ranges, include the oceans of South Africa. We, therefore, agree that the protection of this mammal is of great importance to the continuance of a healthy aquatic ecosystem. We stand together on the shoulders of those before us, against the barbaric, unscientific and irresponsible, money-driven massacre of these mammals.