

July 17, 2023

Mia Otokiak  
Technical Advisor  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**RE: NIRB File No. 23TA030 Notice of Screening and Request for Comment for F. K. Warren Ltd.'s "NG Explorer – Northwest Passage 2023" Project Proposal**

Dear Mia Otokiak,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding F. K. Warren Ltd.'s "NG Explorer – Northwest Passage 2023" Project Proposal.

The GN has reviewed the proposed project and related documents and provides comments described in the attached.

The GN appreciates participating in the screening of this project through the NIRB process. Should there be any concerns or need for follow-up, please do not hesitate to contact me at [dlapierre1@gov.nu.ca](mailto:dlapierre1@gov.nu.ca).

Qujannamiik,



Dianne Lapierre  
Avatiliriniq Coordinator

GN-01: Cultural Resources	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Cultural Resources
<b>References</b>	<ul style="list-style-type: none"> <li>• Notice of Screening for F. K. Warren Ltd.'s "NG Explorer – Northwest Passage 2023" Project Proposal, NIRB File No. 23TA030</li> <li>• NIRB Application forms – 23TA030</li> </ul>
CONCERNS	
<p>According to the intended 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 Palaeontology 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 palaeontological sites obtain a Class 1 Permit.</p> <p>The permit process addresses to 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, protects visitor groups from being held responsible for damages to a site that occurred before and after their visit.</li> </ul>	
RECOMMENDATIONS	

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.

#### ADDITIONAL COMMENTS

GN-02: Economic Development	
<b>Department</b>	Economic Development and Transportation
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Enhancing Economic benefits
<b>References</b>	<ul style="list-style-type: none"> <li>• Notice of Screening for F. K. Warren Ltd.'s "NG Explorer – Northwest Passage 2023" Project Proposal, NIRB File No. 23TA030</li> <li>• NIRB Application forms – 23TA030</li> <li>• Government of Nunavut - Tourism Development Handbook for Nunavut, <a href="https://gov.nu.ca/edt/documents/tourism-development-handbook-nunavut">https://gov.nu.ca/edt/documents/tourism-development-handbook-nunavut</a></li> </ul>
CONCERNS	
<p>According to the planned itinerary presented in the application, the Proponent is visiting the community of Pangnirtung. Further, the GN notes the Proponent aims to work with communities to develop a program that allows the passengers to learn about the culture in a respectful and engaging manner.</p> <p>The GN wishes to highlight the potential economic benefit that tourism can have to communities and their residents. Early engagement with communities on plans of arrival and activities during visits allows community members and organizations to prepare for such visits and to take advantage of the potential economic benefit such as through the purchase of arts and crafts, opportunities to share their culture, and visits to tourist attractions, stores and restaurants.</p>	
RECOMMENDATIONS	
<p>The GN recommends the following:</p> <ol style="list-style-type: none"> <li>1. The Proponent work with community organizations and Hamlets to enhance any economic benefit to the community. Local organizations and Hamlets may identify ways that the community can contribute to the tour experience while providing economic opportunities to local businesses and residents.</li> <li>2. The Proponent perform early and ongoing communication with community organizations and Hamlets to allow communities and individual residents to adequately prepare for visitors. Preparing arts and crafts and other souvenirs as well as preparing to welcome visitors to a community will require sufficient notice.</li> </ol>	
ADDITIONAL COMMENTS	

In addition to applicable legislation, the GN highlights for the Proponent the GN Tourism Development Handbook for Nunavut, particularly Section 14 Marine Tourism in Nunavut.