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Arctic Bay

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Grise Fiord

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Qikiqtarjuaq

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Resolute Bay

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May 8, 2020

Honourable Bernadette Jordan PC  
Minister of Fisheries and Oceans and Canadian Coast Guard  
House of Commons  
Ottawa, Ontario

Dear Minister Jordan:

I am writing you on behalf of the Board of Directors of the Arctic Fishery Alliance (AFA) owned by the communities of Qikiqtarjuaq, Grise Fjord, Resolute Bay, and Arctic Bay to express our concerns about the possibility of Nunavut Wildlife Management Board (NWMB) issuing a call this year for a multi-year quota application under the revised "Allocation Policy for Commercial Marine Fisheries". As you are aware, for matters related to the fishery beyond the Land Claim Area the Board's role is only advisory and it makes recommendations on allocations that you can either accept, reject or modify. As we all know, Canada and Nunavut are in the midst of the most serious health and economic crisis experienced in the past century. Thus, in this crisis environment, we request that you advise NWMB that it should not be asking the Nunavut fishing industry to prepare a quota application that will shape its future for the next five years.

Instead, we would suggest a continuation of the present allocations that the four organizations have for the 2020 season, which would include the quota sharing agreement the Nunavut Fisheries Association agreed to for the two- year period 2019-20 and that your predecessor accepted as a recommendation from NWMB.

We have given this issue considerable thought over the past two months since Covid-19 became an epidemic in our country. We have identified a number of factors that we feel support our recommendation that we should not be required in these circumstances to submit an application to NWMB for a five-year quota decision.

- Since we do not have any TAC increases available for turbot now or in the foreseeable future (due to a lack of DFO research surveys) we will be engaged in a "zero-sum game " in a multi-year allocation process as any quota adjustments can only be made at the expense of another quota holder. We feel that it would be unfair and totally unjust to the existing quota holders to have any of them risk any quota reductions during the current economic crisis caused by the virus. Such action could have unfavourable and harmful impacts on our communities. We feel the only fair course of action is to maintain the status quo for one more year.

- Never has the Nunavut fishing industry been faced with such a degree of uncertainty as we enter the 2020 turbot fishery as a result of problems caused by the virus. Madame Minister, you are dealing on a daily basis with the economic problems our industry is facing. We need to focus all of our management efforts to ensure we are able to survive this crisis.
- The problems the industry faces this season in relation to crewing, potential infections, potential quarantines, possible needs to sanitize vessels, requirements for safe distancing, sourcing protective clothing supplies, testing crew for possible infection, crew availability and other similar issues will require an inordinate amount of management time during the fishing season when we should be devoting attention to producing the best possible quota application proposal. This added pressure on management could result in not having the time or focus to presenting the best possible quota application and thereby result in an unfavourable recommendation from the NWMB for a five-year allocation.
- In addition, significantly more management efforts and time will have to be devoted to the issues surrounding the landing of vessels in Greenland ports under strict controls affecting the discharge and resupply of vessels, restrictions on crews, crew exchanges and crew emergencies. Regardless of how well the industry plans its visits in Greenland, issues will arise that will require significant management time and could affect the success of this season's fishery. As you know, we are forced to land in a foreign country due to the lack of harbour infrastructure in the eastern Arctic.
- Problems created by Nunavut's restrictions on entry into the territory and prohibitions on landing in the territory's ports as the industry's vessels have routinely done every fishing season to pick up/drop off crew and spare parts.
- Due to the special level of restrictions imposed by GN we will be faced with additional restrictions and controls unlike what any other fishery in Canada will have to contend with. The recently announced conditions Nunavut's Chief Public Health Officer stipulated for an easing of the restrictions suggest it could be several months before there is any easing of them.
- Owing to the fact that, we are Nunavut companies, we will have to deal with three different jurisdictions and sets of rules in Nunavut, Newfoundland and Greenland.
- All of these limitations will undoubtedly drive up industry operating costs and negatively affect our profitability. In fact, as your Government has recognized our industry as an essential service it has identified the need for special assistance to keep us operating and deal with the additional hurdles we must overcome. Staying on top of these programs and making application to the various programs will occupy considerable management time and take away from the time necessary to prepare a multi-year quota application.

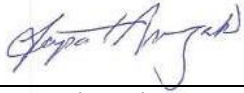
- The industry is facing a very uncertain market outlook for our products this year as the worldwide food service markets where the bulk of our products are sold have been heavily disrupted and we do not have any indication at this time when they will stabilize and at what price levels. This will also have in the short-term a negative impact on profitability and will likely require significant adjustments to our businesses.
- We have no idea when we will return to a what is now being called “a new normal”. It is, however, clear that this will take a number of months and likely at least this full fishing season. What if we are faced with a second wave of infections this fall or next winter as some experts predict? When will a vaccine be available?
- As a result of the stay at home orders issued by GN, we are faced as a Nunavut company with a number of additional problems as we must work from home and are prohibited from inter-community travel. Further, the overburdened internet service, especially in our high Arctic communities, renders video conferencing virtually impossible. Therefore, we will be unable to engage in **meaningful consultation** with our stakeholders while preparing a major five-year quota application. This is simply not possible in the current crisis environment and the restrictions related to it.
- Faced with such instability and uncertainty how can one accurately produce with any degree of confidence a five- year business plan as required under NWMB quota application process?
- If we present now an application for a multi-year allocation, we will have to live with the consequences of this potential mistake for the next 5 years.
- NWMB and its Fishery Advisory Committee (FAC) will be faced with issues considering and studying applications if they are still required to work from home.
- It may not be possible to appear in person before the FAC or NWMB to explain and defend our applications, thereby resulting in less effective presentations and consideration of our applications.
- In the case of AFA our fishing season has already been seriously disrupted by the impact throughout the world of Covid-19. We have been engaged for several months in our plans to purchase a new vessel that would increase our harvesting capacity. However, we have not been able to complete the purchase because the vessel must undergo significant modifications at a shipyard to improve its ice classification. Until restrictions are eased in Poland, we cannot get the vessel in the shipyard to complete the required work. We had hoped to have the vessel fishing this season but owing to the virus it will be delayed until next season.

We believe we have presented strong arguments as to why maintaining the current allocations for another year is a wise course of action that will permit us to focus on surviving the crisis we face because of Covid-19. We know that in your position as Minister of Fisheries and Ocean you understand all too well the disruption in the normal way of conducting our business and the importance of meaningful consultation to our indigenous communities. We therefore urge you to request NWMB to delay their

request for multi-year quota applications until we are operating in a more stable health and financial environment.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jaypetee Akeeagok", written over a horizontal line.

Jaypetee Akeeagok  
Executive Chairman

cc: Mr. Daniel Shewchuk, Chairperson, Nunavut Wildlife Management Board  
Arctic Fishery Alliance Board of Directors  
Mr. Lootie Toomasie, President & CEO, Arctic Fishery Alliance