



Rt Hon Boris Johnson
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Dear Prime Minister

Seal Alliance calls on the UK Government to protect seals from harmful disturbance

Without urgent action by government our globally important seal populations risk devastating consequences from human disturbance, as was tragically illustrated by 'Freddie' the seal's death after a dog attack on the banks of the River Thames.

The Seal Alliance is raising public awareness with our government-backed 'Give Seals Space' campaign, however most seals in England and Wales do NOT yet enjoy legally protected status from disturbance, as whales and dolphins do, even though they both face escalating environmental threats. We support urgent Government action, by making minimal changes to existing legislation, to protect our seals from deliberate disturbance by making it a wildlife crime.

The UK is home to more than a third of the entire world's population of grey seals. We also have 30% of European common seals which are in alarming decline. Yet seals are wildlife assets that support tourism and our coastal communities, that desperately need large numbers of visitors to boost and diversify local economies.

In meetings with Environment Minister George Eustice and Parliamentary Under-secretary of State for the Domestic Environment Rebecca Pow, Seal Alliance members proposed taking action to make deliberate seal disturbance an offence by:

- An amendment to the Conservation of Seals Act (1970), and all other relevant wildlife legislation, adding 'disturbance and harassment' to the current wording 'take, injure, kill' and closing the 'third party' loop-hole (for example when a dog, drone or vessel causes disturbance not just a person)
- Including seals in the Wildlife Legislative Review for the government's Green Paper
- Enabling Natural England to simplify the Site of Special Scientific Interest review process by allowing mobile species such as seals to be added where appropriate evidence exists.

In light of the above, we would be grateful for the opportunity to **meet with government and appropriate agency representatives to ensure any proposed legislative amendments to protect seals from deliberate disturbance are both comprehensive and consistent across all relevant legislation here in the UK.**

Disturbance is defined as any action which disrupts a seal in a settled and rested state in response to a perceived threat. Disturbance includes any direct impact on a seal from needless energy expenditure to potential or likely injury being caused. Disturbance includes alarm, distress and harassment caused to any seal whether it be on land or in the sea. Actions resulting in serious disturbance can be classified as **intentional, reckless or negligent**.

Serious disturbance is caused when people are too close, too visible or too noisy.

Such disturbance causes stress and wastes vital energy reserves, often resulting in injury and can prove fatal. Conserving energy is vital for survival and seals can quickly enter a **fatal energy deficit spiral through chronic disturbance**.

The Seal Research Trust have just released their 2021 'People Protecting Precious Places' **seal disturbance report**.

Promoting better welfare, conservation and protection for all pinnipeds and their habitats.

For further information about the Seal Alliance please contact the Seal Protection Action Group
[01273 515416](tel:01273515416), email andyo@sealaction.org.

Contact details for your local representative please visit <https://www.sealalliance.org>



Disturbance can be categorised as follows:

- **Level 1:** where a seal wakes and/or looks at you.
- **Level 2:** it moves in response to your presence.
- **Level 3:** the seal flees the land for the safety of the sea, crash diving, leaving the area or is prevented from coming ashore to rest, moult or breed.

Disturbance is harmful because:

- **Startled seals** can rush into the sea **and panicked seals injure themselves** stampeding or tombstoning off rocks towards the sea causing broken bones, gashed bellies or ripped out claws
- **Young seals** are most affected by energy loss. **Only 25% are likely to survive** to the age of 18 months in a bad year (5% in a very bad year).
- **Pregnant females** that are disturbed in the summer may produce underweight pups in the autumn that don't survive their first winter. Stampeding over rocks can prove **fatal to both mother and pup**
- Nursing mothers can be scared into leaving **dependent pups** to starve.

The **harm done to disturbed seals may not be immediate, visible or obvious**, but **minimising serious or chronic disturbance will greatly improve any seal's survival chances**.

We strongly support the actions being taken by the UK government to make seal disturbance an offence and hope to use our expertise to ensure the legislation is consistent, robust and enforceable.

Yours sincerely,

Thank you on behalf of the Seal Alliance and seals everywhere!

Andy Ottaway and Sue Sayer

Participant organisation signatories

British Divers Marine Life Rescue

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Cornwall Climate Care

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Hunstanton Seal Life Centre

Marine Conservation Society

Norfolk Seal Group

NW Wales Seal Research Organisation

Pembrokeshire Seal Research Trust

RSPCA

Seal Protection Action Group

Seal Rescue Ireland

Seal Research Trust

Seal Sanctuary Ecomare

Scarborough Sea Life Centre

Skegness Natureland Seal Sanctuary

St Mary's Island Wildlife Conservation Society

Tara Seal Research

Thames Seal Watch

The Cornish Seal Santuary

The Seal Project

The Wash and North Norfolk Marine Partnership

Tynemouth Seal Hospital

Whale and Dolphin Conservation

Wild Justice

Yorkshire Seal Group

Ythan Estuary Seal Watch

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