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Oceans North Letter to Fiskerikommissionen in Greenland

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Oceans North, a non-governmental organization, is focused on marine conservation in the Arctic and northern oceans and supporting the well-being of communities that rely on the marine environment. Oceans North has been engaged in Canadian fisheries management advisory committees in the Eastern Arctic and Atlantic Canada, as well as being an observer to the Northwest Atlantic Fisheries Organization. We know that healthy coastal communities are predicated on a healthy marine environment for food security and economic activity.

In April 2017, Oceans North hosted a meeting in Ilulissat on the Greenland halibut fishery. The three-day conference resulted in a Memorandum of Understanding (MOU) signed by all the major companies and organizations of the coastal fishery for Greenland halibut including KNAPK, SQAPK, Department of Fisheries and Hunting, GFLK, Greenland Institute of Natural Resources, Qaasuitsup Municipality, Royal Greenland, and Greenland Halibut. We have included a copy of this agreement as appendix to this letter. The purpose of the agreement was to create a starting point for future discussions on the establishment of a responsible fishery for Greenland halibut, locally, regionally, and nationally. Sustainability and quality in the fishery must be the focus of management efforts. Dialogue and engagement between fishermen, biologists, management and the industry should be increased.

Oceans North has also been instrumental in the signing of an international agreement to prevent unregulated high seas fisheries in the Central Arctic Ocean (CAO) which was signed in Ilulissat in October 2018. This agreement demonstrates that Arctic nations can adopt a science-based and precautionary approach to Arctic fisheries when they are motivated. We recognize that more needs to be done in implementing the agreement, however the actions of coastal states in their own fisheries management will likely influence and set the stage for the CAO.

Provided herein are our recommendations regarding the current work of the Fisheries Commission and the much-needed modernization of the 1996 fisheries legislation in Greenland. We are fully aware of the economic importance of fisheries to Greenland, including the Greenland halibut and prawn fishery in particular. This letter is also a follow up to the meeting in 2017 and, with a view towards actionable items to achieve the principles in the MOU, we focus on the Greenland halibut fishery given its economic value, catch and quota levels relative to other targeted fisheries.

1. Sustainability of the Inshore Fishery and Adhering to Science Advice

Inshore fisheries prosecuted by smaller vessels are vital to the coastal economy of Greenland and create meaningful employment opportunities for residents. Experience in Canada has shown that coastal fisheries for Greenland halibut are vulnerable to overfishing and extirpation. Following extensive fishing in the bays and nearshore areas of Newfoundland in the 1970s and 1980s, most inshore Greenland halibut fisheries no longer exist, even while the offshore fishery at the shelf break continues to be vibrant. We are concerned that current fisheries management decisions will lead to a similar fate for the inshore fishery in Greenland.

Results of MSC Pre-assessment

The inshore fishery was pre-assessed by MSC in 2018 and significant problems in the fishery were identified. These include:

- Decreasing population of Greenland halibut with no biomass reference limits for the fish population defined.
- No available management plan or recovery plan available.
- While NAFO documents some Harvest Control Rules, there is no provision for the reduction of quota with a decreasing population.
- Stock assessment does not include reference points as related to MSY.
- Bycatch is not regulated and amount of bycatch is not well monitored. The impacts of the fishery on seabirds and marine mammals is not clear.
- There are no maps of corals and sponge distribution or distribution of the fishery in relation to these habitats.

A fisheries management plan that addresses the shortcomings of the MSC assessment, which really only reviews the basic elements of modern fisheries management, should be developed on an urgent basis. As concerns for bycatch species increase – particularly with the NAFO decision to prohibit landings for all Greenland sharks and to require reporting on bycatch levels by Contracting Parties – monitoring of incidental catch will be important.

Science advice and population sustainability

Fish biomass in Disko Bay and Uummannaq has declined in the last five years, with declines less pronounced in Upernavik. In addition, the size of fish has been declining and Catch Per Unit Effort has also declined in recent years. (NAFO SC 2020 report).

In Disko Bay, quotas have been set far above scientific advice for the past several years. In 2015 the NAFO Scientific Council advised that catches in Disko Bay be kept below 8000 metric tonnes. In 2017, NAFO advised catches in Disko Bay not to exceed 6400 metric tonnes. In 2019, the quota was set at 8,180 metric tonnes, with 1320 metric tonnes carried over from 2018. This represents a 40% increase over scientific advice. At the beginning of September 2019, Naalakkersuisut increased the halibut quota by 2,400 metric tonnes in Disko Bay, giving a total quota of 10,580 metric tonnes. This is even though biologists have recommended a quota of 5,120 metric tonnes of halibut in Disko Bay (*Sermitsiaq*; 10. September 2019).

Science advice from NAFO for 2021-2022 recommends a 50% reduction from 2019 catch levels (see table 1). The advice is based on the declining numbers of large fish in the catch. It is important to note that the inshore fishery currently has no management objectives and no reference points. These need to be established and should include a fishing mortality point as well as a limit reference point with implementation of appropriate management measures. There is nothing to suggest that this fishery is sustainable in any way. On the contrary it seems certain, if fishery management decisions continue in this manner, that the inshore Greenland halibut fishery is headed for collapse.

Table 1. Greenland Inshore Fishery for Greenland Halibut. Overview Statistics (data obtained from the NAFO SC Report 2020)

Area	2019 Catch tonnes	2021-2022 NAFO Scientific Advice	% reduction required	Management Objectives	Reference Points	Notes
1A Upernavik	7169 (5 year average)	5068	28%	none	none	Reduction in previous advice to account for continued reduction in mean size of individual fish
1A Uummannaq	10243	5153	50.30%	none	none	Reduction in previous advice to account for continued reduction in mean size of individual fish
1A Disko Bay	8759	4345	49.60%	none	none	Reduction in previous advice to account for continued reduction in mean size of individual fish
1 BC Inshore	?	not to exceed 200	?	none	none	No survey data, no commercial data submitted

Financial sustainability

Concerns by the Bank of Greenland regarding the economic and biological sustainability of the inshore fishery have been raised: "*The changes in quota determination come in the wake of too high quotas for a long time and at the same time too many fishermen in the industry. It is simply not sustainable, either biologically or economically.*" (Bank of Greenland – Annual report 2019)

Scientific bodies, eco-certification assessments and financial institutions have all raised significant concerns regarding the inshore fishery and its management.

Recommendation: In the future, all quota setting should align with science advice. Given the lack of management plan and monitoring of the fishery, it is likely that catches will exceed allocated quotas. Setting quotas above scientific advice has led to fisheries collapses in adjacent ecosystems and has radically reduced the fisheries economy in coastal communities. This should be avoided.

Recommendation: In addition to scientific information collected from surveys, local knowledge on the changes in the fishery and bycatch should also be collected.

Recommendation: Greenland engage in a Fisheries Improvement Project (FIP) with external partners for the inshore fishery for Greenland halibut, with a focus on filling the identified gaps. The inshore and offshore fishery rely on the same population of fish and as such should have some consistency of approach in the scientific basis of quota establishment, fishery management objectives and regulation. An outcome of this Fisheries Improvement Project could be a management plan as well as measures taken to address sustainability concerns in the fishery. Both science and local knowledge should be incorporated.

Recommendation: Given the importance of the fishery to coastal communities, a socio-economic analysis should be conducted so that there is a comprehensive understanding of the impact of the decline of the fish population on local incomes and community economies.

2. Allocation of Fisheries Licenses

Over the past three years, licenses for Greenland halibut fishermen in Disko Bay have increased by 78%, at the same time as the fisheries resource has declined. This has resulted in a decline in earnings per fishermen with more of them chasing the same resource. Allocation of new licenses means that fishermen are investing in boats and fishing gear, catching fewer fish and are then unable to meet loan financing payment requirements. (Bank of Greenland – Annual report 2013/ 2016)

In order to address reduced fish catches, over the past five years Naalakkersuisut has increased inshore fishermen's quotas towards the end of the year, despite already ignoring scientific advice about quotas at the start of the year. Such management is unsustainable in the short and long term. While Greenland halibut continues to be very valuable, the system of increasing quota to meet bank payments is setting up a dangerous habit of permitting overfishing, using fish quotas and licenses for short term political gain – none of which are in the short or long-

term best interests of Greenland communities. Increasing the number of licenses in a declining resource such as this is not a plan for sharing wealth but a plan for sharing poverty.

Recommendation: An allocation plan based on the sustainability of the resources should be developed with a freeze on new licenses until such time as the plan is fully developed.

Recommendation: The practice of increasing allocations and quotas within the fishing year should be stopped immediately and be in place for the 2021 fishing season.

3. Fishing Footprint of Offshore Trawl Fishery and Protection of Sensitive Habitat

While the offshore Greenland halibut trawl fishery has been certified by the Marine Stewardship Council since 2017, there are few areas where bottom trawling is prohibited. In comparison, there are large areas off limits to fishing in the 0A/0B section of the fishery within the Canadian EEZ, including no trawling within 12 nautical miles of the coast.

The map of NAFO regulatory showing the area between Greenland and Canada. Here, you can see area 0A/0B



At the next MSC assessment in 2022, a review of habitat protections, particularly of corals and sponge protections should be a focus for this fishery and its future sustainability. We understand that there is a growing concern in Greenland fishing communities about the impacts of trawling. Greenlandic waters are home to vibrant benthic ecosystems that provide structure and food sources for commercially fished populations. Protecting these habitats can help ensure future resiliency of these populations. Measures can be taken now to ensure recertification of the fishery and meeting standards for protection of vulnerable marine ecosystems.

Recommendation: Fisheries legislation should be amended to include a restriction on bottom trawling within 12 nautical miles of the coast.

Recommendation: Given that the offshore fishery is MSC certified and that significant research has been done to identify areas of high concentrations of corals and sponges within the Greenland EEZ, area closures commensurate with identified habitat should be established, in advance of the MSC re-assessment in 2022.

Recommendation: Action should be taken to identify the trawl fishery footprint. Fishing outside of the footprint should be subject to an exploratory fisheries protocol and to subsequent impact assessment, with a view towards avoiding impacts on vulnerable seafloor species such as corals and sponges as is done in the NAFO regulatory area.

Oceans North is willing to partner with interested parties on fisheries improvement initiatives on the inshore fishery and in furthering the commitment outlined in the 2017 MOU. We look forward to discussing these recommendations with the Fisheries Commission.

Sincerely yours,

On behalf of Ocean North,

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