07 August, 2024

Dear Members of the European Union Public Consultations and Feedback group,

As the New Democratic Party of Canada (NDP) Critic for Fisheries, Oceans, and the Canadian Coast Guard, NDP Critic for Northern Affairs, and NDP Candidate for St. John's East, we are writing to ask you to reconsider your ban on the import of seal products into the European Union.

Seal hunting is integral to the way of life for many Indigenous and non-Indigenous peoples in Canada. There are many reasons to write you in support of the seal hunt. The seal hunt provides for many benefits, including cultural, economic and supporting the ecosystems in the marine environment.

The EU ban on sealing has negatively impacted Canadians for too long. The EU has an opportunity to strengthen in its relationship with Canada by discontinuing its ban on seal products.

We acknowledge the narrow exceptions to the ban that exist for Indigenous products, but that narrow exception does not achieve its target. The difficulties that come from policing indigeneity, and the lack of access to any true market means that both Indigenous and non-Indigenous communities which might otherwise support themselves through their traditional seal harvesting are unable to do so. Indigenous peoples are best placed to govern their own traditional practices. The annual seal hunt is essential to the incomes of many coastal and rural communities where economic opportunities are often in short supply, and the existing regulations in this case do considerable harm.

This is well documented in a recent report of Canada's Parliamentary Standing Committee on Fisheries and Oceans, regarding pinniped populations, as attached. We draw your attention in particular to the list of recommendations, as well as the sections titled "pinniped products" (p. 36), "barriers to the sale of pinniped products" (p. 41-48), and "impacts of import bans…" (p. 48-52). With extensive reference to witness testimony, these sections discuss the shortcomings of existing regulations, and resulting harm to communities. For additional information about the study, including a complete list of witnesses and transcripts of testimony, please see the committee's website: https://www.ourcommons.ca/Committees/en/fopo

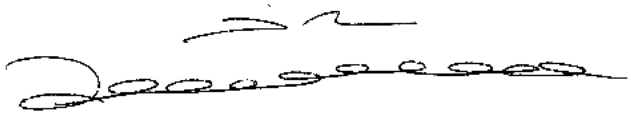
We stand with Indigenous Nations, seal hunters of Canada, coastal communities, and the Fish, Food and Allied Workers' Union (FFAW-Unifor) and respectfully expect you to reconsider and rescind your ban on importing seal products into the European Union.

Sincerely,

Lisa Marie Barron

Member of Parliament for Nanaimo-Ladysmith

NDP Critic for Fisheries, Oceans, and the Canadian Coast Guard



Lori Idlout

Member of Parliament for Nunavut

NDP Critic for Northern Affairs

Mary Shortall

NDP Candidate for St. John's East

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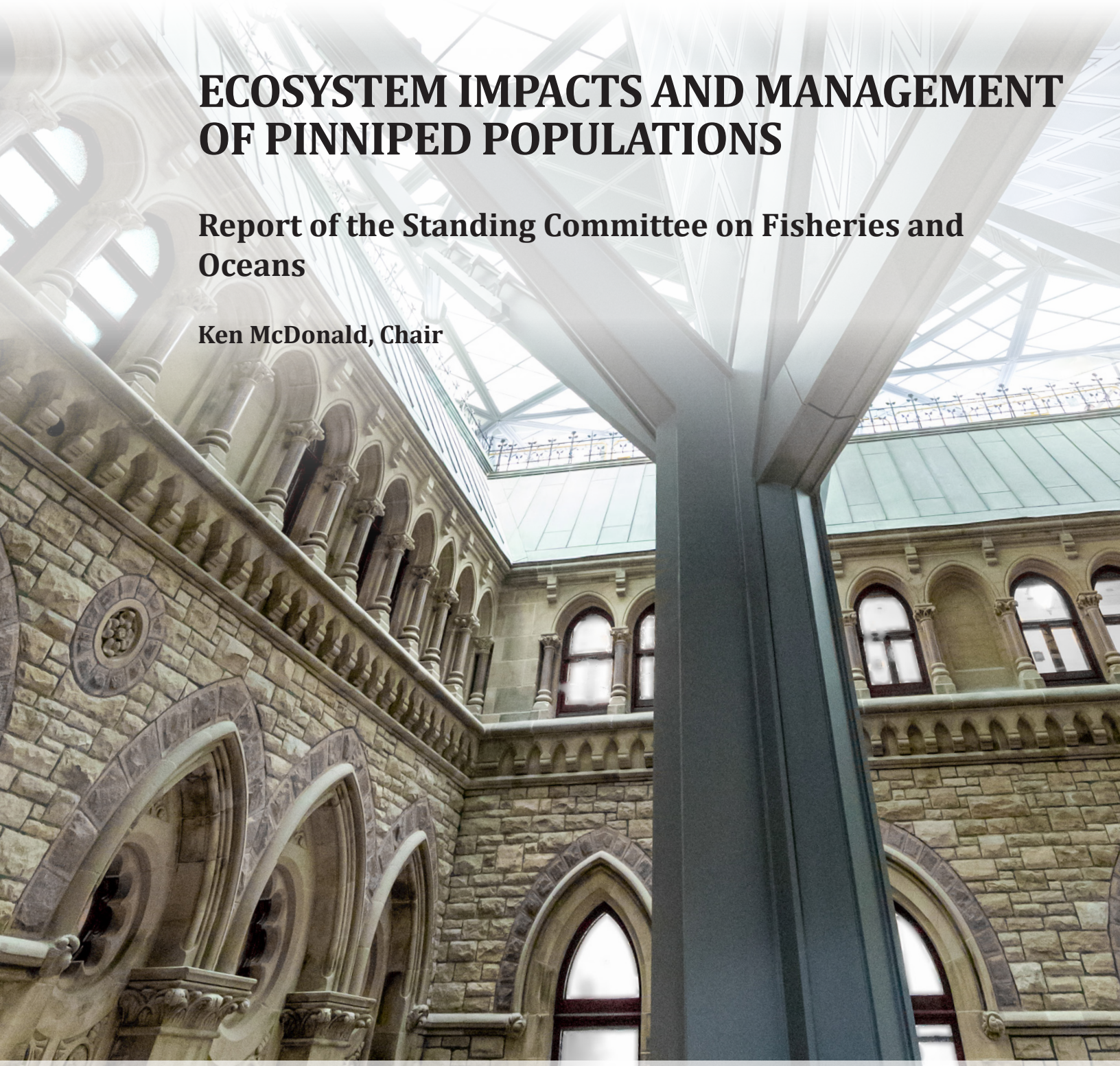

ECOSYSTEM IMPACTS AND MANAGEMENT OF PINNIPED POPULATIONS

Report of the Standing Committee on Fisheries and Oceans

Ken McDonald, Chair

DECEMBER 2023
44th PARLIAMENT, 1st SESSION

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NOTICE TO READER

Reports from committees presented to the House of Commons

Presenting a report to the House is the way a committee makes public its findings and recommendations on a particular topic. Substantive reports on a subject-matter study usually contain a synopsis of the testimony heard, the recommendations made by the committee, as well as the reasons for those recommendations.

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THE STANDING COMMITTEE ON FISHERIES AND OCEANS

has the honour to present its

TWELFTH REPORT

Pursuant to its mandate under Standing Order 108(2), the committee has studied the ecosystem impacts and the management of pinniped populations and has agreed to report the following:

TABLE OF CONTENTS

LIST OF RECOMMENDATIONS

As a result of their deliberations committees may make recommendations which they include in their reports for the consideration of the House of Commons or the Government. Recommendations related to this study are listed below.

ECOSYSTEM IMPACTS AND MANAGEMENT OF PINNIPED POPULATIONS

INTRODUCTION

On 18 January 2022, the House of Commons Standing Committee on Fisheries and Oceans (the Committee) adopted a motion to undertake a comprehensive study on

> the ecosystem impacts of pinniped overpopulation in the waters of Quebec, eastern and western Canada; international experience in pinniped stock management; the domestic and international market potential for various pinniped products; social acceptability; and the social cultural importance of developing active management of predation for coastal and First Nations communities with access to the resource.[1]

Pinnipeds are carnivorous marine mammals and include seals, sea lions, fur seals and walruses. The pinniped diet is varied and can include fish, crustaceans, and molluscs. On the East Coast of Canada, the four species of seals commonly observed are harp, grey, harbour and hooded seals. On the West Coast, northern elephant seals, harbour seals, northern fur seals, California sea lions and Steller sea lions can be found. Ringed and bearded seals and Atlantic walrus can be found in Canada's Arctic waters. Most of the testimony heard during the study focused on harp and grey seals on the East Coast and on harbour seals and California and Steller sea lions on the West Coast.

The Committee held eight meetings on this topic between 9 March 2023 and 1 May 2023, hearing from 56 witnesses. Witnesses included fishers, representatives of various stakeholder groups, members of the scientific community and officials from Fisheries and Oceans Canada (DFO).

Witnesses told the Committee about the state of pinniped science and associated knowledge gaps, including the absence of scientific conclusions about the impact of increasing pinniped populations on particular fish stocks or in particular regions and the apparent disconnect between the conclusions of some scientific studies and the observations of fishers. Some witnesses described the perceived impacts of increasing pinniped populations on commercial fish species, fishers, and coastal communities as

1 House of Commons, Standing Committee on Fisheries and Oceans, *Minutes of Proceedings*, 18 January 2022.

well as impacts to the broader ecosystem, including endangered species. Witnesses discussed how an increased sustainable seal harvest could mitigate the negative impacts of regional instances of pinniped overpopulation and how to eliminate barriers to domestic and international market access for seal-based products.

The Committee agrees with witnesses that regional instances of pinniped overpopulation and their impacts on ocean ecosystems is an issue that requires immediate attention, proper analysis and an immediate and actionable management plan. It is for this reason that the Committee makes 17 recommendations directed to the Government of Canada that touch on pinniped science; the importance of a sustainable, humane and ethical pinniped harvest; the development of the infrastructure necessary for an increased pinniped harvest and the promotion and marketing of seal products both in Canada and internationally.

This report presents the population size of various pinniped species, the impacts of these increasing pinniped populations on fisheries and ecosystems on Canada's three coasts and the state of pinniped science. It also describes the possible approaches described by witnesses to increase the sustainable harvest of pinnipeds, the products resulting from that harvest as well as the state of the infrastructure for commercial pinniped harvests. The barriers to the sale of pinniped products caused by a lack of international market access are described as well as the importance of education and outreach to reduce those barriers. Finally, the report describes the impacts import bans on pinniped products and negative perceptions of the seal hunt have had on coastal, rural and Indigenous communities and discusses how pinniped products could contribute to reconciliation.

PINNIPED POPULATIONS IN CANADA

Witnesses described the population size of different pinniped species. They presented comparable numbers for current populations and agreed that pinniped population sizes had increased over the last 50 years. Almost all witnesses told the Committee that regional instances of pinniped overpopulation are leading to negative impacts on other species in the ecosystem.[2] Danny Arsenault, Chair of the Groundfish Advisory Committee

2 Danny Arsenault, Chair, Groundfish Advisory Committee, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023; Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023; Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023; Keith Hutchings, Managing Director, Canadian Centre for Fisheries Innovation, *Evidence*, 17 April 2023; Craig Pardy, Member, District of Bonavista, House of Assembly of Newfoundland and Labrador, *Evidence*, 17 April 2023; Gil Thériault, Director, Intra-Quebec Sealers Association, *Evidence*, 24 April 2023; and Daniel Lane, Professor, Maritime Seal Management Inc., *Evidence*, 1 May 2023.

at the Prince Edward Island Fishermen's Association, said the overpopulation of seals in Atlantic Canada is of "grave concern."[3] Matt Stabler, Director of the Pacific Balance Pinniped Society, said the "most pressing" issue affecting salmon populations in British Columbia is predation by pinnipeds.[4]

The witnesses who told the Committee that current pinniped populations do not represent an overpopulation but rather a return to population sizes previously seen in the environment were scientists. Kilian Stehfest, Marine Conservation Specialist at the David Suzuki Foundation, did not believe there is an overpopulation of pinnipeds and explained that this belief "is generally based on the steep growth experienced by many pinniped populations in the second half of the 20th century" but that, by that time, "many pinniped populations were severely depleted as a result of decades of commercial harvesting and predator control programs." He noted that "the numbers of pinnipeds we are seeing today have coexisted with healthy and abundant fish stocks in the past."[5] Andrew Trites, Professor at the University of British Columbia who appeared as an individual, told the Committee that pinniped populations in British Columbia "have recovered or are in the process of recovering from over-exploitation."[6] Speaking about the East Coast, Glenn Blackwood, retired vice-president of Memorial University of Newfoundland who appeared as an individual, shared that harp seals and grey seals "have reached historic populations levels."[7]

East Coast Pinnipeds

The Northwest Atlantic harp seal population was estimated at approximately 6.8 million in 2017 and was projected to be 7.6 million by 2019.[8] It has been estimated that there were at least 1.15 million harp seals in 1971.[9] Figure 1 shows the estimated total population of Northwest Atlantic harp seals between 1952 and 2014.

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3 Danny Arsenault, Chair, Groundfish Advisory Committee, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023.

4 Matt Stabler, Director, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

5 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

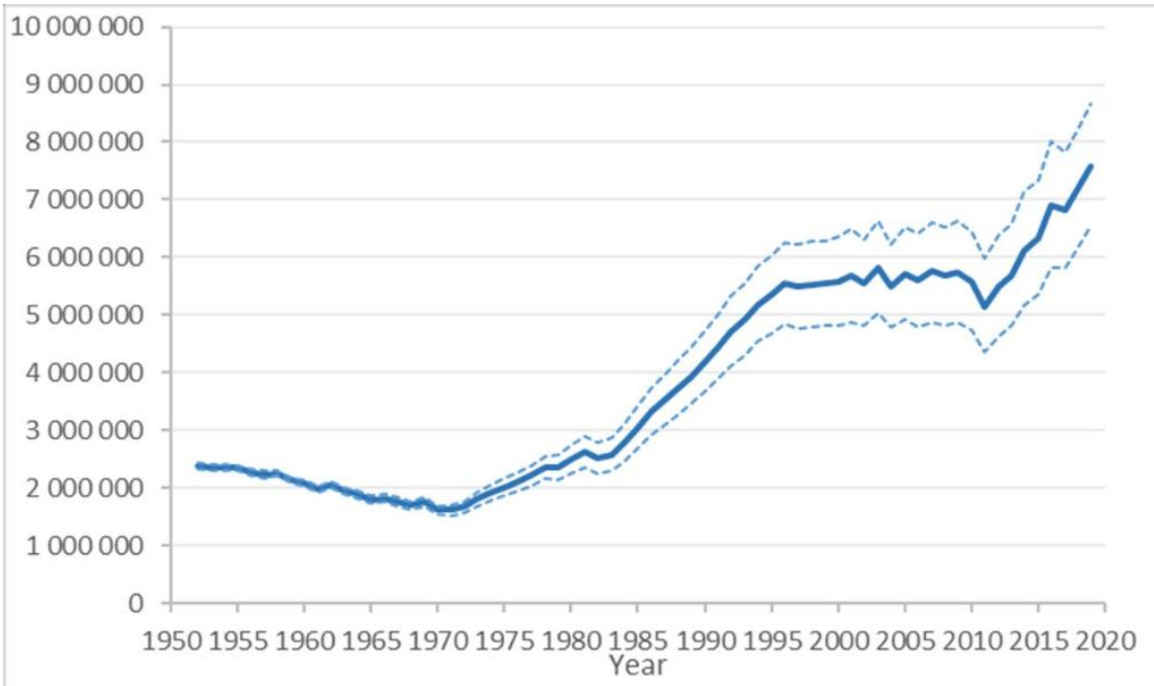
6 Andrew Trites, Professor, University of British Columbia, As an individual, *Evidence*, 23 March 2023.

7 Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023.

8 Mike O. Hammill et al., *Trends in abundance of harp seals,* Pagophilus groenlandicus*, in the Northwest Atlantic, 1952–2019*, March 2021.

9 Ibid.

Figure 1—Harp Seal Population Abundance, 1950s to Present



Source: Figure 2 in DFO, *Report of the Atlantic Seal Science Task Team: Appendix 5*.

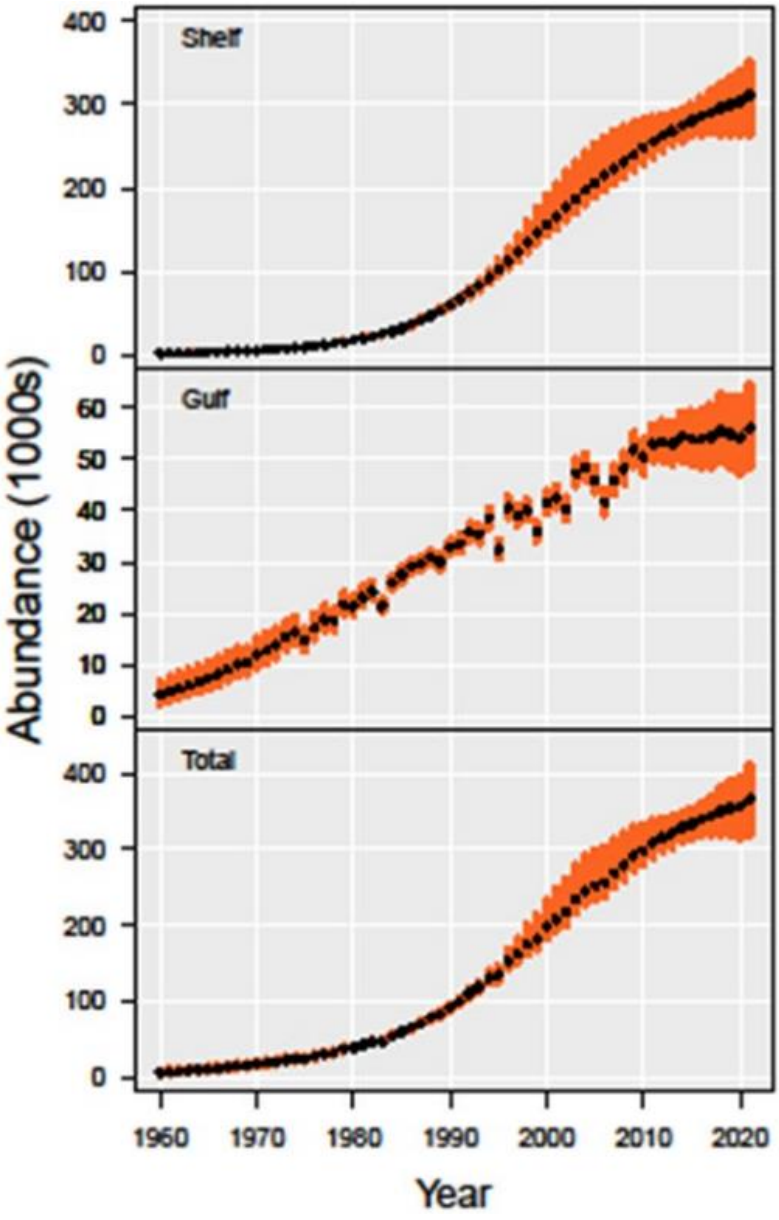
The grey seal population was estimated to be approximately 339,400 in 2016 and approximately 366,400 in 2021.[10] Figure 2 shows the increase in grey seal numbers since the 1960s. George Rose told the Committee that climate change may be contributing to changes in grey seals distribution since they are now being seen on the south coast of Newfoundland, where they were not previously seen.[11] Yoanis Menge, Co-Chief Executive Officer of Reconseal Inuksiuti, told the Committee that approximately 44,000 grey seals stay around the Magdalen Islands year-round.[12]

10 DFO, "Stock Assessment of Northwest Atlantic grey seals (*Halichoerus grypus*) in Canada in 2021," Canadian Science Advisory Secretariat, Science Advisory Report 2022/018, June 2022.

11 George Rose, Professor of Fisheries, As an individual, *Evidence*, 30 March 2023.

12 Yoanis Menge, Co-Chief Executive Officer, Reconseal Inuksiuti, *Evidence*, 9 March 2023.

Figure 2—Grey Seal Population Size for Scotian Shelf Herd, Gulf of St. Lawrence Herd and Total Canadian Population, 1960s to Present



Note: The top panel shows the estimated total abundance for the Scotian Shelf herd. The middle panel shows estimated total abundance for the Gulf of St. Lawrence herd. The bottom panel shows the estimated total abundance for the total Canadian population.

Source: Left panel in Figure 4 in DFO, *Stock assessment of Northwest Atlantic grey seals* (Halichoerus grypus*) in Canada in 2021*, Canadian Science Advisory Secretariat, Science Advisory Report 2022/018, 2022.

Bernard Vigneault, Director General of the Ecosystem Science Directorate at DFO, told the Committee that the first ever assessment of harbour seals in Atlantic Canada is planned for the coming year. He acknowledged that surveys of the population size of hooded seals and bearded seals in Atlantic Canada are gaps that need to be addressed.[13]

West Coast Pinnipeds

The breeding season population size of Steller sea lions in 2017 was estimated to be approximately 43,200. It was estimated to be approximately 39,200 in 2013. According to DFO:

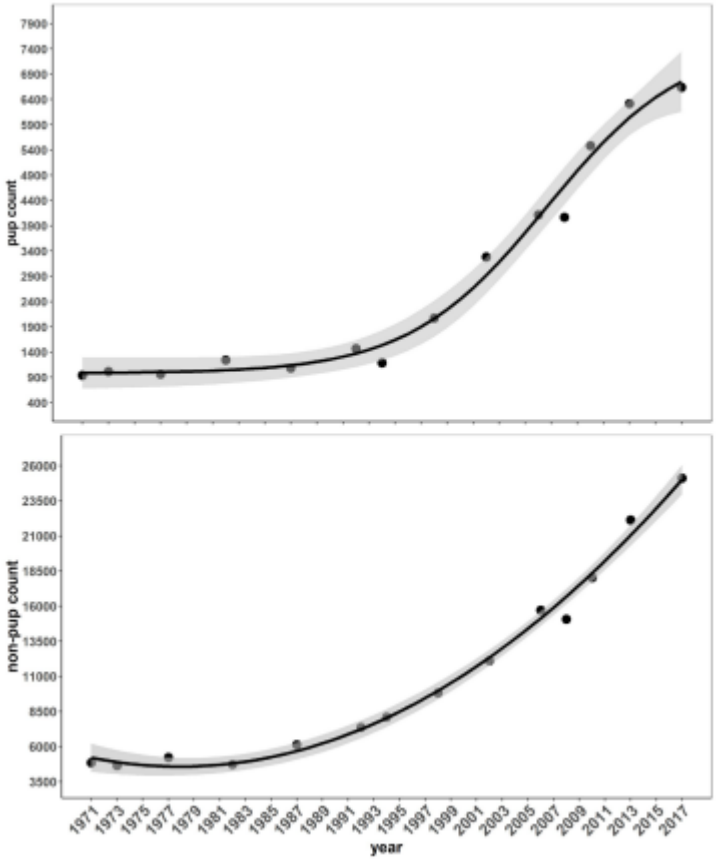
> The first Steller sea lion counts, conducted in 1913 prior to any large-scale kills, estimated a breeding population on rookeries of about 14,000 animals. With the elimination of rookeries [off the central coast of British Columbia], numbers fell to roughly 12,000 by 1938 and by 1956, kills at other rookeries had reduced the breeding population to 8,900–9,400. The population declined sharply with the resumption of control programs for fisheries enhancement and harvests in 1956-66, and by the time the species was protected in 1970, total numbers on B.C. rookeries had been reduced to about 3,400 animals.[14]

The number of Steller sea lions in BC has increased since the lows of the 1970s (Figure 3).

13 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

14 DFO, *Status of Steller Sea Lions (*Eumetopias jubatus*) in Canada*, Canadian Science Advisory Secretariat, Science Advisory Report 2020/046, 2020.

Figure 3—Number of Pups, Juvenile and Adult Steller Sea Lions in British Columbia between 1971 and 2017



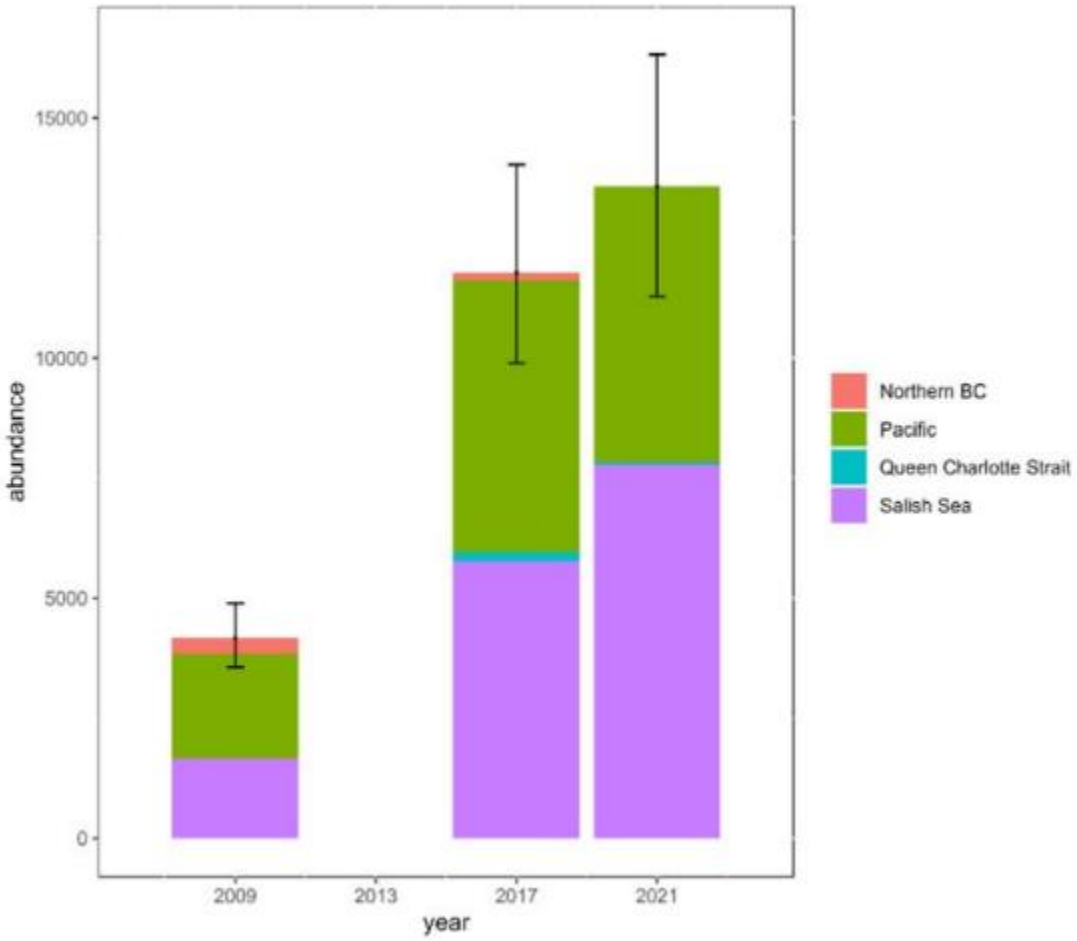
Notes: The top panel shows recent trends in the number of pups based on breeding season aerial surveys. The bottom panel shows recent trends in the number of juveniles and adults based on breeding season aerial surveys.

Source: Figure 2 in DFO, *Trends in Abundance and Distribution of Steller Sea Lions* (Eumetopias Jubatus) *in Canada*, Canadian Science Advisory Secretariat, Science Advisory Report 2021/035, 2021.

The male California sea lion population overwintering in southern BC in 2020–2021 was approximately 13,600, representing a three-fold increase compared to the 2009 estimate of 4,200 overwintering California sea lions but not a significant increase since the 2017 estimate of 11,800 overwintering California sea lions (Figure 4).[15]

15 Andrew Thomson, Regional Director, Fisheries Management, DFO, *Evidence*, 1 May 2023; and DFO, *California Sea Lion Abundance Estimation in Canada, 2020–21*, Canadian Science Advisory Secretariat, Science Advisory Report 2023/016, 2023.

Figure 4—California Sea Lion Average Estimated Abundance in 2009, 2017 and 2021



Source: Right panel in Figure 2 in DFO, *California Sea Lion Abundance Estimation in Canada, 2020–21*, Canadian Science Advisory Secretariat, Science Advisory Report 2023/016, 2023.

George Rose, Professor of Fisheries who appeared as an individual, proposed that climate change might have contributed to the increase in California sea lions in the Salish Sea and that they could be considered an invasive species since they were not previously found in the area.[16]

The harbour seal population in British Columbia reached a low of approximately 10,000 seals in the 1960s after "large-scale predator control programs and harvests in the late

16 George Rose, Professor of Fisheries, As an individual, *Evidence*, 30 March 2023.

1800s to mid-1900."[17] Abundance of harbour seals "increased dramatically following their protection in the early 1970s."[18] The harbour seal population in British Columbia in 2019 was estimated to be approximately 85,000 harbour seals, representing a slight decrease from the peak of over 100,000 in the early 2000s (Figure 5).[19] Andrew Trites explained that the harbour seal population has been stable and at the largest number of individuals that can be supported by the environment for over 25 years.[20]

17 The predator control programs targeted harbour seals.

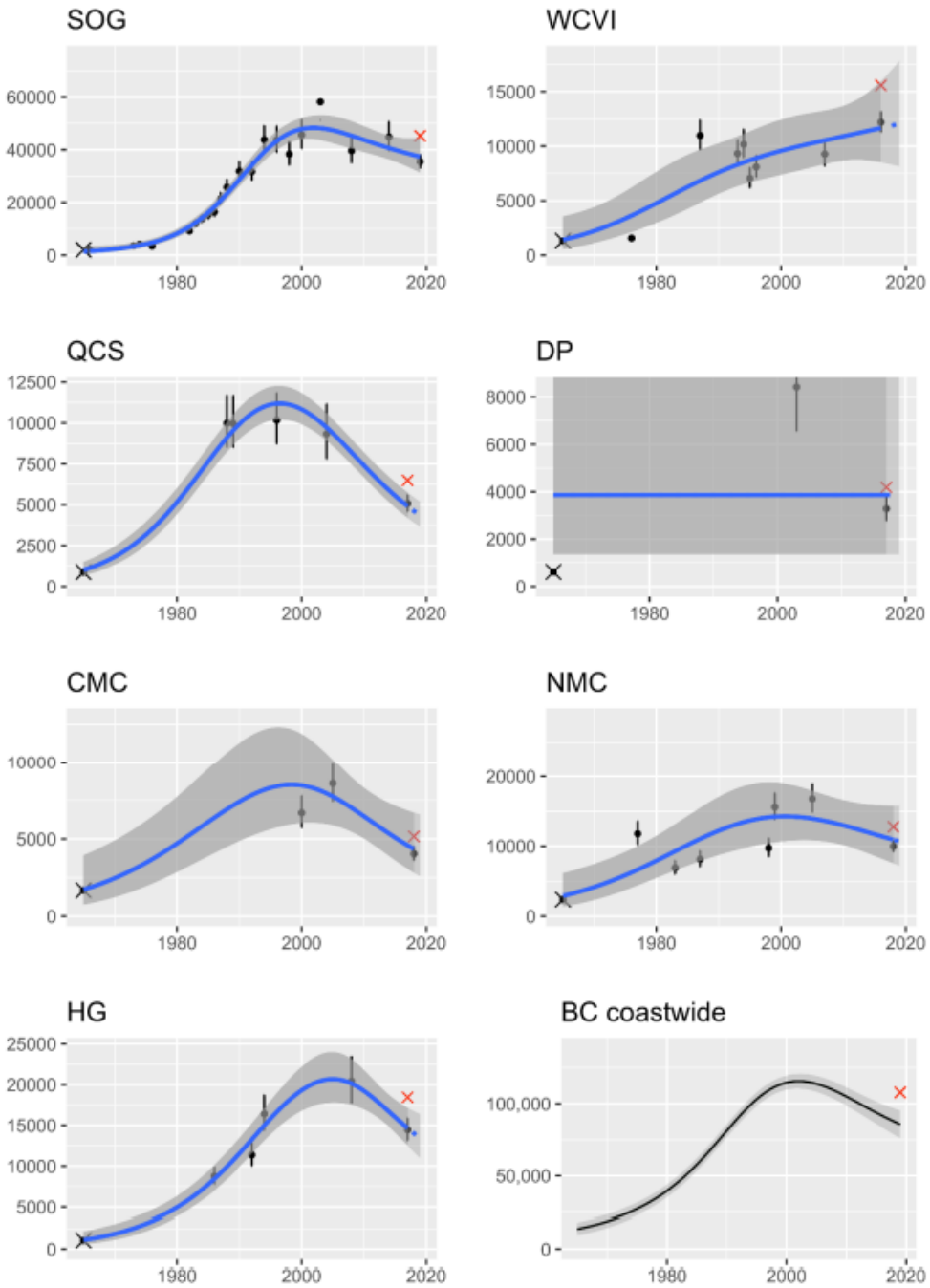
DFO, *Stock Assessment of Pacific Harbour Seals (Phoca vitulina richardsi) in Canada in 2019*, Canadian Science Advisory Secretariat, Science Advisory Report 2022/034, 2022.

18 Ibid.

19 Andrew Thomson, Regional Director, Fisheries Management, DFO, *Evidence*, 1 May 2023.

20 Andrew Trites, Professor, University of British Columbia, As an individual, *Evidence*, 23 March 2023.

Figure 5—Abundance Estimates for Pacific Harbour Seal for Seven Regions in British Columbia and across the Province between 1965 and 2019



Note: The black "x" is the reconstructed abundance estimate for 1965. The red "x" indicates the abundance estimate that would have been obtained using an old correction factor for the proportion of seals hauled out in the model. Lines with shading represent the mean trends in

abundance and standard errors based on model output. Blue dots are the projected abundances to 2019. Regions are: Strait of Georgia (SOG), west coast of Vancouver Island (WCVI), Queen Charlotte Strait (QCS), Discovery Passage (DP), central mainland coast (CMC), northern mainland coast (NMC), Haida Gwaii (HG).

Source: Figure 3 in DFO, *Stock Assessment of Pacific Harbour Seals (Phoca vitulina richardsi) in Canada in 2019*, Canadian Science Advisory Secretariat, Science Advisory Report 2022/034, 2022.

Carl Walters, Professor Emeritus at the Institute for the Oceans and Fisheries of the University of British Columbia who appeared as an individual, noted that the number of seals and Steller sea lions on the B.C. coast today is probably at least twice what it was in the last several thousand years because First Nations in the area "harvested them intensely" before the arrival of Europeans.[21]

Arctic Pinnipeds

According to the North Atlantic Marine Mammal Commission, there are approximately 1.2 million ringed seals in the northwest Atlantic.[22] The population size of bearded seals is unknown.[23]

IMPACTS OF PINNIPEDS

The Committee heard about the impacts of pinniped populations on the East and West Coasts of Canada and the Arctic. These included impacts on commercial fish stocks, endangered fish species and on pinnipeds themselves such as undersized female harp seals having difficulties carrying pregnancies to term or potentially weaning pups earlier and pinniped diet changes towards less nutritious and less fatty fish because of low prey availability. Possible negative effects of seal populations on prey populations include predation, competition for food, the transmission of parasites causing increased mortality in fish, a reduction in reproductive success because of disrupted spawning, and changes in fish behaviour to reduce the risk of seal predation impacting prey productivity.[24] According to Doug Chiasson, Executive Director of the Seals and Sealing Network at the Fur Institute of Canada:

21 Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.

22 DFO, *Ringed seal*.

23 DFO, *Bearded seal*.

24 DFO, *Impacts of Grey Seals on Fish Populations in Eastern Canada*, Canadian Science Advisory Secretariat, Science Advisory Report 2010/071, 2011.

> [M]anaging near-apex predator populations upward has led to increases in natural mortality throughout the food web, impeding the rebuilding of commercial stocks, damaging culturally and economically important species like salmon and driving at-risk fish populations toward extirpation.[25]

In certain cases, it can be difficult for the population to recover once the abundance of a species has declined to a certain level because predation keeps the population size low - a situation known as a predator pit. On the West Coast, Fraser River sockeye salmon could be stuck in a predator pit caused by Steller sea lion predation.[26] On the East Coast, the number of capelin and cod could be being kept low because of seal predation, even if seals were not necessarily responsible for the initial decline.[27]

Most witnesses believed that there is a link between the increase in pinniped populations and the decline in fish stocks and advocated for an increased pinniped harvest to rebuild fish stocks or prevent further declines. George Rose told the Committee that it is "beyond dispute" that the marine ecosystems on both the East and West Coasts are "out of kilter" and "very different from the past norms that supported our fisheries on both coasts for hundreds of years" since, in some cases, the biomass of seals is greater than that of their lower trophic level prey—differing from the usual pyramid shape of a sustainable ecosystem. He added that if the goal of ecosystem management is productive commercial fisheries, it is difficult to view these inverted pyramids positively.[28]

Andrew Trites countered the perception that predation by pinnipeds is "bad and harmful to species and ecosystems" by sharing that "predators such as seals have much better chances of catching slow, diseased and inferior fish, which ultimately makes fish populations healthier;" seals can also bring "indirect benefits" to ecosystems by consuming predatory fish and increasing the abundance of prey for other fish species; and finally "there is increasing evidence coming from terrestrial ecology that reintroducing top predators to their former habitats benefits ecosystem stability, productivity and biodiversity. This rewilding phenomenon appears to be naturally occurring in Canada's marine ecosystems."[29] Kilian Stehfest said that marine food webs

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25 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

26 Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.

27 Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023.

28 George Rose, Professor of Fisheries, As an individual, *Evidence*, 30 March 2023.

29 Andrew Trites, Professor, University of British Columbia, As an individual, *Evidence*, 23 March 2023.

are “far too complex” for a simple reduction in the number of pinnipeds to benefit a fish stock consumed by the pinnipeds.[30]

Kris Vascotto, Executive Director of the Atlantic Groundfish Council, suggested that, under the current ecosystem structure favouring pinnipeds, “many depleted fish stocks may actually be considered fully rebuilt under the current level of predation and productivity offered by pinniped populations at current levels” and that this situation “must be incorporated into rational, modern reference points and rebuilding plans commensurate with the current expectations of productivity.”[31]

Witnesses discussed the impact of large pinniped populations on other species throughout the ecosystem and on pinnipeds themselves. Dion Dakins, Chief Executive Officer of Carino Processing Ltd., shared that there are “indications that seals themselves are no longer able to maintain the population growth and health they currently have if it’s allowed to continue to go unchecked.”[32]

Witnesses stated that pinnipeds, important predators of fish, are being left out of DFO management plans, despite being an important aspect of ecosystem-based management. Ryan Cleary, Executive Director of Seaward Enterprises Association of Newfoundland and Labrador Inc., said it is “inexcusable” that the “impact of millions of seals is not factored into fisheries management assessments.”[33] Morley Knight, retired Assistant Deputy Minister of Fisheries Policy at DFO who appeared as an individual, expressed to the Committee that an effective management strategy would involve understanding the consumption of each fish species by seals and its impact on each stock, and “the elimination, where possible, of an adequate number of the top predators.”[34] Jim McIsaac, Managing Director of the BC Commercial Fishing Caucus, believed DFO’s current management system appears to be “all for managing human harvest or human impact, but it fails to manage the other apex predators that might be in the system” and thought this needed to change if “we want to eat fish from our ecosystem.”[35] According to Christopher Jones, Director of the Halifax East Fisheries Association, although DFO has indicated that ecosystem-based management approaches

30 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

31 Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023.

32 Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

33 Ryan Cleary, Executive Director, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

34 Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

35 Jim McIsaac, Managing Director, BC Commercial Fishing Caucus, *Evidence*, 27 April 2023.

are applied to stock assessments, “in the [absence] of a formal seal stock assessment, concerns exist as to whether DFO has, currently is, or will restrict commercial allocations of traditional fish stocks like cod, capelin, mackerel, etc., to support seal populations.”[36] According to Trevor Jones, Fish Harvester who appeared as an individual, there is a “responsibility to protect fish stocks, and if harvesting seals is part of that and of giving us a balanced ecosystem, then how can anybody argue with that? We're not going to be wasteful. We're just trying to do what's right in our ecosystem.”[37]

The following sections present the impacts of pinnipeds on the East Coast, on the West Coast and in the Arctic as described by witnesses. Recommendations 13, 14, 15, 16 and 17 presented at the end of this report relate to the impacts of pinnipeds.

On the East Coast

The Committee heard about the quantity of fish consumed by pinnipeds on the East Coast. Morley Knight explained to the Committee that all fisheries, including those in Greenland, in Canada from the Scotian Shelf to the Davis Strait, and foreign fisheries on the Grand Banks and the Flemish Cap remove between approximately 500,000 tonnes and 600,000 tonnes of fish while the approximately nine million seals in the same area consume a total of 13 million tonnes of fish annually—“The consumption by seals is more than 20 times the total of all our commercial fisheries.”[38] Robert Hardy, Fisheries Consultant who appeared as an individual, shared that DFO estimates that harp seals consume up to 1,000,000 metric tons of capelin annually and compared that quantity to the 24,000 metric tons of commercial quota in 2022.[39] According to Kris Vascotto, the grey seal herd on the Scotian Shelf could be consuming approximately 50% of the total fish biomass observed in DFO research vessel surveys while harp seals in the Newfoundland region could be consuming approximately 25% of total fish biomass. The “consumptive potential of those pinnipeds is quite dramatic and can impact those systems quite substantively.”[40]

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36 Christopher Jones, Director, Halifax East Fisheries Association, *Evidence*, 20 April 2023.

37 Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

38 Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

39 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; and Robert Hardy, “Study of the ecosystem impacts and the management of pinniped populations”, Written submission to the House of Commons Standing Committee on Fisheries and Oceans, 23 March 2023.

40 Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023.

Bernard Vigneault told the Committee that seal predation in Atlantic Canada is "orders of magnitude" larger than commercial harvesting but specified that DFO only has scientific evidence to support the negative impact of grey seals on groundfish such as cod in the Southern Gulf of St. Lawrence, in the Northwest Atlantic Fisheries Organization (NAFO) division 4T. He cautioned that, in many cases, factors such as the absence of capelin, the presence of other predators and temperature also played a role in the reestablishment of cod populations.[41] There is not yet conclusive scientific evidence regarding the impact of harp seals on northern cod off the coast of Newfoundland and Labrador. The current indication is that the availability of their capelin prey is the main factor limiting the growth of the northern cod rather than predation by seals.[42] Seals can prey upon capelin.[43]

Several witnesses, including Trevor Jones, Craig Pardy, Member for the District of Bonavista of the House of Assembly of Newfoundland and Labrador, Ginny Boudreau, Executive Director of the Guysborough County Inshore Fishermen's Association, Dion Dakins and Glenn Blackwood told the Committee that predation by pinnipeds on depressed stocks may be preventing the rebuilding of fish stocks such as cod, mackerel and capelin.[44] Kris Vascotto shared that predation by pinnipeds such as harp seals on capelin populations, already at critically low levels, "cascades directly into stalled northern cod recovery and the impaired performance of other groundfish stocks."[45] Craig Pardy told the Committee that:

> [I]f nothing is done to reduce the [seal] overpopulation, we can say goodbye to ever rebuilding our cod stocks and maintaining the balance of our pelagic species like capelin, herring and mackerel. Predation of salmon by seals of various species in the estuaries and rivers throughout the east coast is an equally critical issue[…].[46]

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41 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023; and Jennifer Buie, Acting Director General, Fisheries Resource Management, DFO, *Evidence*, 9 March 2023.

42 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

43 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023; and George Rose, Professor of Fisheries, As an individual, *Evidence*, 30 March 2023.

44 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023; Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023; Craig Pardy, Member, District of Bonavista, House of Assembly of Newfoundland and Labrador, *Evidence*, 17 April 2023; Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023; and Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023.

45 Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023.

46 Craig Pardy, Member, District of Bonavista, House of Assembly of Newfoundland and Labrador, *Evidence*, 17 April 2023.

Dion Dakins told the Committee that increasing harp seal populations may be negatively affecting harp seals themselves, sharing that harp seals on the East Coast had been observed by fishers consuming crab and shrimp, which don't provide much nutritional benefit to them, potentially because the stocks of more nutritious and fatty fish are low following high pinniped predation. He outlined DFO harp seal science that found that since the population has risen above 5.4 million, female harp seals, on average, are 20 kilograms lighter in February—a critical point in the gestation cycle—and 1.7 centimetres shorter in body length. Females are, on average, two years older before they have their first young, and "late-term abortions" are up by 200%. He added that claw marks on the hides of young of the year harp seals are being seen more often at the processing plant and that this could be because females are trying to wean the pups earlier than historically normal.[47]

On the West Coast

The Committee heard about the quantity of fish consumed by pinnipeds on the West Coast. Murdoch McAllister, Associate Professor at the University of British Columbia who appeared as an individual, told the Committee that the approximately 48,000 Steller sea lions on the West Coast eat roughly 18 kilograms of fish per day for a total of 300,000 tonnes per year.[48] This is "more fish than all the commercial fisheries combined, mostly hake and herring, but also salmon."[49] Murdoch McAllister told the Committee that the 100,000 harbour seals consume approximately 2 kilograms per day, for a total consumption of 70,000 tonnes of various fish species at different life stage.[50] According to Ken Pearce, President of the Pacific Balance Pinniped Society, "B.C. pinnipeds consume 350,000 metric tons of finfish annually. To put that into perspective, that equates to approximately 7,000 fully loaded seine boats."[51]

Andrew Thomson, Regional Director of Science in the Pacific Region at DFO, described the multitude of factors affecting Pacific salmon populations including pathogens, habitat availability, climate change and predation by pinnipeds.[52] Martin Paish, Director

47 Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

48 Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.

49 Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.

50 Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.

51 Ken Pearce, President, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

52 Andrew Thomson, Regional Director, Science, Pacific Region, DFO, *Evidence*, 9 March 2023.

of Sustainable Fisheries at the Sport Fishing Institute of British Columbia, described the two moments in a salmon's life when it must migrate past "pinch points" and concentrated pinniped predation: as outbound juveniles heading for the ocean and as adults returning to spawn.[53] Research on predation of juvenile chinook and coho salmon by harbour seals in southern B.C. conducted by Murdoch McAllister and his team found that predation rates are "up to about 40% of all juvenile chinook salmon entering salt water and about 60% of all juvenile coho salmon entering salt water."[54] Pinnipeds are themselves prey for Transient Killer Whales and could have contributed to the increased abundance of these whales in certain areas.[55]

Murray Ned-Kwilosintun, Executive Director of the Lower Fraser Fisheries Alliance, told the Committee that pinnipeds had previously been regularly observed at

> the mouth of the Fraser River, right up to the Yale canyon, but now their presence is observed in many of our shallow tributaries, just several kilometres from the Fraser main stem. The assumption is that they are feeding on juvenile and adult salmon and other resident species, but that is yet to be determined.[56]

Witnesses gave the Pacific hake, a predator of salmon and other fish, as an example of how pinnipeds can also affect species a few steps away in the food chain. Pinniped predation on predatory fish such as the Pacific hake that in turn eat young herring could increase the abundance of juvenile herring available for salmon to eat.[57] Kilian Stehfest told the Committee that a reduction in the pinniped population could actually lead to an increase in Pacific salmon mortality since, in the Salish Sea, Pacific hake make up 24% of harbour seal diet on average while chinook represent 3.5% and sockeye salmon represent 2.2%.[58] Murdoch McAllister shared that modelling for the Strait of Georgia has shown that a reduced abundance of harbour seals would not lead to an increase in Pacific hake large enough to have any effect on coho salmon and chinook salmon.[59]

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53 Martin Paish, Director, Sustainable Fisheries, Sport Fishing Institute of British Columbia, *Evidence*, 24 April 2023.

54 Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.

55 Ibid.

56 Murray Ned-Kwilosintun, Executive Director, Lower Fraser Fisheries Alliance, *Evidence*, 27 April 2023.

57 Andrew Trites, Professor, University of British Columbia, As an individual, *Evidence*, 23 March 2023.

58 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

59 Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.

Ken Pearce argued that an increase in Pacific hake resulting from a reduction in pinniped populations could be offset by an increased commercial harvest.[60]

Pinnipeds have also interacted with human infrastructure or practices on the West Coast to increase their ability to catch salmon. They have been observed using log booms as artificial habitat to rest, breed and get more access to salmon. Some have learned that fish hatcheries or fish ladders are good places to catch salmon since the fish are present in higher concentration in those areas.[61]

In Arctic Regions

Aaju Peter, a lawyer who appeared as an individual, activist and recipient of the Order of Canada, described the marked increase of harp seals in Frobisher Bay since the 1980s. Ringed seals, an important Inuit food source, can be intimidated by harp seals since they "travel singularly, and a herd of harp seals is vicious, so it makes it even harder for [Inuit hunters] to harvest [their] food."[62]

In Husky Lakes in the Northwest Territories, seals are having an impact on trout but a lack of resources for scientific studies has meant that the seal population size remains unknown.[63]

Adrian Schimnowski, Chief Executive Officer of the Arctic Research Foundation, shared that hunters in Canada's Arctic had observed seals sinking instead of floating when they are hunted because of smaller fat reserves and attributed the sinking to a change in diet towards less nutritious and less fatty foods and the impacts of climate change.[64]

SCIENTIFIC INFORMATION ON PINNIPEDS

The Committee heard what scientific information on pinniped population sizes, distributions and diets is available as well as gaps to be addressed including the absence

60 Ken Pearce, President, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

61 Andrew Trites, Professor, University of British Columbia, As an individual, *Evidence*, 23 March 2023; Owen Bird, Executive Director, Sport Fishing Institute of British Columbia, *Evidence*, 24 April 2023; Martin Paish, Director, Sustainable Fisheries, Sport Fishing Institute of British Columbia, *Evidence*, 24 April 2023; Jesse Zeman, Executive Director, B.C. Wildlife Federation, *Evidence*, 27 April 2023; and Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

62 Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023.

63 Adrian Schimnowski, Chief Executive Officer, Arctic Research Foundation, *Evidence*, 24 April 2023.

64 Ibid.

of scientific conclusions about the impact of increasing pinniped populations on particular fish stocks or in particular regions and the apparent disconnect between the conclusions of some scientific studies and the observations of fishers. Recommendations 9 to 12 presented at the end of this report relate to the available scientific information on pinnipeds and knowledge gaps.

Recent Scientific Activities

Over the last five years, DFO has dedicated approximately $1 million a year to seal science from ongoing science budgets such as the marine mammal budget.[65] The funded work focuses on supporting science advice for decisions on the seal harvest and science advice for fish stocks.[66] The Committee heard about improvements to the scientific tools available to study seals and sea lions in the last twenty years, including DNA and fatty acid analysis, which contributed to understanding prey relationships across the entire ecosystem and improved modelling to forecast population abundance. Mike Hammill, Scientist Emeritus from the Quebec Region of DFO, told the Committee about improved information on pinnipeds acquired over the last ten years including improved information on diet, more precise measurements of movement and distribution through satellite telemetry and longer time series on abundance estimates for grey seals and harp seals.[67]

Andrew Thomson listed approaches used by DFO to determine the predation rates of pinnipeds on salmon, including through DNA technology and hard-part analysis of pinniped scat samples.[68] As discussed in the following section, some witnesses expressed doubts about the effectiveness of hard-part analysis of pinniped scat. Bernard Vigneault listed other ongoing or upcoming scientific work being performed by the department, including identifying research gaps on the West Coast, the first-ever assessment of harbour seals in Atlantic Canada, a survey of Pacific harbour seals, and an increased number of harp seal samples.[69]

Bernard Vigneault explained that DFO has the benefit of collaborating with stakeholders, including harvesters in Atlantic Canada and Inuit in Canada's Arctic. Scientific studies undertaken by DFO show that the seal harvest is a humane and sustainable hunt of

65 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

66 Ibid.

67 Mike Hammill, Scientist Emeritus, Quebec Region, DFO, *Evidence*, 9 March 2023.

68 Andrew Thomson, Regional Director, Science, Pacific Region, DFO, *Evidence*, 9 March 2023.

69 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

healthy stocks as seal populations have returned to historic levels and could sustain a much larger harvest.[70]

Knowledge Gaps

Despite recent progress on pinniped science and ongoing research, the Committee heard that information is still lacking in several areas, including the diet of all pinniped species throughout their ranges and throughout the entire year as well as up-to-date and accurate population estimates.[71] George Rose told the Committee that complete and timely stock surveys are an important piece of the scientific information needed to determine the impacts of seals on fish stocks.[72] Dion Dakins suggested that "pockets of science" currently available were not sufficient to define the problems caused by pinnipeds and suggested that a gap analysis be undertaken to determine what is known and unknown as well as the strength of the data.[73] Keith Hutchings, Managing Director of the Canadian Centre for Fisheries Innovation, believed Canada needs

> multi-year, multispecies spatial and migratory research. Short-term ad hoc stomach content research is not adequate. So many variables are not being considered, such as migratory patterns, changes in water temperature and even the effects on predated fish species and other species that are available for predation.[74]

Kris Vascotto underscored the importance of gaining a broader perspective with respect to pinniped diet and distribution. He explained that:

> Disentangling the role of pinnipeds in the ecosystem means a thorough appreciation of diets and distribution across the entire year, and not just within short snapshots. Only then can we speak with certainty about the role they play, how they may impact surrounding trophic levels, and how the system may respond to lower pinniped abundance.
>
> Our current understanding is heavily restricted both spatially and temporally, creating severe biases in interpretation. For instance, how can we speak to pinniped diets, when sampling is heavily spatially biased to represent only a small portion of the pinniped herd itself?[75]

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70 Ibid.

71 Erin Carruthers, Fisheries Scientist, Fish, Food and Allied Workers Union, *Evidence*, 24 April 2023.

72 George Rose, Professor of Fisheries, As an individual, *Evidence*, 30 March 2023.

73 Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

74 Keith Hutchings, Managing Director, Canadian Centre for Fisheries Innovation, *Evidence*, 17 April 2023.

75 Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023.

Robert Hardy explained that the sampling of seal stomachs in the winter in Newfoundland and Labrador could have impacted results based on the fish present there at that time of year and gave the following analogy:

> If we were to sample a black bear stomach in the spring of the year, after they came out of hibernation, would we find blueberries in their stomach? No. The same is true for the large part of the seal stomach samples that have been done in Newfoundland [in the winter] —there was little caplan [sic] or cod.[76]

Danny Arsenault and Robert Hardy questioned DFO's current pinniped diet assessment methodology, which consists of counting hard parts and otoliths (ear stones found in fish heads) in seal stomachs. Mr. Arsenault and Mr. Hardy stated that this approach may not be capturing the entire diet since pinnipeds are known to bite the abdomens of large fish or only eat them up to their heads. This kills the fish but does not leave bones or otoliths to be counted in the stomach, leading to incomplete diet assessments.[77] The Committee viewed photos of seal stomach contents showing the large quantity of fish and shellfish that can be consumed by a single seal (Figure 6).

76 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023.

77 Danny Arsenault, Chair, Groundfish Advisory Committee, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023; and Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023.

Figure 6—Seal Stomach Contents

Source: Figure 1 in Robert Hardy, "Study of the ecosystem impacts and the management of pinniped populations", Written submission to the House of Commons Standing Committee on Fisheries and Oceans, 23 March 2023.

Some witnesses told the Committee that pinnipeds are not solely responsible for declining fish stocks.[78] Kilian Stehfest reminded the Committee that since it is more difficult to see fish feeding on other fish, the "in-your-face" predation by pinnipeds can often make them a "scapegoat for the natural mortality of fish."[79] Other factors, such as other marine predators, overexploitation, habitat loss and climate change are also having a significant impact on fish stocks. Matt Stabler told the Committee that the only cause for salmon stock decline on the West Coast that can be acted upon immediately is

78 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023; Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023; and Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.

79 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

predation by seals and sea lions and that this would provide the "time required to address the other bottlenecks these resources face."[80] In the Gulf of St. Lawrence, the warming and acidification of the water are leading to conditions that limit the habitat for several species and impact re-establishment. For this reason, Bernard Vigneault underscored the importance of "good scientific data" and clearly understanding "the specific impacts of predation on the management of commercial fish stocks" and added that focusing efforts on eliminating seals is not guaranteed to impact fish stocks directly and significantly.[81]

Witnesses discussed the perceived reticence by DFO to acknowledge the impact of pinniped populations on fish stocks.[82] Mervin Wiseman, Ex-Officio Board Member of Seaward Enterprises Association of Newfoundland and Labrador Inc., hoped for a way to incorporate scientific data collection and studies with the "empirical knowledge provided by fish harvesters who are out on the ocean every day" into a "mosaic of science" that considered both sources of information.[83] Erin Carruthers, Fisheries Scientist at the Fish, Food and Allied Workers Union, called on DFO to prioritize "collaborative research on seal impacts, research that builds on the observations and knowledge of people on the water."[84]

DFO convened the Atlantic Seal Science Task Team (ASSTT) in 2020 to address the impacts of seal predation on fish stocks in Eastern Canada. Its objectives were to provide:

- input on the priorities of the Department's Atlantic seal science program including the application of technology
- input on how to increase the involvement of the fishing industry in seal science projects

80 Matt Stabler, Director, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

81 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

82 Danny Arsenault, Chair, Groundfish Advisory Committee, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023; Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; and Ryan Cleary, Executive Director, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

83 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

84 Erin Carruthers, Fisheries Scientist, Fish, Food and Allied Workers Union, *Evidence*, 24 April 2023.

- advice on how the Department could better communicate its scientific findings to the fishing industry and other stakeholders.[85]

The ASSTT released its final report, containing nine recommendations focused on harp and grey seals, in April 2022.

Glenn Blackwood, co-chair of the ASSTT, said the recommendations were "designed to close the gap between where DFO science says there is no impact on that part of the ecosystem, and fishermen and other stakeholders who truly believe that there is."[86] Many witnesses supported the recommendations of the ASST.[87] For example, Paul Lansbergen, President of the Fisheries Council of Canada, highlighted recommendations 1 to 3 addressing "the need for more science to fill in the gaps of the existing scientific body of knowledge."[88] Bill Penney, Business Developer at Mi'kmaq Commercial Fisheries Inc., highlighted recommendation 5 stating that "DFO should establish and permanently fund a social science research unit to complement the natural science research."[89]

The Committee was cautioned that the application and interpretation of scientific information are as important as its availability. Jesse Zeman, Executive Director of the B.C. Wildlife Federation, described a Canadian Scientific Advisory Secretariat (CSAS) process for the interior Fraser steelhead that had been "completely undermined." He explained that while "pinniped predation on smolt and adult steelhead, competition with other salmon in the ocean, interception through fishing, ocean conditions and freshwater conditions were all identified as factors which could support recovery," the final report lumped all the factors together and did not identify the relative importance of each factor. He believed this "will likely keep DFO off the hook for doing something

85 DFO, *Atlantic Seal Science Task Team*.
For the Atlantic Seal Science Task Team's final report, see: *Report of the Atlantic Seal Science Task Team*.

86 Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023.

87 Paul Lansbergen, President, Fisheries Council of Canada, *Evidence*, 9 March 2023; Keith Hutchings, Managing Director, Canadian Centre for Fisheries Innovation, *Evidence*, 17 April 2023; Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023; and Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

88 Paul Lansbergen, President, Fisheries Council of Canada, *Evidence*, 9 March 2023; and Keith Hutchings, Managing Director, Canadian Centre for Fisheries Innovation, *Evidence*, 17 April 2023.

89 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

meaningful to recover these endangered fish."[90] He added that the steelhead example showed that

> the process is broken and that there is bureaucratic interference happening in the world of science, and that is not good for any of us. It doesn't matter if they are fish, seals or sturgeon. It matters that the right information is getting out to the right people so they can make the right decision.[91]

The Committee heard that the cost of doing scientific research in the Arctic is far more expensive than in the South. Tom Henheffer, Chief Operating Officer of the Arctic Research Foundation, told the Committee that "DFO and the federal government at large continue to underfund this critical work" and shared that DFO has "consistently failed to properly assess stocks in most of the Arctic."[92] Adrian Schimnowski suggested involving communities, research teams and commercial groups to collect data and observations over longer periods of time and to include traditional knowledge.[93]

TOWARDS AN INCREASED SUSTAINABLE HARVEST OF PINNIPEDS

Many witnesses suggested the time to focus solely on studying the impacts of pinnipeds on fish stocks has passed and that increasing their harvest is the best way forward.[94] Craig Pardy believed that more studies or counts were not necessary to determine "the impacts of seals on the rebuilding of our groundfish stock" since "the data speaks for itself."[95] Eldred Woodford, Fish Harvester who appeared as an individual, mentioned past commissions and reports on seals dating back as early as the 1980s and told the Committee that the "time has come. We don't need any more studies on seals. We don't need any more science on seals. We need actions on seals."[96]

The witnesses who supported an increased harvest of pinnipeds all hoped for a responsible and sustainable harvest. This includes using the entire animal and keeping

90 Jesse Zeman, Executive Director, B.C. Wildlife Federation, *Evidence*, 27 April 2023.

91 Ibid.

92 Tom Henheffer, Chief Operating Officer, Arctic Research Foundation, *Evidence*, 24 April 2023.

93 Adrian Schimnowski, Chief Executive Officer, Arctic Research Foundation, *Evidence*, 24 April 2023.

94 Kris Vascotto, Executive Director, Atlantic Groundfish Council, *Evidence*, 23 March 2023; Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023; and Jesse Zeman, Executive Director, B.C. Wildlife Federation, *Evidence*, 27 April 2023.

95 Craig Pardy, Member, District of Bonavista, House of Assembly of Newfoundland and Labrador, *Evidence*, 17 April 2023.

96 Eldred Woodford, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

pinniped populations at healthy levels while reducing their impact on fish species. Trevor Jones explained that "harvesters and government [must be] responsible for harvesting at the correct level in order to maintain a healthy ecosystem. It is our duty to manage our resources properly, because when we don't, the impacts will be felt for generations to come."[97]

Witnesses wondered why steps to control the pinniped population had not been taken many years ago and worried it will now be more difficult to do so since populations had continued to increase. Danny Arsenault noted that increasing pinniped populations had been a concern for many years and wondered whether groundfish and pelagic stocks would be higher today if actions to control the seal populations on the East Coast had been taken years ago.[98] Craig Pardy informed the Committee that further delays will lead to fisheries in poorer shape and to more fish stocks that are more difficult to rebuild.[99] Jennifer Buie, Acting Director General of Fisheries Resource Management at DFO, told the Committee that DFO's goal, as a resource manager, is to keep the seal stocks at healthy levels and "is not to reduce the seal population."[100]

While Stéphanie Pieddesaux, Industrial Researcher at Merinov, believed that pinniped management was important, she suggested that climate change, including changes to the sea ice required for pupping and changes in the distribution of prey species, could soon be affecting the health of pinniped populations. As such, she stated that any seal management decisions would have to be approached more carefully than if they had been made 10 years ago when the impacts of climate change were not as important.[101] Carl Walters suggested that management practices, known as feedback control or harvest control, can be adapted to deal with the impacts of climate changes by "monitoring population size, by monitoring productivity and by adjusting the harvest from year to year."[102]

Kilian Stehfest, while not opposed to a "sustainably managed seal harvest," cautioned that the harvest of pinnipeds to benefit commercially valuable fish stocks could send

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97 Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

98 Danny Arsenault, Chair, Groundfish Advisory Committee, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023.

99 Craig Pardy, Member, District of Bonavista, House of Assembly of Newfoundland and Labrador, *Evidence*, 17 April 2023.

100 Jennifer Buie, Acting Director General, Fisheries Resource Management, DFO, *Evidence*, 9 March 2023.

101 Stéphanie Pieddesaux, Industrial Researcher, Merinov, *Evidence*, 20 April 2023.

102 Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.

unintended ripples through the food web with devastating impacts on the ecosystem. Further adding that this approach is

> a gamble with the health of coastal ecosystems of epic proportions, and with questionable prospects of achieving the desired outcome. The unpredictability and riskiness of this gamble is compounded by the significant and rapid changes we are already seeing in coastal ecosystems as a result of climate change.[103]

Current Pinniped Harvests

The *Fisheries Act* characterizes pinnipeds as a fish species. The *Marine Mammal Regulations* (MMR) under the *Fisheries Act* outline how seals may be legally harvested, including ages and locations as well as how a seal must be humanely dispatched.

On the East Coast, a commercial seal harvest exists for harp, grey and hooded seals. Since 2009, commercial sealers have been required to undergo mandatory training on a three-step process to ensure seal are dispatched and harvested quickly and humanely.[104] Most harvested seals are harp seals, followed by a small number of grey seals. Gil Thériault, Director of the Intra-Quebec Sealers Association, explained that the harp seal hunt is an established one while the grey seal hunt is a novel hunt developed within the last 10 years.[105] Hooded seals make up a very small portion of commercial landings. No commercial pinniped hunt currently exists on the West Coast.

The number of commercial licences issued, and active harvesters, has declined in recent years. In 2016, there were approximately 9,710 commercial seal licence holders and approximately 1,000 active harvesters.[106] Table 1 shows the number of commercial licences issued and the number of active sealers by province in 2022.

103 Kilian Stehfest, Marine Conservation Specialist, David Suzuki Foundation, *Evidence*, 27 April 2023.

104 DFO, *Ensuring the seal harvest is humane*.

105 Gil Thériault, Director, Intra-Quebec Sealers Association, *Evidence*, 24 April 2023.

106 DFO, *Statistics on the seal harvest*.

Table 1—Total Commercial Seal Licence Holders and Active Licences in 2022

Province	Commercial Licences Issued	Active Licences
Newfoundland and Labrador	3,582	307
Nova Scotia	45	13
New Brunswick	11	0
Prince Edward Island	17	0
Quebec	827	63
Total	4,482	380

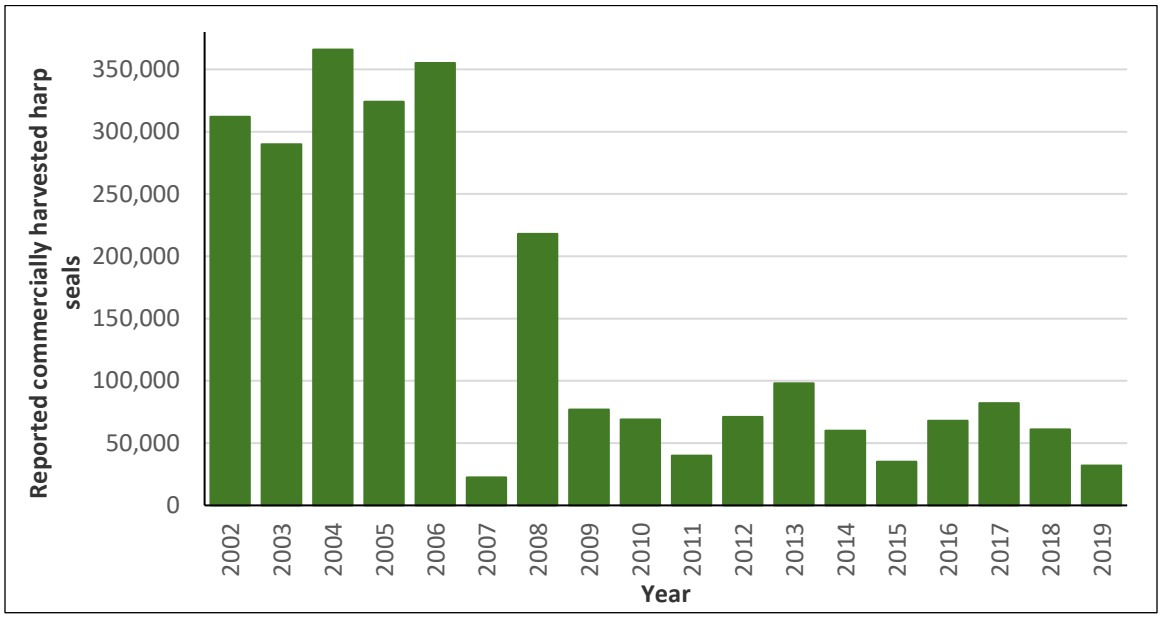
Source: Fisheries and Oceans Canada, *DFO Response to a Question Raised at the October 6 Meeting of the Senate Standing Committee on Fisheries and Oceans (POFO)*, Brief submitted to the Senate Standing Committee on Fisheries and Oceans, 2022.

DFO "does not assign a Total Allowable Catch [TAC] (quota) for the Atlantic seal harvest, as participation in the seal harvest, and the market demand for seals, is low. The number of animals harvested continues to be well within sustainable levels."[107] The last TAC announced for harp seals in 2016 was 400,000. In that same year, 68,000 harp seals were commercially harvested.[108] Figure 7 shows the number of commercially harvested harp seals between 2002 and 2019. Figure 8 shows the number of commercially harvested grey seals between 2010 and 2021. Figure 9 shows the number and value of seal pelts landed in Atlantic Canada between 2004 and 2022.

107 DFO, *Seal management on Canada's East Coast*, Backgrounder, May 2022.

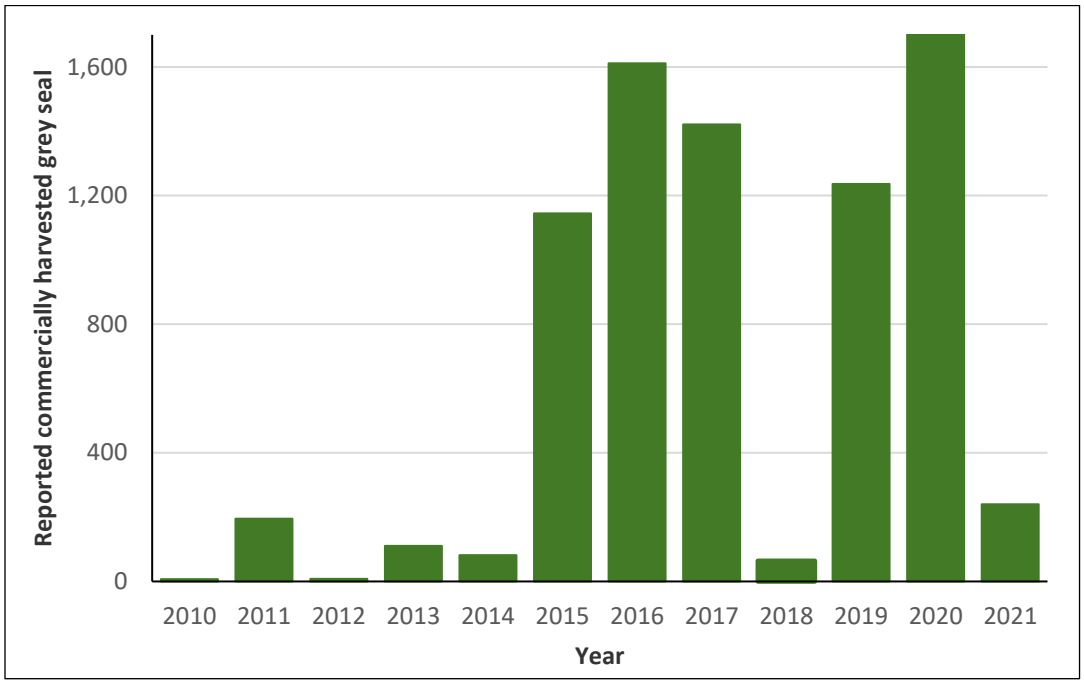
108 DFO, *2019 Status of Northwest Atlantic Harp Seals,* Pagophilus groenlandicus, Canadian Science Advisory Secretariat Science Advisory Report, 2020/020, March 2020.

Figure 7—Number of Reported Commercially Harvested Harp Seals in Canada between 2002 and 2019



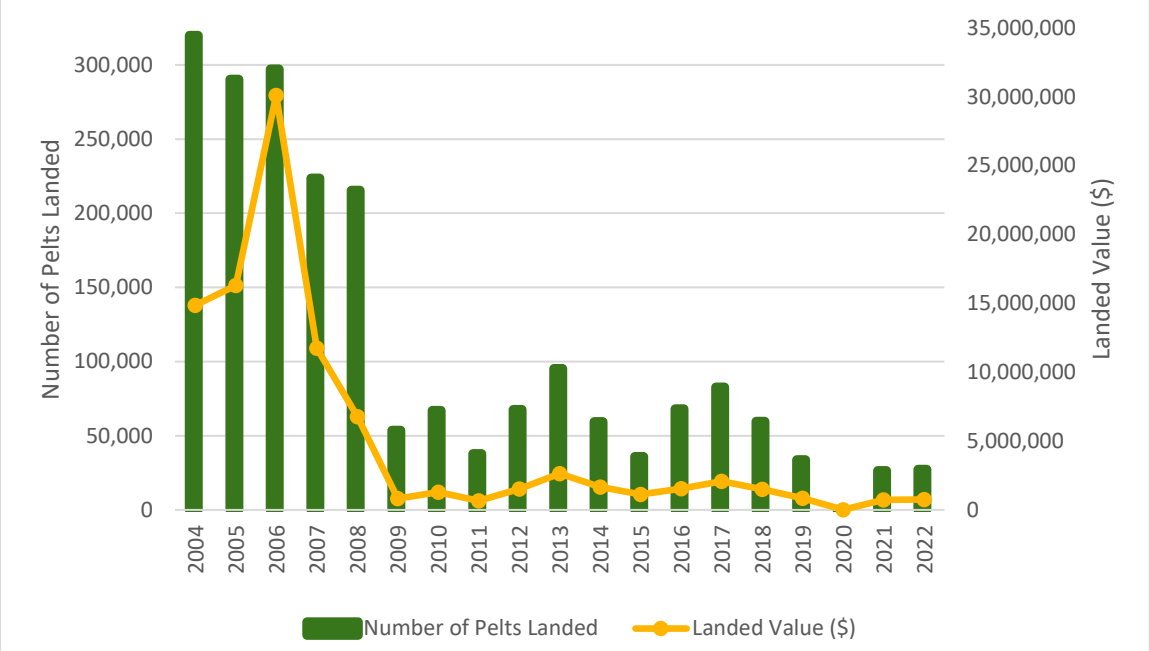
Sources: Figure prepared by the Committee using data obtained from Fisheries and Oceans Canada (DFO), *Statistics on the seal harvest*; and DFO, *2019 Status of Northwest Atlantic Harp Seals,* Pagophilus groenlandicus, Canadian Science Advisory Secretariat, Science Advisory Report, 2020/020, March 2020.

Figure 8—Number of Reported Commercially Harvested Grey Seals in Canada between 2010 and 2021



Sources: Figure prepared by the Committee using data obtained from Fisheries and Oceans Canada (DFO), *Statistics on the seal harvest*; and DFO, *Stock assessment of Northwest Atlantic grey seals (Halichoerus grypus) in Canada in 2021*, Canadian Science Advisory Secretariat, Science Advisory Report 2022/018, June 2022.

Figure 9 – Number and Value of Seal Pelts Landed in Atlantic Canada between 2004 and 2022



Notes: "Landings" are defined as "the part of the catch that is put ashore." See Fisheries and Oceans Canada (DFO), *Landings*.

The number of pelts landed and the landed value for 2022 are preliminary data and are subject to revision.

Sources: Table prepared by the Committee using data obtained from personal communications with DFO, Legislation and Parliamentary Affairs, 9 August 2016 and 21 July 2017; and DFO, *Regional Statistics – Fish Landings and Landed Values*.

Indigenous persons have a right to fish without a licence for seals and other species for food, social and ceremonial (FSC) purposes on all of Canada's coasts.[109] Subsistence harvests take place for harbour, ringed and bearded seals in Canada, but there are no commercial harvests for these species. Indigenous peoples in Canada "have a

109 The collective right to fish for food, social and ceremonial (FSC) purposes is protected under section 35 of the Constitution. "Indigenous harvesters can catch what is needed for themselves and/or their community for FSC purposes. FSC fishing does not provide an opportunity for the sale of catch. It may also occur at various times of the year, which are not always aligned with commercial fishery seasons or areas. Decisions about when a fishery is opened or closed are made through the fish management process." See: DFO, *Food, social and ceremonial fisheries*.

constitutionally-protected right to harvest marine mammals, including seals, as long as the harvest is consistent with conservation needs and other requirements."[110]

Pinniped Products

Witnesses described existing seal products and products under development that contribute to the use of the whole animal. Doug Chiasson told the Committee that "the current offering from Canadian seal harvests is diverse and innovative."[111] Omega-3 oils and supplements for heart and joint health and athletic performance can be derived from seal fat.[112] Heme iron pills derived from seals could be used by people with iron deficiencies with fewer side effects than chemically produced iron.[113] Seal fur and seal leather are warm, waterproof, biodegradable and can be used for visually striking garments and accessories.[114] Seal meat is lean, high in iron, and less contaminated than bluefin tuna. The most tender cuts of meat could be destined for restaurants while less tender meat could be suitable for jerky or stews.[115] Pets can be fed food, treats, and supplements derived from seals.[116] There are even markets for seal hearts, kidneys, and penises.[117]

According to Kendall Flood, Chief Executive Officer of Ár n-oileán Resources Ltd., transformed seal products, such as vacuum-packed ribs or high-quality jerky, should be

110 DFO, *The importance of the seal harvest*.

111 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

112 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; Romy Vaugeois, Program Manager, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; and Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

113 Steinar J. Engeset, President, Harbour Grace Shrimp Company Limited, *Evidence*, 17 April 2023.

114 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023; Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023; Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; and Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

115 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023; and Mélanie Lemire, Associate Professor, Université Laval, Collectif Manger notre Saint-Laurent, *Evidence*, 20 April 2023.

116 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023; and Daniel Lane, Professor, Maritime Seal Management Inc., *Evidence*, 1 May 2023.

117 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

prioritized over untransformed products of lower value because they are more commercially viable.[118]

Witnesses including Sandra Gauthier, Executive Director of Exploramer, Mélanie Lemire, Associate Professor at Université Laval, Collectif Manger notre Saint-Laurent, and Colombe St-Pierre, Chef-Owner of the Restaurant Chez Saint-Pierre, Collectif Manger notre Saint-Laurent, informed the Committee that seal meat could contribute to Canada's food independence and self-sufficiency.[119] Pinniped products such as omega-3 oils, meals made from seals or even protein powders could also be sent abroad as food aid in areas in the world that are food insecure or lacking protein.[120]

Increasing the Seal Harvest on the East Coast

Recommendations 1, 3, 6 and 8 found at the end of this report relate to the testimony about increasing the seal harvest presented in the following sections.

Commercial Seal Harvest

No TAC is set on the East Coast since participation in the seal harvest is low and the number of seals harvested is well within sustainable levels. Kendall Flood told the Committee that DFO has been "perfectly open" that the quota could be increased if harvest numbers approached it, adding that DFO has calculated that a harvest of between 425,000 and 450,00 harp seals would maintain the population while a harvest of about 600,00 would reduce the population.[121] Sandra Gauthier spoke of a desire to

> increase the number of commercial licenses in the more northern regions of Quebec, such as the Gaspé and the North Shore. These are areas where harp seals and some grey seals are still found today. We would like to see more commercial licenses issued and the seal hunting season extended so that we can have access to more meat.[122]

118 Ibid.

119 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023; Mélanie Lemire, Associate Professor, Université Laval, Collectif Manger notre Saint-Laurent, *Evidence*, 20 April 2023; and Colombe Saint-Pierre, Chef-Owner, Restaurant Chez Saint-Pierre, Collectif Manger notre Saint-Laurent, *Evidence*, 20 April 2023.

120 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; and Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

121 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

122 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023.

Witnesses spoke about the chicken-and-egg scenario involving a lack of demand for pinniped products and a low pinniped harvest. Causes for this lack of demand, including a lack of education and outreach in Canadian and international markets and the lack of market access to the United States and the European Union are discussed in upcoming sections.

Doug Chiasson stated that the "single most effective" tool to control seal populations is a successful commercial harvest. He warned, however, that action in this direction needs to be taken soon because "as experienced sealers age out of the workforce, we run the risk of not being able to rise to the challenge of scaling up our harvest to the levels needed to ensure proper management."[123] Ginny Boudreau told the Committee that seals are a resource that could "add economic growth to harvesting, processing and marketing within our communities and alleviate economic loss" due to reduced TAC or fishing moratoria on other species.[124]

Personal Seal Harvest

The Exploramer Science Museum in Gaspésie, Quebec, offers training to 30 new personal use seal hunters every year. The two-day training covers seal biology and relevant laws, gives workshops on how to butcher and cut up seal meat and ends with a culinary workshop. There is currently a 10-year waiting list for the personal licence course—indicating a high level of interest in sustainable sealing.[125]

According to Sandra Gauthier the personal use hunt could become "a very interesting lever for the economic development of Quebec's coastal regions, especially during the off-seasons for tourism."[126] The arrival of sport or recreational hunters in the Gaspé, on the North Shore, in the Lower St-Lawrence or the Magdalen Islands from November to March for a well-managed hunt would alleviate economic concerns in areas where there is higher unemployment in the winter.[127] Sandra Gauthier described different approaches that could increase the personal use seal hunt including an extension to the

123 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

124 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

125 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023.

126 Ibid.

127 Ibid.

personal use sealing season and allowing people who do not live in coastal areas to participate in the hunt after taking training courses.[128]

Creation of a Commercial Pinniped Harvest on the West Coast

No commercial harvest for pinnipeds exists on the West Coast. DFO considers such proposals under the New Emerging Fisheries Policy.[129] The Committee was informed that the Pacific Pinniped Balance Society, composed of "115 First Nations, UFAWU-Unifor, B.C. Wildlife Federation and many of the other local sports fishing clubs" submitted a proposal over five years ago for a progressive harvest of pinnipeds on the West Coast, starting at 5,000 animals and moving incrementally forward.[130] Matt Stabler, however, explained that the proposal, has been subjected to "nonsensical roadblocks repeatedly" due to a fear of the public and added that none of the reasons put forward by DFO for the delays were "based on science."[131] He told the Committee that markets exist for the hides, meat and omega-3 fatty acids for even larger quantities than those resulting from the proposed harvest. The only part of the animal left to deal with are the bones.[132]

Ken Pearce listed the risks of not reducing pinniped populations as the loss of salmon stocks, the collapse of the sport-fishing industry worth over $1 billion and the collapse of the remaining commercial fishery.[133] Jesse Zeman supported an increased pinniped harvest on the West Coast to reduce predation on wild Pacific salmon because "steelhead are endangered, pinnipeds are not."[134]

INFRASTRUCTURE FOR PINNIPED HARVESTS

Witnesses had differing opinions on whether the existing Canadian sealing infrastructure would be able to handle an increased seal harvest on the East Coast. Some witnesses, including Mervin Wiseman and Kendall Flood, said that current ships could be used for a

128 Ibid.

129 Bernard Vigneault, Director General, Ecosystem Science Directorate, DFO, *Evidence*, 9 March 2023.

130 Ken Pearce, President, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

131 Matt Stabler, Director, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

132 Ibid.

133 Ken Pearce, President, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

134 Jesse Zeman, Executive Director, B.C. Wildlife Federation, *Evidence*, 27 April 2023.

pinniped harvest using the entire animal.[135] The latter also believed processing infrastructure was sufficient.[136] Trevor Jones, on the other hand, stated that investments would be necessary to develop the infrastructure needed to support a harvest of 400,000 harp seals with full utilization of the animal but believed that the infrastructure would fall into place once markets are in place for the products.[137] Doug Chiasson concurred that some time would be needed to develop sufficient infrastructure to handle a large increase in the number of harvested seals and informed the Committee that creating a market for seal products would motivate businesses to "reorganize themselves accordingly."[138] Ginny Boudreau saw a role for "the provincial government, as well as the federal government, in assisting the industry to get those processing plants, the facilities, up and running then into the markets."[139]

Sandra Gauthier explained that in Quebec, a "steady and increasing growth in demand for seal meat for food purposes" has been observed.[140] So much so that the only butcher that processes seal meat in the province, located in the Magdalen Islands, is no longer able to meet demand. Transporting the meat from the islands to the continent is also challenging. She stated that opening two more seal meat processing plants in Quebec would allow more meat to be distributed to restaurants, but also to supermarket chains, which require significant amounts of meat to stock their shelves.[141]

With respect to the West Coast, Matt Stabler stated that the region already has the boats, crews and processing capacity for a harvest starting at 5,000 animals and is only waiting on permission to commercially harvest pinnipeds.[142] Jim McIsaac, on the other hand, stated that the infrastructure to harvest pinnipeds requires further development on the West Coast, since fisheries infrastructure is being lost there in general.[143]

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135 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023; and Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

136 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

137 Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

138 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

139 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

140 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023.

141 Ibid.

142 Matt Stabler, Director, Pacific Balance Pinniped Society, *Evidence*, 23 March 2023.

143 Jim McIsaac, Managing Director, BC Commercial Fishing Caucus, *Evidence*, 27 April 2023.

Recommendations 2, 3 and 6 presented at the end of this report relate to infrastructure for pinniped harvests.

BARRIERS TO THE SALE OF PINNIPED PRODUCTS

Both market demand and market access are barriers to the sale of pinniped products. These barriers contribute to a low pinniped harvest. Witnesses described how the seal harvest could benefit from education or outreach programs aimed towards increasing potential markets in Canada and abroad and countering its negative image. Market access barriers must also be addressed to increase the markets in which pinniped products can be sold. Recommendations 4 to 7 presented at the end of this report are related to the importance of education and outreach to reduce barriers to the sale of pinniped products.

Education and Outreach

Ginny Boudreau told the Committee that negative opinions of the sealing industry are the result of "sensationalized inaccuracies with respect to pinniped harvesting" that have been circulated by media and extreme environmental groups.[144] Owen Bird, Executive Director of the Sport Fishing Institute of British Columbia, suggested that "the information used by some groups is appealing to urban populations that are not familiar with the circumstances."[145] Bill Penney similarly expressed that

> the public's view on the global stage has been shaped by an onslaught of celebrity reactions to the seal industry as it existed over 30 years ago. In fact, government policy around the management and regulation of the seal population is still being shaped by public perceptions that are created by activists and that have no connection to truth, facts or science.[146]

Bill Penney suggested that federal support for marketing and sales programs focused on facts could help reshape the narrative, explaining that most Canadians "do not know the facts about the seal, but they can repeat the misinformation and propaganda produced by organizations that use the seal industry for its fundraising efforts."[147] Aaju Peter shared that the negative perceptions of the seal hunt are very hard to fight and are

144 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

145 Owen Bird, Executive Director, Sport Fishing Institute of British Columbia, *Evidence*, 24 April 2023.

146 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

147 Ibid.

"making a harsh life even harsher" for Inuit. She proposed that putting a human face on 5,000 year-old traditions and a lost hunting culture could be a way forward.[148] Morley Knight suggested that information campaigns presenting the necessity of managing seal herds in an effective manner given their impacts on fish stocks and the humane way in which harvesting is done could help the public understand the situation and accept seal products.[149] Mervin Wiseman described Denmark's successful marketing of seal products from Greenland and their promotion in auction houses and fashion houses and told the Committee that Canada needs an international marketing framework for seal products.[150] Ginny Boudreau believed Canada needs to "invest resources into a major education and promotion plan for pinniped harvesting and marketing, and be proud of it."[151]

Romy Vaugeois, Program Manager at the Seals and Sealing Network, Fur Institute of Canada, reported that a recent online advertising campaign promoting seal products resulting from Indigenous and non-Indigenous harvests, focused on Quebec and Ontario, generated 68 million impressions.[152] Bill Penney told the Committee that a targeted marketing approach in Montreal and Toronto which explained the sustainability and benefits of seal products as well as the humane harvesting that produces them, led to an increase of 6% in the number of Canadians open to buying seal products (from 23% to 29%). He stated that "the more we educate Canadians, the more we're going to be able to make seals a Canadian product."[153]

Exploramer's Fouchette Bleue Program has been working since 2009 to market seal meat as a healthy, high-end product without growth hormones.[154] Mélanie Lemire informed the Committee that "marketing more seal products would help diversify the

148 Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023.

149 Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

150 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

151 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

152 Romy Vaugeois, Program Manager, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

153 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

154 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023.

fishery economy [in Quebec] and improve [the province's] resiliency to the ups and downs of climate change and international markets."[155]

Increasing demand for pinniped products in Canada was cited as a good first step in increasing overall demand for pinniped products by many witnesses.[156] Gil Thériault suggested that, to convince international markets to buy seal products, Canada needs to show that the meat, blubber, pelts and the rest of the seal can be used to their fullest.[157] Ginny Boudreau agreed and wondered how the international market could be expected to expand if

> Canadian governments have not invested in national or international markets, nor are they educating Canadians as to the benefits to our dietary health and economic well-being. We are embarrassed to promote an extremely iron-rich meat, the highest omega-3 oil in the world, pelts and skins that are durable, warm and yes, very fashionable.[158]

Market Access

Witnesses including Dion Dakins, Robert Hardy, Eldred Woodford and Doug Chiasson underscored that access to international markets is an important hurdle to harvesting seal.[159] Eldred Woodford told the Committee that the closure of three of the four seal processing companies in Newfoundland and Labrador can be linked to the loss of market access to the European Union and Russia.[160] Bill Penney told the Committee that "the marketing challenge for seal products is not a lack of customers but rather the lack of access to those customers."[161] Jen Shears, Owner of Natural Boutique who appeared as an individual, described the threats of violence made by animal rights activists against herself and her young daughter as a result of her attempts to sell her products. These

155 Mélanie Lemire, Associate Professor, Université Laval, Collectif Manger notre Saint-Laurent, *Evidence*, 20 April 2023.

156 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023; and Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

157 Gil Thériault, Director, Intra-Quebec Sealers Association, *Evidence*, 24 April 2023.

158 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

159 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; Eldred Woodford, Fish Harvester, As an individual, *Evidence*, 30 March 2023; Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; and Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

160 Eldred Woodford, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

161 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

included threats to dissolve them in acid and to "track [them] down at [their] house."[162] Kendall Flood pointed out that an increased access to international markets would be necessary to absorb the volume of pinniped products that would be produced if harvest rates increased dramatically.[163]

Many witnesses, including Ginny Boudreau, Jen Shears, Eldred Woodford, Doug Chiasson, Trevor Jones, Ruben Komangapik, Co-Chief Executive Officer of Reconseal Inuksiuti, and Aaju Peter told that Committee that a bolder political approach by the Government of Canada or the Minister of Fisheries and Oceans was necessary to change the image of the seal hunt, increase international market access for pinniped products and remove barriers to the export of Canadian seal products, particularly to the United States and the European Union.[164] Mervin Wiseman suggested that Canada should model itself on other countries that have had the "fortitude to stand up and say they're going to do what they have to do to harvest their seals, and to do it on behalf of their fish harvesters and the people of their countries."[165] According to Ginny Boudreau, a "good start" would be to have the Minister of Fisheries and Oceans publicly promote the seal industry in Canada as a "viable, sustainable, humane industry."[166] Kenneth LeClair, Vice President of the Prince Edward Island Fishermen's Association, suggested that if the impacts of seal predation on fish stocks were more visible there would be more public outcry and action.[167]

The *Marine Mammal Protection Act* of the United States

In 1972, the United States (U.S.) adopted the *Marine Mammal Protection Act* (MMPA). The MMPA bans the import of marine mammal products, including seal products.

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162 Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

163 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

164 Ruben Komangapik, Co-Chief Executive Officer, Reconseal Inuksiuti, *Evidence*, 9 March 2023; Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023; Trevor Jones, Fish Harvester, As an individual, *Evidence*, 30 March 2023; Eldred Woodford, Fish Harvester, As an individual, *Evidence*, 30 March 2023; Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023; Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; and Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

165 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

166 Ginny Boudreau, Executive Director, Guysborough County Inshore Fishermen's Association, *Evidence*, 30 March 2023.

167 Kenneth LeClair, Vice President, Prince Edward Island Fishermen's Association, *Evidence*, 23 March 2023.

Bill Penney described the difficulties of including seal products in markets that involve the U.S., even when the seal product is not destined for that country. He gave the example of a pet food company that was unable to produce a seal-based pet food since the company had American clients and could not have any seal products in their value chain.[168]

Witnesses were unsure if access for other Canadian seafood products destined to the U.S. could be subject to restrictions under the MMPA because of an increased seal harvest.[169] Other countries, including Norway, Japan and Iceland, harvest marine mammals such as seals and whales without any apparent impact on trade relations with the U.S. for other seafood.[170]

An exception to the MMPA exists on the West Coast of the United States for the lethal removal of California and Steller sea lions in specific areas of the Columbia River and its tributaries to reduce the impact of sea lion predation on various endangered or threatened fish stocks, including salmon. An increasing number of sea lions have gathered in the areas surrounding the Bonneville Dam and the Willamette Falls; the sea lions having learned that salmonids are an easy prey in these pinch point areas.

Efforts to deter sea lions from feeding on fish or using specific areas near these pinch points using non-lethal deterrents such as underwater firecrackers, acoustic deterrents, vessel chase, or physical barriers have proven "difficult and largely unsuccessful."[171] As a result, the U.S. National Marine Fisheries Service (NMFS) granted a permit for the lethal removal by chemical euthanasia or the placement in permanent captivity of up to 540 California sea lions and 176 Steller sea lions by authorized state and tribal entities in

168 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

169 Paul Lansbergen, President, Fisheries Council of Canada, *Evidence*, 9 March 2023; and Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

170 Paul Lansbergen, President, Fisheries Council of Canada, *Evidence*, 9 March 2023; Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023; Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired), As an individual, *Evidence*, 27 April 2023; and Tore Haug, Scientist Emeritus, Institute of Marine Research, *Evidence*, 1 May 2023.

171 Oregon Department of Fish and Wildlife, Washington Department of Fish and Wildlife, Idaho Department of Fish and Game, Nez Perce Tribe, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes and Bands of the Yakama Nation, 3.6.D Committee, *Request for Marine Mammal Protection Act Section 120 Authorization to Lethally Remove California and Steller Sea Lions from a Section of the Mainstem Columbia River and its Tributaries that Contain Spawning Habitat for ESA Listed Salmon and Steelhead*, June 2019.

designated zones of the Columbia River and its tributaries between 2020 and 2025.[172] It is estimated that the 38 California sea lions and 53 Steller sea lions that were removed at the Bonneville Dam and at Willamette Falls between October 2020 and May 2022 would have fed on approximately 20,000 salmonids over the course of their lifetimes had they not been removed.[173]

Dion Dakins related frustrations from Americans about "Canadian seals coming down and eating the American fish."[174] Erin Carruthers stressed that collaboration between fish harvester groups in Canada and the United States could lead to a change in the U.S. government's stance on the MMPA.[175] Murray Ned-Kwilosintun stated that collaboration between First Nations and Tribes in the Pacific Northwest could facilitate the collection of baseline data to determine if a harvest was warranted.[176]

Recommendations 16 and 17 presented at the end of this report relate to the *Marine Mammal Protection Act* and predation by pinnipeds at pinch points.

Ban of Import and Sales in the European Union

Since 2009, the European Union (EU) has banned the importation and sale of seal products, except for those resulting from traditional hunts by Indigenous communities.[177] Since 2015, Canadian seal products must have a certificate to be placed on the EU market. The certificate confirms that seal products come from hunts carried out by Inuit or other Indigenous communities. To receive a certificate, the hunt must:

172 Barry A. Thom, Regional Administrator, United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS), *Permit Authorizing the Intentional Taking on the Waters of the Columbia River*, 14 August 2019; and Oregon Department of Fish and Wildlife, Washington Department of Fish and Wildlife, Idaho Department of Fish and Game, Nez Perce Tribe, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes and Bands of the Yakama Nation, 3.6.D Committee, *Request for Marine Mammal Protection Act Section 120 Authorization to Lethally Remove California and Steller Sea Lions from a Section of the Mainstem Columbia River and its Tributaries that Contain Spawning Habitat for ESA Listed Salmon and Steelhead*, June 2019.

173 John Edwards, Columbia River Pinniped Biologist, Washington Department of Fish and Wildlife, *RE: MMPA §120(f) Sea Lion Management Annual Report for the period of July 1, 2021, through June 30, 2022*, 1 December 2022.

174 Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023.

175 Erin Carruthers, Fisheries Scientist, Fish, Food and Allied Workers Union, *Evidence*, 24 April 2023.

176 Murray Ned-Kwilosintun, Executive Director, Lower Fraser Fisheries Alliance, *Evidence*, 27 April 2023.

177 European Commission, *Trade in seal products*.

- be traditionally conducted by the community;
- contribute to the community's subsistence in order to provide food and income and not be primarily conducted for commercial reasons; [and]
- pay due care to animal welfare, while taking account of the community's way of life and the subsistence purpose of the hunt.[178]

The Government of Nunavut and the Government of the Northwest Territories are "recognized bodies" that can grant attesting documents certifying that the seal products result from Inuit or Indigenous hunting activities. The Government of Nunavut obtained recognized body status in 2015. The Government of the Norwest Territories obtained recognized body status in 2017.

Between 26 October 2016 and 31 December 2018, the Department of the Environment of the Government of Nunavut issued attesting documents for a total of 171 ringed seal products exported to the EU Member States of France, the United Kingdom, Poland, Sweden, and Estonia. One attesting document was issued for one harp seal product exported to Estonia in 2018.[179]

Between 14 February 2017 to 31 December 2018, the Government of the Northwest Territories did not issue any attesting document since "raw seal pelt sales through auctions have been limited to the domestic Canadian market that does not require verification of origin. According to the [Government of the Northwest Territories], the lack of EU market/demand is due to the EU seal ban."[180]

178 European Union, *Trade in seal products*.

Under the regulation, Inuit means "Indigenous members of the Inuit homeland, namely those arctic and subarctic areas where, presently or traditionally, Inuit have aboriginal rights and interests, recognised by Inuit as being members of their people." In Canada, this includes the Inuit and Inuvialuit peoples. See: Article 2 of *Regulation (EC) No 1007/2009 of the European Parliament and of the Council of 16 September 2009 on trade in seal products*.

179 European Commission, *Report from the Commission to the European Parliament and the Council on the implementation of Regulation (EC) No 1007/2009, as amended by Regulation (EU) 2015/1775, on the Trade in Seal Products*, 2020, pp. 10–11.

180 European Commission, *Report from the Commission to the European Parliament and the Council on the implementation of Regulation (EC) No 1007/2009, as amended by Regulation (EU) 2015/1775, on the Trade in Seal Products*, 2020, p. 11.

Increasing International Market Access

The Committee heard that there is interest in Canadian seal products from potential European and American customers but import bans are preventing purchases. Jen Shears described interactions with disappointed American tourists at her shop in Newfoundland where they were told they would not be able to bring the products home. European tourists, however, can bring back seal products from their trip through a personal use exemption. Online orders from potential customers from the EU or the U.S. who are unaware of the import bans must be cancelled or reimbursed. Jen Shears estimated that, over the past year, she has had to refund 25,000 dollars' worth of online orders from the U.S.[181]

Many witnesses highlighted the benefits that could be gained from increased international market access to the U.S. and the EU. Some stated that gaining access to the US market would be a "game changer" with "astronomical" impacts.[182]

Witnesses described ways in which the Government of Canada could help the seal products gain better market access abroad. Daniel Lane, Professor at Maritime Seal Management Inc., recommended engaging Export Development Canada and extending the Certification and Market Access Program for Seals (CMAPS) to support "nation-wide sealing and world-wide market access."[183] Doug Chiasson told the Committee that, "given the restricted scale of the current seal sector, and the significant barriers to entry" that the seal sector faces, developing new markets will require government support and suggested that the "full engagement from DFO, from Agriculture and Agri-Food Canada and, particularly, from Global Affairs Canada, the diplomatic corps and the trade commissioners" was needed to support international market access for seal products.[184] According to Morley Knight, seal products from Indigenous organizations and companies could benefit from governmental support to effectively market their seal

181 Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

182 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023; and Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

183 Daniel Lane, Professor, Maritime Seal Management Inc., *Evidence*, 1 May 2023.

The Certification and Market Access Program for Seals (CMAPS) was meant to support the development of certification and tracking systems to allow seal products harvested by Indigenous communities access to the European Union, support capacity-building for Indigenous communities to take advantage of renewed market access and support the broader commercial seal industry to access world markets.

184 Doug Chiasson, Executive Director, Seals and Sealing Network, Fur Institute of Canada, *Evidence*, 17 April 2023.

products in Europe, given the exemption to the EU ban.[185] However, in order to access the EU market, Indigenous seal products must be certified by a recognized body. The cost of becoming a recognized body is "incredible."[186]

Paul Lansbergen told the Committee that seafood markets can be affected by market access but also by market acceptance—i.e., "the private sector's willingness to buy our products."[187] He stressed that decisions about pinniped harvest should consider both market access and the "acceptance of Canadian fish and seafood products both internationally and domestically."[188] Jen Shears dismissed concerns of losing international market access for other Canadian seafood products, because "if we don't do something about the seals, there will be nothing to fish."[189]

IMPACTS OF IMPORT BANS AND NEGATIVE PERCEPTIONS ON INDIGENOUS, RURAL AND COASTAL COMMUNITIES

Disapproval of the seal harvest has sometimes been expressed in inappropriate ways. Sandra Gauthier told the Committee that the first year the museum offered training to people wishing to harvest seals for their own personal use, they received "death threats and the police had to get involved."[190] Jen Shears, owner of a boutique specialized in seal fur products in St. John's, Newfoundland and an Indigenous woman of the Mi'kmaq Qalipu First Nation, described threats of violence directed towards herself and her daughter because of her inventory.[191]

Gil Thériault shared that anti-sealing campaigns had made it very hard for sealers to get insurance and when it is available, rates are very high.[192] The deductibles in commercial insurance can be as high as $100,000. According to Morley Knight, these high deductibles may be contributing to an ineffective hunt since seal harvesters "can't use their main vessels because they just can't afford to take the risks" and, as a result, "are using smaller vessels or older, worn-out vessels to harvest seals." He suggested that a

185 Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

186 Bill Penney, Business Developer, Mi'kmaq Commercial Fisheries Inc., *Evidence*, 20 April 2023.

187 Paul Lansbergen, President, Fisheries Council of Canada, *Evidence*, 9 March 2023.

188 Ibid.

189 Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

190 Sandra Gauthier, Executive Director, Exploramer, *Evidence*, 23 March 2023.

191 Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

192 Gil Thériault, Director, Intra-Quebec Sealers Association, *Evidence*, 24 April 2023.

program like the Fisheries Vessel Insurance Program, which provided "a reasonable cost level of insurance to fishing vessels" and was administered by government before being eliminated in the mid 1990s, "would be a very great benefit to increasing the capacity to harvest seals."[193]

Kendall Flood informed the Committee that activists operating drones or helicopters are putting seal harvesters' lives at risk. He explained that harvesters are "working on ice with eight-inch knives, with machines moving around and with rifles. If they're distracted by a drone or a helicopter that's literally there to harass them, it's quite dangerous. These guys are a long way from home."[194]

Aaju Peter told the Committee that Inuit communities have been "gravely" affected by the EU ban since "Canada, in its feeble attempts to deal with the sealing issue, has failed to recognize the unique identity of the Inuit community and how the EU bans impacted negatively on the Inuit to a far greater degree than other Canadian communities."[195] She also described the difficulties surrounding the patronizing attitude of Europeans who "think they can define who's Inuit and what is traditional and what is sustainable" including the administrative and financial burdens associated with proving that the hunt and product meet EU criteria. As a result of the import bans, the price of seal pelts fell from 100$ to 10$, reducing incomes and increasing food insecurity in the Arctic.[196] As Aaju Peter described:

> For more than 5,000 years, sealing has been central to almost every aspect of Inuit life in the Arctic. Inuit hunters still follow the ancient practice of sharing their catch with their families and communities. Because the seal meat is not sold but shared, the hunters depend on their ability to sell the sealskins so that they can keep feeding their families and communities. However, the seal bans in 1983 and 2009 have caused undue hardship and increasing food insecurity in Arctic Canada.[197]

Eldred Woodford told the Committee that before the European ban, seal products were being sold at three times their current price.[198] Mervin Wiseman believed a reduced seal

193 Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, DFO (Retired), As an individual, *Evidence*, 20 April 2023.

194 Kendall Flood, Chief Executive Officer, Ár n-oileán Resources Ltd., *Evidence*, 20 April 2023.

195 Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023.

196 Ibid.

197 Ibid.

198 Eldred Woodford, Fish Harvester, As an individual, *Evidence*, 30 March 2023.

harvest has impacted the economic and social well-being of many harvesters and their families.[199]

Robert Hardy and Ryan Cleary questioned why the reduction and cessation of commercial fishing is often put forward as a necessary action to rebuild fish stocks such as capelin, while seal predation is often left out of the equation despite seals often consuming many times more than commercial fisheries.[200]

Pinnipeds and Reconciliation

Yoanis Menge described Reconseal Inuksiuti which is "made up of Magdalen Islanders and Inuit who work together, hunt grey seals on the Magdalen Islands, and then distribute the meat and skins to urban Inuit."[201] The project aims to "encourage the reappropriation of traditional practices, and to restore the value of those practices for [communities in the Magdalen Islands and Nunavut], which are distinct in many regards but are united by this common tradition."[202] Ruben Komangapik added that access to seal is not just about food, it's about access to Inuit culture. Access to seal allows Inuit born in cities to

> learn about what parts are utilized in different ways, and the names of the body parts. There is also teaching on how to care for the sealskin, and all of the tools that come with utilizing the skin. It keeps the culture alive, even though [they are] so far away from Nunavut, wherever Inuit are located.[203]

Bill Penney told the Committee that "supporting Indigenous exports is important for reconciliation. There cannot be reconciliation without economic reconciliation."[204] According to Aaju Peter, reconciliation requires "reconcili-action" from the federal government since it is the body with the power to end the bans that defame Inuit communities.[205] Jen Shears believed anti-sealing campaigns are "patronizing and racist" since "when you're targeting people who live off the land, you're targeting [I]ndigenous

199 Mervin Wiseman, Ex-Officio Board Member, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

200 Robert Hardy, Fisheries Consultant, As an individual, *Evidence*, 23 March 2023; and Ryan Cleary, Executive Director, Seaward Enterprises Association of Newfoundland and Labrador Inc., *Evidence*, 30 March 2023.

201 Yoanis Menge, Co-Chief Executive Officer, Reconseal Inuksiuti, *Evidence*, 9 March 2023.

202 Ibid.

203 Ruben Komangapik, Co-Chief Executive Officer, Reconseal Inuksiuti, *Evidence*, 9 March 2023.

204 Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023.

205 Ibid.

peoples and you're targeting rural peoples" without regard for the fact that this stewardship has been ongoing since time immemorial.[206]

Murray Ned-Kwilosintun told the Committee that salmon ceremonies can no longer take place because of declines in chinook salmon numbers caused by factors including climate change and pinniped predation. He suggested that the enactment of the *United Nations Declaration on the Rights of Indigenous Peoples* created a "great opportunity" for the federal government and others to partner with the Lower Fraser First Nations in British Columbia to collect the baseline data needed to determine pinniped population size and their predation impacts on salmon stocks.[207]

CONCLUSION

Summarizing the Committee's findings based on testimony heard and recommendations offered, members generally concluded that a way forward should focus on developing domestic and international markets for ethically and humanely harvested pinniped products.

Reflecting testimony presented in the sections of this report on an increased seal harvest, on infrastructure for pinniped harvests and on the barriers to the sale of pinniped products, our recommendations are that:

Recommendation 1

A pinniped harvest continue to be ethical, humane, sustainable, regionally specific and economically beneficial, bolstered by a certification and membership program that reflects these values and backed by severe penalties for non-compliance.

Recommendation 2

All applicable federal government departments work with provincial governments to promote maximum utilization of the harvested resource through processing and supply chain alignment.

206 Jen Shears, Owner, Natural Boutique, As an individual, *Evidence*, 27 April 2023.

207 Murray Ned-Kwilosintun, Executive Director, Lower Fraser Fisheries Alliance, *Evidence*, 27 April 2023.

Recommendation 3

DFO review and, as needed, update its funding mechanisms, such as the Atlantic Fisheries Fund, and pursue opportunities to work with funding partners to support capacity building in Canada's sealing industry.

Recommendation 4

An all-of-government program be rapidly implemented by Canada for the national and international promotion of the ethical, humane and sustainable seal hunt to restore the reputation of Canadian sealers and to remove international trade and public perception barriers to harvests of pinniped resources.

Recommendation 5

In light of the economic and cultural harms on Indigenous peoples as a result of misinformation campaigns around pinniped harvesting and the resulting ban of the EU importation of Canadian pinniped products, that all possible measures are taken by the Government of Canada to re-establish international markets as a means of economic and cultural reconciliation.

Recommendation 6

Federal and provincial governments collaborate on enabling practical sealing rules and regulations that allow ease of entry for harvesters, harvesting and processing infrastructure, insurance coverage for vessels and promotional campaigns to ensure a sustainable industry.

Recommendation 7

Programs be launched to promote pinniped products (food, fur products, nutrition supplements, etc.) to Canadians and to international markets with a special focus on the benefits of such products in Canada's foreign aid initiatives.

Recommendation 8

Deliver programming that promotes the generational transfer of pinniped harvesting skills and skills development for professional harvesters.

Science at Fisheries and Oceans Canada

The Committee's findings further concluded that changes to DFO science are necessary to better understand the interrelationships of marine species and the impact of pinnipeds on the overall balance between them. The Committee supports the findings of the Department of Fisheries and Oceans' Atlantic Seal Science Task Team report of April 2022 that concluded that seal populations must be included in the effective management of ocean ecosystems. Improvements to the management regime are necessary to understand the health of marine species, identify factors leading to species being at risk, and rebuild species to a state of abundance necessary to maintain a sustainable population and balance in the ocean ecosystem as well as permit economically viable and responsible harvests to take place.

On March 9, 2023, the Committee's 8th report of the 44th Parliament, *Science at the Department of Fisheries and Oceans*, was tabled in the House of Commons. This report detailed what the Committee found to be deficiencies in the way the DFO collects, assesses, and reports data on the health of ocean species. Similar concerns emerged in this study, as outlined in the sections of this report on scientific information on pinnipeds and knowledge gaps, leading to recommendations that:

Recommendation 9

The DFO acknowledge and act on concerns of stakeholders, scientists, harvesters and Indigenous bodies that the population of most pinnipeds have expanded to points of imbalance in certain regions, with negative impacts on fisheries and livelihoods.

Recommendation 10

The Government of Canada prioritize the timely collection and the timely, consistent and public reporting of regionally specific scientific data on pinniped populations, the predator-prey relationship between pinnipeds and other species, seasonal variations in pinniped range and diets, and the impact of climate change on pinniped populations including breeding and feeding habits and habitats.

Recommendation 11

The collection and assessment of scientific data and the resulting fisheries management decisions be informed by Indigenous and non-Indigenous fishers' local knowledge and observations.

Recommendation 12

The Government of Canada recognize the increased costs of research in the Arctic and take necessary steps to provide the resources needed for comprehensive data collection, including the mobilization of communities in that effort.

Management

During the hearings, the Committee heard testimony questioning the DFO's management of fisheries. Stakeholders perceive that DFO's main management strategy is to control fishing effort as a way to preserve fish stocks rather than address environmental, habitat or predation factors. While DFO purports to manage fisheries with an ecosystem-based approach that should consistently identify natural predation such as that of pinnipeds, the department does not connect this approach to actions to manage pinnipeds or the conservation of other fish stocks. Reflecting testimony presented in the sections of this report on the impact of pinnipeds and on the *Marine Mammal Protection Act*, Committee members have concluded that a more comprehensive and effective approach to fisheries management should also include the following recommended actions:

Recommendation 13

Given the complexity of marine food webs, DFO deliver their purported utilization of an ecosystem-based approach to fisheries and pinniped management that includes consideration of predator-prey relationships and the interconnection between species.

Recommendation 14

Meaningful consultation with those 'out on the water' including fishers, pinniped harvesters, processors and holders of Indigenous traditional knowledge and coastal communities must be incorporated in the decision-making process for management measures.

Recommendation 15

Pinniped management must be agile and responsive to location-specific factors along each of Canada's three coasts, including impact on the sustainability of prey populations and climate-change driven changes in migratory patterns, behaviours, and diet of predators and prey.

Recommendation 16

Taking steps to reduce pinniped predation of salmonid and other prey species made vulnerable at 'pinch points' in all Canadian waters including fish ladders, hatcheries and at the mouth of tributaries (especially where log booms are positioned) through consultation with companies and agencies responsible for them and, if necessary, through a targeted harvest of 'specialist' pinnipeds, building on the conservation success achieved in other jurisdictions such as Washington and Oregon States and Norway.

Recommendation 17

Consult with Canadian and American harvesters and Indigenous fishers on a bilateral strategy to address pinniped predation of fish stocks that provides the public with a clear, accurate picture of the impact of regional instances of pinniped overpopulation, measures to address this issue that are demonstrably ethical, humane and sustainable, do not draw US *Marine Mammal Protection Act* sanctions and include a mechanism to evaluate results in terms of the overall health of monitored fish stocks.

This report's objective is to draw the attention of DFO, relevant departments and the Canadian government to important observational and empirical evidence that the over-population of pinnipeds on Canada's three coasts is having a significant and damaging impact on the health and conservation of fish stocks and is creating an imbalance in our marine ecosystems. At the core of the recommendations offered is the Committee's strong belief that measures to address this issue are urgently required. It is time to act.

APPENDIX A
LIST OF WITNESSES

The following table lists the witnesses who appeared before the committee at its meetings related to this report. Transcripts of all public meetings related to this report are available on the committee's webpage for this study.

Organizations and Individuals	Date	Meeting
As an individual	2023/03/09	56
Murdoch McAllister, Associate Professor, University of British Columbia		
Department of Fisheries and Oceans	2023/03/09	56
Jennifer Buie, Acting Director General, Fisheries Resource Management		
Mike Hammill, Scientist Emeritus, Quebec Region		
Atef Mansour, Regional Director, Science, Newfoundland and Labrador Region		
Andrew Thomson, Regional Director, Science, Pacific Region		
Bernard Vigneault, Director General, Ecosystem Science Directorate		
Fisheries Council of Canada	2023/03/09	56
Paul Lansbergen, President		
Reconseal Inuksiuti	2023/03/09	56
Ruben Komangapik, Co-Chief Executive Officer		
Yoanis Menge, Co-Chief Executive Officer		
As individuals	2023/03/23	58
Robert Hardy, Fisheries Consultant		
Andrew Trites, Professor, University of British Columbia		
Atlantic Groundfish Council	2023/03/23	58
Kris Vascotto, Executive Director		

Organizations and Individuals	Date	Meeting
Exploramer	2023/03/23	58
Sandra Gauthier, Executive Director		
Pacific Balance Pinniped Society	2023/03/23	58
Ken Pearce, President		
Matt Stabler, Director		
Prince Edward Island Fishermen's Association	2023/03/23	58
Danny Arsenault, Chair, Groundfish Advisory Committee		
Kenneth LeClair, Vice President		
As individuals	2023/03/30	60
Trevor Jones, Fish Harvester		
George Rose, Professor of Fisheries		
Eldred Woodford, Fish Harvester		
Guysborough County Inshore Fishermen's Association	2023/03/30	60
Ginny Boudreau, Executive Director		
Seaward Enterprises Association of Newfoundland and Labrador Inc.	2023/03/30	60
Ryan Cleary, Executive Director		
Mervin Wiseman, Ex-Officio Board Member		
As an individual	2023/04/17	61
Aaju Peter, Lawyer		
Canadian Centre for Fisheries Innovation	2023/04/17	61
Keith Hutchings, Managing Director		
Fur Institute of Canada	2023/04/17	61
Doug Chiasson, Executive Director, Seals and Sealing Network		
Romy Vaugeois, Program Manager, Seals and Sealing Network		
Harbour Grace Shrimp Company Limited	2023/04/17	61
Steinar J. Engeset, President		

Organizations and Individuals	Date	Meeting
House of Assembly of Newfoundland and Labrador	2023/04/17	61
Craig Pardy, Member, District of Bonavista		
As an individual	2023/04/20	62
Morley Knight, Former Assistant Deputy Minister, Fisheries Policy, Department of Fisheries and Oceans (Retired)		
Ár n-oileán Resources Ltd.	2023/04/20	62
Kendall Flood, Chief Executive Officer		
Collectif Manger notre Saint-Laurent	2023/04/20	62
Mélanie Lemire, Associate Professor, Université Laval		
Colombe Saint-Pierre, Chef-Owner, Restaurant Chez Saint-Pierre		
Halifax East Fisheries Association	2023/04/20	62
Christopher Jones, Director		
Merinov	2023/04/20	62
Stéphanie Pieddesaux, Industrial researcher		
Mi'kmaq Commercial Fisheries Inc.	2023/04/20	62
Bill Penney, Business Developer		
Arctic Research Foundation	2023/04/24	63
Tom Henheffer, Chief Operating Officer		
Adrian Schimnowski, Chief Executive Officer		
Carino Processing Ltd.	2023/04/24	63
Dion Dakins, Chief Executive Officer		
Fish, Food and Allied Workers Union	2023/04/24	63
Erin Carruthers, Fisheries Scientist		
Intra-Quebec Sealers Association	2023/04/24	63
Gil Thériault, Director		
Sport Fishing Institute of British Columbia	2023/04/24	63
Owen Bird, Executive Director		
Martin Paish, Director, Sustainable Fisheries		

Organizations and Individuals	Date	Meeting
As individuals	2023/04/27	64
Glenn Blackwood, Vice-President, Memorial University of Newfoundland (Retired)		
Jen Shears, Owner, Natural Boutique		
B.C. Wildlife Federation	2023/04/27	64
Jesse Zeman, Executive Director		
BC Commercial Fishing Caucus	2023/04/27	64
Jim McIsaac, Managing Director		
David Suzuki Foundation	2023/04/27	64
Kilian Stehfest, Marine Conservation Specialist		
Lower Fraser Fisheries Alliance	2023/04/27	64
Murray Ned-Kwilosintun, Executive Director		
As an individual	2023/05/01	65
Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia		
Department of Fisheries and Oceans	2023/05/01	65
Cédric Arseneau, Director, Magdalen Islands Area, Québec Region		
Jennifer Buie, Acting Director General, Fisheries Resource Management		
Simon Nadeau, Director, Marine Mammals and Biodiversity Science		
Andrew Thomson, Regional Director, Fisheries Management		
Institute of Marine Research	2023/05/01	65
Tore Haug, Scientist Emeritus		
Maritime Seal Management Inc.	2023/05/01	65
Daniel Lane, Professor		

APPENDIX B
LIST OF BRIEFS

The following is an alphabetical list of organizations and individuals who submitted briefs to the committee related to this report. For more information, please consult the committee's webpage for this study.

Hardy, Robert

Institute of Marine Research

Maritime Fishermen's Union

Raincoast Conservation Foundation

Rolston, Dave

Tremblay Dionne, Érick

REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the committee requests that the government table a comprehensive response to this report.

A copy of the relevant *Minutes of Proceedings* (Meetings Nos. 56, 58, 60 to 65, 76 to 79, 85, 86 and 88) is tabled.

Respectfully submitted,

Ken McDonald
Chair

CPC Supplementary Opinion

Canada has pinniped problems.

Canadian fish populations and ecosystems are being harmed in areas where pinniped populations have been allowed to increase unchecked, resulting in the depletion of wild fish stocks due to over predation, preventing depleted stocks from recovering.

For the West Coast, the Committee received testimony stating pinniped predation rates on juvenile chinook and coho salmon have increased exponentially and are inflicting a mortality rate of up to 40% on juvenile chinook salmon and about 60% on juvenile coho salmon migrating to sea.[1] The Committee also heard that on the British Columbia coast, sea lions consume over 300,000 tonnes of fish annually, more fish than all the commercial fisheries combined.[2] Pinniped predation in B.C. is also a contributor to many stocks of salmon and steelhead being classified as threatened or endangered as defined by the Committee on the Status of Endangered Wildlife in Canada.[3]

The Committee was also provided insights into the damages inflicted by pinniped predation in the Gulf of St. Lawrence where a study found that pinniped predation on cod have exponentially increased since the 1970s.[4] Despite low fishing rates of cod in the Gulf, stocks have not recovered and continue to decline with negative rates of production among the lowest stock sizes and modelling suggests that these trends are driven by pinniped predation.[5] Studies have shown that the diet of pinnipeds includes enough cod to account for continuing declines of cod in the Gulf of the St. Lawrence stock, and continued predation could potentially lead to the extinction of cod in certain areas of the Gulf.[6]

Testimony also stated that as pinniped populations increase to unsustainable levels, the increased competition for limited prey causes stunted growth, increased juvenile mortality, starvation, and an exponential increase in miscarriages.[7]

Unmanaged pinniped populations also inflict harmful impacts on Canadians and coastal communities. Canadian fish harvesters depend on secure access to sustained and well-managed fisheries for their livelihoods and the increasing pinniped predation only causes further

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[1] Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.
[2] Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.
[3] Owen Bird, Executive Director, Sport Fishing Institute of British Columbia, *Evidence*, 24 April 2023;
[4] Murdoch McAllister, Associate Professor, University of British Columbia, As an individual, *Evidence*, 9 March 2023.
[5] Ibid
[6] Ibid.
[7] Dion Dakins, Chief Executive Officer, Carino Processing Ltd., *Evidence*, 24 April 2023; Carl Walters, Professor Emeritus, Institute for the Oceans and Fisheries, University of British Columbia, As an individual, *Evidence*, 1 May 2023.

instability and insecurity of fish stocks which in turn causes instability and insecurity for harvesters. As pinniped predation remains out of balance, entire communities and peripheral sectors benefiting from fisheries activities are harmed.

Pinniped products including fur, meat, omega 3 oil, and protein powder could provide many communities sources of food security and income. Harvest opportunities lost due to non-management of pinnipeds represent direct losses of food security for many communities, and whether they be coastal or further afar, this is especially true for isolated communities such as those in Canada's far north.

The Committee was provided testimony stating that Inuit communities have faced the greatest hardship caused by the 2009 EU ban on Canadian seal products as the ban directly undermined food security and incomes inflicting grave effects in those communities.[8]

During Committee meetings, Members heard an overwhelming amount of evidence from harvesters, Indigenous representatives, and scientists describing the devastation facing wild fish and ecosystems where pinniped populations have not been reduced and allowed to grow to severe levels. Conservative Members are motivated to provide this supplementary report to ensure key concerns raised in testimony of the clear majority of fishermen, Indigenous representatives, and scientists are properly reflected.

Managing Canada's pinniped populations with ethical pinniped harvests will both help restore balance in ecosystems and allow Canada to empower Indigenous and coastal communities with opportunities that restore economic and food self-sufficiency through pinniped harvests.

The issue of increasing pinniped populations and the resulting harmful effects have been factored into multiple studies concluded by the Committee over the past seven years. In response to rounds of compelling expert testimony describing the acute threats of increasing pinniped predation to fisheries sustainability, biodiversity, and conservation of wild fish, the Committee has consistently and repeatedly issued recommendations calling on the Government to finally take actions to manage pinniped populations.

Such recommendations were clearly articulated to the Government in the Committee's reports on wild Atlantic salmon (2017),[9] Newfoundland and Labrador's northern cod fishery (2017),[10] lobster and snow crab in Eastern Canada (2019),[11] striped bass in the Miramichi River and the

[8] Aaju Peter, Lawyer, As an individual, *Evidence*, 17 April 2023.
[9] FOPO, *"Wild Atlantic Salmon in Eastern Canada,"* January 2017.
[10] FOPO, *"Newfoundland and Labrador's Northern Cod Fishery: Charting a New Sustainable Future,"* March 2017.
[11] FOPO, *"In Hot Water — Lobster and Snow Crab in Eastern Canada,"* June 2019.

Gulf of St. Lawrence (2019),[12] and wild Pacific salmon (2021).[13] The Government's failures to implement the many recommendations provided by the Committee over the years have allowed the prevailing harms and threats of pinniped overpopulation to both persist and worsen.

The Committee's 2023 report examining science at the Department of Fisheries and Oceans (DFO) touched on the DFO's non-management of pinniped populations and the DFO's suppression of scientific work that concluded that reducing pinnipeds in the Fraser River could assist recovery of endangered interior Fraser steelhead. [14] Revelations in the science study and the Government's refusal to act on years of Committee recommendations related to pinniped management raise very serious questions about what factors are outweighing values of conservation and biodiversity in the Department's and the Government's decision-making.

Persisting and expanding pinniped overpopulation in Canadian waters has been enabled by failures to apply the very ecosystem-based fisheries management approaches touted by successive fisheries ministers and DFO officials. On its web page titled "*Principles of Ecosystem-Based Fisheries Management*," the DFO states that fisheries management decisions need to consider ecosystem changes including interactions (e.g. natural mortality caused by predation) of target fish stocks with predators, competitors, and prey species.[15] Despite this expressed commitment to ecosystem-based management, testimony from DFO officials failed to validate or invalidate needs for pinniped populations and predation to be reduced to conserve, restore, and in some cases save from extinction, particular populations of fish.

Summary

Canada's population of pinnipeds is out of control having grown from 2.5 million in the 1980s to over 10.3 million today.

The only way to restore balance to our ocean's ecosystem as other countries have done is by increasing the number of pinnipeds available for harvest in areas where populations need to be reduced. Allowing pinniped populations to grow to unprecedented levels poses acute threats to conservation, restoration, biodiversity, food security and coastal communities, including Indigenous communities, that depend on fisheries.

While ongoing scientific research is required to support management of pinnipeds to points of balance, there is a sufficient scientific basis for overdue management action through increased

[12] FOPO, *"Impact of the Rapid Increase of the Striped Bass in the Miramichi River and the Gulf of St. Lawrence,"* May 2019.
[13] FOPO, *"Pacific Salmon: Ensuring the Long-term Health of Wild Populations and Associated Fisheries,"* June 2021.
[14] FOPO, *"Science at the Department of Fisheries and Oceans,"* March 2023.

[15] DFO webpage, "*Principles of Ecosystem-Based Fisheries Management,"* viewed 19 November 2023.

pinniped harvests of specific populations. Pinniped management is also essential for the conservation of harvester livelihoods and benefits, cultures, and traditions that flow from them.

Increased and sustainable pinniped harvests can restore ecosystem balances and supply value chains for optimum utilization of pinniped protein, oils, and hides. Increased pinniped harvest and production of pinniped products would greatly benefit from increased demands and trade of products in domestic and international markets.

After seven years of recommendations from this Committee and pleas from Canadian harvesters and the coastal communities they sustain, the Government must act now to enable the timely reduction of pinniped populations where they need to be reduced.

Recommendations

- that the DFO immediately increase the number of pinnipeds that may be harvested in specific areas where pinniped predation harms biodiversity, conservation, or recovery of stocks of concern.

- that the DFO and any other appropriate federal departments engage with provincial governments of the DFO's Atlantic, Gulf, Newfoundland and Labrador, Quebec, Arctic, and Pacific regions to cooperatively identify and reduce federal and provincial regulations impeding the harvest, processing, or trade of pinnipeds and pinniped products.

- that Cabinet immediately issue direction to appropriate federal departments to develop and deploy a diplomatic strategy to neutralize misconceptions, irritants and barriers of Canada's trading partners related to trade of pinniped products, such as outdated and irrelevant elements of the U.S.' *Marine Mammal Protection Act*.

- that the Federal Government recognize decades of negative economic and cultural impacts on Canada's fishing industry and coastal and Indigenous communities caused by misconceptions of the seal industry and impacts of pinniped overpopulation.

- that the Federal Government develop a fact-based transparent educational program to address pinniped overpopulation and impacts on coastal and Indigenous communities and the fishing industry.

- that the Federal Government immediately enhance current seal fishery science in cooperation with harvesters and Indigenous and coastal communities.

-that the DFO review its current nuisance seal policy and its impact on fisheries, fish farms, recreational fisheries and Indigenous and coastal communities and define and provide to the Committee the threats of trade sanctions that DFO would expect in response to potential removals of nuisance seals.