



Nunavut Fisheries Association



May 6, 2022

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Dear Messrs. Shewchuk and Metuq:

Re: Nunavut Wildlife Management Board and Nunavik Marine Region Wildlife Board Written Public Hearing to Consider the 2022–23 Total Allowable Catch Levels for Northern and Striped Shrimp

The following letter provides the joint written submission from the quota holders for Northern and Striped shrimp from Nunavut and Nunavik. This letter provides the following recommendations from industry for the Boards' consideration:

For the Western Assessment Zone (WAZ):

1. Overall Total Allowable Catch (TAC) for both northern (*Pandalus borealis*) and striped (*P. montagui*) shrimp in the WAZ
2. Harvest level for both northern and striped shrimp in the Nunavut-West (NU-W)
3. Harvest level for both northern and striped shrimp in the Nunavik-West (NK-W)

For the Eastern Assessment Zone (EAZ)

1. Overall TAC for both northern and striped shrimp in the EAZ
2. Harvest level for both northern and striped shrimp in the Nunavut-East (NU-E) management unit
3. Harvest level for both northern and striped shrimp in the Nunavik-East (NK-E) management unit
4. Distribution of northern shrimp TAC within the Davis Strait management units (DS-W, DS-E) and the allocation of the TAC among fleet interests

Management Measures

1. Continuation of the practice whereby both northern and striped shrimp allocations in NU-W and NK-W may be harvested in either management unit, regardless of land claim boundaries
2. Continuation of the practice whereby both northern and striped shrimp allocations in NU-E and NK-E may be harvested in either management unit, regardless of land claim boundaries

Background

For the 2022/23 Northern (*Pandalus borealis*) and Striped (*Pandalus montagui*) Shrimp fisheries in the WAZ and EAZ, Fisheries and Oceans Canada (DFO) has provided the Boards with a Submission for Decision and an Addendum to Submission for Decision for their March meetings. In addition, DFO also submitted for the March Board meetings a Summary of Stakeholder Views from 2022 North Shrimp Advisory Committee Meeting. Within these documents, and as confirmed in the March NWMB Board meeting, DFO outlined several TAC options for each stock but did not make specific TAC recommendations. The Department did make the following recommendations in its Addendum for the respective zones:

Western Assessment Zone – 2021/22 TACs – *montagui* 9,470 t; *borealis* 5,090 t:

No HDRs currently exist for stocks in the WAZ. HDRs may be proposed in future, pending outcomes of NPAWG discussions.

The Department maintains its view from 2021-22 that the Boards could continue to establish an overall TAC (combined for NU-W and NK-W) with ER that falls within the range where the stock has shown an ability to recover; 7.3% - 19.8% for *P. borealis*; 8.0% - 19.3% for *P. montagui*.

Eastern Assessment Zone – 2021/22 TACs - *montagui* 966 t; *borealis* 12,252 t:

For *P. borealis*, an option could be to decrease the TAC by 15% for 2022-23 (ER 19.4%). Where the stock remains in the Healthy Zone, the resulting exploitation rate is reasonable and within the range of past ERs applied in similar circumstances.

For *P. montagui*, options could be to maintain the TAC at 965.5t for 2022-23 (ER 6.3%) or increase the TAC by 15% to 1110t (ER 7.3%) given the relatively conservative ERs currently being applied in this fishery.

It should be noted that these recommendations were submitted prior to the discussion that took place at NSAC and a meeting between industry representatives from each of the major associations (NFA, Northern Coalition (NC), and Canadian Association of Prawn Producers (CAPP)) and senior management at DFO.

Based on the DFO submissions to the Boards, discussions at the March NWMB Board meeting, the science update presented through the Canadian Science Advisory Secretariat (CSAS), the discussions and recommendations reached at the NSAC and Indigenous pre-meetings, and discussions between the industry members from Nunavut and Nunavik, the following pages outline the rationale and recommendations from the current quota holders in Nunavut and Nunavik for consideration by the Boards.

NU/NK Industry Analysis

Stock Status

Details on stock status for the four stocks under consideration in this written response were provided in CSAS Document 2022/13: UPDATE OF STOCK STATUS INDICATORS FOR NORTHERN SHRIMP, *PANDALUS BOREALIS*, AND STRIPED SHRIMP, *PANDALUS MONTAGUI*, IN THE WESTERN AND EASTERN ASSESSMENT ZONES, JANUARY 2022.

For each of the stocks under consideration the status is as follows:

- WAZ montagui – The fishable biomass index increased by 27.7% from 2020 to 2021, and is now at 65,026 t. The female SSB index showed an increase, by 39.5% from 2020 to 2021, and is now at 37,398 t. Both indices are above their respective long-term means in 2021.
Based on the proposed USR, *P. montagui* in the WAZ is within the Healthy Zone of the PA Framework. Transgressing into the Cautious Zone is very unlikely based on the confidence interval not crossing the proposed USR;
- WAZ borealis – The fishable biomass index decreased by 39.7% from 2020 to 2021, and is now at 19,784 t. The female SSB index showed a decrease, by 19.8% from 2020 to 2021, and is now at 14,082 t. Both indices were near their respective long-term means with the fishable biomass being slightly below the long-term mean and the female SSB being slightly above the long-term mean.
Despite the decline in the SSB index, based on the proposed USR, *P. borealis* in the WAZ still remains within the Healthy Zone of the PA Framework. Note there is a possibility of transgressing into the Cautious Zone based on the confidence interval crossing the proposed USR;
- EAZ montagui – The fishable biomass index decreased by 19.0% from 2020 to 2021, and is now at 15,225 t. The female SSB index showed a decrease, by 22.4 % from 2020 to 2021, and is now at 11,200 t. Both indices were close to their respective long-term means in 2021.
Despite the decline in the SSB index, based on the proposed USR, *P. montagui* in the EAZ still remains within the Healthy Zone of the PA Framework. Note, there is a possibility of transgressing into the Cautious Zone based on the confidence interval crossing the proposed USR;
- EAZ borealis – The fishable biomass index decreased for the second year in a row, by 37.8% from 2020 to 2021, and is now at 53,658 t. The female SSB index showed a second consecutive annual decrease, by 40.9% from 2020 to 2021, and is now at 35,792 t. Both indices fell below their respective long-term means in 2021.
Despite the decline in the SSB index, based on the proposed USR, *P. borealis* in the EAZ still remains within the Healthy Zone of the PA Framework. Note, there is a possibility of transgressing into the Cautious Zone based on the confidence interval crossing the proposed USR.

As outlined above, despite the reductions experienced in biomass indices for some of the stocks in 2021, all remained in the healthy zone of the PA Framework. In general, the target Exploitation Rates (ER) under the PA Framework for stocks in this zone are around 20%.

HDRs and TAC Considerations

In 2021, for the stocks in the EAZ and WAZ, DFO convened the Northern Precautionary Approach Working Group (NPAWG) to discuss and recommend stock reference points and harvest decision rules for these fisheries. Several stakeholder meetings were held and various recommendations on HDRs were presented and discussed. For each stock, the Lower Reference Point (LRP) has been established and recommendations provided on the Upper Stock Reference (USR). No final decision was made in 2021 on the USR or HDRs.

To the surprise and disappointment of the Canadian shrimp industry and other stakeholders, in 2021 DFO made the decision to ignore the advice provided at the NSAC table and implement an approach to TAC establishment based on a maximum 15% change in TAC and using only the most recent biomass numbers for calculating the TAC/ER. This approach was implemented in all areas other than the WAZ,

where the decision of the Boards was implemented. The Nunavut and Nunavik industry members were very surprised and concerned that the decision of the Boards for NU/NK E within the settlement areas was not accepted, even after going through a written process for reconsideration, and that the Minister applied the 15% approach to this area as well. At the 2022 NSAC meeting industry expressed its significant concern on the 2021 approach taken by DFO and the overall detrimental impact continuing such an approach would have on industry and its viability over time. A consensus request was made by industry for DFO to convene a working group to consider HDRs for all SFAs in 2022.

Based on the issues around HDRs and TAC setting in 2021 and with the understanding that any new working group will take time to recommend new HDRs, the primary industry associations involved in the shrimp fishery (NFA, NC, and CAPP) met to discuss possible interim HDR approaches for 2022. On March 16, 2022, representatives from these associations met with senior DFO Management to discuss their concerns on the 2021 approach. Analysis completed by industry has concluded that if the 2021 approach had been applied to the setting of shrimp TACs over the past decade or so, it would have cost the industry tens of millions of dollars in lost revenues. For 2022, industry has requested that DFO consider implementing an interim approach that would enable the desired smoothing of TAC changes to occur while also ensuring that there is equity on TAC changes in both an upward and downward direction. Consensus industry recommendations for 2022 TACs in all areas other than the WAZ were provided to DFO.

On April 27, 2022, DFO released the final 2022/23 TAC decisions for SFAs 4-6. For SFA 6, the new TAC was determined based on a 10% ER (critical zone) while for SFA 5, the new TAC represents a 20% ER (healthy zone). In SFA 4, for borealis a 30% increase in TAC is provided, in excess of the 15% rule implemented in 2021 but not reflective of the precipitous increase in biomass witnessed in 2021 and resulting in a very low 8.6% ER for a stock at its highest point ever in the healthy zone. Industry questions DFO's rationale for this decision, which will forgo tens of millions of dollars in lost opportunity costs for the Canadian shrimp industry in 2022/23.

NU/NK Recommendations on Overall TACs in the WAZ and EAZ

The following paragraphs outline the joint recommendations of the NU and NK shrimp industry with respect to TACs for 2022/23 in the WAZ and EAZ. This is followed by industry's recommendations on the sharing of these TACs. In order to aid in this discussion, Table 1 below summarizes the TACs and Fishable Biomass indices (FBI) by area for the past few years.

Figure 1: TAC and FBI for Shrimp Stocks in the EAZ and WAZ

SFA/AREA	TACs			Fishable Biomass			
	2021 TAC	2020 TAC	2019 TAC	2021 FBI	2020 FBI	2019 FBI	2018 FBI
EAZ							
<i>P. borealis</i>	12,252	10,653	8,610	53,658	86,211	95,138	46,900
<i>P. montagui</i>	966	840	840	15,225	18,803	8,503	8,503
WAZ							
<i>P. borealis</i>	5,090	3,163	3,163	19,784	32,835	20,378	21,088
<i>P. montagui</i>	9,470	11,975	11,975	65,026	50,911	64,268	79,835

Western Assessment Zone (WAZ) – montagui – 2021/22 TAC of 9,470 t and borealis – 2021/22 TAC of 5,090 t

For the stocks in the WAZ, in considering the biomass numbers outlined in Table 1 the fishable biomass levels for both borealis and montagui have returned in both cases very close to where they were the year before last. Also, the WAZ was the only area in 2021/22 where DFO accepted the decisions of the Boards and did not implement the 15% rule, resulting in a sizeable increase in borealis and a sizeable decrease in montagui TACs. There are a number of options that could be considered for establishing TACs for 2022/23, including:

- With the biomass numbers reverting back in close proximity to previous levels, revert to the TACs that were in place from the prior two years, i.e. 11,975 t for montagui and 3,163 t for borealis;
- Since both species are well into the healthy zone in this area, apply the 20% ER to both, resulting in a 13,005 t TAC for montagui and 3,957 t for borealis; or
- Apply the 50% or Finish approach industry is recommending for the other areas, which would result in a 11,238 t TAC for montagui and 4,523 t for borealis.

In its recommendations to the Boards outlined in its Addendum, DFO has stated the following: “The Department maintains its view from 2021-22 that the Boards could continue to establish an overall TAC (combined for NU-W and NK-W) with ER that falls within the range where the stock has shown an ability to recover; 7.3% - 19.8% for P. borealis; 8.0% - 19.3% for P. montagui.”

Based on the above and the shift in biomass back to previous levels, industry is recommending that the TACs in the WAZ be adjusted to the levels of the prior two years:

- **WAZ montagui: TAC of 11,975 t, an increase of 2,505 t from the 2021/22 TAC and an ER of 18.4%; or**
- **WAZ borealis: TAC of 3,163 t, a reduction of 1,927 t from the 2021/22 TAC and an ER of 16.0%.**

These ERs are consistent with the recommendations provided by DFO.

Eastern Assessment Zone (EAZ) – montagui – 2021/22 TAC of 966 t

For 2021/22, the 15% maximum change approach was applied by DFO throughout the EAZ, including to the montagui in DSW and NU/NK E. The decision on TACs for the NU/NK E area was not announced by the Minister until very late in the season (in December, after access to the area for fishing was over for the year) and was limited to the 15% increase. This was not consistent with the decision of the Boards for this region within their respective settlement areas, who had decided on a total TAC for NU/NK E montagui of 1,087 t for 2021/22, up from 430 t in 2020/21. The Boards had also reconfirmed this decision in keeping with the Minister’s request for reconsideration. Industry is extremely concerned that the Minister had chosen to ignore the decision of the Boards within their own settlement areas, bringing into question the decision-making authority under the Land Claims.

At the NSAC meeting for 2022 and in subsequent discussions between industry participants and with DFO, including at the March meeting of the NWMB, discussions were held regarding significant issues with the TAC levels for montagui in the EAZ. Although montagui is primarily considered a bycatch in this area, industry is very concerned that the low level of TAC has and will impact on its ability to fully harvest its directed borealis allocations in the area. This concern exists for both the offshore license holders and the industry players from Nunavut and Nunavik. In recent years, the presence of higher levels of montagui when harvesting in the region has increased the risk that the montagui TAC available to individual harvesters could be fully taken before they are able to take all of their borealis, thus

shutting them out of the fishery for the remainder of that year. DFO has acknowledged that this is an issue facing the industry.

Industry discussions have resulted in an overall recommended TAC for montagui in the EAZ which is comprised of two components, an 850 t target bycatch allowance for the offshore industry in DSW/DSE and a 1,400 directed allocation for Nunavut and Nunavik in NU/NK E. It is not anticipated that the full target bycatch allowance would be taken by the offshore in DSE/DSW but establishing it as an overall allowance will ensure individual offshore harvesters do not experience issues with montagui bycatch impacting on their ability to harvest their full borealis allocations. Combining the allowance target and the directed amount would result in a target total of 2,250 t, which if harvested would result in an overall ER for montagui in the EAZ of 14.8%, still maintaining a conservative level for a stock in the healthy zone. For NU/NK E, based on the breakdown of stock survey results by area within the EAZ, the ER for this directed fishery at 1,400 t would be only 10%, a very low number for a stock in the healthy zone.

To summarize, following is the NU/NK industry recommendation on TAC:

- **EAZ montagui: A directed TAC of 1,400 t for NU/NK E and an allowance target of 850 t in DSW/DSE for the offshore, resulting in an overall target maximum of 2,250 t, an increase of 1,285 t from the 2021/22 TAC and an ER of 14.8% (with an ER of 10% in NU/NK E for the directed portion).** Although the actual ER based on bycatch harvest may come in at a much lower level, if consistent with prior years, this new TAC and allowance level will be more reflective of the PA approach and will protect industry from excessive bycatch in the EAZ borealis fishery.

Eastern Assessment Zone (EAZ) – borealis – 2021/22 TAC of 12,252 t

The EAZ borealis stock remains in the healthy zone and although the FB dropped to 53,658 t, it remains above the FB from 2018/19 of 46,900 t.

In the EAZ, for borealis the TACs are divided into three sub-areas, Davis Strait West (DSW), Davis Strait East (DSE), and Nunavut/Nunavik East (NU/NK E). Although TACs are included for each of these areas, the DSE area is generally considered non-viable, or in industry terms “paper fish” as although a quota exists it cannot be harvested viably and very little is taken every year. For example, of the 12,252 t in total EAZ quota last year, 2,995 t was in DSE. This means that while the nominal ER for this area may have been 14.2%, the real fishable ER was more like 10.7% when taking out the unfishable amount in DSE. This 10.7% ER can be considered very low for a stock which remains in the healthy zone.

For 2022/23, there are various options to consider for the establishment of this TAC, based on the use of either the nominal or real ER for the area:

- A 20% nominal ER, resulting in a TAC of 10,732 t for 2022/23;
- A 20% real ER (closer to 23% nominal), resulting in a TAC of 12,341 t for 2022/23;
- A 18.5% real ER (closer to 21.5% nominal), resulting in a TAC of 11,536 t for 2022/23.

Based on the continued placement of this stock within the healthy zone and the recognition that DSE remains a non-fishable area, but also considering that the biomass levels have decreased, for 2022/23, the NU/NK industry is recommending the following TAC:

- **EAZ borealis: TAC of 11,536 t, a decrease of 715 t from the 2021/22 TAC and a nominal ER level of 21.5%. When adjusting for the removal of the non-fishable DSE allocation, the real ER will be closer to 18.5% (below the 20% target for healthy stocks).**

The following section outlines the recommendations of the NU/NK industry on how these TAC levels should be distributed.

Distribution/Sharing of Recommended NU/NK Industry TACs

The following paragraphs present the position of the Nunavut and Nunavik industry on the sharing of the recommended TACs outlined above for 2022/23.

Western Assessment Zone (WAZ) – montagui – 2022/23 Recommended TAC of 11,975 t

The WAZ is located fully within the Nunavut and Nunavik settlement areas and, as such, access is limited to the industry players in these Territories. Since the WAZ fishery started the agreement has been to share WAZ TACs between NU and NK on a 50/50 basis. Industry supports a continuation of this practice, which would result in the following distribution:

- **NU – 50% of TAC – 5,987.5 t;**
- **NK – 50% of TAC – 5,987.5 t.**

Western Assessment Zone (WAZ) – borealis – 2022/23 Recommended TAC of 3,163 t

A 50/50 split for WAZ borealis is also recommended, as follows:

- **NU – 50% of TAC – 1,581.5 t;**
- **NK – 50% of TAC – 1,581.5 t.**

Eastern Assessment Zone (EAZ) – montagui – 2022/23 Recommended TAC of 2,250 t

As previously discussed, in the EAZ stocks are subdivided into three areas, DSW, DSE and NU/NK E. At present, the 2021/22 EAZ montagui TAC is distributed with 471.5 t provided as a bycatch to the offshore sector in DSW/DSE and the remaining 494 t provided to NU and NK in NU/NK E (346 t to NU and 148 t to NK).

Based on industry discussions a directed TAC of 1,400 t for NU/NK E and an allowance target of 850 t in DSW/DSE is being recommended for 2022/23. This would result in the following sharing of TACs:

- **Offshore – DSW/DSE – 850 t, as an allowance bycatch target with no expectation that it will be reached;**
- **NU/NK – NU/NK E – 1,400 t directed fishery, an increase of 906 t**
 - **NU – 981 t, an increase of 635 t**
 - **NK – 419 t, an increase of 271 t**

Eastern Assessment Zone (EAZ) – borealis – 2022/23 Recommended TAC of 11,536 t

At present, the 2021/22 EAZ borealis TAC is distributed between the offshore sector, Nunavut and Nunavik, as follows:

- Offshore – 5,250 t in DSW, 1,150 t in DSE, 6,400 t total;
- NU – 2,753 t in DSW, 1,845 t in DSE, 758 t in NU/NK E, 5,356 t total;
- NK – 305 t in DSW, 190 t in NU/NK E, 495 t total.

In 2020/21, NFA recommended to the Boards that a portion of the increase in the TAC be provided to the offshore to increase its DSW total to its historical level of 5,250 t, with the understanding that any further future increases would be distributed solely to northern participants. DFO maintained this approach for 2021/22, distributing the 15% increase amongst the other participants/areas, with the vast majority going to Nunavut and Nunavik (offshore did receive a 150 t increase in DSE).

It is recommended for 2022/23 that distribution of the overall 715 t decrease be apportioned based on the same ratio used for the increases in 2021/22. Using this approach, the final sharing of the new 11,536 t TAC would be as follows:

- Offshore – 5,250 t in DSW, 1,083 t in DSE, 6,333 t total – a 67 t decrease;
- NU – 2,317 t in DSW, 1,737 t in DSE, 714 t in NU/NK E, 4,768 t total – a 588 t decrease;
- NK – 257 t in DSW, 179 t in NU/NK E, 436 t total – a 59 t decrease.

NU/NK Industry Recommendations on Management Measures

The NU and NK shrimp industries support the continuation of the following management measures:

- Continuation of the practice whereby both northern and striped shrimp allocations in NU-W and NK-W may be harvested in either management unit, regardless of land claim boundaries;
- Continuation of the practice whereby both northern and striped shrimp allocations in NU-E and NK-E may be harvested in either management unit, regardless of land claim boundaries; and
- In addition to continuing the above management measures, the NU/NK industry is also requesting that in view of the large amount of montagui shrimp on the NKW/NKE border, to extend the practice in Ungava Bay of allowing tows to cross a line in Ungava Bay. Harvests will continue to be reported where the tow begins.

Summary

The above paragraphs have outlined the joint recommendations of the Nunavut and Nunavik shrimp industries with respect to the TACs and sharing in the WAZ and EAZ and the continuation of current management measures. Industry's recommendations with respect to TACs and the sharing of these TACs is summarized in the following table.

Shrimp Stock	TAC Recommendation	Sharing Recommendation
WAZ montagui	11,975 t , an increase of 2,505 t	NU – 50% of TAC – 5,987.5 t; NK – 50% of TAC – 5,987.5 t
WAZ borealis	3,163 t , a decrease of 1,927 t	NU – 50% of TAC – 1,581.5 t; NK – 50% of TAC – 1,581.5 t.
EAZ montagui	1,400 t directed in NU/NK E; 850 t bycatch allowance in DSW/DSE for offshore; for 2,250 t target maximum , an increase of 1,285 t	Offshore – DSW/DSE – 850 t, as an allowance bycatch target with no expectation that it will be reached; NU/NK – NU/NK E – 1,400 t directed fishery, an increase of 906 t <ul style="list-style-type: none">• NU – 981 t, an increase of 635 t• NK – 419 t, an increase of 271 t
EAZ borealis	11,536 t , a decrease of 715 t	Offshore – 5,250 t in DSW, 1,083 t in DSE, 6,333 t total – a 67 t decrease; NU – 2,317 t in DSW, 1,737 t in DSE, 714 t in NU/NK E, 4,768 t total – a 588 t decrease; NK – 257 t in DSW, 179 t in NU/NK E, 436 t total – a 59 t decrease

Thank you in advance for the Boards' consideration of these joint NU/NK industry recommendations on these important issues.

Regards,

Brian Burke
Executive Director
Nunavut Fisheries Association

Andy Moorhouse
Vice-President, Economic Development
Makivik Corporation

cc: Honourable Joyce Murray, 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. Olayuk Akesuk, 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
Mr. Tony Wright, Makivik Corporation



Nunavut Fisheries Association



LPEA
Société Makivik
Makivik Corporation

LΔ 6, 2022

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a~r~r~a~c~c~j~< ~a~n~s~s ~d~p~c~c~n~a~r~l~d~a~s~c ~(DS-W, DS-E) ~a~L ~a~s~d~a~b~a~b~C~d~s~a~r~c ~b~n~c~J
~a~n~c~d~C~s~b ~a~n~s~a~r~a~s~b ~d~p~d~C~a~b~C~G ~a~L ~a~r~a~s~a~d~C~c~c

Λύλασθετος περιοχης Δασογεωπευκαρπης - 2021/2022 οποιασδεν σημειωσεται αποτελεσματικα - montagni 9.470 C¹⁴; borealis 5.090 C¹⁴.

ba~a~a~σ ~b~D~A~I~G~A~D~Y~Δ - Δσ~a~σ - 2021/2022 b~N~c~r~c ~Λ~N~C~D~Y~a~σ ~b~σ~b ~Λ~D~σ~γ~a~σ~b - montagvii 966 C~a~ borealis 12.252 C~a~.

▷ доля Pandanus borealis, оцениваемая в 19.4% (ER 15%) в 2022-2023 гг. Абсолютное количество особей сократилось на 15%.

Δέσμευση (NFA), Δρόςες (NC), Αλγόριθμος (CAPP) Αλγόριθμος Δέσμευσης Δέσμευσης Αλγόριθμος

oo>c/oo&b A'b c-cos^qb b>A'c C>cos^qc

$\Lambda C^a b^c \sigma^d \gamma^e \omega^f \gamma^g b^h \partial A^i c^j \bar{c}^k \bar{\omega}^l \sigma^m \gamma^n$

◀▷σ ΛC⁹b⁹σ⁹r⁹_⁹c◀▷σ Δr⁹L⁹r⁹▷▷σ⁹_⁹b⁹σ⁹ΔC⁹_⁹σ⁹r⁹ΔL⁹ΔC⁹_⁹σ⁹b⁹C⁹c:

የብዕስና በርሃን ስም የሚከተሉት ነው፡፡

- ხართულის ხდების დატვინის *borealis* - აღმოჩენის დროის დატვინის უმცირესი დატვინი 2020 წელს 37.8% დატვინი 2021 წელს 53,658 კმ², დატვინი SSB უმცირესი დატვინი 2020 წელს 40.9% დატვინი 2021 წელს 35,792 კმ². ცლების უმცირესი დატვინი 2021 წელს 44,628 კმ². დატვინი SSB უმცირესი დატვინი 2021 წელს 24,870 კმ². ცარცულის უმცირესი დატვინი 2021 წელს 14,700 კმ². მაგრავის უმცირესი დატვინი 2021 წელს 10,000 კმ². მაგრავის უმცირესი დატვინი 2021 წელს 8,000 კმ². მაგრავის უმცირესი დატვინი 2021 წელს 6,000 კმ². მაგრავის უმცირესი დატვინი 2021 წელს 4,000 კმ². მაგრავის უმცირესი დატვინი 2021 წელს 2,000 კმ².

$\sigma^a \rho_b \sigma^c \rho_d C^{ab} C^{cd} \sigma^e \Delta \Gamma L \Delta \rho^b C D^a C D^c L C \Gamma \Delta \rho^c \Delta \Gamma b \Gamma^e \Gamma^f \Delta \Gamma L \Delta \rho^d C D^a \rho^b C \sigma^b \Delta \Gamma \sigma^e \Gamma^f \sigma^b \Delta \Gamma L \Gamma^e \Delta \rho^d \sigma^e \Gamma^f$

የብድሪያዎች 1: ከበርሃሪ ለበርድሩ ዘመን ተስፋል ለነዚያ ስም እና በFBI የሚከታተሉ ለመስማት ያለፈ

	ԵՐԵՎԱՆԻ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՀԱՆՐԱՊԵՏԱԿԱՆ ՏԵՍԱԿԱՆ ԸՆԴՀԱՆՈՒՐ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՀԱՆՐԱՊԵՏԱԿԱՆ ՏԵՍԱԿԱՆ ԸՆԴՀԱՆՈՒՐ			ՀԱՆՐԱՊԵՏԱԿԱՆ ՏԵՍԱԿԱՆ ԸՆԴՀԱՆՈՒՐ ՀԱՆՐԱՊԵՏՈՒԹՅԱՆ ՀԱՆՐԱՊԵՏԱԿԱՆ ՏԵՍԱԿԱՆ ԸՆԴՀԱՆՈՒՐ			
SFA/ $\Delta\sigma$	2021 TAC	2020 TAC	2019 TAC	2021 FBI	2020 FBI	2019 FBI	2018 FBI

ԵԶԱԾՈ ԿԵՐՏԿՐԱՎԱՐ ΔԾԱԾՈ ԾԾԱ (EAZ)							
Pandalus borealis	12,252	10,653	8,610	53,658	86,211	95,138	46,900
Pandalus montagui	966	840	840	15,225	18,803	8,503	8,503
ՎՀԱԾԱԾՈ ԿԵՐՏԿՐԱՎԱՐ ԾԾԱ (WAZ)							
Pandalus borealis	5,090	3,163	3,163	19,784	32,835	20,378	21,088
Pandalus montagui	9,470	11,975	11,975	65,026	50,911	64,248	79,835

Λύση σε υπότιτλο σε περιοχή που περιλαμβάνει την περιοχή *montagui* - 2021/2022 μηνών Αύγουστος-Σεπτέμβριος και την περιοχή *borealis* - 2021/2022 μηνών Οκτωβρίου-Νοεμβρίου. Η περιοχή *montagui* περιλαμβάνει την περιοχή που περιλαμβάνει την περιοχή *montagui* - 2021/2022 μηνών Αύγουστος-Σεπτέμβριος και την περιοχή *borealis* - 2021/2022 μηνών Οκτωβρίου-Νοεμβρίου. Η περιοχή *borealis* περιλαμβάνει την περιοχή που περιλαμβάνει την περιοχή *borealis* - 2021/2022 μηνών Οκτωβρίου-Νοεμβρίου.

◀▷Следимо за бутлаком Асбестом, Амбрустом и др. вида. Судя по результатам 2021-22 гг., в Беларусь попало 46% речного лосося из Германии, 46% из России и 8% из Исландии. Видимо, в Европе не хватает лосося из Беларусь.

- **ხდებულის ხდებულის** **Delta**-**სიცოდურა** **montagui:** ცეკვების განვითარების ხელშეწყობის მიზანით აღინიშნული არის ეს დანართი. 2021/2022 წლის მარტის მიზანით აღინიშნული არის ეს დანართი. 2021/2022 წლის მარტის მიზანით აღინიშნული არის ეს დანართი.

- 20% Δրվුලදාරීන් ER, නෑර්යාසාධක බුන්ජ පෙන්වා සංඛ්‍යාත්මක සංඛ්‍යාත්මක පෙන්වා 10,732 සංඛ්‍යාත්මක පෙන්වා 2022/2023;
 - 20% පැනදාරීන් ER (අංශීකරණයේ 23% Δරුලදාරීන්), නෑර්යාසාධක බුන්ජ පෙන්වා පෙන්වා සංඛ්‍යාත්මක සංඛ්‍යාත්මක පෙන්වා 12,341 සංඛ්‍යාත්මක පෙන්වා 2022/2023;

Λύση σε πρόβλημα ΔΣΥ - montagui - 2022/2023 Απόδειξης
Λύση σε πρόβλημα ΔΣΥ - montagui - 2022/2023 Απόδειξης

Λύσεις στη σειρά $b \Delta x^4 \delta \Delta x$ Δ $\sigma^4 L$ (WAZ) - borealis - 2022/2023 ΑΙΓΑΙΟΝ δέλτα της Κύπρου
Λύση στη σειρά $b \Delta x^4 \delta \Delta x$ Δ $\sigma^4 L$ 3,163 Σταθμοί

50/50 $\Delta\theta^{\circ}$ CDR_{avg} D_{avg} $\Delta\sigma^{\circ}$ $\Delta\sigma^{\circ}$ borealis ΔC_{avg}° D_{avg} $\Delta\Delta\sigma^{\circ}$

- ቅድሚ - 50% ከበርታ ለበርታው ዓይነቶች ለልማትና ማስታወሻ - 1,581.5 ፍቃድ;
 - ቅድሚ - 50% የቅድሚው ለበርታው ዓይነቶች ለልማትና ማስታወሻ - 1,581.5 ፍቃድ.

ba^ao^alσ 'b>A^ag>v^a Δσ^alσ (EAZ) - montagui - 2022/2023 <Jc^ad>v^a bU^azJ
ΛΠC>v^ag^aσ^a Λb>σ^af^aσ^a 2,250 C^a

- **ՃԼՃԱԾԳԻ - ԿՐԲԽԸՆՀԱՅՆ**՝ ՃՐԱՆՑ ԱՊԱՅԱՆ/ԿՐԲԽԸՆՀԱՅՆ ՃՐԱՆՑ ԵԶԱԾԱՅՆ - 850 ԸՆ, ԱՇԽԱԾՈՒԾԾԱՏ ՃՐԱԿԸՆՀԱՅՆ ՃՐԱԿԸՆՀԱՅՆ ԿԴՎԵՑԱՅՆ ԷՐԵՋԱՆԵՐԸՆԿՆ ՈՐՈՇԵԿԱՏ;
 - **ԹԱԳԻ/ԹԱԳԻՆ** - **ԹԱԳԻ/ԹԱԳԻՆ** ԵԶԱԾԱՅՆ - 1,400 ԸՆ ԵՐԱԿԱՆՈՒԾԸՆՀԱՅՆ ՃՐԱԿԸՆՀԱՅՆ, ԿԴՎԵՑԱՅՆ 906 ԸՆ
 - **ԹԱԳԻ** - 981 ԸՆ, ԿԴՎԵՑԱՅՆ 635 ԸՆ
 - **ԹԱԳԻՆ** - 419 ԸՆ, ԿԴՎԵՑԱՅՆ 271 ԸՆ

бо́рье́льсъ (бóрье́льсъ) — бореалид (Бореалид) — borealis — 2022/2023 40-й год бореалид
11,536 C^o

- **ΔԼՃԱԳԻ** - 5,250 ԸՆԿ ▷ՔԾ ԳՐԲԳԸՆՑ՝ ՀՐԱՄԱՆ, 1,150 ԸՆԿ ▷ՔԾ ԳՐԲԳԸՆՑ՝ ՀՐԱՄԱՆ, 6,400 ԸՆԿ ԵՂԿՐԸ;
 - **ԹԱՋԸ** - 2,753 ԸՆԿ ▷ՔԾ ԳՐԲԳԸՆՑ՝ ՀՐԱՄԱՆ, 1,845 ԸՆԿ ▷ՔԾ ԳՐԲԳԸՆՑ՝ ՀՐԱՄԱՆ, 758 ԸՆԿ ▷ՔԾ ԹԱՋԸ/ԹԱԺԸ ԵՐԱՎԱՆ, 5,356 ԸՆԿ ԵՂԿՐԸ;
 - **ԹԱԺԸ** - 305 ԸՆԿ ▷ՔԾ ԳՐԲԳԸՆՑ՝ ՀՐԱՄԱՆ, 190 ԸՆԿ ▷ՔԾ ԹԱՋԸ/ԹԱԺԸ ԵՐԱՎԱՆ, 495 ԸՆԿ ԵՂԿՐԸ.

- **ΔΙΔΑΞΤΟΣ** - 5,250 Σεντ σύριγγας ΔΡΑΣ ΛΑΣ ΑΠΟΛΟΓΙΣ, 1,083 Σεντ σύριγγας ΔΡΑΣ διαδοχικές, 6,333 Σεντ σύριγγας - 67 Σεντ ΕΠΙΧΕΙΡΗΣΗΣ;
 - **ΦΟΙΤΗΣ** - 2,317 Σεντ σύριγγας ΔΡΑΣ ΛΑΣ ΑΠΟΛΟΓΙΣ, 1,737 Σεντ σύριγγας ΔΡΑΣ διαδοχικές, 714 Σεντ σύριγγας/ΦΟΙΤΗΣ διαδοχικές, 4,768 Σεντ σύριγγας - 588 Σεντ ΕΠΙΧΕΙΡΗΣΗΣ;
 - **ΦΟΙΤΗΣ** - 257 Σεντ σύριγγας ΔΡΑΣ ΛΑΣ ΑΠΟΛΟΓΙΣ, 179 Σεντ σύριγγας ΦΟΙΤΗΣ/ΦΟΙΤΗΣ διαδοχικές, 436 Σεντ σύριγγας - 59 Σεντ ΕΠΙΧΕΙΡΗΣΗΣ.

ወዢኖ/ወዢኖ ፍቃርጓዢንና ፍቅርጓዢንና ፍቅርጓዢንና
ወዢኖ ፍቅርጓዢንና ፍቅርጓዢንና ፍቅርጓዢንና

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Բայց <Δ ^c և C ^c b ^c σ ^c Γ ^c	ԵՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ	ԵՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ
Ասեղությունը՝ Δσ ^c կազմությունը՝ montagui	11,975 C ^c , ճգնաժամական 2,505 C ^c	50% - 50% եՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ 5,987.5 C ^c ; 50% - 50% եՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ 5,987.5 C ^c
Ասեղությունը՝ Δσ ^c կազմությունը՝ borealis	3,163 C ^c , ճգնաժամական 1,927 C ^c	50% - 50% եՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ 1,581.5 C ^c ; 50% - 50% եՌԵՎԱՐԱՐՈՒԹՅՈՒՆ ԱՆՑԱԿԱԾ 1,581.5 C ^c .
Եղաղացությունը՝ Δσ ^c կազմությունը՝ montagui	1,400 C ^c Կրկերակած ▷ՔԾ 50% / 50% եղաղացությունը; 850 C ^c Δեպակած Δեպակած Արտադրակած ▷ՔԾ բրաչիալ եղաղացություն 850 C ^c Եղաղացություն 2,250 C ^c Կարագան ճարշակ, ճգնաժամական 1,285 C ^c	ΔԼԴԱԳԻ - բրաչիալ եղաղացություն Ասեղություն / բրաչիալ եղաղացություն եղաղացություն - 850 C ^c , Համարակած Եղաղացություն Ահապակած Եղաղացություն Կարագան ճարշակ Ահապակած ՈՐՈՇՎԵԿԱՏ; 50% / 50% - 50% / 50% եղաղացություն - 1,400 C ^c Կրկերակած Արտադրակած, ճգնաժամական 906 C ^c <ul style="list-style-type: none"> 50% - 981 C^c, ճգնաժամական 635 C^c <ul style="list-style-type: none"> 50% - 419 C^c, ճգնաժամական 271 C^c
Եղաղացությունը՝ Δσ ^c կազմությունը՝ borealis	11,536 C ^c , ճգնաժամական 715 C ^c	ΔԼԴԱԳԻ - 5,250 C ^c ▷ՔԾ բրաչիալ եղաղացություն 1,083 C ^c ▷ՔԾ բրաչիալ եղաղացություն եղաղացություն, 6,333 C ^c եՌԵՎԱՐՈՒԹՅՈՒՆ - 67 C ^c ճգնաժամական; 50% - 2,317 C ^c ▷ՔԾ բրաչիալ եղաղացություն Արագած 1,737 C ^c ▷ՔԾ բրաչիալ եղաղացություն եղաղացություն, 714 C ^c ▷ՔԾ 50% / 50% եղաղացություն, 4,768 C ^c եՌԵՎԱՐՈՒԹՅՈՒՆ - 588 C ^c Ճգնաժամական;

	መፋፌኬ - 257 ሲኅን ደቃስ ንብረቴ ልምሬ ለዚህ በርሃኩ ስራ, 179 ሲኅን ደቃስ መጥሪ/መፋፌኬ ከዚህ በርሃኩ ስራ, 436 ሲኅን ከበርሃኩ - 59 ሲኅን ፍቅርና የሚከተሉት
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የሚለውን አገልግሎት ስምምነት ተወስኗል፡፡

ԱՐԴՅՈՒՆ,

Burke

• 9b

۲۰۰۷۸۴۹۳

ՀՅՈՒՅՆ-ՎՐԱՅԻՑ, ՔԱՂԵԾՈՄԸ ԱՅՍԿԱՂՈՄԸ ԼՅՈՒՅՆ ԺԱՐՈՒՅՆ

የኋር ሁሉም በኋር ተሸቃሚነት እንደሆነው የሚያስፈልግ ይችላል እና የሚያስፈልግ ይችላል የሚያስፈልግ ይችላል

ԼԵՍԵՇՆՈ ԾԱՔԸ ԷՎՔՋՐԻ, ԴԵԿ ԱՅՆԸ ՎՃԵՇՆՈՄ ԷԿ ԾԱԲԿԸ, ԹԱԴԿ ՏՔԼԵԺԸ

ገናዘኑ የሚያስተካክለውን ስራውን አጠቃላይ ተቀብሱ ይችላል

የኋላውን ማቅረብ በዚህ አገልግሎት የሚያስፈልግ የሚከተሉ ደንብ እንደሆነ ተሰጥቶ ይችላል

ገናዘኑ የሚከተሉት ስምዎችን በመስጠት አገልግሎት የሚከተሉት ስምዎችን በመስጠት አገልግሎት
በመስጠት አገልግሎት የሚከተሉት ስምዎችን በመስጠት አገልግሎት የሚከተሉት ስምዎችን በመስጠት አገልግሎት