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February 28 2014

Mr. Ben Kovic  
Chairman  
Nunavut Wildlife Management Board  
P.O. Box 1379 Iqaluit, Nunavut  
X0A 0H0

**Re: Northern (*Pandalus borealis*) and Striped (*Pandalus montagui*)  
Shrimp Total Allowable Catch levels for the 2014/15 season**

Dear Mr.Kovic:

Baffin Fisheries Coalition (BFC) as the only Nunavut fishing company with 100% of the *Pandalus montagui* and *Pandalus borealis* allocations in the Eastern and Western Assessment Zones is responding to:

- NWMB email of February 11 2014. NWMB states “seeking input from stakeholders on total allowable catch levels for northern and striped shrimp in the Eastern and Western Assessment Zones for 2014/15 and DFO’s request to NWMB for recommendations on the TAC for 2014/2015 based on the most recent update of stock status indicators for the two species (see attached CSAS Report). Of note is the substantial decrease in biomass for *Pandalus montagui* in the Eastern Assessment Zone.”.
- DFO’s February 2014 briefing note prepared for NWMB by DFO Central and Arctic, Resource Management, “ Issue: Northern (*Pandalus borealis*) and Striped (*Pandalus montagui*) Shrimp Total Allowable Catch levels for the 2014/15 season”.

Our thoughts on the DFO recommendations are as follows:

**1) Precautionary Approach (PA)**

The newly agreed upon PA should be the driving force in doing the analysis.

Furthermore, this approach should be consistently implemented in all Shrimp Fishing Areas (SFA). The actions and steps taken in Nunavut's adjacent waters should be no different than what happens elsewhere, why should we be treated any differently.

## **2) For Western Assessment Zone (WAZ)**

DFO has recommended Option 3 while option Option 1 at 10% the ER is still very low (at the level the PA Framework sets as the max for when in the critical zone, whereas it is currently well within the healthy zone). In summary, we do not agree with DFO's recommendation Option 3, "Maintain current TAC levels (5,000t for P. montagui and 1,500t for P. borealis) given the newness of the fishery in this area and the limited data available. The potential ER would be approximately 11% for P. montagui and 7% for P. borealis. Therefore based on the PA framework, we are recommending Option 1: utilizing a two year average and maintaining the 10% ER, the quotas should increase to 5,860 t for montagui and 2,080 t for borealis (an 860 t and 580t increase respectively for NU/NK, 50% to NU).

## **3) For Eastern Assessment Zone (EAZ)**

We recommend that the borealis TAC should stay the same, as is in the healthy zone and less (at around 15%) than the 20% ER maximum. However, following the PA Framework we feel that montagui may have to be reduced with Option 1. Quota would drop from 1,150 t for NU/NK to 429 t (NU would drop from 805 t to 300 t).

## **4) Net Impact to Nunavut**

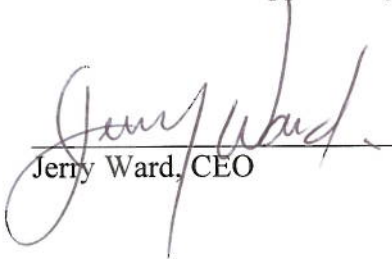
Net impact (for both species) based on our recommendations above would be an increase for NU of 420 t.

## **5) Special Northern Shrimp Advisory Council (NSAC) meeting**

Based on the PA Framework rules, a special NSAC meeting should be called to discuss the montagui in EAS. Considerations should include:

- a) Why is 2012 survey data excluded, when SFA 4 has also shown wide swings in year over year survey biomass results;
- b) The relationship between montagui in the EAZ and SFA 4 must be considered not only in setting the TAC for EAZ but also the TAC for SFA 4.

We welcome the opportunity to discuss further with you at your convenience.

  
Jerry Ward, CEO

CC:

BFC Board members

Jeff Maurice, Fisheries Advisor, NWMB

Devon Imerie, Acting Director, Fisheries and Sealing Division  
Department of Environment, GN

Jim Noble, Executive Director, NWMB