



**APPENDIX (2 Comments)**

<b>NIRB SCREENING COMMENTS # 1 (1 of 2)</b>	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeological Resources
<b>References</b>	Project Description
<b>CONCERNS</b>	
<p>The proponent does not plan to visit historical/archaeological sites while cruising in Nunavut waters. Therefore a Class 1 permit for site visitation is not required.</p> <p>The GN would like to take this opportunity to reiterate that under the Nunavut Archaeological and Palaeontology Site Regulations, Nunavut Act, 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 palaeontological sites obtain a Class 1 Permit.</p> <p>The permit process addresses the following concerns:</p> <ul style="list-style-type: none"><li>• 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.</li><li>• Concerns expressed by archaeologists, tourists and local residents about site protection arising from shipborne tourism.</li><li>• Incidence of site disturbance.</li><li>• The potential cumulative effects of large-scale and unregulated site visitations.</li><li>• The need for accountability with respect to site disturbance arising from tourist activities.</li></ul> <p>The permit process also provides the following benefits:</p> <ul style="list-style-type: none"><li>• Provides a mechanism through which the Government of Nunavut can obtain information concerning current site conditions (monitoring and reporting) and,</li></ul> <p>Protects visitor groups from being held responsible for damages to a site that occurred before and after their visit.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	

N/A
<b>ADDITIONAL COMMENTS</b>
N/A

<b>NIRB Screening Comment # 2 (2 of 2)</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Polar Bear Safety and Wildlife Interactions
<b>References</b>	16TN052 – Environmental Impact Assessment Report
<b>CONCERNS</b>	
<p>1. Polar Bears</p> <p>Polar bears are a designated species of special concern under the Federal <i>Species at Risk Act</i>. Polar bears are an important component of Arctic marine and terrestrial ecosystems. Polar bears are also of commercial and cultural importance to the Inuit. Polar bears can also pose a safety risk to humans. During the ice-free season polar bears are forced on land and are in a fasting state because their prey, are generally not accessible. During this time it is essential that the bears be disturbed as little as possible. Stress resulting from disturbance by human activities will increase the bear’s energy requirements and potentially affect bear health and survivorship.</p> <p>Swimming polar bears are vulnerable as they cannot escape or defend themselves and will be stressed by boats and close approaches. Females with cubs are especially vulnerable.</p> <p>The Arctic Expedition Cruise Operators (AECO) guidelines for Polar Bear safety state the <i>“In the event of a polar bear sighting, on land or on ice, from a zodiac, the zodiac-driver shall make sure that he/she always keeps at least a distance of <b>30 meters</b> between the zodiac and the land/ice/spot where the polar bear is present.”</i> And <i>“This distance is only acceptable when it is absolutely clear that the bear shows no signs of stress or being disturbed from the presence. If the polar bear shows any signs of stress or starts walking away, never follow it but retreat from the area immediately.”</i></p> <p>This distance is shorter than Government of Nunavut recommended distance of 100 meters, and may result in undue stress to the bears being observed.</p> <p>2. Deterrents</p> <p>The Proponent is utilizing AECO recommended procedures that include the use of .308 Win caliber rifles or larger for bear protection. This differs from the Government of Nunavut recommended procedures of using 12 gauge shotguns as they are capable of firing non-lethal deterrents such as cracker shells and rubber bullets.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	

1. Polar Bear Interaction

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.

The Government of Nunavut recommends maintaining a distance of 100 meters if a bear is encountered on land or ice while The Proponent is conducting activities from a zodiac or other small craft. All interactions with polar bears including defensive kills must be reported to the nearest Conservation Officer as soon as possible.

2. Deterrents

The guides employed by the Proponent should carry 12 gauge shotguns. These are the standard bear deterrent firearm in Nunavut because they can be used to fire non-lethal deterrents and lethal rounds. Non-lethal deterrents should be used whenever possible to deter problem wildlife, with lethal rounds only being used in defense of life or property.

Polar bears in Nunavut are protected by the Nunavut Wildlife Act: 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.

3. General Wildlife Interactions

The Government of Nunavut requests that a copy of the Proponents wildlife recording log be sent to the Department of Environment. If possible the Government of Nunavut requests that in addition to the information outlined in the Proponents guidelines, the following information be recorded: age class, gender, group size, behavior of animals at detection, speed of yacht/small craft, distance of animals from yacht/small craft, time of day. These reports may be sent to the Ecosystems Biologist, Wildlife Research Section. BOX 209, Igloolik, Nunavut, X0A 0L0, phone: 1-867-934-2176.

**ADDITIONAL COMMENTS**

N/A