

May 4, 2020

Jason Akearok
Executive Director
Nunavut Wildlife Management Board
PO Box 1379, Iqaluit, NU
X0A 0H0

Re: Season Bridging of NU & NK Allocations in the EAZ and WAZ

Dear Mr. Akearok:

On April 15, 2020, the Nunavut Fisheries Association (NFA) and its members received a request from Fisheries and Oceans Canada (DFO) to provide “views on the extension of season bridging for Nunavut and Nunavik allocations in the Eastern and Western Assessment Zones, with two proposed additions”. Subsequent to providing these views, which differed from the DFO recommendations, NFA was informed that DFO would be proceeding to bring its recommendations forward to the NWMB Board at its June meeting. As a result, NFA is writing this letter to detail its position on season bridging in the EAZ and WAZ.

The current season bridging protocol for the EAZ and WAZ was approved in 2018 as a pilot project, with significant input from industry. DFO has indicated to NFA that it will be recommending the following to the Board:

DFO recommends that, beginning in the 2021/22 fishery and until such a time as HCRs are developed for the WAZ and southern SFAs, to maintain the existing season bridging protocols for Nunavut and Nunavik allocations within the WAZ and in Davis Strait; with two additions:

- Should a decision be taken between the Boards and the Minister: allow season bridging of *P. borealis* allocations in the NU/NK E; and
- In the EAZ, reduce or suspend carry-forward amounts where the *P. borealis* stock is no longer in the Healthy Zone, such that:
 - If the stock is in the Cautious Zone, original carry-forward amounts for Nunavut and Nunavik allocations are reduced by 13% and 26% in the upper- and lower-half of the Cautious Zone, respectively.
 - If the stock is in the Critical Zone, no carry-forward is permitted.

NFA does not support the implementation of the current season bridging protocol with the additions requested by DFO at the present time. Since this pilot project was put in place in 2018 significant changes have taken place in both the EAZ and WAZ which requires further analysis on season bridging protocols before full implementation. The concerns of NFA with respect to the proposed protocol relate to both the season bridging levels and the implementation dates.

In the WAZ shrimp allocations were significantly increased in 2019 and in the EAZ recent survey results indicate that significant increases in *P. borealis* allocations may take place for 2020. NFA therefore requests consultation on increasing carry forward amounts in proportion to allocation increases. The Harvest Control Rules (HCRs) have not been established as of yet for the WAZ but should be in the near future. These significant changes in

allocations and having HCRs that indicate stock status in the WAZ need to be considered before establishing final season bridging levels for both areas.

NFA members are also concerned with the implementation dates outlined in the current pilot project. Ice and weather conditions continue to limit the available fishing season in both the WAZ and EAZ. The requirement to complete harvesting prior to September 30 in the WAZ and July 31 in the EAZ provides very little time to harvest any carry-forward amounts.

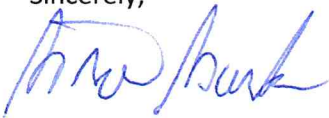
Although NFA agrees that season bridging amounts should be adjusted if stocks are in the top or bottom sections of the cautious zone, further assessment is needed on whether the reductions proposed by DFO are reasonable. NFA does agree that season bridging should not be considered for stocks in the critical zone and that NU/NK E should be considered for season bridging upon conversion from a bycatch to directed fishery.

Based on the above, NFA is recommending to the NWMB Board that it does not implement final season bridging protocols at this point, that the current pilot project protocols with DFO's adjustments be implemented for 2020, and that further discussions take place between industry, DFO, the NWMB and other stakeholders on this issue prior to the 2021 season, with a goal of reaching consensus of future season bridging protocols in the EAZ and WAZ.

The northern stocks of shrimp in the EAZ and WAZ are becoming ever more important for the shrimp industry, given the recent positive biomass estimates in these areas and the continued stock reductions in southern SFAs. As such, implementing season bridging protocols that are reasonable and provide the best opportunity for industry to harvest these important resources warrants the further analysis and discussion being requested. NFA foresees utilizing season bridging in these areas on a regular basis as required in the future.

Thank you in advance for the Board's consideration of NFA's position on this important issue.

Sincerely,



Brian Burke
Executive Director, Nunavut Fisheries Association

c.c. 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