

May 8, 2020

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Dear Messrs. Shewchuk and Moshenko:

**Re: Nunavut Wildlife Management Board and Nunavik Marine Region Wildlife Board Written Public Hearing to Consider the 2020/21 Total Allowable Catch Levels for Northern and Striped Shrimp**

The following letter provides the written submission from the quota holders for Northern and Striped shrimp from Nunavut, as represented by the Nunavut Fisheries Association (NFA). As outlined in this submission, for the Eastern Assessment Zone (EAZ) the NFA is recommending that the total quota for *P. borealis* be established based on a conservative Exploitation Rate (ER) of 15%. This will result in an overall quota increase for the zone of 2,043 t, which we recommend distributing amongst the two areas that experienced biomass increases in the latest survey, i.e. David Strait West (DSW) and Nunavut/Nunavik East (NU/NK E), at a ratio equal to the overall fishable biomass distribution amongst these areas (72.5%/27.5% respectively). Distributing this increase between the three current access holders (offshore, Nunavut and Nunavik), NFA is recommending a final distribution of the increase of 513 t to the offshore, 1,321 t to NU and 209 t to NK, as further described in this submission.

For *P. montagui* in the EAZ and for both *P. montagui* and *P. borealis* in the Western Assessment Zone (WAZ), NFA is recommending a rollover of existing quota levels. For the WAZ, where Harvest Decision Rules (HDRs) are still being developed, this would result in ERs of 16.6% and 15.2% respectively based on two-year averaging of fishable biomass levels.

**Background**

For the 2020/21 Northern (*Pandalus borealis*) and Striped (*Pandalus montagui*) Shrimp fisheries in the WAZ and EAZ, Fisheries and Oceans Canada (DFO) has provided the Boards with both an information and a decision note, i.e. *Total Allowable Catch levels for Northern (Pandalus borealis) and Striped (Pandalus montagui) Shrimp for the 2020/21 season in the Western and Eastern Assessment Zones* and *2020/21 Total Allowable Catch levels for Northern (Pandalus borealis) and Striped (Pandalus montagui) Shrimp in the Eastern and Western Assessment Zones*. Within these documents, DFO has made the following TAC recommendations for the respective zones:

**Western Assessment Zone – 2019/20 TACs – montagui 11,975 t; borealis 3,163 t:**

... The Department maintains its view from 2019/20 that the Boards could continue to establish the combined TAT and TAH levels at an ER that falls within the range since 2015/16 (7.3% - 19.8% for *P. borealis*, 8% - 19.3% for *P. montagui*) without impacting the sustainability of the stocks.

Eastern Assessment Zone – montagui – 2019/20 TAC 840 t:

Two options have been outlined by DFO for the 2020/21 TAC for montagui in the EAZ, with the second option recommended, as follows:

- Option 1: The Boards could consider recommending a 15% increase to the P. montagui TAC, resulting in a TAC of 966t and an ER of 11.4%
- Option 2 (Recommended): Maintain the TAC at 840t (9.9% ER)

Eastern Assessment Zone – borealis – 2019/20 TAC 8,610 t:

Two options have been outlined by DFO for the 2020/21 TAC for borealis in the EAZ, without providing a recommendation as to the preferred option. These are as follows:

- Option 1: Increase the TAC by 15% (+1,292t) to 9,901t (10.4% ER).
- Option 2: Increase the TAC by 20% to 10,332t (10.9% ER), given the significant increase in fishable biomass and the resulting low ER.

Based on the DFO submissions to the Boards, the discussions and recommendations reached at the NSAC and Indigenous pre-meetings, and discussions between industry members from Nunavut and with members from Nunavik, the following paragraphs outline the recommendations and rationale from the current quota holders in Nunavut for consideration by the Boards. For 2020/21, the industry members from Nunavut and Nunavik were unable to reach a full consensus on their recommendations and, as such, each group is providing its own submission to the Boards for consideration.

NFA Recommendations

*Western Assessment Zone (WAZ)*

The WAZ is not currently covered under the Precautionary Approach (PA) framework, although the required data points have now been collected and DFO has indicated that:

A Science peer-reviewed process will be undertaken in the spring, 2020 to develop a Limit Reference Point (LRP) for each stock. Resource Management will then work with Science, the Boards' staff and Nunavut and Nunavik industries to establish an Upper Stock Reference point (USR) and Harvest Decision Rules (HDRs) for each stock. All decisions on the PA, other than the establishment of the LRP which is unilaterally established by Science, will go to the Boards for decision. The Department will endeavor to finalize the full PA for both stocks for application to the 2021/22 TAC setting process, which coincides with the next full stock assessment for this area.

DFO has requested that the Boards consider the following primary considerations when making its decision:

- Science cannot detect trends for either stock at this time. There is no PA for either stock in the WAZ, i.e. the stock statuses are unknown.
- The development of reference points, coupled with observed significant fluctuations in biomass indicators may require TAC reductions in the future.
- A rollover of the current TACs would result in ERs within the previous ranges since 2013 for both species.
- The WAZ has generally been managed in the order of a 10% ER, however ERs for both stocks have been above this level since the 2017/18 fishery.

- A 20% ER for stocks in the Healthy Zone is the accepted maximum rate to maintain Marine Stewardship Council (MSC) certification.

As outlined above, DFO has not made a recommendation on TACs for the 2020/21 WAZ shrimp fishery but has instead stated that: “the Boards could continue to establish the combined TAT and TAH levels at an ER that falls within the range since 2015/16 (7.3% - 19.8% for *P. borealis*, 8% - 19.3% for *P. montagui*) without impacting the sustainability of the stocks”.

Based on the above, NFA is recommending a rollover of the current borealis and montagui quota levels in the WAZ. This rollover would result in an ER for borealis of 15.2% based on two-year averaging (as now utilized in all other SFAs) (15.5% for one year). For montagui a rollover would result in an ER of 16.6% based on two-year averaging (18.6% for one year). Using either method these ERs are within the range considered by DFO as not impacting on the sustainability of the stocks.

Industry is also recommending that the current 50/50 split on shrimp allocations between Nunavut and Nunavik in the WAZ be maintained for 2019/20.

#### *Eastern Assessment Zone (EAZ) - montagui*

NFA is in support of DFO’s recommendation for montagui in the EAZ, to rollover the current TAC at 840 t, resulting in an ER of 9.9%. This approach also received consensus support at NSAC and is consistent with the recommendations of Boards, Nunavut and Nunavik industry and the offshore fleet since 2014.

#### *Eastern Assessment Zone (EAZ) - borealis*

DFO decision note indicated that: “science update results indicate a significant increase (102.8%) in fishable biomass to 95,138t, following a 19.6% increase in fishable biomass last year. The stock remains in the Healthy Zone of the PA framework”. This constitutes a precipitous increase in the biomass (greater than 25% increase) that requires recommendations from the Boards on the TAC increase and its distribution.

The use of two-year averaging of fishable biomass in establishing the ERs, as in all southern SFAs, was first utilized for the EAZ borealis stock in 2019/20 and there was consensus at NSAC to continue to utilize this approach in the future. At the NSAC meeting, DFO presented options outlining either a 15% or 20% increase in the TAC for EAZ borealis. Based on the precipitous increase in the biomass, DFO was asked to also present TACs for ERs of between 15% to 20% under the two-year averaging approach. At NSAC a majority of participants supported utilizing a conservative 15% ER, which would result in a new TAC for 2020/21 of 10,653 t, an increase of 2,043 t.

NFA supports the 15% ER as reasonable, given that the EAZ borealis stocks have in the past demonstrated significant fluctuations in fishable biomass. Future increases in the ER utilized for this area may be supported by NFA if the current high biomass levels continue to be documented through future surveys.

As such, NFA is recommending that the ER for borealis in the EAZ be set at 15%, resulting in a TAC increase of 2,043 t.

## Sharing the EAZ borealis increase:

NFA is recommending a sharing of the 2,043 t increase amongst existing access holders as outlined in the following table and based on the following rationale:

- The DSE area is showing a decrease in survey biomass and should not participate in the increase;
- The split of increase between DSW and NU/NK E should be based on the biomass of borealis in each area from the survey, as is the norm. That would result in a 72.5%/27.5% split between the DSW and NU/NK E, i.e. 1,481 t in DSW and 562 t in NU/NK E;
  - The DSW is traditionally the primary shrimp fishing area in the EAZ, with industry having good success in harvesting their allocations, especially as compared to DSE;
  - Allocations in NU/NK E have been low, at 263 t total in 2019/20 and this area has been considered a bycatch area, which is only now being considered for conversion to a directed fishery;
  - NFA is concerned that a greater than 1000% increase in fishable biomass in the most recent survey in NU/NK E may not be sustainable and that this area is not proven for harvesting;
  - As such, it is recommending that the distribution of the increase be based on the relative share of fishable biomass between these areas, rather than on the survey increases from 2019.
- In DSW, as per discussions at NSAC, 513 t of the increase would go to the offshore to bring them up to their long-term position. Once this position is reached the offshore should not participate in any future increases in this area;
  - CAPP indicated at NSAC that the long-term allocation for the offshore in this area was at a level of 5,250 t and that they would like to get back to this level when allocations are increased in the DSW;
  - In 2019/20, the increase in the DSW was provided to the offshore to return allocations that had been taken from the prior year's decrease. NFA supported this approach to rectify for what may have been a year effect and indicated that it supported the offshore being brought back to its past level in this area. NFA is now aware that the past allocation for the offshore was at a level of 5,250 t for many years and, with a healthy stock, supports the offshore reaching this level;
  - As in its 2019/20 position, NFA believes that once the offshore reaches its past level, it should not participate in any future increases, which should be provided to adjacent jurisdictions.
- For DSW the remaining 968 t increase should be distributed on a 90/10 basis between NU/NK as per land claims provisions, i.e. 871 t for NU and 97 t for NK;
  - This is consistent with the distribution between NU and NK in this area since 2016.
- For NU/NK E the 562 t should be split on an 80/20 basis between NU/NK as per the current distribution, i.e. 450 t for NU and 112 t for NK;
  - NFA supports maintaining the current distribution between NU and NK in this area.
- As a result of the above recommendations, the increase for NU in the EAZ would be 1,321 t and for NK would be 209 t.



EAZ <i>P. borealis</i>	2020 Increase at 15% ER - 2 year averaging		
	2019	Proposed Increase	2020
Offshore DSW	4,737	513	5,250
Nunavut DSW	1,084	871	1,955
Nunavik DSW	120	97	217
Offshore Expl DSE	802	0	802
Nunavut Expl DSE	1,604	0	1,604
Nunavut bycatch NUE	210	449	659
Nunavik bycatch NKE	53	112	165
Total	8,610	2,043	10,653
Total NU Increase		1,321	

#### Summary

In summary, the above paragraphs have outlined the recommendations of the Nunavut shrimp industry with respect to the TACs and sharing in the WAZ and EAZ. A rollover of allocations is recommended for both species in the WAZ, with a continuation of the 50/50 split in allocations between the two territories. In the EAZ, a rollover of the current montagui TAC is recommended and for borealis, setting the ER at 15%. For consideration in sharing the EAZ borealis increase it is recommended that the increase be distributed amongst the current access holders in DSW and NU/NKE such that the offshore receives 513 t, Nunavut 1,321 t and Nunavik 209 t.

Thank you in advance for the Boards' consideration of the Nunavut industry's recommendations on these important issues.

Regards,



Sakiasie Sowdlooapik  
A/Chairperson  
Nunavut Fisheries Association

cc: Honourable Bernadette Jordan, Minister of Fisheries and Oceans, Government of Canada  
Mr. Gabriel Nirlungayuk, Regional Director General, Arctic Region, Fisheries and Oceans Canada  
Honourable David Akeeagok, Minister of Economic Development and Transportation, Government of Nunavut  
Ms. Aluki Kotierk, President, Nunavut Tunngavik Incorporated  
Mr. PJ Akeeagok, President, Qikiqtani Inuit Association  
Mr. Jaypetee Akeeagok, NFA Director, Arctic Fishery Alliance  
Mr. David Alexander, NFA Director, Baffin Fisheries  
Mr. Jerry Ward, NFA Director, Qikiqtaaluk Corporation

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