

Open letter to The Hon. Keith Ashfield, Minister of Fisheries and Oceans Canada

The Honourable Keith Ashfield
Minister of Fisheries and Oceans
Parliament Buildings
Wellington Street
Ottawa, Ontario
Canada K1A 0A6

Sent via email
Min@dfo-mpo.gc.ca

26 September 2011

Dear Minister:

Re: FRCC Recommendation to kill some 140,000 grey seals

The Fisheries Research Conservation Council (FRCC), and other groups and individuals, have been calling for a grey seal cull in eastern Canada for at least a quarter century. No such cull has ever taken place, however, because your predecessors have continually rejected such recommendations on the grounds that they were not supported by the available science. We recommend that you follow their example and reject the latest FRCC recommendation. Such action is once again not justified by the available scientific evidence.

The process by which we arrived at the present situation represents the antithesis of how science should function in the fishery management process. First, in June 2009, the fisheries minister (your predecessor) directed the Department of Fisheries and Oceans (DFO) “to *ensure* the targeted removal [= cull] of grey seals” (emphasis added) in the southern Gulf of St. Lawrence.

Next, officials in the Department of Fisheries and Oceans, aided and abetted by a few (but by no means all) department scientists, dutifully set out to provide a rationale for the previously announced cull. In October 2010, they organized a Canadian Science Advisory Secretariat (CSAS) workshop to consider the impacts of grey seals on fisheries. In fact, the workshop only examined *negative* impacts of grey seals on cod (and a few other fish species). It is nothing more than a self-fulfilling prophecy that the Science Advisory Report (SAR 2010/071) arising from the meeting concluded that grey seals have a negative impact on cod. Once the workshop neglected the positive impacts of seals on marine systems – well documented in the scientific literature, including papers by DFO scientists and others who participated in the workshop – the workshop couldn’t possibly come to any other conclusion.

To complete the circle, the FRCC, having participated in the CSAS workshop, now agrees with the workshop report and sends an ill-advised recommendation back to the fisheries minister to implement the cull that had been announced two years earlier! Needless to say, this is not how the consultative process – especially the procurement of scientific advice – should be conducted.

If you have only been given the SAR to read, you will not know that the problems with the workshop's focus were brought up before and throughout the meeting, and again during the drafting and editing of the SAR. Those problems were repeatedly ignored by the workshop Chair and by the DFO bureaucrats who were well and truly in control of the workshop and the production of the SAR. We're sure you will not have been informed, for example, of a comment made during the workshop by one dissenting DFO scientist (expressing a view shared by a number of other scientists) that "Anthropogenic interference [meaning a cull] would be irresponsible". That comment, like many others, was simply ignored by the workshop Chair and not recorded in the workshop report.

The FRCC recommendation, therefore, simply reflects the biased report arising from the DFO workshop in which it participated. In addition to the lack of scientific evidence supporting a grey seal cull, there are a number of other problems of which you should be aware. First, any suggestion that the proposed cull could be conducted as a "controlled experiment" – a notion that appears both in the SAR and in the FRCC Report – challenges scientific credulity. It is not possible in the real world to conduct a cull of grey seals as a controlled experiment. We are not capable of controlling variables in the natural world and there is no possibility of replication. Once a cull has taken place, there is no way to determine what might have happened in the absence of a cull.

Contrary to the pleadings in the FRCC report, the implementation of a grey seal cull represents the antithesis of a precautionary management approach. It is well documented in the scientific literature (including a working paper submitted by a DFO scientist to the workshop) that a cull could produce a number of unintended consequences. Scientists cannot rule out the possibility, for example, that a grey seal cull could have deleterious consequences for recovering fish stocks, including cod. Even DFO's SAR notes (p 6) that, "Any intervention in the southern Gulf would first require a thorough investigation of the likely multi-species impacts of a cod-seal interaction in this ecosystem". That such a thorough investigation has yet to be undertaken is reason enough to reject the FRCC recommendation. It would be prudent also to conduct the sort of review outlined in UNEP's Protocol for the Scientific Assessment of Proposals to Cull Marine Mammals before making any decision to implement the FRCC recommendation.

It also seems incongruent to think about spending millions of dollars to cull grey seals at a time when DFO budgets are being severely cut. History has amply demonstrated that large-scale culls rarely achieve their intended objectives. Seals and cod are part of multi-species ecosystems. Because of the complexity and natural variability of marine food webs, one cannot predict with any confidence how changes in the abundance of one generalist predator (grey seals) will affect the abundance of one of its prey (cod). There are many other species in this ecosystem that consume cod (the greatest of which are cod themselves and other fish). An additional reality is that, because of the scientific uncertainties, it simply will not be possible to attribute any future changes (positive or negative) in cod abundance to a seal cull. A management measure that lacks a reliable means of evaluating the effectiveness of the measure is not management. It is guesswork.

The FRCC proposal, if implemented, would also raise serious animal welfare and ethical issues that we need not go into here. Canada's international reputation as a developed and progressive nation – once a world leader in fisheries management – would surely take another beating as well. In fact, we would argue that the world's horrified reaction to such a massive and scientifically unjustified undertaking would be an extreme embarrassment to its citizenry.

When the Royal Commission on Seals and Sealing recommended in 1986 that a cull of grey seals was an urgent priority, another of your predecessors convened a small meeting to examine the basis for the recommendation and to debate its merits. During that meeting, two of us pointed out errors in the Royal Commission's assessment and provided a contrary scientific opinion. A few days later, the minister announced that the government would not be implementing the Royal Commission's recommendation, because it was not supported by the available science.

We recommend that you follow a similar course of action. Bring together some independent scientists and you will quickly learn the deficiencies in the FRCC analysis and recommendation. If you don't do that you will run the risk of jeopardizing the on-going recovery of cod stocks, recently documented in the scientific literature. You will also violate a fundamental age-old principle of conservation: the avoidance of waste. In the absence of markets for grey seal products, the disposal of over 100,000 grey seal carcasses is nothing if not an irresponsible waste of living organisms that constitute an important component of functioning marine ecosystems.

Yours sincerely,

David Lavigne PhD
Science Advisor
International Fund for Animal Welfare

Sidney Holt DSc
Palazzetta 68
Paciano (PG), Italy

Sara Iverson PhD
Professor
Department of Biology
Dalhousie University

Lindy Weilgart PhD
Research Associate
Department of Biology
Dalhousie University

Hal Whitehead PhD
University Research Professor
Dalhousie University

Boris Worm PhD
Associate Professor
Department of Biology
Dalhousie University

Copied to:

Fin Donnelly MP
NDP Fisheries and Oceans Critic
1130 La Promenade
House of Commons
Ottawa, ON K1A 0A6
Fin.Donnelly@parl.gc.ca

The Hon. Lawrence MacAulay MP
Liberal Party Critic for Fisheries and Oceans
650 Confederation Building
House of Commons
Ottawa, ON
K1A 0A6
lawrence.macaulay@parl.gc.ca

Jean-François Fortin MP
Bloc Québécois Critic for Fisheries and Oceans
House of Commons
Ottawa, Ontario
K1A 0A6
Jean-Francois.Fortin@parl.gc.ca

Elizabeth May MP
Leader of the Green Party of Canada
Confederation Building, Room 518
244 Wellington Street
Ottawa, ON K1A 0A6
elizabeth.may@parl.gc.ca

Frank Valeriote MP
925 Confederation Building
Ottawa ON K1A 0A6
Frank.valeriote@parl.gc.ca

Janice Harvey
Green Party of Canada Critic for Fisheries and Oceans
janice.harvey@greenparty.ca