

WGC(13)8

United States Explanatory Notes on the Proposal Regarding the Fishery at West Greenland for 2013 and 2014

Background

- ICES advice is that there are no mixed-stock fishery options at West Greenland in 2013 and 2014 and estimates that even without a fishery there is only an 8% chance of simultaneously meeting management objectives for the stock complexes exposed to the West Greenland fishery in 2013 and 2014.
- The status of stocks contributing to the West Greenland fishery is among the lowest recorded, and as a result, the abundance of salmon within the West Greenland area is thought to be very low compared to historical levels.
- Greenland's Fisheries Act states that all fish stocks must be exploited in a way that is sustainable.
- In 2012, 82% of the salmon sampled at West Greenland were of North American origin. And many wild Atlantic salmon populations in the United States and Canada are threatened and endangered.

NASCO Agreements and Associated Actions

- NASCO's Action Plan for the Application of the Precautionary Approach states that management measures should be aimed at maintaining all stocks above their conservation limit.
- ICES has advised that if the management of the fishery at Greenland were based on the principle of ensuring that there is a high probability that all contributing river stocks exceed their river-specific conservation limits, then there would probably be no chance of a fishery ever being advised.
- Denmark, in respect of the Faroe Islands and Greenland, has stated that they set a quota in 2012 in response to the FAR Report which noted that the internal use fishery is not restricted by NASCO quota and expressed concern that Greenland does not have power to control the harvest. While we acknowledge that a quota can be used to regulate factory landings, establishing an associated factory quota creates a new component to the Greenland fishery and does not appear to have increased control over the fishery as it existed at the time of the FAR review (i.e. personal consumption and local sales of fresh fish).

Regulatory Measure for Fishing for Salmon at West Greenland for 2012, 2013 and 2014

- Reiterates the agreement of the Parties to the WGC to base regulatory measures for the WG fishery based on scientific advice from ICES;
- Refers only to catches of salmon taken for private sales and local consumption;
- Stipulates that the catch at West Greenland be restricted to that amount used for internal consumption in Greenland, and states that in the past that has been estimated at 20 tons annually.

For the reasons above, the United States thinks that the spirit, if not the letter, of the regulatory measure is not being followed. The 2012 and previous Regulatory Measure were based on a clear understanding that the scientific advice was for no fishery, and the accommodation to allow a fishery at West Greenland was to acknowledge the existence of a

small constrained internal use fishery. Moreover, the need to improve data collection on the internal fresh fish fishery was mutually agreed.

Further, the information now available causes us to have the following concerns:

- Increase in Landings - Reported landings have increased over time with the 2012 catch levels being the second highest over the past 10 years (a 55% increase over the previous 10 year mean reported landings of 21.2mt)
- Underestimate of Landings - Available data suggests that reported landings are an underestimate of landings:
 - Landings have had to be adjusted every year since at least 2002 (with the exception of 2006 and 2011) with the sampling team observing more fish than reported
 - Where adjustments are made they are significant
 - Adjustments are only made in ports where there is sampling. Further, sampling only occurs during a small portion of the fishing season
- Factory Landings - The components of the internal use fishery appear to have changed since the Regulatory Measure was agreed.
 - The Regulatory Measure speaks to internal consumption and only identifies catches from private sales and local consumption.
 - Factory landings were allowed in 2012. This is, in our understanding, creating a new component of the fishery that was not present when the existing regulatory measure was adopted. Historically, no quota could be agreed for the internal use fishery in previous regulatory measures because it was the position of Denmark (in respect of Greenland) that the local use fishery could not be subjected to a quota. That further supports our interpretation that the establishment of a quota and opening of factories is equivalent to creating a new fishery that supplements the previously understood local use fishery that was the subject of previous regulatory measures.¹
 - The opening of factories provides an opportunity for higher intensity fishing during the 3 months of the fishery to provide wild salmon that could be processed and frozen for year round consumption in Greenland. So, while we recognize that the population size of Greenland provides some cap on the quantity of Atlantic salmon that can be consumed, under the local use fishery the limit was a 3 month window where a fresh product could be provided for immediate use. With the operation of the factories, the window for consumption by residents of Greenland expands from 3 months to 12 months which could increase demand by four times. Essentially, the wild caught Atlantic salmon could replace what is now imported Atlantic salmon for consumption in the 9 months outside of the open fishery in Greenland.
 - Under the Regulatory Measure for 2012, 2013 and 2014, we had anticipated a maximum fishery of 30 tons (to include the internal consumption and unreported catch amount)

¹ We acknowledge that in past fishing seasons some fish were frozen for consumption year-round, but it is our understanding that a significant portion was consumed immediately and therefore was not available outside of the fishing season. We understand that the demand for salmon outside of the fishing season was met by imported farmed salmon. These previous imports could be replaced by wild caught fish in Greenland thereby increasing the overall demand for the wild product.

- With the information available to us now, we anticipate a fishery of up to 88 tons composed of the 35 ton factory landing quota, up to 43 tons of personal use, local sales and sport and leisure fishing (the landings from 2010) and an additional 10 tons of unreported catch.

In conclusion, we acknowledge the dependency of the people of Greenland on natural resources; however, the internal use fishery being proposed in Greenland in 2013 and 2014 is inconsistent with scientific advice is not consistent with the agreed Regulatory Measure for 2012, 2013, and 2014.