

APPENDIX (4 Comments)

NIRB Screening Comment # 1 (1 of 4)	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological permits
References	NIRB Notice of Screening; Non-technical summary
CONCERNS	
The Proponent states on the Non-Technical Summary (2 ^{sd} paragraph) that: <i>“No visits are planned to archaeological and/or paleontological sites where permits are required”</i> . However, the Proponent did apply for a Class 1 archaeology permit to visit archaeological sites.	
SUGGESTIONS AND RECOMMENDATIONS	
The Government of Nunavut suggests that the Proponent amend the second paragraph of the non-technical summary to indicate that archaeological site visits will take place.	
ADDITIONAL COMMENTS	
N/A	

NIRB Screening Comment # 2 (2 of 4)	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological resources
References	NIRB Notice of Screening; project location maps
CONCERNS	
<p>According to the intended and alternate itineraries provided in the application documents, visits to certain areas will overlap with known archaeological sites and subsequently require an application for an archaeological permit.</p> <p>Under the <i>Nunavut Archaeological and Paleontology Site Regulations, Nunavut Act</i>, the Department of Culture and Heritage is the Government of Nunavut agency responsible for the management and protection of Nunavut’s archaeological heritage. The management and protection of Nunavut’s archaeological resources is achieved through legislation, policy and procedures, including the requirement to obtain authorization, in the form of a permit, from the Government of Nunavut. Since 2005, the Government of Nunavut has required that commercial tourism operators interested in visiting Nunavut archaeological or paleontological sites obtain a Class 1 Permit.</p> <p>The permit process addresses to following concerns:</p> <ul style="list-style-type: none"> • The landing of thousands of visitors each year at archaeological and historical sites in Nunavut without the knowledge of the Department of Culture and Heritage or Inuit Heritage Trust; • Concerns expressed by archaeologists, tourists and local residents about site protection arising from shipborne tourism; • Incidence of site disturbance; • The potential cumulative effects of large-scale and unregulated site visitations; and • The need for accountability with respect to site disturbance arising from tourist activities. <p>The permit process also provides the following benefits:</p> <ul style="list-style-type: none"> • Provides a mechanism through which the Government of Nunavut can obtain information concerning current site conditions (monitoring and reporting); and • Protects visitor groups from being held responsible for damages to a site that occurred before and after their visit. 	
SUGGESTIONS AND RECOMMENDATIONS	
N/A	

ADDITIONAL COMMENTS

As the Proponent has already applied for the required permits, the GN would like to take this opportunity to stress that they respect the requirements of the archaeological permits if/when they are issued and to pay special attention to the concerns noted above during landings and exploration of the indicated coastlines.

Permit applications must be submitted to the Department of Culture and Heritage by March 31 of each year. Permits are usually issued in late-May early-June. Each permit application is also reviewed by Inuit Heritage Trust and forwarded to nearby communities. Article 33 of the Nunavut Land Claim Agreement, and Article 20 of the Nunavik Land Claim Agreement, provide the framework for decisions concerning approval or denial of permits. Government's decisions concerning the issuance or denial of permits are made in accordance with the provisions of the land claims agreements.

NIRB Screening Comment # 3 (3 of 4)	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Polar Bear Safety
References	Voyage Map Expedition Highlights; EA submission
CONCERNS	
The Proponent did not discuss polar bears in their Environmental Assessment submission under wildlife viewing or safety.	
SUGGESTIONS AND RECOMMENDATIONS	
The Government of Nunavut Requests that the Proponent presents a clear protocol for dealing with Polar bear- human interactions.	
ADDITIONAL COMMENTS	
N/A	

NIRB Screening Comment # 4 (4 of 4)	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Timing of Activity and Summer Retreat Polar Bear Habitat Sensitivity
References	14AN024 – Environmental Impact Assessment
CONCERNS	
<p>The period between September 9th-21st the region the Proponent intends to traverse is ice free therefore bears and other marine mammals will be on shore along southern Baffin Island. The islands identified in the Voyage Map are all well known as important polar bear summer habitat, and some islands can have a very high density of bears: Lady Franklin Island, Monumental Island, Resolution Harbour, Island, Lower Savage Islands and Akpatok Island. As well in the future the Cruise plans on visiting the following islands: Dundas Harbour, Beechy Island, Caswell Tower, Radstock Bay, Devon Island, Blacklead Island that are also places where polar bears are commonly observed during the ice-free season.</p> <p>Polar bears are fasting during the summer period therefore it is essential that they be disturbed as little as possible, stress from human activities, including wildlife viewing, will increase the energy requirements of bears. Bears in a fasting state need to conserve as much energy as possible until the sea ice returns and they are able to forage on seals again. In the South Baffin region, freeze-up occurs in November but can be delayed into December.</p> <p>Swimming polar bears are vulnerable as they cannot escape or defend themselves and will be stressed by boats. Females with cubs are especially vulnerable.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>Any interactions with polar bears should be avoided if at all possible. Expedition boats should stay clear of any swimming polar bears and under no circumstances approach them. If swimming polar bears are encountered the boat should stop, move away, and allow the swimming bear(s) to proceed in the direction of their choosing.</p> <p>All interactions with polar bears must be reported to the nearest Conservation Officer as soon as possible.</p>	
ADDITIONAL COMMENTS	
<p>Polar bears in Nunavut are protected by the Nunavut Wildlife Act.</p>	

This Act states: no person shall otherwise molest, harm, or destroy a bear without a Government of Nunavut permit except in exceptional circumstances including clear and present threat to human safety.