



Marine Life Sanctuaries Society

The Honourable Minister Bernadette Jordan
Bernadette.Jordan@parl.gc.ca; min@dfo-mpo.gc.ca
 Minister of Fisheries, Oceans and the Canadian Coast Guard

Date: July 15, 2021

Regarding: MLSS 2021 BC Prawn Fisheries Season & Damage to Sensitive Benthic Habitats

Honourable Minister Jordan,

The Prawn Fisheries 2021 Season on the Pacific Coast of Canada was a tragedy for two BC sensitive benthic habitats: sponge bioherms and gorgonian coral gardens. The Marine Life Sanctuaries Society of BC (MLSS) considers it critical to provide better protection for these habitats. The regulatory framework for Ecologically and Biologically Sensitive Areas (EBSA; Fisheries Act 2019: Section 34, 35; Policy for Managing the Impacts of Fishing on Sensitive Benthic Areas) needs to be invoked to protect diversity of marine life, fish habitat for commercial, recreational and cultural species, and habitats important for carbon sequestration as a potential climate change remediation tool. Although the economic value of the prawn fishery is recognized, without the existence of sponge and coral foundation species, all ecosystem benefits are compromised, if not lost.

Prawning infractons in protected sponge reefs within Howe Sound were documented (videography) and reported to DFO.ORR in May/June 2021; as well as suspected damage within the coral and sponge communities of Hoeya Head Sill in Knight Inlet in May (See references below). The infractons are mostly caused by commercial vessels and the damage is industrial in scope.

Neither of these sensitive foundation habitats - glass sponge reefs nor gorgonian coral gardens - can withstand the physical damage caused by continuous bottom-contact fishing activities. The long-term survival of these habitats is already being jeopardized:

- Howe Sound Marine Refuges 2019 designation: illegal commercial fishing on four separate occasions
- Howe Sound westside reefs: 2019/2020 review by Stakeholders, identified as “voluntary no trapping” status after voluntary avoidance removed, but no protection status formalized; and,
- Hoeya Head Sill in 2021: legal commercial fishing but a too late in-season request for “voluntary no trapping” status.

Solutions for protection of sponge and coral sensitive benthic habitats:

- 1/ invoke the necessary governance framework for Ecologically and Biologically Sensitive Areas to use as a tool to designate these habitats as EBSAs under the Fisheries Act.
- 2/ an immediate increase in DFO funding for enforcement to ensure protection of these habitats with their associated marine life communities. Increased funding to hire more Enforcement Officers and support staff is essential to ensure prevention, constant monitoring, and enforcement of illegal fishing.
- 3/ Establish meaningful fines for damage done to these habitats, e.g., those levied for spawning habitat, Riparian Areas and eelgrass meadows when altered, damaged or destroyed (HADD). Currently only the act of fishing is fined, but no retribution for habitat loss caused by bottom contact activities.



Marine Life Sanctuaries Society

4/ Conduct an external review of DFO Enforcement in the Pacific Region to ensure best use of resources in fulfilling DFO's conservation mandate and goals.

5/ Increase funding for DFO Science and Citizen Science programs to fully document these sensitive habitats before they are lost. For example, the cumulative live sponge coverage occurring in Howe Sound reefs rate > 25 % to < 95 % compared to Strait of Georgia reefs at > 1 % to < 18 %. The coral and sponge communities of Hoeya Head Sill are not well documented.

Out of the abundance of 'precautionary measures', please provide the necessary funding to increase protection and to hire Enforcement Officer staff, ASAP. Do so for the sake of the long-term sustainability of our coastal marine life and sensitive habits, if not for the long-term benefit of humankind.

Kind regards,

Glen Dennison, MLSS President
Adam Taylor, MLSS Director Citizen Science

Sheila Byers, MLSS Vice-President
Neil McDaniel, Associate

References

- Archer, S.K., G. Dennison, L. Tryon, S. Byers, and A. Dunham. 2020. Invertebrate settlement and diversity on a glass sponge reef. *Canadian field-Naturalist* 134((1): 1-15. doi.org/10.2262/cfn.v134i1/2297
- DFO 2018. Glass sponge aggregations in Howe Sound: locations, reef status, and ecological significance assessment. DFO Can. Sci. Adv. Sec. Sci. Resp. 2018/032.
- DFO 2018. Indirect effects of bottom-contact fishing activities (y trap gear) on sponge reefs in the strait of Georgia and Howe Sound. glass sponge aggregations in Howe Sound: locations, reef status, and ecological significance assessment. DFO Can. Sci. Adv. Sec. Sci. Resp. 2018/042.
- DFO. 2020. Ground-truthing the final set of suspected glass sponge reefs in Howe Sound: Reef delineation and status assessment. DFO Can. Sci. Advis. Sec. Sci. Resp. 2020/026
- Dunham, A., S.K. Archer, S.C. Davies, L.A. Burke, J. Mossman, J.R. Pegg, and E. Archer. 2018. Assessing condition and ecological role of deep-water biogenic habitats: glass sponge reefs in the Salish Sea. *Mar. Envir. Res.* 141: 88-99. doi.org/10.1016/j.marenvres.2018.08.002.
- Gasbarro, R., J.W.F. Chu, Tunnicliffe, V. and J. Syvitski. 1983. Corals move boulders: an unusual mechanism of sediment transport. *Limnol. Oceanogr.* 28: 564-568.
- Gasbarro, R. W.F. Chu, V. Tunnicliffe. 2019. Disassembly of an epibenthic assemblage in a sustained severe hypoxic event in a northeast Pacific basin. *Journal of Marine Systems*, 198: 103184 doi.org/10.1016/j.jmarsys.2019.103184
- McDaniel, N. 2021. A Proposal to Create a Marine Refuge at the Knight Inlet Sill, British Columbia to Protect Unique Gorgonian Coral Habitat. July 6, 2018 (with updates to May 2021).

Distribution List:

The Honourable Minister Jonathan Wilkinson, Minister of Environment and Climate Change Jonathan.Wilkinson@parl.gc.ca
Honourable Minister Ken Hardie MP for Fleetwood—Port Kells, BC, Ken.Hardie@parl.gc.ca
Honourable Patrick Weiler, Minister of West Vancouver—Sunshine Coast—Sea to Sky Country, Patrick.Weiler@parl.gc.ca
Chief Ian Campbell, Squamish Nation Negotiator/Cultural Ambassador, ian_Campbell@squamish.net
Aleria Ladwig, DFO Ecosystems Approach Officer, Aleria.ladwig@dfo-mpo.gc.ca
Amy Mar, DFO Regional Manager, Sustainable Fisheries Framework, Amy.Mar@dfo-mpo.gc.ca
Anmarie Harris, Manager/Senior Policy Advisor, Transport Canada, anmarie.harris@tc.gc.ca
Dr. Anya Dunham, DFO Research Scientist, Anya.Dunham@dfo-mpo.gc.ca



Marine Life Sanctuaries Society

Dr. Cherisse Du Preez, DFO Marine Spatial and Ecology Analysis Division, Cherisse.DuPreez@dfo-mpo.gc.ca
Dan Leus, DFO Senior Regional Sustainable Fisheries Framework Coordinator, Dan.Leus@dfo-mpo.gc.ca
DFO Vancouver Regional Headquarters, info@dfo-mpo.gc.ca
DFO's Observer, Record, Report line (1-800-465-4336), DFO.QRR-ONS.MPO@dfo-mpo.gc
Joshua Mann, DFO Engagement Coordinator, Joshua.Mann@dfo-mpo.gc.ca
Karen Leslie, DFO Regional Manager, Marine Spatial Planning, Sustainable Fisheries Framework, North Coast, Karen.Leslie@dfo-mpo.gc.ca
Laura Convey, DFO Fisheries Manager, North Coast, Laurie.Convey@dfo-mpo.gc.ca
Lindsay Klopp, DFO Regional FAM Officer Sustainable Fisheries Framework Lindsay.Klopp@dfo-mpo.gc.ca
Mike Kattilakoski, DFO Fish Management Coordinator – Invertebrates, Mike.Kattilakoski@dfo-mpo.gc.ca
Natasha Dickinson, DFO Fishery Officer/ Field Supervisor, Conservation and Protection, Natasha.Dickinson@dfo-mpo.gc.ca
Nick Carter, Nature Network Organizer, Nature Canada, ncarter@naturecanada.ca
Pascal Gauthier, DFO Fisheries Enforcement Officer, Squamish Office, Pascal.Gauthier@dfo-mpo.gc.ca
Pauline Ridings, DFO, Pauline.Ridings@dfo-mpo.gc.ca
Rebecca Reid, DFO Regional Director General, Pacific Region, Rebecca.Reid@dfo-mpo.gc.ca
Rick Harbo, Biologist, diver, researcher, writer, retired DFO Resource Manager, rmharbo1@gmail.com
Ross Jameson, CPAWS, Ocean Conservation Manager, ross@cpawsbc.org
Ryan Lyth, DFO Fishery Officer/Field Supervisor, Ryan.Lyth@dfo-mpo.gc.ca
Dr. Sabine Jessen, Executive Director at IMPAC5 Secretariat, DFO, sabine@cpawsbc.org
Dr. Sarah Dudas, DFO Aquatic Science Biologist, Strait of Georgia Data Centre, Sarah.Dudas@dfo-mpo.gc.ca
Dr. Verena Tunnicliffe, Professor Emerita, Biology and School of Earth & Ocean Sciences, University of Victoria, verenat@uvic.ca

MLSS Board of Directors:

Adam Taylor, Director of Citizen Science, Howe Sound Liaison, adamtaylor@mlssbc.com
Chris Straub, Director at Large, chrisstraub@mlssbc.com
Connor Parry, Social Media, connorparry@mlssbc.com
Deirdre Forbes McCracken, Director at Large, deirdremccracken@mlssbc.com
Glen Dennison, President, glen_dennison@hotmail.com
Huddie Bennett, Treasurer, huddie@mlssbc.com
Judith Sung, Web and Social Media Coordinator, judithsung@mlssbc.com
Lora Tryon, Secretary, loratryon@mlssbc.com
Meagan Abele, Rockfish Conservation, meaganabele@mlssbc.com
Sheila Byers, Vice-President and Resident Scientist, sheilabyers@mlssbc.com

MLSS Advisors:

Andy Lamb, Biologist, diver, researcher, writer, andylamb@telus.net
Dr. Angela Stevenson, Marine Evolution Ecology, GEOMAR | Helmholtz-Zentrum für Ozeanforschung Kiel, astevenson@geomar.de
Bernard P. Hanby, Diver, photographer, bphanby@shaw.ca
Dr. Jeff Marliave, retired OceanWise Research Scientist, jeff.marliave@gmail.com
Neil McDaniel, Biologist, diver, photographer, Neil.mcd@telus.net
Ruth Simons, Howe Sound Biosphere Reserve Initiative, howesoundbri@gmail.com
Dr. Stephanie Archer, Assistant Professor, Louisiana Universities Marine Consortium, sarcher@lumcon.edu
Tom F Beasley, LLP, Litigation, beasley@bernardllp.ca

Minister / Ministre (DFO/MPO)

From: Sheila Byers <sheilabyers@mlssbc.com>
Sent: Thursday, July 15, 2021 3:52 PM
To: Bernadette.Jordan@parl.gc.ca; Minister / Ministre (DFO/MPO); Jonathan.Wilkinson@parl.gc.ca
Cc: Ken.Hardie@parl.gc.ca; Patrick.Weiler@parl.gc.ca; Ian_Campbell@squamish.net; Ladwig, Aleria; Mar, Amy; anmarie.harris@tc.gc.ca; Dunham, Anya; Du Preez, Cherrisse; Leus, Dan; Info / Info (DFO/MPO); DFO.ORR-ONS.MPO@dfo-mpo.gc; Mann, Joshua; Leslie, Karen; Laura.Convey@dfo-mpo.gc.ca; Klopp, Lindsay; Kattilakoski, Mike; Dickinson, Natasha; ncarter@naturecanada.ca; Gauthier, Pascal; Ridings, Pauline; Reid, Rebecca; Rick Harbo; Ross Jameson; Lyth, Ryan; sabine@cpawsbc.org; Dudas, Sarah; verenat@uvic.ca; Adam Taylor; chrisstraub@mlssbc.com; Connor Parry; Deirdre McCracken; Glen Dennison; Glen Dennison; Huddie Bennett; Judith Sung; Lora Tryon; Meagan Abele; Sheila Byers; Andy Lamb; astevenson@geomar.de; Bernard P. Hanby; Jeff Marliave; Neil; Stephanie Archer; Tom Beasley; Ruth Simons
Subject: MLSS 2021 BC Prawn Fisheries Season & Damage to Sensitive Benthic Habitats
Attachments: MLSS 2021 BC Prawn Fisheries Season & Damage to Sensitive Benthic Habitats 15July2021.pdf

Honourable Minister Bernadette Jordan,

The Marine Life Sanctuaries Society of BC is contacting you out of great concern regarding continuous damage that has been observed occurring to the sensitive benthic habitats of glass sponge and gorgonian coral off the coastal waters of British Columbia. Although particularly evident in 2021, these observations have been recorded over at least the past 10 years.

Please see the attached PDF document that addresses our concerns. We urgently request your attention in acknowledging the damage and the suggested solutions, particularly those relating to the need for additional regulatory protection and an increase of on-the-water DFO Enforcement Officers to ensure protection of these sensitive benthic habitats.

Thank you very much,
Glen Dennison, MLSS President
Sheila Byers, MLSS Vice-President
Adam Taylor, MLSS Director
Neil McDaniel, Associate