



West Greenland Commission

WGCIS(18)19

*U.S. Views and Suggestions on a Possible Regulatory Measure
for the West Greenland Atlantic Salmon Fishery*

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Introduction: In 2015, the West Greenland Commission (WGC) adopted a Multi-Annual Regulatory Measure for Fishing for Salmon at West Greenland for 2015, 2016 and 2017 (WGC(15)21). In 2018, the WGC will consider development of a new regulatory measure for possible adoption. The United States is committed to engaging constructively with our WGC partners in this effort.

We have carefully considered the information and discussions from the two WGC intersessional meetings held so far in 2018. We continue to agree that there is no need to develop a new regulatory measure completely from scratch. Many of the existing paragraphs of the regulatory measure agreed in 2015 are still relevant. It is the U.S. opinion, however, that improvements and additional elements are needed in what the Chair's Working Document and its associated attachment to ensure any new regulatory measure is as clear as possible and that it strengthens the management of the West Greenland salmon fishery to balance, to the extent possible, stock conservation needs with an internal use fishery.

In an effort to help advance development and possible adoption of a new regulatory measure, the United States offers below its views and suggestions on various elements of a possible regulatory measure for consideration by WGC members. As noted, our starting point is the Chair's Working Document. It includes a number of elements, some of them longstanding, that we believe should be included in a new regulatory measure. Under some of the elements, we have provided commentary reflecting our views, including identifying additional elements and those elements that could potentially be dropped from a new regulatory measure. In some cases, we have also suggested phrasing to improve the clarity of an element, and/or to expand elements, including adding specificity. In addition, we request that, as a general matter, where the word "will" appears, it be changed to "shall" to conform with standard international usage.

We look forward to continuing discussion of a possible new regulatory measure for the West Greenland fishery during the third WGC intersessional meeting on June 10, 2018. In that regard, we hope this document facilitates discussions.

U.S. Views and Suggestions

Preamble: In Copenhagen, it was decided that the preambles of documents WGC(15)20 and WGC(15)21 should be reviewed at the Annual Meeting as necessary. A revised preamble will be needed as part of any new regulatory measure. Before turning to revising the preamble, additional progress is needed on the operative elements of a new measure.

Operative paragraphs of WGCIS(18)11:

- (1) There shall be no export of wild Atlantic salmon or its products from Greenland;
- (2) The fishery shall open no earlier than DD MM and close no later than DD MM each year;
- (3) The catch limit for the West Greenland fishery shall be XX tonnes. Any overharvest in a particular year will result in an equal reduction in the catch limit in the following year; there will be no carry forward into a future year of any under-harvest;

Suggested modification to the first sentence of this element:

- *“The total allowable catch for all components of the Atlantic salmon fishery at West Greenland shall be restricted to ## metric tonnes.”*

(4) Efforts will be made to identify and implement temporal or spatial harvest restrictions that would provide increased protection for weaker stocks taking into account information provided by ICES;

- To date, no such restrictions have been identified and until new information is presented, there appear to be no options available. Thus, this element could be dropped from a new regulatory measure.
- Whether or not this element is included in a regulatory measure, it might be helpful to consider including a standing question in the Request for Scientific Advice from ICES to “advise on changes to temporal and/or spatial fishery patterns that may provide increased protection for weaker stocks” as last requested in 2015 (CNL(15)11).

(5) Denmark (in respect of the Faroe Islands and Greenland) will further improve the monitoring, management control and surveillance of its salmon fishery during the period covered by this measure, at a minimum, in accordance with the attachment, with the objective of achieving full catch accountability and, if possible, will report annually on these actions;

- Such general language could be included in a new regulatory measure; however, specific monitoring and control elements also need to be included.

(6) Denmark (in respect of the Faroe Islands and Greenland) will inform NASCO and, as appropriate, ICES in a timely manner of any modifications to the management of the West Greenland salmon fishery, of the outcome of the fishery and of progress with the implementation and effectiveness of agreed monitoring and control measures in the attachment for annual review by the Commission;

- In line with current practice, requirements to report on modifications to the management of the fishery, the implementation of the regulatory measure, and the fishery outcome each year should be included in a new regulatory measure.

Suggested modification to the text:

- *“Denmark (in respect of the Faroe Islands and Greenland) shall, in a timely manner, inform NASCO and, as appropriate, ICES, of any modifications to the management of the West Greenland salmon fishery and provide a report on the outcome of the fishery.”*
- *“The WGC shall review implementation of all aspects of this regulatory measure in advance of the NASCO Annual Meeting for each year that it is in force.”*

(7) States of origin will explore opportunities to share experiences with Greenland on monitoring, management, control and surveillance in the salmon fishery through knowledge-sharing exchange programmes;

(8) This regulatory measure will apply to the fishery at West Greenland in XX. This measure may also apply in XX unless any Member of the Commission requests review.

- A new regulatory measure needs to cover, at a minimum, the West Greenland fishery for 2018. The United States is open to considering a multi-annual regulatory measure and to finding a way forward in this respect. If a multi-annual measure can be agreed, it should include a reconsideration clause along the lines of that in the 2015 regulatory measure and that also could include a reference to the Framework of Indicators since this can also be the basis for reconsideration.

Attachment to WGCIS(18)11

(1) Greenland shall annually collect and verify catch data of fishing activity of all licensed fishermen;

- Collecting and verifying the fishing activity of all fishermen is important. Specific actions in this regard should be included in the regulatory measure, and some ideas in this regard are offered below in the discussion under other paragraphs.

(2) All professional fishermen fishing for salmon shall require a license; only licensed professional fishermen shall be authorised to supply salmon to the communities;

- Licensing requirements are an effective fishery management tool and should not be limited to only professional fishermen. Further, fishing without a license should not be allowed.

Suggested modification to the text:

- *“All fishers for Atlantic salmon shall be required to have a license to fish and fishing for Atlantic salmon without a license shall be prohibited.”*

(3) In the case of non-professional fishermen, approaches shall be identified and implemented to provide a means for accurately quantifying harvests;

- Our suggestions under paragraph 2 above and paragraph 6 below would help address this element not only for non-professional fishermen but for all fishermen, which is essential. In addition, we continue to agree with the ICES advice that a standardized telephone survey should be implemented to help address any reporting gaps. Given its expertise and previous advice on the matter, ICES should be asked to help with the survey design. Further, this tool could potentially be implemented in a manner that would help with the outreach aspects of paragraph 7 below.

Suggested modification to the text:

- *“A telephone survey shall be implemented after the fishing season to interview all licensed fishers who did not report catches to gather relevant fishing information, including harvest, using a standardized questionnaire in light of the advice from ICES and agreed by the WGC. Results of the phone survey shall be provided to ICES for their consideration prior to their annual Atlantic salmon assessment meeting.”*

(4) Landing of salmon at fish factories shall be prohibited;

Suggested modification to the text:

- *“Landings of wild Atlantic salmon to fish processing factories shall be prohibited.”*

(5) Catches will be monitored regularly to allow in-season monitoring of the catch limit;

(6) All salmon fishermen / all licensed salmon fishermen will be required to provide a seasonal catch report, including zero catch reports, within one month of the end of the salmon fishing season;

- Paragraphs 5 and 6 are important elements that should be retained in a new regulatory measure.
- Development of a standardized reporting template to attach to a regulatory measure as a technical matter that should involve ICES scientists.

Suggested modification to the text in paragraphs 5 and 6:

- *“All licensed fishers for Atlantic salmon shall provide a full accounting of all fishing activity and harvest, including zero harvest, according to the standardized template annexed to this measure. Reporting shall be required on a weekly and/or daily basis as appropriate to allow for in-season monitoring of the catch limit.”*

(7) Failure by a fisherman to report catches, including zero catches, as specified in (6) shall result in follow-up action by the Government of Greenland to encourage reporting, and, if appropriate, other actions, such as the impositions of penalties;

- Non-punitive actions to encourage fishermen to meet their reporting obligations are important for effective management. Access to the resource, however, must be linked to meeting that fundamental obligation. In that regard, the suggested text below could replace or augment the language in the Chair’s Working Document.

Suggested modification to the text:

- *“All Atlantic salmon fishers that have not provided a full accounting of their catches, including reports for zero catches, within one month of the end of the fishing season shall be prohibited from fishing for salmon during the subsequent fishing season until such catch data are received.”*

(8) It shall be a condition of the licence that fishermen shall allow samplers from the NASCO sampling programme to take samples of their catches upon request; and

- The West Greenland sampling program has provided important information to NASCO. We would like to discuss this and other ways to continue to ensure access to samples.

(9) Information will be provided to fishermen and supervisors at open air markets explaining the rationale for the sampling programme. The findings of the sampling programme will be disseminated through appropriate means, with the assistance of the Government of Greenland, as requested.

- Sharing information on the benefits of the sampling program within Greenland is valuable and should be continued.