



Wednesday, April 13, 2011

The Honourable Gail Shea, M.P.
Minister of Fisheries and Oceans
200 Kent Street
Ottawa, Ontario
K1A 0E6

Re: Management Measures for Turbot in and adjacent to Nunatsiavut

Dear Minister Shea:

Pursuant to the provisions of the Labrador Inuit Land Claims Agreement, please find attached the Torngat Joint Fisheries Board's (TJFB) 2011 recommendations regarding the continuing co-management of turbot in NAFO Sub-area 2 and Divisions 3KLMNO.

The Torngat Joint Fisheries Board was established by the three signatories to the Labrador Inuit Land Claims Agreement, with its powers and responsibilities defined in Chapter 13. The Board is established as the primary body advising the responsible Minister(s) on matters relating to the management of fish, fish habitat, and fisheries in Nunatsiavut, with advisory powers in waters adjacent to 'the zone'. NAFO Sub-area 2 overlaps the zone and is therefore within, and adjacent to it.

On 17 February, 2010, after a year long process that included careful analysis of the development and management of the turbot fishery, the TJFB recommended that the Minister establish a 650mt Nunatsiavut Communal Turbot Allocation.

Your response of 27 July recognizes the Board's advisory responsibilities in waters adjacent to the zone, but does not acknowledge that areas 2GHJ are not only adjacent to the zone, but partially within it. The attached recommendation builds on the 2010 submission, and the analysis and reasoning that underpin it remain sound and unchanged. But the resource situation has changed, and with a quota increase in the offing there is a distinct opportunity to introduce some equity to the fishery off Nunatsiavut, while adhering to long held allocation principles of adjacency and historical attachment, and the Crown's obligations respecting the Labrador Inuit Land Claims Agreement.



We look forward to your timely response to this submission.

Your's truly,

John Mercer
Chairman
Torngat Joint Fisheries Board



Torngat Joint Fisheries Board
Memorandum to the Minister of Fisheries and Oceans
Fishery Management in Nunatsiavut
(April 13, 2011)

Issue: A Turbot Allocation for Nunatsiavut

Recommendation:

It is recommended by the Torngat Joint Fisheries Board that:

- The Minister establish a 650mt Nunatsiavut Communal Turbot Allocation.

Background:

1. The Torngat Joint Fisheries Board and the Labrador Inuit Land Claims Agreement

- The Torngat Joint Fisheries Board (hereafter the “Board”) received representation from Nunatsiavut residents and officials requesting a review of the turbot fishery and explicit requests for a communal allocation. The Board has also been involved in ongoing dialogue between the Nunatsiavut Government and Fisheries and Oceans Canada.
- The Board is the creation of the three negotiating parties to the Labrador Inuit Land Claims Agreement (LILCA), with its roles, responsibilities and powers outlined in parts 13.10 and 13.11 of Chapter 13. The Board is the primary body making recommendations on fish, fish habitat, and fisheries in the Labrador Inuit Settlement Area, and has advisory powers in waters adjacent to the ‘Zone’. The TJFB has both the authority and the responsibility to make recommendations to the Minister in respect of issues surrounding the management of Greenland halibut, as per 13.11.2 items (a) through (h) of the LILCA.
- The Board consulted with fishers and community members in each of Nunatsiavut’s five communities in 2008. Subsequently, a retrospective analysis was conducted for the period from the 1960s, when the fishery expanded, through to Canada’s commencement of modern licensing, allocation and scientifically based management in its fisheries (i.e. the early to mid-1970s), and up to the present day.
- Consultations and further analysis confirmed that Labrador Inuit access, participation and catch history in all groundfish fisheries is negligible, despite Nunatsiavut being

immediately adjacent to some of the most productive fishing grounds and water masses in the northwest Atlantic (i.e. Hopedale Channel, Cartwright Channel, Hawke Channel and Saglek Slope) that have sustained large demersal and pelagic fisheries for generations.

2. Review of the Turbot Fishery and Fishery Development in Nunatsiavut

- The modern turbot fishery commenced and expanded with the advent of synthetic gillnets in the mid 1960s. It is also generally agreed that Canada's attention to formalized fishery management accelerated in the mid-1970s, associated with the Groundfish Crisis of 1974-1976, the extension of jurisdiction and creation of NAFO in 1977, and the introduction in May 1976 of the first "Policy for Canada's Commercial Fisheries". This period is relevant because it coincided with the Report of the Royal Commission on Labrador, which was undertaken in 1975 and explored in detail the state of the fisheries on Labrador's north coast, to wit:

*"...other species are not commercially harvested for a number of reasons which include a lack of adequate knowledge of the resource, lack of proper gear, lack of processing facilities, and lack of available markets or marketing agencies. Other species known to occur on the Labrador coast, which can be marketed and which could be accessible with proper gear, to inshore based Labrador fishermen include, rock cod, capelin, halibut, **turbot** (emphasis added), Icelandic scallops, and shrimp...p.550"*

"A Summary of the Coastal Fishery; Northern Labrador.....There are no longliners now owned by the residents of northern Labrador to take advantage of an autumn cod fishery in deeper waters or to search out other species such as turbot and flounder.p.560"

- The state of the fishery in Nunatsiavut is largely unchanged since the 1975 Royal Commission. The northern Labrador fishery has stagnated over the period, while southern fleets have progressed steadily, and Nunavut's fishery has expanded dramatically.
- In assessing the cause to the current predicament the Board focused on the fishery development model applied in Nunatsiavut versus that applied in adjacent areas. The Board determined that the approach employed over at least the past two decades in Nunatsiavut has been a succession of general funding programs; the most prominent among these were the Newfoundland Inshore Fisheries Development Agreement (NIFDA) and the Fisheries Component of the Comprehensive Labrador Cooperation Agreement (CLCA) that focused on infrastructure development in Labrador during the

1980s and early 1990s. These programs were, unfortunately, unsuccessful in achieving stated objectives. By comparison, over the past three decades other aboriginal groups and “southern” interests have been provided significant resource allocations, in lieu of or in tandem with capital.

- For illustration, the approach taken in developing the Nunavut turbot fishery has been the provision of substantial allocations for the exclusive use of the region (i.e. 6,500t provided in NAFO 0A since 2001, and a 1,350t increment on November 9, 2009 to the 1,500t previously held in NAFO 0B, which brought Nunavut’s total turbot allocations to 9,350t). Consequently, the Nunavut harvesting sector has rapidly expanded after many years of virtual non-existence. Moreover, Nunavut has been given latitude to develop a fishery of its own design; Labrador Inuit were constrained by policy and program measures to develop an inshore fishery based on <65’ vessels (without dedicated allocations), which are inappropriate for the environment in which they reside and operate.
- Inuit interests received their first and only groundfish allocations in 1990 when 1500t of turbot was provided in the announcement of the northern turbot development program (i.e. 750t each to Labrador Inuit Development Corporation and the Torngat Fish Producers Cooperative Society Limited), but these were reduced to a total of 230t by 1996 under subsequent reallocation decisions. The region has received no further groundfish allocations. **The Board notes that both entities are separate and distinct from the Nunatsiavut Government.**
- A criticism of the funding programs available to the Labrador Inuit was that they were programs of general application; the very modest northern Labrador fishery was treated as being at par with other fleets of Atlantic Canada. This was an oversight, as Labrador Inuit fishers were disadvantaged on many fronts. Most operated out of open speed boats (<9 metres), fished near shore, possessed only rudimentary navigating and deep water fishing experience, and were neither eligible for nor technically competent to master large vessels needed for fishing in deepwater. The absence of local fleet support services, seasonality (ice often remained on the coast until mid-July and September gales precluded use of small vessels), lack of representation (including language barriers) and other externalities were overlooked or improperly weighted when fishery management plans and program criteria were developed.
- Efforts to develop inshore groundfish capacity on the northern Labrador coast occurred after all the fish were gone. Various commissioned reports relate that “fish” (i.e. cod) had virtually disappeared from the northern Labrador coast by the early 1980s. Despite

the often generous funding available, there was no impetus to build an enterprise without fish to catch.

- It is the Board's conclusion that commentary on Nunatsiavut's lack of historical participation and dependency on turbot and groundfish in general is unbalanced. An equivalent discussion is needed on the policy instruments and resource prospects off Labrador through the 1980s to the present, and the accompanying fishery development model that was delivered and failed on the northern Labrador coast. In addition to vessel replacement rules that were a continuous barrier to fleet development, there was no business case or viable fishing plan to support inshore fishery or fleet development in Nunatsiavut in the mid 1980s or early 1990s (or thereafter).
- The Labrador Inuit were also frustrated by a succession of related policies and programs (*i.e. Vessel Replacement Rules in the Commercial Fisheries Licensing Policy for Eastern Canada (1976 - 89), Resource Short Plant Program (1979), Sector Management (1981), Enterprise Allocation Program (1985), Northern Turbot Development Program (1990)*) that failed to provide Nunatsiavut secured access, or to protect fish resources on which they relied. Of the specific programs identified above, the Northern Turbot Development Program requires particular mention.

3. The Northern Turbot Development Program

- In the wake of the northern cod collapse and the groundfish moratoria the one program that offered hope for aboriginal communities, indeed all northern fishing communities that were struggling to gain a firm footing in the groundfish fishery, was the *Northern Turbot Development Program*.
- The program provided large fishery development quotas in Sub-areas 0 and 2, immediately adjacent to Nunavut and Nunatsiavut. It seemed academic that northern aboriginal groups would be the principal beneficiaries based on routinely applied allocation criteria of adjacency, need and historical attachment to the area, and notwithstanding the absence of other opportunities. This appeared to be the case as the Labrador Inuit Development Corporation and Torngat Fish Producers Cooperative Society Limited each received 750t allocations in NAFO 0B on announcement of the program in 1990, but by the end of the program in 1998 they were left with only 70t and 160t, respectively - far short of what is needed to substantiate a fishery or fleet development.
- Significant competitive northern turbot developmental program quotas were also announced in NAFO 2GH, an area that is unattractive to the southern inshore and

groundfish fleets because of the distance to the fishing grounds, the difficult fishing conditions, and lack of fleet support. In 1994 the 2GH stock unit was eliminated and combined with 2J and 3K to form the current 2+3K stock unit, and placed under the management authority of NAFO. The inclusion of 2GH with 2J and 3K as one management unit has facilitated the taking of the entire quota in the southern component of the stock area.

- The 2+3K inshore quota is now accessible by most of the Newfoundland based inshore vessels and is caught quickly under the fishing pressure of the more numerous and better equipped southern fleets. It is late in the season when northern Labrador based harvesters are ready to fish turbot in Sub-area 2, and by that time the quota is either taken or insufficient to warrant gearing up. The Department of Fisheries and Oceans introduced season and quota splits in 2007 to provide Nunatsiavut fishers some opportunity to catch turbot before the quota is totally exhausted. Season and quota splits have been ineffective and unpopular – they have not provided Nunatsiavut fishers access to a share of turbot, as they were intended to do. A communal quota is a different tool intended to better accomplish the intended objective – provide access to Nunatsiavut.

4. Turbot Science and Resource Status

- Turbot is understood to be a contiguous stock in the northwest Atlantic. Hence, management units are intended to restrict access and movement of vessels or fishery participants in relation to resource distribution.
- Turbot have been heavily exploited since the 1980's but the resource has proven resilient, suggesting that there are contributions to the stock from deepwater areas beyond the reach of modern fishing gears, or that a certain portion of the population is able to escape bottom fishing gears.
- Dwyer and Healey (2005) document the sampling design and sampling frequency in Subarea 2 and Division 3K over 1978-2004. *Division 2G is no longer covered by Canadian surveys (emphasis added)*. Division 2H is scheduled for survey coverage *in every second year (emphasis added)*, and was included in the 2010 fall survey. NAFO Divisions 2J and 3K have been surveyed annually since the 1970s, but a total of twenty strata in Divisions 2J and 3K were not completed in the fall of 2008.
- Surveys have been conducted by Canada in Divisions 3LMNO for many years; however, prior to 1996 the maximum depth usually did not exceed 400 meters. Therefore, data collected on Greenland halibut were considered inadequate to describe distribution and



abundance for this stock and were not used for assessment purposes. In 1996, the survey design was extended to depths of at least 730 meters, and where possible, to 1500 meters during fall surveys.

- In 2003, the Fisheries Commission of NAFO established a fifteen year rebuilding plan for the 2+3KLMNO portion of the turbot resource, with the intent to: “take effective measures to arrest the decline in the exploitable biomass and to ensure the rebuilding of this biomass to reach a level that allows a stable yield of the Greenland halibut fishery over the long term.”
- The status of the resource in 2G and 2H is uncertain, and this has been the case for many years - it follows that the stock status is poorly understood across the entire 2+3K management Unit.
- There is no robust scientific basis to the quota currently set for turbot in NAFO 2+3K, or in fishing areas to the north and south. The recent 1500t increase of the 0B turbot quota came from the best available, but dubious information sources including Canadian offshore vessel single and double trawl CPUE data and proxies in the form of surveys in Greenlandic waters in depths <600 metres, and a deepwater Greenland Halibut survey conducted by Denmark in NAFO 1CD. There is no dedicated Canadian survey in 0B to validate the 1500t quota increase, as the only two surveys in the management unit were conducted in 2000 and 2001.
- Finally, the absence of regular research surveys in NAFO Divisions 2G and 2H is troubling for the Board, as informed debate with Nunatsiavut representatives on the status and management of turbot or any species adjacent to the “Zone” is not possible. The paucity of science and absence of surveys in 2GH is a longstanding point of contention with the Labrador Inuit, and is adding to current controversy over allocation of turbot and other resources. The Board deems it prudent to take the initiative to address the significant gap in science information in NAFO 2GH, to the extent its resources allow.



Current Synopsis

- Recently the Nunatsiavut Government, the Labrador Inuit Development Corporation and the Torngat Fish Producers Cooperative Society Limited engaged consultants to undertake a review of their fishing assets, with a view to consolidation in one viable fishing entity. This concept has been espoused for many years by internal and external observers of the Nunatsiavut fishery. The consultant's analysis of the assets, resource allocations and licences held by the parties suggest an opportunity exists, but the resource package is deficient without a groundfish supply.
- The Board is convinced that past programs and current fishery management measures aimed at assisting local fishers in participating in the Turbot fishery, though well intended, were not sufficient to rescue the Nunatsiavut fishery from its current malaise. Programs and policies of general application that were insensitive to Nunatsiavut circumstances some 3 decades ago remain largely intact. Governments' genuine efforts and objectives for fishery development in northern Labrador have not been attained, as evidenced by the current inactivity and absence of a fleet.
- The Board is concerned that the certainty and "spirit of intent" of the Fisheries Chapter of the Labrador Inuit Land Claims Agreement is proving elusive as it pertains to resolving management and allocation issues.
- It is the Board's view that a recommendation to establish a 650MT Communal Allocation is the only practical means to achieve multiple objectives and resolution to a longstanding inequitable situation. The recommended allocation could be partially comprised of the announced 297t increase in 2+3K. The balance (353t) might be excised from the existing turbot quota in 2+3K, or could be achieved through a general quota increase as per the recent OB increase.

Alternatives:

- The Board considered a number of policy alternatives to address the disparity in the turbot fishery:
- The Board dismissed the quota/season split as an effective tool to allow access to Nunatsiavut fishers. It amounts to a "half-measure", is difficult to manage, and was not supported by Nunatsiavut fishers or the remainder of the inshore fleets, nor did it generate a satisfactory outcome in terms of fleet development and local landings.



- Another option considered was a licensing policy variation whereby Nunatsiavut would be provided a number of large vessel eligibilities (i.e. the privilege to license/register a number of larger vessels). This option was dispensed summarily on the basis of the foregoing retrospective; there is not sufficient quota or a viable fishing plan for a large vessel based solely on accessing the competitive turbot quota.
- The status quo was evaluated as an option, but this would serve to continue the current inactivity in the fishery, and generate additional discontent. This option would entail Nunatsiavut or its fishers gaining access to the fishery through purchasing quotas or enterprises, implying that private investment or government dollars would be used to purchase enterprises and allocations. This option was not supported on the grounds that it would be too costly and that either version would be untenable to government(s) or Nunatsiavut fishers.

Legislative and Policy Considerations:

- The Labrador Inuit Land Claims Agreement and the Fisheries Act provide the legal and constitutional basis to the supplied recommendation and the suggested course of action. The recent allocation decisions in OB which have potential to directly impact resource availability and fishing prospects for Nunatsiavut provide rationale.
- In respect of an antecedent the Board refers to the Quebec-Newfoundland 4RST Turbot Dispute. During the early to mid-1990s Newfoundland based fishermen began to heavily target the competitive turbot quota in the Gulf of St. Lawrence such that they harvested far beyond their traditional catch level in the fishery. This became an issue for many years between the Quebec and Newfoundland fleets. When traditional consultation mechanisms and inter-regional management interventions (i.e. Laurentian and Newfoundland Fisheries Management Branches) were unable to resolve the escalating dispute the two parties were obliged to prepare their respective arguments for presentation to an independent committee led by Judge Gerard V. La Forest. The committee recommended that history be restored with Quebec receiving 82% of the allocation and Newfoundland based fishers provided 18%.
- An adjunct to the Quebec case is referenced from DFO CSAS documents...*"Since 1998, new fishers in the Gaspé and along the Lower North Shore targeting Greenland halibut with gillnets have participated in the Quebec fishery. **They were granted an allocation as a part of the Quebec competitive fishery** (emphasis added). An Individual Quota project was introduced in 1999 for traditional fishers in Quebec to allow them to extend their fishing season."*(www.dfo-mpo.gc.ca/csas/Csas/status/2000/A4-03e.pdf.)

Social-Economic Considerations

- The Board determined that 63 enterprises based out of 2+3K (including 4 vessels from 2J and 2 overlap vessels based in 4R) participated in the 2+3K competitive fishery in 2009. Thirty one (31) of these vessels reported landings exceeding 100t (i.e. highliners primarily based out of La Scie and Fogo). The remaining participants had nominal landings, typically under 12t. The 297t increase, if it is split amongst all licence holders, will have a negligible impact on each; if the increase is incorporated into a 650t communal allocation, as per this recommendation, it will provide a real opportunity for fisheries-wide development in Nunatsiavut.
- The benefits to Nunatsiavut harvesting and processing operations from a 650t secure supply of turbot can be represented and measured in many forms:

Harvesting

- Nunatsiavut fishers and enterprises require turbot to establish viable multi-species enterprises.
- Over the past few years Inuit harvesters have balked at using joint venture arrangements in the 2+3K competitive fishery because the split-season quota overruns that occur in June make an August fishery uncertain. A dedicated allocation will support increased fishing activity, technology transfer, and eventual fleet development.
- The allocation will correct for loss of available raw material due to DFO changes in the management area boundaries of 2GH during the mid-1990s.
- The allocation will promote harvesting in and adjacent to the land claims area.

Processing and Employment

- The allocation of turbot will ensure stability of raw material supply for processing operations, versus events of past years due to over-harvesting of the June fishery in 2+3K. Unstable supply has deteriorated Torngat Fish Producers Cooperative Society Limited (TFPC) standing in the market, due to uncertainty over landings.
- The allocation would support modifications/upgrades to facilities placed on hold due to uncertainty of supply.
- The additional turbot would enable production at TFPC's Nain facility, and make local production of existing OB quotas more attractive. Under current challenges, these quotas are sold in the water to generate maximum revenue to support operations.
- The allocation will augment employment levels at both processing facilities at Nain and Makkovik, providing additional workers eligibility for employment insurance.



- The allocation will increase the viability of processing facilities during the short production season, and support increased hourly rates for employees and purchase prices for harvesters, and aid in retaining employees with employment levels equal to full time seasonal employment.
- In summary, for the processing operations the 650t turbot allocation translates into a doubling of the current processing employment at the TFPC facilities.

Intergovernmental Considerations

- A reallocation within 2+3K is confined to the Province of Newfoundland and Labrador and is under the purview of the Newfoundland and Labrador Region of the Department of Fisheries and Oceans. The Governments of Canada, Newfoundland and Labrador, and Nunatsiavut have appointees on the Torngat Joint Fisheries Board.
- A reallocation from a broader component of the North West Atlantic stock complex would involve interest outside of Newfoundland and Labrador.

Consultations and Meetings on Turbot

- Since 2008 the Torngat Joint Fisheries Board has invested considerable time and resources to gain a comprehensive understanding of the various issues and positions surrounding turbot. The Board held consultations during the week of November 3 -7, 2008 in the Nunatsiavut communities of Nain, Hopedale, Postville, Makkovik and Rigolet. An analysis of the turbot fishery complemented the message coming from consultations – turbot is plentiful in and adjacent to the Labrador Inuit Settlement Area, but Nunatsiavut lacks the resources to access the species, and requires a communal quota in order to obtain benefit from the fishery.
- The Board met at length on four separate occasions between January 2009 and September 2009 to deliberate on the positions put forward at the community consultations, to clarify its role with respect to turbot management, and to identify data gaps and arrange the collection of relevant information. In early November the Board received a final report on the history of the Nunatsiavut and Canadian turbot fishery. At a meeting on November 16th, 2009 the Board concluded its review of the available information, and commenced formulation of its final recommendation, which was finalized at a January 26th meeting and submitted on February 17, 2010. The Board has met four times since the original submission and has continued to seek out opportunities to provide the Minister with sound, well-reasoned advice intended to equitably and sustainably manage resources located within and adjacent to Nunatsiavut



for the betterment of Nunatsiavut fishers and all Canadians. The announced increase of 297t in 2+3K turbot now provide an opportunity for the Department of Fisheries and Oceans to foster a viable fishery in Nunatsiavut.

- The TJFB submitted a draft version of this recommendation to the Nunatsiavut Government on March 22, 2011, as per consultation processes detailed in the LILCA. The Executive Council of the Nunatsiavut Government met on April 6th, 2011, and issued a letter of support the following day (attached as Appendix A).

Prepared by: Torngat Wildlife, Plants and Fisheries Secretariat

Approved by: _____ Executive Director

Approved by: _____ Chairman



Appendix A: Nunatsiavut Government Response to the Torngat Joint Fisheries Board's
2011 Fisheries Recommendations





NUNATSIAVUT
kavamanga Government

Nunaliginikmik amma Nunamiutanik
Ujaganik Imaniklu

Lands and Natural Resources

April 7, 2011

Via email jamie.snook@torngatsecretariat.ca

Jamie Snook
Executive Director, Torngat Secretariat
Happy Valley - Goose Bay, NL

Mr. Snook:

**TJFB Consultation letters
2011 Crab, Shrimp and Turbot Allocations**

The Nunatsiavut Governments Executive Council met yesterday to discuss the TJFB recommendations on the 2011 commercial fishery. As per your letters dated March 15, 17 and 22, 2011 requesting a submission of the Nunatsiavut Government's (NG) views on the Torngat Joint Fisheries Board's (TJFB) 2011 crab, shrimp and turbot recommendations, the NG would like to provide the TJFB with the following comments.

NG'S VIEW ON TGFB'S CRAB RECOMMENDATION:

The Nunatsiavut Government is *not* in support of the following recommendation:

The 2011 Quota level for the Nunatsiavut Snow crab fishery be maintained at the 2010 level of 462 mt.

Nunatsiavut Government is recommending the following to TJFB and DFO:

The 2011 quota reflect the level of 2010 removals in 2HS (70 mt).

The 2JN 2011 quota be maintained at the 2010 level.

The separation between NAFO area 2JN and 2HS be maintained.

The northern boundary limit of 2HS, 55° 50' N be extended ten miles north to 56° 00' N.

No transfers of the 2HN exploratory quota to any other area for the 2011 season.

We feel our suggestions reflect what the science is indicating and can help ensure the crab fishery in these areas are sustainable over the long term.

Should TJFB decide to present their current recommendation to the Minister of Fisheries, the Nunatsiavut Government is recommending the following language change be made to better reflect the Nunatsiavut Government's role in fisheries management in Northern Labrador:

“And as per your commitment of 28 June, 2010, the Board will recommend NG work with regional officials to”.

In replacement of the following wording

“And as per your commitment of 28 June, 2010, the Board will work together with regional officials to”.

NG’S VIEW ON TJFB’S TURBOT RECOMMENDATION:

The Nunatsiavut Government is in support of the following recommendation:

The Minister establish a 650mt Nunatsiavut Communal Turbot Allocation.

NG’S VIEW ON TJFB’S SHRIMP RECOMMENDATION:

The Nunatsiavut Government is in support of the following:

Increase the exploitation rate on the northern shrimp fishable biomass in Shrimp Fishing Area 4 (SFA 4) to 14% in 2011 and allocate 75% of the corresponding increase in the Total Allowable Catch (TAC) to the Nunatsiavut Government;
Exempt the Nunatsiavut Government from any future quota reductions in SFA 5.

However, the Nunatsiavut Government is suggesting that the following statement be revised and reworded to clearly distinguish Labrador Inuit stakeholders and their participation in the SFA 4 and 5 shrimp fishery as this may lead to further confusion on NG’s percentage participation in the shrimp fishery:

“An examination of the allocations of the Labrador Inuit licence-holders in SFAs 4 and 5, which is extraneous to this issue because the LILCA refers only to the Nunatsiavut Government, reveals that participation is below 10% and 17%, respectively, and less than 15% overall given that these entities hold only 4,936t of the total 34,620t available in these areas (and less if the allocations held under a 50/50 joint venture in Pikalujuk Fisheries are extracted)”.

If you have any questions or would like to further discuss some of the views that have been presented, please do not hesitate to contact me at 709-896-8582 or via email at carl_mclean@nunatsiavut.com.j

Sincerely,



Carl McLean
Deputy Minister