



**HUMANE SOCIETY
INTERNATIONAL**
CANADA

Open letter to the Honourable Céline Hervieux-Payette, P.C.

VIA EMAIL to: hervic@sen.parl.gc.ca

The Honourable Céline Hervieux-Payette, P.C.
Senate of Canada
Ottawa, Ontario
K1A 0A4

May 28, 2012

Dear Senator:

Re: Inaccuracies in Response to Letters of Support for Senator Harb's Bill

It has come to our attention that you are sending the letter attached as Schedule 'A' to those who contact your office expressing support for Senator Harb's Bill to end the east coast commercial seal hunt.

To set the record straight and to inform members of the Senate on this important issue, we are providing the facts that refute the misinformation contained in your letter. We respectfully invite you to review our comments and amend your form letter accordingly for future use. The pertinent quotations from your letter are below in bold italics.

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Misleading statement #1: “The Harp seal’s population roughly increased from 2 million animals to 10 million in the space of 40 years.”

Fact: The harp seal population is estimated by the Canadian government to be 7.7 million¹ – over two million animals fewer than the number you cite.

Moreover, independent scientists argue that the Canadian government estimate is likely inflated, noting the population model does not adequately reflect the impacts of climate change and the unregulated Greenland seal hunt (which targets the same population).² Canadian government scientists admit, “uncertainty associated with how the current population is changing and the variability in reproductive rates as well as uncertainty in harvest levels in Greenland, complicates efforts to model future trends in this resource.”³

Fact: Climate change is causing alarming mortality rates in harp seal pups.

Like polar bears, harp seals are ice dependent animals and they rely on sea ice to give birth to and nurse their pups. Climate change is causing the sea ice to melt earlier in the season, resulting in pups being forced into open water before they are strong enough to survive. The sea ice habitat of harp seals has declined by up to 6 percent per decade since 1979 and, in some poor ice years, entire generations of seal pups have been lost.⁴ The Canadian Department of Fisheries and Oceans in 2010 stated:

Examination of the total extent of ice over the past 40 years indicates that there is a declining trend in accumulated ice, in both in the Gulf and the south-western Labrador Sea. Therefore there is an increased likelihood of increased mortality in future years.⁵

Mike Hammill, Section Head of Marine Mammals Biology and Conservation for Fisheries and Oceans Canada, recommended a 25% reduction in the 2012 harp seal quota

¹ http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2011/2011_070-eng.html

² <http://www.information.com/downloads/pdfs/HarrisReportMarch06.pdf>
http://www.greenpeace.org/international/PageFiles/25714/GP_Seals_def_lowres.pdf

³ http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2011/2011_070-eng.html

⁴ Johnston DW, Bowers MT, Friedlaender AS, Lavigne DM (2012) The Effects of Climate Change on Harp Seals (*Pagophilus groenlandicus*). PLoS ONE 7(1): e29158. doi:10.1371/journal.pone.0029158

⁵ Canadian Science Advisory Secretariat. 2010. A review of ice conditions and the harp seal total allowable catch (TAC) for 2010. Dartmouth, N.S.: Canadian Science Advisory Secretariat, 2010.

to account for the impacts of climate change.⁶ The Fisheries Minister ignored this advice and set a harp seal quota of 400,000 this year.

Fact: When the harp seal population measured 2 million, it was on the brink of collapse.

You are correct that the harp seal population was estimated to be 2 million in the early 1970s. You neglect to mention, however, that the northwest Atlantic harp seal population, at 2 million animals, was near collapse.

The Canadian government estimated the harp seal population to have been approximately 11 million in the 1800s.⁷ Overhunting in the 1950s and 1960s quickly reduced the harp seal population to a dangerous low and, by the early 1970s, it was estimated to be at approximately 2 million. At the time, senior Canadian government scientists warned that the population could be lost altogether in the absence of a moratorium on commercial sealing.⁸ The actions of foreign governments in prohibiting trade in products of newborn harp seals in the early 1980s resulted in a significant reduction in the seal kill levels in Canada, providing an opportunity for the harp seal population to rebuild. But the increase in population since that time has been a recovery, not “overpopulation” as your letter incorrectly suggests.

Misleading statement #2: “As of today, the natural balance of the Atlantic coast’s ecosystem is at risk because of the reduction in hunting, the threat of abolition and the recent overpopulation of the Harp seal.”

Fact: Harp seals are not “overpopulated” (see above) and Canadian government scientists confirm that harp seals are not negatively impacting cod stocks either through direct consumption or through competition for prey species.

Harp seals are an important part of the marine ecosystem of the northwest Atlantic and help to keep fish species healthy and abundant. Harp seals are opportunistic feeders,

⁶ <http://www.cbc.ca/news/technology/story/2011/12/26/pei-harp-seal-quota-548.html>

⁷ http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2011/2011_070-eng.html

⁸ Lavigne, D., and K. Kovacs. 1988. Harps and hoods: Ice-breeding seals of the Northwest Atlantic. Waterloo, Canada: University of Waterloo Press.

consuming small amounts of many different fish species. Most of the diet of harp seals is comprised of noncommercial fish species, including a number of significant predators of commercially targeted fish stocks. Not surprisingly, harp seals have historically coexisted with large and healthy fish populations.

Notably, Gary Stenson, Section Head for Marine Mammals for Fisheries and Oceans Canada, concluded recently that harp seals do not appear to be harming cod stocks either through direct consumption or through competition for prey species.⁹

Misleading statement #3: “The Seal Hunt is tightly regulated and sustainable.”

Fact: The seal hunt is neither tightly regulated nor sustainable.

Canada’s commercial seal hunt goes on for several months and is conducted far offshore, over hundreds of square kilometres of ocean, in extreme weather conditions. Hundreds of sealers operate from hundreds of vessels, in areas as distant from each other as the Gulf of St. Lawrence and the Labrador Sea.

In 1986, the Canadian government appointed Royal Commission on Seals and Sealing noted:

The area that they must patrol is very extensive, the number of sealers is large, and sealing operations are multifaceted. For these reasons it is impossible to keep all parts of the seal hunt under close supervision at all times.

In 2005, the Canadian government funded ‘Independent Veterinarians’ Working Group’ noted:

The Front currently accounts for two-thirds of the seals killed during the annual Canadian harp seal hunt. Because of its remoteness and difficult environmental conditions, it is generally considered not to be well observed or monitored.

⁹ Stenson, G. et. al. “Is competition with harp seals impeding the recovery of cod stocks off Newfoundland, Canada?” Presented at the 19th Biennial Conference on the Biology of Marine Mammals http://www.marinemammalscience.org/index.php?option=com_content&view=article&id=390&Itemid=65&abstractID=702.

Moreover, Canada's Marine Mammal Regulations, as amended in 2009, do not prescribe a humane death for seals as any responsible veterinary authority would define it and permit the following practices:

- Herding seals prior to stunning, causing pain, fear, distress, and separation of newborn pups from mothers (as is the practice in sections of the grey seal hunt);
- Clubbing and shooting seal pups that are in groups, causing trauma and distress to the pups as they witness each other dying (a common practice in the harp seal hunt);
- Shooting seals in open water (as is a common practice in all seal hunts) where the likelihood of an accurate stun is severely reduced and the risk of wounded animals escaping is very high;
- Shooting seals near open water, allowing wounded seals to escape beneath the surface of the water, where they die slowly and are not recovered (a common practice in the harp seal hunt);
- Impaling conscious, wounded seals on metal hooks and dragging them across the ice (a common practice in the harp seal hunt);
- Throwing conscious, wounded seals across the ice or onto vessels (a common practice in the harp seal hunt);
- Wounding seals with bullets and leaving them to suffer on the ice (a common practice in the harp seal hunt);
- Clubbing and shooting seals repeatedly to achieve unconsciousness (a common practice in the harp seal hunt).

Additionally, the seal hunt is not sustainable. Independent scientists warn that Canada's management plans threaten the survival of seal populations.¹⁰

¹⁰ <http://www.information.com/downloads/pdfs/HarrisReportMarch06.pdf>

Misleading statement #4: “The United States is currently considering repealing the 1972 Marine Mammal Protection Act to establish a new law called the Controlled Seal Population Plan (CSPP).”

Fact: There is no such repeal being considered and no such “Control” provision being proposed.

While a limited proposal to allow the killing of sea lions in the Columbia River has been put forward, the proposal has not gained traction. It is misleading to suggest that a longstanding piece of legislation such as the MMPA would be repealed in this manner.

Misleading statement #5: “In Canada, seal hunters value utilizing this resource to its full potential demonstrating their communities’ full commitment to respecting nature.”

Fact: Canada’s commercial seal hunt does not involve full utilization of the animal. Rather, it is a slaughter of seal pups for their fur.

In 2006, Ken Jones, a Canadian government senior fisheries management officer, testified before the Canadian government Standing Committee on Fisheries and Oceans and said in reference to the seal hunt:

The weakness in marketing the whole animal is the meat. We did a meat subsidy that began in about 1995 and finished off in 1999. We found that they were taking mainly big adult seals. The pelt was actually getting wasted because it has less value. We were propping up markets that didn’t exist. Meat did end up being destroyed anyway, and it was very costly. Those were years when a lot of hooded seals were taken because they don’t have good pelts, which are all bitten and ravaged by fighting. We ended up scaling back the meat subsidy and going back to what was primarily a fur hunt.

One of the things people think is that there’s a lot of meat wasted. We learned from the meat subsidy that the beater seal--the stage where most of the pelts come from, and when animals are taken in Canada--has about

12 pounds of marketable meat on it. That's hard to fish off. It's not worth their while, and it takes up room in the boat.¹¹

Canada's commercial seal hunt remains a slaughter of seals for their fur, as is evidenced by the prices paid for seal products – often more than \$20 for the skins of seals, and only pennies per kilo of seal meat.

Misleading statement #6: “Regarding the market for Seal products, demand still exists for such products.”

Fact: Global markets for seal products have closed, including Canada's two top trading partners. Existing trade bans will remain in place, and other nations are increasingly taking actions to prohibit seal product trade.

According to the President of the Canadian Sealers Association, the sealing industry cannot be commercially viable in absence of a kill exceeding 100,000 animals. Demand does not exist for seal products at this level, and has not in several years. In 2009 the European Union joined the United States and Mexico in prohibiting trade in products of commercial seal hunts. In 2011, the Russian Federation, Belarus and Kazakhstan followed suit, banning the import and export of harp seal fur – the primary product of the commercial seal hunt in Canada.

In December 2011, Paul Boudreau, Vice President of Tamasu, a Quebec seal processor, admitted to Canadian media that 400,000 seal furs are currently stockpiled on the global market.¹² As of March 2012, the Canadian Sealers Association was indicating that no Canadian seal processors were expressing an interest in buying seal fur this year as a result of the Russian ban on harp seal fur trade.¹³ In fact, the 2012 commercial seal hunt took place only because the Government of Newfoundland and Labrador provided \$3.6 million in financing to a seal processor so that sealskins could be stockpiled.

¹¹ Standing Committee on Fisheries and Oceans. Hansard. June 2006.

<http://www2.parl.gc.ca/HousePublications/Publication.aspx?DocId=2293772&Language=E&Mode=1&Parl=39&Ses=1>

¹² http://www.cfim.ca/accueil/-/pub/jSA4/content/1140517-priorites-de-gestion-de-l-industrie-du-phoque?101_INSTANCE_jSA4_redirect=%2F

¹³ <http://www.thestar.com/news/canada/article/1140149--end-of-the-seal-hunt-will-have-domino-effect-sealers-say>.

Misleading statement #7: “Finally, I urge you to speak out against the looming extinction of the Mediterranean Monk Seal. This species has never been publicly defended by animal rights organizations opposed to the sustainable Canadian seal hunt.”

Fact: As explained above, Canada’s commercial seal hunt is not sustainable and, as you are likely well aware, a large number of conservation and animal protection groups – including those who are campaigning against the Canadian commercial seal hunt -- are working hard to save Mediterranean monk seals.

One of the primary challenges these groups face in preserving Mediterranean monk seals is the belief held by local commercial fishermen that the seals are negatively impacting fish stocks. Notably, this is exactly the kind of false perception about seals and fisheries interactions that is inspired by the misinformation contained in your letter about harp seals in Canada.

In the interests of sound public policy, we urge you to cease misrepresenting the facts of the Canadian commercial seal hunt and the role of harp seals in the marine ecosystem.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Aldworth', with a long horizontal line extending to the right.

Rebecca Aldworth, Executive Director
Humane Society International/Canada

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Schedule 'A'**Letter from the Honourable Céline Hervieux-Payette, P.C.**

Dear seal hunt concerned citizen,

Thank you for taking the time to write to me about Senator Harb's Bill.

Like you, I am concerned about sustainable economic development. In Canada, the Seal Hunt is tightly regulated and sustainable: the Harp seal's population roughly increased from 2 million animals to 10 million in the space of 40 years. As of today, the natural balance of the Atlantic coast's ecosystem is at risk because of the reduction in hunting, the threat of abolition and the recent overpopulation of the Harp seal.

In 2009, experts have come together to propose a code of ethics that guarantees an ethical and sustainable seal hunt. As such, I invite you to consult the Universal Declaration on the Ethical Harvest of Seals. A document that is endorsed by the Governments of Quebec, Newfoundland and Labrador and the Northwest Territories. (www.sealsonline.org <<http://www.sealsonline.org>>)

Regarding the control of animal species, the United States is currently considering repealing the 1972 Marine Mammal Protection Act to establish a new law called the Controlled Seal Population Plan (CSPP). This Law would allow hunters to partake in a seal hunt to control the west coast's booming sea lion population. In Canada, seal hunters value utilizing this resource to its full potential demonstrating their communities' full commitment to respecting nature.

Regarding the market for Seal products, demand still exists for such products. Such is the case of chefs who serve seal meat in their restaurants in Quebec. Furthermore, the French Press Agency reported on February 28th 2012 that Russia was considering allowing the sale of canned seal meat in an attempt to control the seal population while providing food to its citizens.

Finally, I urge you to speak out against the looming extinction of the Mediterranean Monk Seal (total population 150-200 animals). This species has never been publicly defended by animal rights organization opposed to the sustainable Canadian seal hunt. Just like the European Union, the United States, Mexico and Russia.

Best regards,

The Honourable Céline Hervieux-Payette, P.C.
Senator

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