



**West Greenland Commission
Inter-Sessional Meeting**

WGCIS(17)6rev

(Revised 30 March 2017)

*Questions Relating to the Self-assessments Using the Six Tenets for Effective
Management of an Atlantic Salmon Fishery*

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1. Introduction

- 1.1 At its Thirty-Second (2015) Annual Meeting, the West Greenland Commission established its *Ad hoc* Working Group on the Application of the Six Tenets for Effective Management of an Atlantic Salmon Fishery. The Working Group was asked to develop an approach and suggested timeline for the application of the six tenets process to all Atlantic salmon fisheries conducted by Members of the West Greenland Commission. This *Ad hoc* Group held its meeting in Dublin, Ireland in February 2016 and its report, WGCIS(16)3, was considered at the Commission's inter-sessional meeting held in June 2016. This report contains information on how the six tenets should be applied.
- 1.2 In light of the Group's recommendations, the Commission agreed a revised matrix for the application of the six tenets and it was agreed that self-assessments using this matrix should be provided to the Secretariat no later than 31 December 2016. The six tenets had previously been applied to the salmon fishery at West Greenland and the Working Group had noted that it would be more consistent with the review of the Greenland salmon fishery if these self-assessments were then subject to review. The self-assessments were compiled by the Secretariat and issued to Members of the Commission and the NGOs. They will be reviewed as part of the process of reviewing the Multi-Annual Regulatory Measure for Fishing for Salmon at West Greenland for 2015, 2016 and 2017, WGC(15)21, during an inter-sessional meeting of the Commission to be held on Sunday 4 June, immediately prior to the 2017 Annual Meeting.
- 1.3 In order to assist with preparations for that meeting, the Commission requested that any questions on the self-assessments be provided in advance and that the Parties/jurisdictions be asked to provide written responses to these questions by 1 May 2017. We have received questions and/or comments on the self-assessments from Canada, Denmark (in respect of the Faroe Islands and Greenland), the United States and NASCO's accredited NGOs. These are included below. The European Union has informed the Secretariat that it has no questions on the assessments at this stage.

2. General Comments

Source – Greenland

- 2.1 The general perspective of Greenland on the application of the agreed six tenets is that it offers each Member an appropriate opportunity to examine its own fishery and the effectiveness of the measures implemented in order to conserve the Atlantic salmon. Hence Greenland considers the six tenets a valuable tool in that regard.
- 2.2 In 2014, an evaluation was undertaken of the salmon fishery at West Greenland by an *Ad hoc* Working Group on Monitoring and Control using the six tenets. This process resulted in the development of options to enhance the management, monitoring and

enforcement systems in use in Greenland. This evaluation had been undertaken over a period of three days and had involved representatives from various agencies in Greenland including the control and enforcement agency, other Members of the Commission and NASCO's accredited NGOs. In the light of this detailed and thorough evaluation, the West Greenland Commission adopted a Plan for Implementation of Monitoring and Control Measures in the Salmon Fishery at West Greenland, WGC(15)17, which includes a range of measures that are currently being implemented by Greenland with progress against each measure being reported annually to the Commission. This work has involved considerable commitment of resources by Greenland which the other Parties have recognized. It is a reflection of Greenland's commitment to salmon conservation. Under the 2015 Multi-Annual Regulatory Measure for Fishing for Salmon at West Greenland for 2015, 2016 and 2017, WGC(15)21, it was agreed that all members of the Commission would implement the six tenets. It was recognized that due to the number of jurisdictions involved in the broader application of the six tenets, it would be a substantial task for a group to conduct the assessments but it was agreed that it would be more consistent with the review of the Greenland salmon fishery if these self-assessments were then subject to review.

- 2.3 The application of the six tenets offers each member of the Commission the opportunity to critically evaluate the control and enforcement measures in its fishery, albeit through a self-assessment rather than the more detailed approach used in the case of the Greenland fishery. Greenland has considered the assessments provided by the other Members and while we do not have detailed questions, at this stage, we would like to make a number of observations. Greenland notes that not all EU Member States have submitted a self-assessment (recognizing that it was agreed that Finland and Sweden would not do so). Some of the assessments provide little information to support the status assigned with some responses being simply yes or no answers. Overall, Greenland notes that for most Members the assessments indicate that the principle outlined in the tenets are being met. There are very few amber or red assessments. This suggests that the systems in place are considered to be effective, to a certain or a larger extent, and yet information provided by ICES in 2016 highlights an unreported catch of 52 tonnes attributed to Members of the West Greenland Commission that provided, or would have been expected to undertake, a self-assessment. Greenland considers that this highlights the need for further measures to improve monitoring and control and suggests that details of actions to be taken to address this issue, where appropriate, will be provided to the Commission for its consideration.

Source - United States

- 2.4 The United States appreciates the opportunity to review the six tenets self-assessments submitted by the Parties to the West Greenland Commission (WGC). In general, these assessments provide useful information on the management and control of fisheries within Parties/jurisdictions. Below we have provided comments on the individual reports, but we also noticed a common issue with many of the reports, namely, that they lack sufficient explanation to justify the certain ratings given. In particular, we note that some tenets have been rated as amber or red, which indicate deficiencies in that tenet. There is, however, little or no information provided as to how these deficiencies will be addressed. Improving deficiencies is essential to ensuring adequate monitoring, control, and accountability of salmon fisheries. Moreover, some tenets have been rated as green, but there is either insufficient or no information provided to support that rating. In such

cases, we have requested additional information to improve our understanding of the self-assessment. In light of the foregoing, below please find our specific comments and questions on each Party's assessment:

Source - NGOs

- 2.5 We are disappointed in the responses from most countries, especially those that have significant salmon fisheries. In general, the responses are lacking in detail, and the rationale for the scores assigned is weak. In many cases, countries have simply listed regulations that relate to each tenet without any attempt to assess or discuss the extent to which those regulations actually meet the criteria. Simply having a regulation in place does not necessarily mean it works the way it is designed or that it meets the criteria for assessment. We note that the tenets (and the questions provided as the basis for assessment) indicate that regulations should be "effective" and that information should be "accurate", "timely", and "used to inform the management of the fishery." Too frequently, countries simply listed their regulations without any attempt to assess or demonstrate effectiveness, accuracy, timeliness, or usefulness.
- 2.6 We note that the vast majority of the tenets have been assessed as "green" for all fisheries in all countries. Those few that are not "green" have been assessed as "amber". None were assessed as "red". While we are sure there are many ways in which salmon fisheries are being effectively managed, we are surprised that most countries see so little room for improvement. Given the lack of justification provided in support of these assessments, we remain sceptical that salmon fisheries are as well managed as these assessments seem to indicate.
- 2.7 Part of the problem is the way in which countries have been asked to provide the basis for their assessments. Countries have been asked to make a qualitative assessment of their performance on each tenet (poor, fair, good) and then provide a rationale for that assessment. This provides an opportunity for bias (either consciously or unconsciously) towards emphasizing the strengths while de-emphasizing the weaknesses. Likewise, questions that provide the basis for assessment are a series of yes/no questions which limits responses (we note that some countries/regions simply replied yes or no to many of the questions with no explanation or justification).
- 2.8 This exercise would be more valuable if countries were asked to explicitly discuss the strengths and limitations of their fisheries management for each tenet/fishery to provide a fuller picture of where management works well and where it does not; identifying areas where improvements need to be made is important if this exercise is to be useful. Likewise, we suggest that steps could be taken to make the assessments less subjective (e.g., by describing a "gold standard" for each tenet so that assessments can be performed against that standard).

3. Questions to Canada

Source - United States

Recreational

- 3.1 Tenet 1: It would be helpful if Canada could provide information on why there is no salmon license in PEI.
- 3.2 Tenet 3: In Newfoundland, Labrador, and Nova Scotia, there is mandatory reporting, but Canada indicated that the reporting rate is 50%. Please explain the gap in required versus actual reporting. Are there penalties for those who do not report and if so, what are they? Additionally, it is stated that the tracking system needs electronic upgrades. Are these updates planned and, if so, when will they be implemented?
- 3.3 Tenet 3: In New Brunswick, it was reported that there is no harvest and, thus, no reporting. Is there is a system in place to estimate effort or post-release mortality? If not, are there any plans to address this and if so, what are they?

Subsistence

- 3.4 Tenet 3: Although the commercial salmon fishery is closed, is there bycatch of salmon in other fisheries and, if so, must it be reported? Are there penalties for non-reporting of salmon in directed subsistence fisheries or when it is taken as bycatch? If so, please describe the range of penalties available and used and whether they are adequate in deterring violations?

Source - NGOs

- 3.5 The Working Group Report (WGCIS(16)2) states in 7.1 that ‘The Working Group noted that it had also been requested to advise on whether reporting should be at the national or sub-national level. It considered that this would be a matter for the Parties/jurisdictions concerned, but where different management regimes operate in different provinces or regions, separate sub-national assessments should be considered in order to provide a clear picture of the status of those management regimes.’ In the self-assessments provided, Spain (with very few and small salmon rivers) has reported on four separate jurisdictions and the UK has reported on three jurisdictions. Why did Canada, with its large salmon resource and five different recreational and subsistence fisheries management jurisdictions (provinces), decide not to follow the guidance provided by the Working Group?
- 3.6 How did Canada decide on colour coding of a tenet when different coding may have been appropriate for the different provinces, e.g. if one was green, one was yellow and one was red, how would it be coded?
- 3.7 Tenet 5: It is estimated that poachers in Canada take 24 tonnes of salmon per year, yet control and enforcement is given a consistent “green” rating across fisheries. How is it that an enforcement system that allows 24 tonnes of salmon to be taken illegally is considered “good”?

Quebec

Recreational

- 3.8 Tenet 2: In Quebec, permits are issued electronically and hence are not restricted to the number printed annually as stated.
- 3.9 Tenet 3: As reporting of harvest is mandatory in Quebec, the colour coding for this province should likely be green, although reporting of released salmon is voluntary.
- 3.10 Tenet 4: For Quebec, fishing guides and plans are not provided with each license as they are no longer being produced in printed form, only electronically.

Subsistence

- 3.11 Tenet 2: Does carcass tagging for retained salmon occur in Quebec?
- 3.12 Tenet 3: What portion of licenses report their harvest in Quebec and are there any assessments to determine the accuracy of the catches that are reported? For Quebec, the coding as yellow is likely not appropriate and should be changed to red (tenet is not currently being met and significant improvement is needed to the current management regime).
- 3.13 Tenet 4: Are FSC licenses in Quebec negotiated annually by the Federal government, as stated?
- 3.14 Tenet 6: Are there any scientific fishery sampling programs in Quebec? The coding as yellow is likely not appropriate and should be changed to red (tenet is not currently being met and significant improvement is needed to the current management regime).

New Brunswick

Recreational

- 3.15 Tenet 3: What assessment is done to confirm the accuracy of catch returns? As noted, there is a very low return rate of catch information such that alternate methods are used to guesstimate the harvests and released salmon. This method of guesstimating the angling catch in New Brunswick is totally inadequate and the coding here should be red (tenet is not currently being met and significant improvement is needed to the current management regime).
- 3.16 Tenet 4: As regulatory changes in NB are not being announced in a timely fashion (often after the season has begun), the colour coding here should be yellow at best.
- 3.17 Tenet 5: Considering the magnitude of the recreational fishery in New Brunswick, one would expect that, if an enforcement regime was as efficient as noted in the text, there would be numerous prosecutions and convictions for illegal angling activity. How many prosecutions and convictions occur annually in New Brunswick? As there is likely much room for improvement, the colour coding here should be yellow at best.

- 3.18 Tenet 6: As there is no biological sampling of harvests, how can the colour coding for this tenet be green for New Brunswick?

Subsistence

- 3.19 Tenet 3: What proportion of the FSC licenses are reported in New Brunswick each year and how are the reported catches used to determine total catch (assuming that there is not 100% reporting)?
- 3.20 Tenet 3: What assessment is conducted in New Brunswick to determine the accuracy of these catch reports?
- 3.21 Tenet 5: How many prosecutions and convictions occur annually for these fisheries in New Brunswick? As there is likely much room for improvement, the colour coding here should be yellow at best.

Prince Edward Island

Recreational

- 3.22 Tenet 1: How does Canada determine the number of anglers fishing for salmon in PEI when there is not a separate licensing and how is the number of salmon released determined (as there is currently no retention allowed)? The colour coding here for this tenet and Tenet 3 should be red for PEI.

Nova Scotia

Recreational

- 3.23 Tenet 1: While a salmon license is required when targeting wild Atlantic salmon, many anglers are using a general fishing license while salmon fishing, claiming to be fishing for other species i.e. trout, striped bass, etc. How does Canada therefore determine the entire pool of participants and also their catch and release (Tenet 3)?
- 3.24 Tenet 3: Canada has noted that a license stub return is mandatory in Nova Scotia. What portion of licence stubs are actually returned in recent years and how does this compare to historical proportions of return?

Subsistence

- 3.25 Tenet 3: What proportion of the FSC licenses are reported in Nova Scotia each year and how are the reported catches used to determine total catch (assuming that there is not 100% reporting)?
- 3.26 Tenet 3: What assessment is conducted in Nova Scotia to determine the accuracy of these catch reports?
- 3.27 Tenet 5: How many prosecutions and convictions occur annually for these fisheries in Nova Scotia. As there is likely much room for improvement, the colour coding here should be yellow at best.

Newfoundland and Labrador

Recreational

- 3.28 Tenet 1: How can the entire pool of participants be available at any time when it depends on when vendors submit their information? For the recreational fishery, the participants are only known post-season.
- 3.29 Tenet 3: Canada has noted that a license stub return is mandatory in Newfoundland and Labrador. What portion of license stubs are actually returned in recent years and how does this compare to historical proportions of return?

Subsistence

- 3.30 Tenet 3: What proportion of the FSC licenses are reported from Labrador each year and how are the reported catches used to determine total catch (assuming that there is not 100% reporting)?
- 3.31 Tenet 3: What assessment is conducted in Labrador to determine the accuracy of these catch reports?
- 3.32 Tenet 5: How many prosecutions and convictions occur annually for these fisheries in Labrador? As there is likely much room for improvement, the colour coding here should be yellow at best.
- 3.33 Tenet 5: Enforcement is thought to be lacking in Labrador as often Fishery Officer positions are left vacant in important FSC fishing areas such as Cartwright and Nain. What efforts are occurring to assure staff in these areas?

4. Questions to European Union - Denmark

Source - United States

Recreational

- 4.1 Tenet 1: We would appreciate more information on this tenet to support an amber rating. Is there is a mechanism in Denmark that the government can use to track total participation in the recreational fishery.
- 4.2 Tenet 2: Regarding question 1 of this tenet, we would appreciate more information on how catch limits and seasons are set, monitored, and closed. Regarding question two, we would appreciate more information on if and how management measures are consistent with NASCO guidelines.
- 4.3 Tenet 3: We would appreciate additional information to support a green rating for this tenet. This tenet is designed to assess whether what is reported is an accurate assessment or not. Examples of achievement are provided by the working group (WGCIS(16)3)) and include license inspections, vessel inspections, among others. Please clarify what approaches or methods are in place to ensure the mandatory reporting of all salmon catches is "accurate, effective, and timely reporting by all participants?" Regarding question 2, it would be helpful if Denmark could describe how assessments are conducted to confirm the accuracy of catch returns. Additionally, regarding question 3, we would appreciate an explanation on how the outputs from the first two questions in this tenet are used to set catch limits and effectively limit harvests.
- 4.4 Tenet 4: Regarding question 2, additional information on precisely what information is shared in the constituent meetings would be helpful.
- 4.5 Tenet 5: Additional information on how much enforcement activity is undertaken would be helpful. We would also appreciate any additional information on the type and extent of available penalties (e.g., what is the range of fines that can be assessed, what is the process for excluding someone from the fishery if they do not have a government run licensing program?) and how often fines or other penalties have been used.
- 4.6 Tenet 6: We would appreciate additional information to support the green rating for this tenet given that information gathered by measuring spawning runs seems to us to be different than that gathered through a sampling program for a fishery. Further, it would be helpful if Denmark could provide further information as to how the information that is collected informs the Ministry about the status of Danish salmon runs and how the Ministry uses this information in setting fishery rules.

5. Questions to European Union - Germany

Source - United States

- 5.1 All tenets should be rated on the “red, amber, green” scale, even if all fisheries are closed.
- 5.2 Tenet 5: What is the range of fines and other penalties that can be levied on a fisherman who has illegally harvested salmon, and how frequently are they utilized?

Source - NGOs

- 5.3 There is no separate reporting here for commercial vs. recreational. Does that mean that this applies to both?

6. Questions to European Union - Ireland

Source - NGOs

- 6.1 Tenet R3: How does a return rate of 71% for salmon angling logbooks warrant a green score?
- 6.2 Tenet R4: There is widespread incomprehension around both the TAC process and its outcomes. To credibly claim a green colour, how do you propose to simplify explanations to the wider public?
- 6.3 Tenet R5 and C5: Since this report was prepared, it has emerged that there are disturbing doubts about the prosecution powers of Inland Fisheries Ireland due to omission in the Inland Fisheries Act 2010. How do you propose to plug that legislative gap?

7. Questions to European Union - Spain (Asturias)

Source - United States

- 7.1 It would be helpful if Spain stated that there are no commercial fisheries in Asturias.
- 7.2 Tenet 1: We would appreciate additional information to support the green rating for this item. Please describe how licenses are issued and controlled and please explain how and when the licensing system allows Asturias to know the pool of participants.
- 7.3 Tenet 2: We would appreciate additional information rating for this item. Please explain the actual measures in place to set quota and gear limitations or how this management program is consistent with the NASCO guidelines.
- 7.4 Tenet 3: We would appreciate additional information to support the green rating for this item. Please explain what system is used to collect data, how those data are used to limit catch, and describe the assessment process.
- 7.5 Tenet 4: We would appreciate additional information to support the green rating for this item. Please explain how often the council convenes and how fishery rules are promulgated.

- 7.6 Tenet 5: We would appreciate additional information to support the green rating for this item. Please provide information on what control and enforcement measures are in place, why they are considered effective, what kinds of penalties are available to deter violations, and whether or not they are used.
- 7.7 Tenet 6: We would appreciate additional information to support the green rating for this tenet given that information gathered through census and salmon counts in fish passes seems to us to be different than that gathered through a sampling program for a fishery. Further, it would be helpful if Spain could provide additional information as to how the information that is collected through census and salmon counts informs the government about the status of Asturian salmon runs and how this information is used in setting fishery rules.

Source - NGOs

- 7.8 Insufficient information is provided in support of the universal “green” ratings. In many cases nothing more than a “yes” answer has been provide in answer to the questions posed as the basis for the assessment. There has been no analysis provided to justify the rankings. For all tenets, how have you evaluated or confirmed the effectiveness and/or accuracy of the regulatory methods employed or the data collected?

8. Questions to European Union - Spain (Galicia)

Source - NGOs

- 8.1 Insufficient information is provided in support of the universal “green” ratings. In many cases nothing more than a “yes” answer has been provide in answer to the questions posed as the basis for the assessment. There has been no analysis provided to justify the rankings.
- 8.2 Tenet R2: How effective are the catch limits at controlling the harvest to sustainable levels? How much variation is there in the information available? What are the specific management objectives?
- 8.3 Tenet R5: How is the surveillance conducted? How effective is the surveillance service? How is effectiveness measured?

9. Questions to European Union - Spain (Bizkaia)

Source - United States

- 9.1 All tenets should be rated on the “red, amber, green” scale, even if all fisheries are closed.
- 9.2 Tenet 4: How is information that there is no legal harvest of salmon communicated to the public?
- 9.3 Tenet 5: Please explain how monitoring, control, and enforcement is undertaken to ensure no one is fishing for salmon or keeping it as a bycatch. Please also explain what kinds

of fines or other penalties are available to deter violations and whether or not they are used.

10. Questions to European Union - Spain (Cantabria)

Source - United States

10.1 It would be helpful if Spain stated that there are no commercial fisheries in Cantabria.

Recreational

10.2 Tenet 1: Please clarify what constitutes a "fishing free area?"

10.3 Tenet 2: We would appreciate more information on if and how management measures are consistent with NASCO guidelines.

10.4 Tenet 3: We would appreciate further information on Spain's implementation of this tenet in Cantabria to support the green rating. This tenet is designed to assess whether what is reported is complete and accurate and used to effectively limit catches. Examples of achievement are provided by the working group (WGCIS(16)3)) and include license inspections, vessel inspections, among others. Specifically, what method or approach is used to "register" salmon catches that are retained? Further, in the case of catch and release fishing, how do fishermen report their catch? We would also appreciate more information on whether and how Spain conducts assessments or verifications to confirm the accuracy of catch returns. Finally, we would appreciate additional information on how catch data (both for retained catch and catch and released fish) are used to limit catches.

10.5 Tenet 5: Please explain the range of fines or other penalties available to deter violations and whether or not they are used.

10.6 Tenet 6: Please explain how the results from sampling programs are used to inform fishery management.

Source - NGOs

10.7 Tenet R2: On what information is the TAC based? How effective is it a limiting the catch to a sustainable level? Are these measures consistent with NASCO guidelines?

10.8 Tenet R3: How accurate is the information collected?

10.9 Tenet R5: How effective is the enforcement regime?

10.10 Tenet R6: Why was this given both a green and amber rating?

11. Questions to European Union - Spain (Navarra)

Source - United States

11.1 It would be helpful if Spain stated that there are no commercial fisheries in Navarra.

Recreational

11.2 Tenet 1: We note that Navarra has a licensing system but that it does not define the number of participants. We would appreciate clarification on this. Is the number of potential participants in the fishery unlimited? Can the number of participants in the fishery be ascertained by the number of licenses issued?

11.3 Tenet 2: We would appreciate more information on if and how management measures are consistent with NASCO guidelines.

11.4 Tenet 3: Please explain the mechanisms used to gather data and ensure it is accurate, effective, and timely. Please also explain how catch data are used to limit catch/harvest.

11.5 Tenet 5: Please provide additional information on the scale of the monitoring, control, and enforcement efforts with respect to salmon in Navarra. Please also explain what kinds of fines or other penalties are available to deter violations and whether or not they are used.

11.6 Tenet 6: Please explain how the information obtained through sampling programs is used to inform management.

Source - NGOs

11.7 Tenet R1: If the system does not define the number of licenses or participants, how can a green rating be justified here? It is not clear from the answers provided here whether the entire pool or participants is known or not.

11.8 Tenet R2: How is the TAC determined? Is it effective at limiting the catch to a sustainable level? Are these measures consistent with NASCO guidelines?

11.9 Tenet R3: How accurate is the information collected? What is the reporting rate?

12. Questions to European Union - United Kingdom (England and Wales)

Source - United States

Recreational

12.1 Tenet 3: Are there penalties for non-reporting and, if so, are they applied and effective at ensuring compliance?

Source - NGOs

12.2 Tenet C1: What does it mean that harvest is “generally” controlled? How effective are these rules at limiting catch?

- 12.3 Tenet C5: How effective is the enforcement? How do you measure its effectiveness?
- 12.4 Tenet R2: How effective are these measures at limiting catch? Are they consistent with NASCO guidelines?
- 12.5 Tenet R5: Is there no formal enforcement of the recreational fishery? How effective are the informal efforts? How is effectiveness measured?

13. Questions to European Union - United Kingdom (Northern Ireland)

Source - United States

Recreational

- 13.1 Tenet 3: While there is mandatory reporting, the assessment indicates that compliance rates are low. An electronic licensing process is being instituted which it is indicated will allow for the identification of anglers that do not report. However, it is not clear if there are or will be penalties for non-reporting. We would appreciate more information on this aspect.

Source - NGOs

- 13.2 General - there is a problem with the Northern Ireland section in that it appears to cover both the Loughs Agency (LA) area and also the area administered by the Department of Agriculture Environment and Rural Affairs (DAERA). This is not stated in the document. The Loughs Agency area lies partially within the Republic of Ireland and there are significant differences in salmon management. We feel it would be best to have two documents: one for the DAERA area and a separate document for the LA area. While a number of the responses will be the same for each area, the differences may then be described and clarity will be achieved.
- 13.3 Tenet C1: We were under the impression that netsmen who had taken a buyout would not be permitted to recommence netting afterwards. The descriptions within the document appear to indicate that this would in fact be permitted. Could you please clarify?
- 13.4 Tenet C2: How is the number of tags determined? How effective is this method for limiting the catch to a sustainable level?

14. Questions to European Union - United Kingdom (Scotland)

Source - United States

Recreational and Commercial (same questions for both):

- 14.1 Tenet 1: We would appreciate further clarification on how Scotland knows the full participant pool since there is no licensing requirement for recreational fisheries. We would appreciate further explanation of how this is the case.

- 14.2 Tenet 2: We would appreciate further clarification on why a green rating was warranted as there is no explanation of how the management measures are consistent with NASCO's guidelines. We would appreciate more information on this aspect.
- 14.3 Tenet 3: We would appreciate further information on why a green rating was warranted for this tenet. This tenet is designed to assess whether what is reported is complete and accurate and used to limit catches. Examples of achievement related to question 2 of this tenet are provided by the working group (WGCIS(16)3)) and include license inspections, vessel inspections, among others. Specifically, how does Scotland verify catches are being reported accurately and how are catch data used to inform management, including effectively limiting catch/harvest?
- 14.4 Tenet 5: We would appreciate further clarification on why a green rating was warranted since there is no explanation of the range of penalties or how often they are used. We would appreciate more information on this aspect.
- 14.5 Tenet 6: It would be useful if Scotland could explain how the results of their scientific sampling are used to inform management.

Source - NGOs

- 14.6 Tenet C2: How effective is this plan? How will it be measured? Are these measures consistent with NASCO guidelines?
- 14.7 Tenet C5: How effective are these enforcement and compliance systems?
- 14.8 Tenet R1: How are the locations of all fishers known?
- 14.9 Tenet R2 (and C2): When exploitation is considered to be sustainable, are there any measures that are used to limit the catch/harvest? How effective are they?

15. Questions to the United States

Source - Canada

- 15.1 Canada has reviewed the six-tenet submissions and has some follow-up questions for the United States as a fellow member of the West Greenland Commission.
- 15.2 The US report simply notes that all directed salmon fisheries are closed. Canada is curious about what the requirements would be if the recreational fisheries were to reopen. Are there legally enforceable measures for managing recreational fisheries in the US? Are there examples from existing recreational fisheries that would be applied to salmon and would they comply with NASCO guidelines? This is specifically relevant to the following two sections:
- 15.3 Item 1 – known pool of participants: Would all people fishing for salmon have to be licenced and registered? Would it be a state regulation or a federal regulation? Etc.
- 15.4 Under item 3 – accurate, effective and timely reporting: Before the closure of the fisheries, was there a reporting system? What methods would be in place to ensure accurate, effective and timely reporting if the fishery were to reopen?
- 15.5 In a similar vein, Canada included a section on commercial fisheries (despite being closed) in order to provide context as to what management measures were in place previously.

Source - NGOs

- 15.6 Tenet 5: How effective are enforcement efforts? Is there any evidence of poaching? Are there ever any arrests/convictions? Please include a statement of effectiveness here rather than a reference to the APR.