

August 4, 2020

Jason Akearok
Executive Director
Nunavut Wildlife Management Board
PO Box 1379, Iqaluit, NU
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Re: Total Allowable Catch for Subarea 0 Greenland Halibut for the 2021 and 2022 Fishing Seasons

Dear Mr. Akearok:

Thank you for your letter of July 28th requesting advice from the Nunavut Fisheries Association (NFA) on the Total Allowable Catch (TAC) for Greenland Halibut in Subarea 0+1 (offshore) for the 2021 and 2022 fishing seasons. In this letter, NFA is pleased to provide its advice on the TAC for Subarea 0, the distribution of TAC between Division 0A and 0B and Nunavut's share of the allocation in Division 0A and 0B.

On July 23, 2020, Fisheries and Oceans Canada (DFO) convened a conference call with stakeholders to obtain their input on the TAC for Subarea 0 Greenland halibut for the 2021 and 2022 fishing seasons. NFA participated in this call and outlined the following points on behalf of the Nunavut commercial fishing industry:

- Based on NAFO's Scientific Council response to Canada's annual inquiry on the potential impact of changes in TAC levels requests consideration should be given to a 5% increase in the TAC, and NFA noted that even this small increase would provide significant positive economic benefits to Nunavut fishing enterprises and communities.
- NFA also expressed its concern that there has been a three-year gap in useable results from the annual multi-species survey, due to two missed surveys and one survey providing data that was incompatible with the existing time series. There are questions and concerns about the future surveys and compatibility with the time series, in terms of what this will mean for TAC advice in the future beyond 2022. As such this makes taking advantage of the current opportunity for a small increase even more important.

NFA welcomes the opportunity to expand on its advice with respect to small 5% increase in the TAC for 2021 and 2022. This request is fully in line with NAFO Scientific Council's advice, as follows:

2020 Canadian Request: Canada again encourages the Scientific Council to continue exploring opportunities to develop risk-based advice, including the implications of catch differing from the TAC (e.g. +/- 5-15%) on the stock's long-term trajectory.

*Response: A quantitative assessment of risk at various catch options is not possible for this data limited stock that is assessed using a qualitative assessment of biomass and abundance indices. Whereas **differences of up to 5% are unlikely to pose a risk to the stock at this time**, systematic exceedances of the TAC may not be sustainable in the medium to long term.*

For 2021 and 2020 NAFO SC also made the decision to provide separate advice for the offshore areas of 0+1 and the inshore areas of Greenland, i.e. *This year, for the first time, this catch advice is exclusive of catches taken in the inshore areas of Divisions 1B-F, for which separate advice is provided.* This is a significant development in that any past concerns regarding exceeding TACs have been attributable to overages in these inshore areas.

Based on the above, it is NFA's view that a 5% increase is very conservative in light of the historically low exploitation rate and low risk to the stock, the removal of the inshore fishery in Greenland from the analysis, and the very strong commercial fishing results our members have been achieving.

In its advice SC also makes the following point: *There is no scientific basis with which to provide separate advice for the offshore areas of Div. OA+1AB and Div. OB+1C-F. The SC advises that consideration be given to the distribution of effort in each area to avoid localized depletion.* Based on recent norms in applying TAC increases, NFA would support a 50/50 split of the Canadian increase between areas OA and OB, to spread the distribution of effort.

Given the uncertainty regarding future stock advice and potential extensive delays in future increases, as well as Nunavut's continued disparity in adjacent allocations, NFA would recommend that the established norm for distribution of TAC increases in OA and OB should continue, i.e. 100% of any increase in OA to Nunavut and 90% of any increase in OB to Nunavut, with the remaining 10% to Nunavik. This is not the time to open additional access to our northern waters.

In summation, NFA is recommending: a 5% increase in the OA/OB turbot TAC for 2021 and 2022; a 50/50 split in this increase between OA and OB; and that Nunavut receive 100% of the OA and 90% of the OB increase. Please let me know if you have any questions regarding NFA's position on this important issue.

Sincerely,



Brian Burke
Executive Director, Nunavut Fisheries Association

c.c. Trevor Taylor, Chairperson, Fisheries Advisory Committee
Sakiasie Sowdloopik, A/Chair, Nunavut Fisheries Association
Jaypetee Akeeagok, Director, Nunavut Fisheries Association
David Alexander, Director, Nunavut Fisheries Association
Jerry Ward, Director, Nunavut Fisheries Association