



May 5<sup>th</sup>, 2015

The Honourable Gail Shea  
Minister of Fisheries and Oceans  
200 Kent Street, 8<sup>th</sup> Floor  
Ottawa, ON, K1A 0E6

**Re: Turbot Co-Management in and adjacent to the Labrador Inuit Settlement Area**

Dear Minister Shea,

The Torngat Joint Fisheries Board ('the Board') here offers its recommendations for the 2015 Turbot fishery in NAFO Divisions 2+3KLMNO, in partial fulfillment of its mandate under Chapter 13 of the Labrador Inuit Land Claims Agreement.

Turbot is an important adjacent resource for the fishing industry in Nunatsiavut. It has the potential to be a significant driver of positive change, but the Nunatsiavut Government has limited secure access to the resource, and partly as a result, has limited opportunity to participate in the competitive August fishery. While adjacent users have been the primary beneficiaries of adjacent turbot resources to the North and South, the same has not been true for adjacent users in Nunatsiavut. We therefore recommend that:

*The Nunatsiavut Communal Allocation be increased to 650MT.*

Without secure access through a communal allocation, access to the competitive fishery is undermined. Whether in terms of fleet development or negotiated lease arrangements, the communal fishery and the competitive fishery adjacent to Nunatsiavut are inter-dependent. We therefore recommend that:

*The 75/25 quota split for the June/August fisheries be maintained.*

We thank you for considering this advice and request a meeting at your convenience to discuss the future direction of the Turbot fishery in and adjacent to the Labrador Inuit Settlement Area.

Yours truly,

John Mercer  
Chairperson



**Torngat Joint Fisheries Board**  
Memorandum to the Minister of Fisheries and Oceans  
Turbot Co-Management in 2+3KLMNO  
(May 5<sup>th</sup>, 2015)

**Issue:** Turbot Co-Management In and Adjacent to the Labrador Inuit Settlement Area.

**1.0 Recommendations:**

- *Increase the Nunatsiavut Government Communal Allocation to 650MT.*
- *Maintain the 75/25 quota split for the June/August fisheries.*

**2.0 Background:**

**2.1 Case History**

- The TJFB has submitted recommendations on Turbot annually since 2010. Each year the Board has recommended a Nunatsiavut communal allocation of 650MT. In 2013 the Nunatsiavut Government was issued a communal allocation of 3.38% of the Canadian allocation in 2+3KLMNO, which equated to 189MT.

**2.2 Quota and Landings (2013)**

- The Nunatsiavut Government landed 177.1MT of the 189MT communal allocation, and 16.1MT on permits associated with groundfish licenses. An additional 85.5MT was caught on non-Nunatsiavut Government permits and landed at the processing facility in Makkovik.

**2.3 Quota (2014)**

- Nunatsiavut Communal Allocation 3.38% of Canadian allocation in 2+3KLMNO, equal to 189MT.
- The total quota for the 2+3K fishery was 1,982MT, split between the August portion of 496MT (25%) and the June portion of 1486MT (75%).
- 100MT carried forward from the June portion to the August portion, for a total of 556MT.

## 2.4 Landings (2014)

- 2014: 30.2MT landed at Makkovik in 3 trips. All Makkovik Landings were on non-Nunatsiavut Government permits. The Makkovik plant stopped accepting turbot on August 7<sup>th</sup>. The operations challenges were a direct result of labour shortages and we understand that plans have been put in place to address these operational challenges.
- The remainder was landed at Cartwright and St. Lunaire.

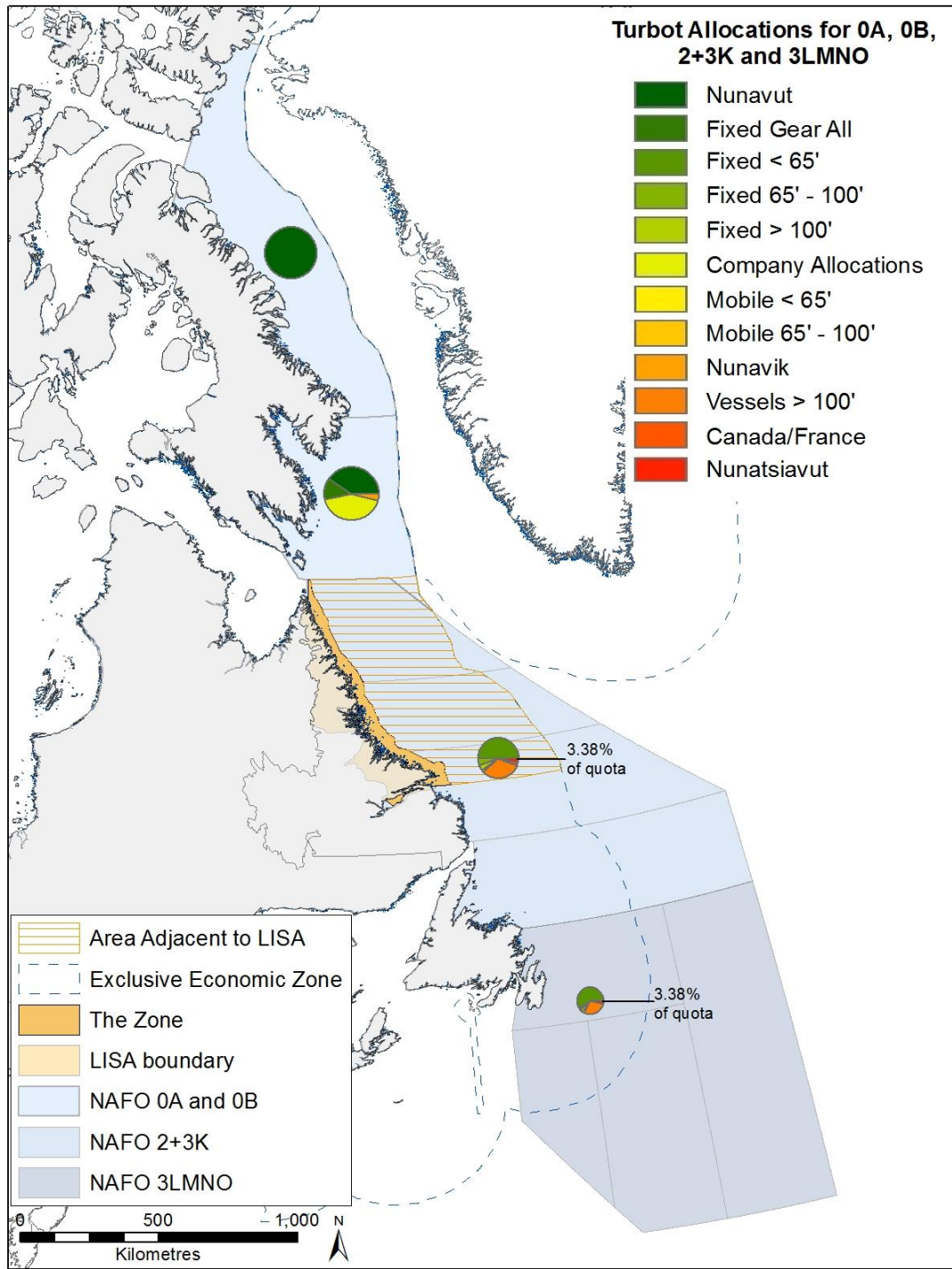
## 3.0 Management Framework and Resource Status:

- The status of the resource is uncertain, and made more so by uncertainty over landings. In 2003, in response to an apparent decline, the Fisheries Commission of NAFO (with advice from the Scientific Council) established a fifteen-year rebuilding plan for the 2+3KLMNO portion of the turbot resource. In 2010 the Fisheries Commission concluded a management strategy evaluation and established harvest control rules which limit TAC adjustments in any given year to +/-5%. As a result, the 2+3KLMNO TAC for 2014 was reduced by 5% and in 2015 the TAC will be increased by 5%.
- In 2014 the Board supported the rebuilding plan, the harvest control rules, and the resultant 5% decrease, and the Board continues that support in the absence of clear rationale for a departure from the current system. We note that at the 2015 meeting of the 2+3K Turbot Working Group, hosted by your Department in Deer Lake, Newfoundland and Labrador, on April 15<sup>th</sup>, 2015, a proposal was tabled that would effectively remove domestic turbot from the NAFO management regime. The Board has not had an opportunity to conduct or review any analysis of this proposal, and in the absence of further analysis and supporting rationalize, we are not in a position to comment.

## 4.0 Total Allowable Catch and Allocations:

- Nunavut has 100% of the 6,500MT quota in Sub-Division 0A, and 41% of 7,000MT in 0B.
- Nunatsiavut has access to 3.38% of 3,900MT in 2+3K (132MT), and 3.38% of 1,724MT in 3LMNO (58MT).
- While the fishery has developed in the North and South over the last several decades, the Turbot fishery in Nunatsiavut has progressed little. Although the 2013 communal allocation has increased Nunatsiavut Government participation, the Nunatsiavut Government is not a significant beneficiary of the significant Turbot resources in and adjacent to the zone. The zone established by the Labrador Inuit Land Claims Agreement accounts for 7.66% of NAFO Sub-Divisions 2+3K, and 5.33% of 2+3KLMNO.

• **Figure 1.0** Turbot Allocations for 0A, 0B, 2+3K, and 3LMNO



## **5.0 Split Quota/Season:**

- In 2007 the DFO implemented a quota/season split to allow northern interests an opportunity to participate in the competitive Turbot fishery. The quota/season split has been only partially successful in this respect, but it has proven a necessary compliment to the communal allocation. In practice, any modification to the existing quota/season split would compromise the Nunatsiavut Government's ability to harvest Turbot in the competitive fishery and the communal fishery.

## **6.0 Consultation and Deliberation**

- The TJFB hosted a Turbot workshop in Happy Valley – Goose Bay in November of 2014. The workshop brought together fishers, researchers, processors, and managers, and those discussions continue to inform the Board's recommendations.
- The Board attended the 2015 meeting of the 2+3K Turbot Working Group, hosted by your Department in Deer Lake, Newfoundland and Labrador, on April 15<sup>th</sup>, 2015. The TJFB has consistently made the point that attendance at Groundfish Advisory Meetings and Turbot Working Group meetings does not satisfy the Board's responsibility to make recommendations to your office.
- A representative of the Board has participated as a member of the Canadian delegation to the NAFO annual general meetings since 2012.

## **7.0 Policy and Legislative Considerations**

- The Labrador Inuit Land Claims Agreement, the Fisheries Act, the Aboriginal Communal Fishing Licences Regulations, the North Atlantic Fisheries Organization Fisheries Commission decisions, and Department of Fisheries and Oceans policies provide the legal, constitutional and policy context to the supplied recommendations.

## **8.0 Summary Conclusions and Recommendations**

- Whereas the Nunatsiavut Government is immediately adjacent to 2+3K; and considering that 7.33% of 2+3K is comprised of the zone; and having also considered allocations to the North and South; and recognizing that the 3.38% allocation was harvested successfully in 2013 and 2014; and recognizing that access to Turbot is a critical element of the fishing industry in Nunatsiavut; the Board recommends that the communal allocation be increased to 650MT.
- Whereas the existing quota/season split has been in place since 2007; and recognizing that the Nunatsiavut Government's access to the competitive Turbot fishery is made possible by the split; and recognizing also that the Nunatsiavut



Government's participation in the competitive fishery facilitates their ability to harvest the communal allocation; the Board recommends that there be no modification to the quota/season split.

