

April 11, 2024

Mr. Ken McDonald  
Chair  
Standing Committee on Fisheries and Oceans  
House of Commons  
Ottawa ON K1A 0A6

Dear Mr. McDonald,

On behalf of the Government of Canada, I would like to thank the House of Commons Standing Committee on Fisheries and Oceans (the Committee) for its report entitled, *Ecosystem Impacts and Management of Pinniped Populations* (the Report). I appreciate the comprehensive set of recommendations developed by the Committee that touch on scientific research, domestic and international markets, and the sustainable management of pinniped populations on Canada's three coasts.

I would also like to thank the Indigenous peoples, industry representatives, academics, and other expert witnesses from diverse backgrounds who testified on this important topic. Many witnesses expressed concerns about negative impacts of pinniped populations, and others shared personal stories about the impact of international market barriers on their livelihoods and cultural practices. I have heard these concerns, and appreciate the witnesses for dedicating their time and effort to identifying ways in which we can collaborate to support a sustainable, humane and well-regulated seal harvest. Promoting such a harvest remains one of my top priorities.

I am a strong champion of Canada's sustainable, humane, and well-regulated seal harvest that supports our Indigenous, rural and remote populations. Canada's sustainable seal harvest is important to the economic and cultural strength of our coastal communities. I am committed to taking actions to improve the conditions for sealing in Canada. As part of this commitment, Fisheries and Oceans Canada (DFO) will pursue initiatives that facilitate sealing activities, while maintaining conservation and humane-harvest objectives.

I have also raised the issue of seal trade and resulting economic opportunities in my meetings with foreign representatives and will continue to do so. As part of this work, the Government will continue to work with indigenous partners, businesses, and international stakeholders.

Details are provided below regarding the Government's Response to the specific recommendations of the Committee.

**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.**

The Government of Canada acknowledges this recommendation and shares the Committee's view of the importance of a sustainable, humane and well-regulated seal harvest as an economic and cultural activity that supports Canada's Indigenous, rural and coastal communities. DFO manages the seal harvest using the same approach as all other commercially managed fisheries, working to ensure seal populations remain above a precautionary population level to ensure sustainability. The compliance and enforcement regime for the seal harvest is outlined in the *Marine Mammal Regulations*, which include humane harvesting requirements and 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.**

The Government of Canada agrees with the Committee's recommendation to promote maximum utilization of harvested seals. Currently, DFO manages commercial and personal-use harvests for grey and harp seals in the Atlantic and Quebec regions, as well as a commercial and personal-use hunt for hooded seals by harvesters based in the Newfoundland and Labrador region. In addition, DFO monitors Indigenous harvest of grey, harp and hooded seals that occurs in the Atlantic and Quebec region, and works with First Nations in the Pacific region to facilitate harvest for food, social and ceremonial purposes. In the North, a subsistence seal harvest occurs. The seal harvests across Canada's three coasts endeavour to maximize the utilization of the resource, and are an important contributor to food security for Indigenous and non-Indigenous coastal communities

At the federal level, DFO and other government departments work together to promote the seal harvest and market access for pinniped products. In support of maximum utilization, DFO continues efforts to facilitate access for a wide variety of seal product exports to international markets, working collaboratively with Indigenous peoples and industry stakeholders. DFO works with the National Oceanic and Atmospheric Administration (NOAA) of the United States to ensure Canada's seal harvesting practices remain consistent with the U.S. Marine Mammal Protection Act and its regulations, in order not inadvertently limit Canada's access to the U.S. markets for export of other key commercial fisheries.

The Government of Canada also works to help ensure that resources harvested from seals can access global markets. Global Affairs Canada leads the negotiation of bilateral, plurilateral and multilateral trade agreements, the administration of export and import controls, as well as the management of international trade disputes. This work

could help to address concerns about market access and concerns about international supply chain disruptions. The Canadian Food Inspection Agency (CFIA) collaborates with provinces and industry throughout the food supply chain, including processors, to prevent health risks related to food and zoonotic diseases. Agriculture and Agri-Food Canada (AAFC) provides programs and services and works in collaboration with the sector to support its competitiveness at home and abroad. AAFC also works to increase opportunities for the sector to export its products by maintaining and expanding market access and advancing agricultural interests internationally.

In addition to the established relationships between the Government of Canada and provincial and territorial counterparts that exist within each of these organizations, DFO will seek to promote federal, provincial and territorial (FPT) collaboration on maximum utilization of the harvested resource within the context of the Canadian Council of Fisheries and Aquaculture Ministers' (CCFAM) Economic Development Task Group. CCFAM is the primary multi-lateral engagement forum between FPT governments to address fisheries and aquaculture issues of national importance. EDTG remains an important forum for DFO to discuss pinniped issues and the promotion of maximum utilization of harvested resources more broadly.

**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.**

DFO accepts the recommendation to review and, as needed, update its funding mechanisms, such as the Atlantic Fisheries Fund, to support capacity building in Canada's sealing industry and will seek opportunities to work with other funding partners to achieve this goal.

Federal programs available to seal harvesters are outlined in more detail in the responses to recommendations #4 and #5.

**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.**

The Government of Canada acknowledges this recommendation and shares the Committee's view that promotion of ethical, humane and sustainable seal products is important, and has several programs already in place to support Canadian seal harvesters in the national and international promotion of seal products.

The Government has raised the issue with the United States and Japan of economic opportunities that would be available as a result of trade in seal products. We will

continue to work with Indigenous partners, businesses, and international stakeholders to promote seal trade.

DFO has a number of programs to support the Fish and Seafood sectors, including the sealing sector. For example, from 2018-2024, the sector has received a total of \$4.5M from the Canadian Fish and Seafood Opportunities Fund (CFSOF), which seeks to help the fish and seafood sector build a collaborative national approach to issues facing the sector. These projects have helped to strengthen the sealing sector and market conditions for Canadian seal products in domestic and international markets through marketing, branding, traceability, industry coordination, and quality assurance activities. The CFSOF, introduced in 2018, sunsets in March 2024, however DFO is considering ways to continue to support these types of projects under existing programs.

Sealing industry proponents are also eligible for project funding under the Atlantic Fisheries Fund (AFF) and the Quebec Fisheries Fund (QFF). Projects under AFF and QFF are funded in partnership with Atlantic and Quebec provinces, respectively, and they aim to help Canada's seafood sector transition to meet growing market demands for products that are high quality, value added, and sustainably sourced. Combined, these funds have invested \$1.3M in eight projects with the sealing industry in Atlantic Canada and Quebec related to product development, processing equipment upgrades and professional capacity building since 2017. DFO remains committed to supporting the sealing sector in future programs aimed at the Fish and Seafood sector.

In addition to DFO programs, Global Affairs Canada (GAC) offers support for export-ready Canadian seal products companies. For example, through the CanExport small and medium-sized enterprises (SMEs) program, GAC provides eligible Canadian SMEs with co-funding of up to \$50,000 per company to help them access new international markets. The program is designed not only to diversify Canadian export markets, but also to foster a more inclusive approach to trade for all Canadians, including Indigenous exporters.

Agriculture and Agri-Food Canada (AAFC) offers the AgriMarketing program to support national agricultural sectors to increase and diversify exports to international markets and seize domestic market opportunities. The AgriMarketing Program is a five-year, \$129M program with the objective of growing the economy by providing matching contributions to industry-led national organizations to support the implementation of market development strategies. These strategies are aimed at increasing and diversifying Canadian exports of agriculture, agri-food, agri-based products, including fish and seafood, by increasing the visibility of Canadian products and increasing the capacity of exporting producers to identify and seize market development opportunities in targeted markets.

AAFC also offers the AgriAssurance program, which is a five-year \$64M program with two components. The National Organization component helps sector organizations develop, verify and integrate assurance systems to address a wide-range of issues, including: food safety, plant and animal health surveillance, animal welfare,

environmental sustainability, traceability, market attributes and quality standards. These systems can assist producers to better market their products by more readily conforming to required standards, as well as supporting the use of specific product quality claims. The Small and Medium-sized Enterprise component supports businesses to adopt assurance systems and the supporting tools necessary to make verifiable claims to meet export market requirements, or domestic markets for Indigenous Peoples.

**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.**

The Government of Canada agrees with this recommendation and deplores that misinformation campaigns around pinniped harvesting have done considerable unjust damage to seal harvesters, in particular to Indigenous peoples whose cultural practices and traditions have been impacted. Indigenous and non-Indigenous peoples who reside in coastal areas have historically relied on seals as an important food source. In particular, the Inuit of Canada's north have been dependent on seals for food, clothing, tools and warmth for generations. In more recent times the harvest of seals supports Canada's Indigenous, rural and coastal communities as it is an important economic and cultural activity throughout Atlantic Canada, Quebec and the Arctic. Furthermore, Canadian seal processors, artisans and Inuit produce some of the finest products in the world that not only generate much needed revenue for remote communities, but also contribute significantly to the maintenance of culture and tradition.

Through the 2023-2028 Action Plan to achieve the objectives of the United Nations Declaration on the Rights of Indigenous Peoples (UN Declaration), the federal government has committed to an action plan measure, proposed by Inuit Tapiriit Kanatami (ITK), to co-develop legislative and policy options for a framework to support the processing, sale and trade (domestic and international) of Inuit traditional and country foods, which may include pinniped products. The Government of Canada continues to work towards this goal and has begun preliminary discussions with ITK.

To support Indigenous people's ability to access export markets for seal products, the Government of Canada introduced in 2015 the Certification and Market Access Program for Seals (CMAPS) as a five-year program of \$5.67 million. This program supported the sector's access to European Union (EU) markets, and funded the development of certification and tracking systems so that seal products harvested by Indigenous communities could be certified to be sold in the EU. As a result Indigenous peoples in the Northwest Territories and Nunavut can access markets in the EU. We are working with provinces to see how the Government of Canada can support them in establishing their own certification bodies so their Indigenous peoples can benefit from Indigenous exceptions and access markets.

As part of the Government of Canada's inclusive approach to trade, and to ensure that Indigenous peoples in Canada have access to the benefits and opportunities that flow from international trade and investment, GAC seeks provisions on Trade and Indigenous Peoples in the context of free trade agreement negotiations with other countries. GAC also has dedicated funding in place to support business development activities abroad by Indigenous-led companies. In 2023-2024, GAC's Trade Commissioner Service supported some 20 initiatives tailored to Indigenous businesses and entrepreneurs. The Trade Commissioner Service also has dedicated Champions in its regional offices across Canada who provide region-specific support to Indigenous entrepreneurs seeking to export abroad.

The Government will engage international partners on Canada's sustainable and humane seal products. Furthermore, the Government of Canada, through its Indo-Pacific Strategy, will organize Team Canada Trade Missions (TCTMs) in the region to promote Canadian business development in order to increase trade and investment. In 2024, the TCTM will visit Malaysia and Vietnam in March, South Korea in April and Indonesia and the Philippines in November. Canada's dynamic seal industry is encouraged to participate in these trade missions to showcase their products and explore new markets in the region.

**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.**

The Government of Canada acknowledges this recommendation and agrees with the Committee that collaboration between governments, Indigenous peoples, and industry is important to enable participation in the seal harvest, while respecting humane harvesting and safety requirements. This is why in 2023, DFO established a Working Group on Policy and Regulatory Review for Seals (working group) that brings together DFO officials, provincial and territorial governments, Indigenous partners and industry stakeholders to identify areas where DFO can alter policies and regulations to address longstanding or emerging barriers to participation in the sector.

The working group began with a list of 12 potential initiatives and refined the list to three priorities for action, with other actions that may still be revisited in the longer term. The initiatives currently being considered are: the inclusion of Maritimes and Gulf region provinces for Personal Use license eligibility; the creation of a youth licence to facilitate the transfer of knowledge and skills between generations; and training consistency across regions. Amendments to the Commercial Fisheries Licensing Policy for Eastern Canada are currently being finalized to include the issuance of Personal Use licences for seal harvesting and officials are working to implement personal use licences in Maritime provinces as soon as is practicable, which will be informed by consultations.

**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.**

The Government of Canada acknowledges this recommendation. As outlined in the responses to Recommendations #4 and #5, seal harvesters are eligible for a number of federal programs that support the Canadian fish and seafood sector in reaching domestic and international markets, and in transitioning to meet growing market demands for new products.

As the lead department for humanitarian assistance and food aid, Global Affairs Canada is responsible for setting policy for the Government of Canada. In line with international recommendations and best practices, Canada's food assistance has been fully untied and in grant form since 2012-13. It has been found that in terms of foreign aid, untied food assistance has been more responsive to people in need, as well as more cost-effective and efficient. Humanitarian partners have continuously shared that the cost and duration of transport; the cultural appropriateness and quality of items collected; the disruptions to local economies; and the logistics required to send and distribute donated goods often outweigh their potential life-saving impact. Wherever possible, food assistance should be sourced locally through competitive procurement processes. This is why Canada responds to international emergency food needs by providing funding through experienced humanitarian partners, notably the World Food Programme (WFP) and the Canadian Foodgrains Bank (CFGB). In line with international recommendations and best practices, Canada's food assistance has been fully untied and in grant form since 2012-13.

**Recommendation 8:**

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

The Government of Canada acknowledges this recommendation and shares the Committee's view that the transfer of knowledge and skills related to pinniped harvesting is important to ensure that the next generation of harvesters are well-trained in humane harvesting techniques. The Atlantic seal licencing regime requires that all sealers serve as assistant sealers for two-years prior to being eligible for a professional sealer licence. This requirement ensures that new sealers train with experienced harvesters and fully benefit from their knowledge and skillset, and are well-equipped to fulfill humane harvesting requirements. Further, as noted above in the response to Recommendation 6, to support the generational transfer of harvesting skills, the recently formed Working Group on Policy and Regulatory Review for Seals recommended that a youth observer licence be further explored to help introduce the seal harvest to those not yet old enough to meet seal licence requirements. DFO is currently reviewing the feasibility of this proposal.

**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.**

The Government of Canada acknowledges this recommendation. Many witnesses at the Committee hearings expressed concerns that populations of pinniped species have expanded to the detriment of economically and culturally important fisheries. DFO officials have also heard these concerns through discussions at the Atlantic Seal Advisory Committee (ASAC), the principal body for engaging stakeholders and partners on seal-related issues, including management approaches, scientific research, and market access. The Government of Canada can assure Committee members, Indigenous peoples, industry stakeholders, and members of coastal communities that concerns raised about the impact of seals and sea lions on fisheries are taken seriously.

Generally speaking, seal species in Canada that were historically over-exploited or subject to culling programs, such as harp, grey and Pacific harbour seals, are simply recovering, and are likely returning to levels that ecosystems are currently capable of supporting. To date, the only location where DFO has scientific evidence that seal predation is directly limiting commercial fish stocks is in the Southern Gulf of the St. Lawrence, where a DFO-led study concluded that grey seals were preventing the recovery of three commercial fish species that had previously been depleted by overfishing. Scientific evidence has not shown harp seal predation to be a key driver of abundance of Northern cod stocks in Newfoundland. Similarly, DFO does not have direct evidence of pinniped predation being responsible for Pacific salmon declines. Certainly, scientific findings from DFO and elsewhere generally demonstrate that many diverse factors, including predation by a range of species including pinnipeds, fish, seabirds and other species may contribute to fish stock declines, along with changes in sea temperature, oxygen levels, ice cover, and species distribution and abundance, speaking to the need to investigate pinniped impacts on a stock specific basis. Where feasible, research on pinnipeds at DFO continues, and increasingly, the Department seeks to integrate a greater number of ecosystem factors, such as oceanographic conditions and predation, into its stock assessments.

Additionally, to help address concerns from industry stakeholders and Indigenous peoples, DFO established the Atlantic Seal Science Task Team (Task Team) in 2019 to gather input on science activities and programs related to seals and their role in the ecosystem in Atlantic Canada and Quebec. The Task Team tabled its final report in May 2022, and in response, the Department hosted a Seal Summit in November 2022 for stakeholders and relevant government bodies to come together to present views and options to pursue to improve conditions for the Atlantic sealing industry.

In light of recommendations from the Task Team for DFO to enhance collaborative efforts with stakeholders and partners, DFO is funding four externally-led research projects to help fill key gaps in our understanding of the role of seals and sea lions in



the ecosystem. In Newfoundland, the Fish, Food and Allied Workers were funded to identify local changes in seal abundance, distribution and seasonality over a 20-40 year time period through the collection of current and historical seal observations by fish harvesters. In British Columbia, the Heiltsuk Tribal Council was funded to collect data on the abundance, distribution, health, diet, and contaminant load of California and Steller sea lion populations in Heiltsuk Territory, and to identify how these factors have changed over time. In a third project, researchers at Dalhousie University in Halifax will develop a chemical method to assess seal diets in the Northwest Atlantic – they will examine the spatial and temporal variation in stable isotopes of major fatty acids found in fish and grey seal blubber and will use the information to estimate the contribution of various prey species to seal diets. Finally, a project by researchers at Memorial University of Newfoundland will use two ecosystem models to evaluate key parameters of harp seal and cod interactions. The results of these research projects will contribute to greater understanding of seal and sea lion populations.

**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.**

The Government of Canada acknowledges this recommendation and shares the Committee's view that scientific research on pinniped populations is necessary to ensure management decisions are evidence-based. Where feasible, DFO's scientists are continuously increasing our understanding of seal and sea lion populations and their roles in marine ecosystems, and continue to undertake research on priority pinniped species. DFO recently completed surveys and/or assessments on harp and grey seal populations, and for the first time, on Atlantic harbour seals. These assessments provide estimates on the number of individual seals of these three species. Two of the seven surveys needed to update the Pacific harbour seals coast-wide assessment were also completed in 2022 and 2023. Science reports are published on the Department's website when finalized.

DFO is also conducting seal research in the Maritimes, Arctic, Quebec, Newfoundland and Pacific regions. Samples are being collected to estimate diet of harp, hooded, grey, bearded, ringed and harbour seals and Steller and California sea lions. This work will be done using traditional methods (i.e., hard parts from stomach contents and fecal samples) as well as more advanced analysis methods (genetics and chemical tracers, e.g., fatty acids and stable isotopes). Additionally, DFO is working to better understand the seasonal distribution of grey seals in Atlantic Canada using various means of telemetry.

As with many aquatic species, undertaking monitoring activities and generating peer-reviewed scientific research and advice for pinniped populations is resource-intensive and time-consuming. Research on pinnipeds is considered as part of a long-term plan

that seeks to ensure that harvested seal species are assessed approximately every five years. Put another way, pinniped research is considered for funding alongside other research initiatives, including those that inform harvest levels for Canada's most economically important fisheries. Resources for monitoring and research are allocated through various DFO science research programs, and where possible, departmental scientists capitalize on research being undertaken throughout the Department to ensure the best and most coordinated results are achieved.

**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.**

The Government of Canada agrees with this recommendation, and is committed to continuing this important work, particularly in light of the Government's commitment to "develop and employ mechanisms that respect and incorporate Indigenous Knowledge as a distinct knowledge system in the management of fisheries, fish habitat, conservation, marine safety and protection of the marine environment" under UNDA Action Plan Measure #40 (Chapter 1). DFO ensures that Indigenous Knowledge and feedback are collected through regular engagement with Indigenous peoples, industry, and other stakeholders at the Atlantic Seal Advisory Committee (ASAC) and through consultations with Indigenous communities. This information and feedback help to inform management decisions and scientific research priorities that DFO undertakes. For example, the design for the September 2022 survey used to assess the abundance of walrus in South and East Hudson Bay was informed by previous surveys and Inuit Qaujimaqatugangit (Inuit traditional knowledge). DFO also supports Indigenous and non-Indigenous harvesters conducting research related to pinnipeds.

The Department publishes scientific advice and information that addresses the important issues facing our oceans and aquatic ecosystems, such as fish stock dynamics, species at risk, invasive species, ecology of marine and freshwater ecosystems, marine protected areas, and aquaculture. This advice is then provided to decision-makers and shared with Canadians on the DFO website.

**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.**

The Government of Canada acknowledges this recommendation and agrees with the Committee that scientific research on Arctic marine mammals is resource-intensive and complex to undertake. In all regions of Canada, conducting pinniped research is inherently expensive. Not only is the work often conducted in remote locations requiring support from aerial and vessel-based assets, but tagging studies, which are integral for providing data on free-ranging seal, walrus and sea lion distributions and for correcting

abundance estimates, are also difficult to undertake. This is why DFO actively pursues partnerships with external organizations to fully leverage all available resources for collaborating on marine mammal surveys. For example, in the Arctic, DFO has worked with groups such as the Polar Continental Shelf Program, northern wildlife management boards, and environmental non-governmental organizations to carry out integrated research activities in the Arctic. DFO also engages with local communities prior to undertaking science activities in the Arctic, and relies on the support of local hunter and trapper organizations to conduct research programs. This engagement process benefits research programs in the Arctic as it facilitates the inclusion of Indigenous input and guidance into research planning.

**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.**

The Government of Canada acknowledges this recommendation and agrees with the Committee's view that marine food webs are exceptionally complex. DFO continues to analyze how ecosystem information can be better incorporated in fisheries management. DFO's ecosystem approach to fisheries management (EAFM) seeks to incorporate information into fish stock assessments about how fish stocks may be influenced by various elements of their ecosystems, including climate, habitat, temperature, chemistry, and key food web interactions, to foster better-informed management choices.

In Fall 2023, DFO completed an early round of engagement with Indigenous Peoples, co-management partners, industry, and stakeholders about the broad adoption of EAFM. Feedback is currently being summarized and will help inform a Strategic Plan for incrementally advancing implementation of EAFM. The rate of application of EAFM will be scaled to available resources.

**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.**

The Government of Canada agrees that stakeholder views are an important part of the decision-making process for establishing fisheries management measures. As mentioned previously, ASAC is DFO's principal body for engaging stakeholders and partners on seal-related issues, including management approaches, scientific research, and market issues. Every year, as part of the annual management cycle for pinnipeds, DFO meets with this important group, to engage them on the latest science and the management approaches and discuss key issues and challenges. Members of the advisory committee play a key role in sharing their information and views with DFO on

seal related topics. Their perspectives contribute to the decision-making process, as the information and advice they provide is considered as part of the ongoing work to manage this resource. The Department is committed to strengthening relationships with industry and Indigenous partners on seal related matters by enhancing communications with them, and further including them, as appropriate, in management and science processes as well as extra ad hoc consultations.

DFO is also optimistic that the Working Group on Policy and Regulatory Review for Seals will be an effective conduit for additional participation by stakeholders and Indigenous peoples in reviewing processes and suggesting changes that will remove barriers to participation in a sustainable and culturally important seal harvest.

**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.**

The Government of Canada acknowledges this recommendation. Currently, DFO manages commercial and personal-use harvests for grey and harp seals in the Atlantic and Quebec regions, as well as a commercial and personal-use hunt for hooded seals by harvesters based in the Newfoundland and Labrador region. In addition, DFO monitors Indigenous harvest of grey, harp and hooded seals that occurs in the Atlantic and Quebec region, but does not play a role in the management. There are currently no commercial fisheries for pinnipeds in the Pacific region, though DFO works with First Nations to facilitate harvest for food, social and ceremonial purposes. In the North, a subsistence seal harvest occurs.

The ongoing harvest of seals in Atlantic Canada is managed with an overall goal of keeping seal populations sustainable, and in accordance with humane harvesting requirements, is not intended to be used as a population control tool. In alignment with the precautionary approach and science-based decision-making, DFO will continue to review scientific research to inform the management of pinnipeds in Canada.

On the west coast, there has been interest to establish a commercial pinniped fishery. DFO works with proponents to assess proposals for new commercial fisheries under the New Emerging Fishery Policy. The proposal review process ensures that a wide range of biological, environmental, socio-economic and other factors are considered before proceeding with the establishment of a new fishery. Currently, there are no proposals being advanced under the Policy to establish a new commercial pinniped fishery.

**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.**

The Government of Canada acknowledges this recommendation. Under Canada’s fisheries management regime, including the *Marine Mammal Regulations*, interventions to decrease pinniped populations must be based on, and supported by, science.

At present, DFO has no evidence that pinniped predation is causing Pacific salmon declines. In the event that compelling scientific evidence is produced indicating a pinniped predation problem affecting Pacific salmon at ‘pinch points’, Canada’s existing pinniped management regime has mechanisms in place that could be used to address the issue. Under Canada’s *Marine Mammal Regulations*, the Minister of DFO may issue a licence to remove nuisance seals that represent a danger, based on scientific recommendation, to the conservation of anadromous or catadromous fish stocks along estuaries and in rivers and lakes during the migration of those species.

**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.**

The Government of Canada acknowledges this recommendation and DFO will continue to implement management measures for pinnipeds according to the precautionary approach. These measures will be informed by the best available, peer-reviewed scientific information, and will be informed by consultation with industry and Indigenous peoples through ASAC, the established mechanism for seeking stakeholder input into decision-making.

DFO will continue to consult bilaterally with US trade authorities through organizations such as the WTO and the U.S. National Oceanic and Atmospheric Administration (NOAA) to ensure Canadian fisheries have the information required to be compliant with the U.S. Marine Mammal Protection Act (MMPA). DFO also actively monitors for changes to MMPA requirements.

Once again, on behalf of the Government of Canada, I would like to thank the members of the Standing Committee on Fisheries and Oceans for their diligence and commitment

in studying and providing recommendations on ecosystem impacts and management of pinniped populations in Canada.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Diane Lebovillier', written in a cursive style.

The Honourable Diane Lebovillier, P.C., M.P.  
Minister of Fisheries, Oceans and the Canadian Coast Guard