



August 27, 2025

Hon. Joanne Thompson, MP, PC
Minister of Fisheries
Fisheries and Oceans Canada
200 Kent St
Station 15N100
Ottawa ON K1A 0E6

Via email: DFO.Minister-Ministre.MPO@dfo-mpo.gc.ca

Dear Minister:

We are pleased to write to provide our views on the Subarea 01 TAC levels for 2026 and 2027 for Greenland Halibut, in response to DFO's Eastern Arctic Groundfish Stakeholder Advisory Committee (EAGSAC) update of August 12, 2025 requesting our views.

The NAFO Scientific Council Report of June 2025 ((NAFO SCS Doc. 25/13, Serial No. N7664) provides clear evidence that the Greenland Halibut stock remains in excellent health. As the report demonstrates, across all catch scenarios provided there is less than a 1% chance of the stock falling below *Blim*, the threshold at which serious harm to the stock could occur. Furthermore, there is less than a 7% chance of the stock declining below *Btrigger* in 2027, the level at which it would move into the cautious zone within the NAFO Precautionary Approach Framework. Current biomass remains well above *Bmsy*, with the *B/Bmsy* ratio estimated at 1.20, placing the stock firmly within the Healthy Zone of the Precautionary Approach Framework.

Additionally, the assessment model consistently under-estimates biomass while over-estimating fishing mortality, as documented in the NAFO SC June Report. This inherent conservatism means all TAC options provide additional protections beyond the stated risk levels. Additionally, fisheries performance continues to remain robust, with broadly distributed and historically high catch rates demonstrating the stock's continued productivity.

Given the above, a fishery Total Allowable Catch (TAC) based on *Fmsy* represents the optimal balance between conservation and sustainable utilization. This approach would ensure continued economic and social benefits to adjacent and dependent Nunavut communities, who are majority Inuit. An *Fmsy*-based TAC remains entirely consistent with both Canada's and NAFO's Precautionary Approach Frameworks. Notably, even at *Fmsy* fishing levels, projections indicate a one-third probability that biomass will actually increase by 2027-2028 compared to 2025 levels.

For the above reasons, and the stock's placement in the healthy zone, a reinstatement to the 2022 TAC level is a plausible option. That is clearly defensible.

Our position, however, is to recommend that the 2026 and 2027 TAC levels be set at *Fmsy* (35,328t and 34,618 mt respectively) as contained in Table 1.2 at page 105 of the NAFO SC June meeting report. This recommendation is grounded on compelling scientific evidence that demonstrates the stock's robust health and minimal risk profile.

The *Fmsy* TAC level effectively balances conservation objectives with sustainable resource utilization while avoiding any material risk of stock harm. Given the robust health of this resource, there are no scientific grounds for constraining its optimal economic use. Conversely, there are compelling reasons to fully utilize this healthy and productive stock for the benefit of dependent communities.

Thank you for your consideration.

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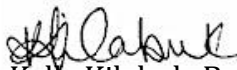


Hon. David Akeeagok

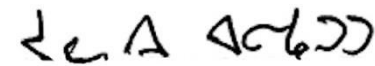
Minister of Community Services, Government of Nunavut



Joeli Qamanirq, Arctic Fishery Alliance



Kelly Kilabuk, Baffin Fisheries



Julai Alikatuktuk, Chair of NFA Board, Cumberland Sound Fisheries



Jerry Ward, Qikiqtaaluk Corporation



Derek Butler, Nunavut Fisheries Association



August 25, 2025

Submission on 2026/27 TAC recommendations for GHL Subarea 0

Attn: Nunavut Wildlife Management Board

Introduction

Oceans North is a charitable organization that fosters science- and community-based conservation in the Arctic and Atlantic regions of Canada, as well as western Greenland. Our goal in all fisheries processes in which we participate is to ensure that depleted fish populations are rebuilt wherever possible and that they support future generations of fishers while contributing to a functional marine ecosystem. We appreciate the opportunity to provide input on the Total Allowable Catch for Greenland halibut in NAFO Subarea 0 +1 offshore for the 2026/2027 fishing seasons.

Goal of long-term sustainability

We are pleased that this offshore Greenland halibut stock now has an accepted model assessment tool and acknowledge the hard work of NAFO Scientific Council (SC) members in achieving this goal. The 2025 NAFO SC assessed the stock as being in the healthy zone according to the NAFO Precautionary Approach Framework, with a low (<1%) probability of the stock being below B_{lim} and risk of fishing mortality being above F_{msy} at 42%.

Greenland halibut are of significant value to the region in many ways. As a species, they play a critical role in Arctic ecosystems as a benthic-pelagic predator, helping transport nutrients throughout the water column and acting as an important prey item for narwhal, beluga, and seals. The fishery further adds tremendous economic value to northern communities, providing employment opportunities and financial benefits as one of the most lucrative groundfish fisheries in the region.

We appreciate that with the stock in the healthy zone there may be strong desires to ramp up the fishery to maximize short-term profits. However, given the significant value of the fishery combined with below-average recruitment indices in recent years,

we suggest following lower-risk TAC recommendations that would benefit the sustainability of the stock in the long-term.

We are therefore recommending **TAC be set at F_{target} fishing levels that result in the long-term stability of the stock**, corresponding to catch levels of 30,243 t and 30,153t in 2026 and 2027, respectively.

Thank you for your consideration of this submission.

Sincerely,

Katie Schleit
Fisheries Director
Oceans North