

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Indicate your concerns about the project proposal below:

- Terrain
- Wildlife and their habitat
- Marine mammals and their habitat
- Fish and their habitat
- Other: History of unlicensed, unpermitted research, including removal of specimens and publication of research results.

History of not consulting with local community or Inuit association.

History of soliciting participation of researchers and support staff likewise without permits or licenses.

History of misrepresentation of permit/license status safety plans, medevac agreements, roster of team members and relevant security considerations to NASA management and safety office.

Facilitation of access for foreign nationals conducting "research" activities without permits, licenses or consultation with Inuit communities.

History of disparagement of Inuit community members previously hired to support field studies at Haughton Crater.

History of field seasons conducted with limited planning, safety preparation or planning for contingencies, with arrangements made urgently at the last minute.

History of continuing field activities, in successive years, despite explicit guidance to Dr. Glass and NASA management that they must ensure they have appropriate permits, research license and consent of Inuit communities.

Prior termination of relationship with PCSP, for non-payment of fees for services.

Please describe the concerns indicated above:

My concern with this project is that the proponent has a lengthy history of conducting unpermitted, unlicensed research at Haughton Crater, spanning the years 2012-2016, 2018, 2023 and 2024. These were conducted despite explicit advice I provided, directing him to ensure that he had the appropriate permits, research license and permission from the local communities and Inuit association, and repeatedly directing him to confer with appropriate NASA offices about his project plans and relevant safety/security considerations.

During those years, he removed samples from the drilling site on IOL, published research about the studies he conducted, and left waste materials over winter at the base camp he used.

Dr. Glass was first informed in summer 2016 that no active license, lease or permits existed on record with NIRB, and that the entity through which he contracted services for Haughton Crater had been dissolved years prior. He was a co-author of a conference paper prepared that year, making recommendations for future conduct of NASA research at Haughton Crater, and published the following year (ASCE, 2017, attached). As such, he was aware at the time of the requirements for conduct of research in Nunavut, and of the deficiencies/non-compliance at the Haughton base camp he used.

When asked if he had permits/license for his field work at Haughton Crater and removal of specimens in 2018, he responded that he did not know if he had them. I directed him to discuss safety and security concerns following that field season with NASA OIG and NASA CI/CT, and I advised him to do so candidly, and without delay.

Dr. Glass proceeded to discuss plans with Mars Institute in early 2019, and I again advised him that he must confer with NASA management and safety/security personnel before proceeding with any future activity. It was at that point I learned he had not communicated concerns with NASA OIG or CI/CT. I then undertook to provide them a truthful account of prior field season activities. NASA's field program managers, ARC line management and Office of International and Interagency Relations were made aware of concerns.

Dr. Glass did not travel to Haughton Crater in 2019, and 2020-2021 seasons were cancelled due to the COVID-19 pandemic.

Dr. Glass contacted me in July 2022 with an urgent request to furnish NASA communications equipment for a field team heading to Haughton Crater. I declined the urgent request, and advised him to speak with NASA safety/security personnel, and reminded him that he must do so and ensure permits/licenses were in place before engaging in or facilitating any activity there.

Dr. Glass contacted me in May 2023 asking if I would travel to Haughton Crater to support his field season there. I declined and reminded him that past security/safety issues and permit/licensing issues must be addressed with NASA and Nunavut Government before he undertook any further activity there. He then solicited others to provide field season support, proceeded with field work, and did not address the safety or permit issues.

Dr. Glass contacted me in August 2023 requesting emergency assistance with handling of samples he and a fellow researcher had retrieved at Haughton Crater. I contacted NASA management and safety personnel, and documented the activities that I was made aware of.

NASA-Ames Safety officers, Center management, NASA-HQ program managers and executives, and NASA OIG & CI/CT were made aware of concerns about safety and lack of permits/licenses again between August 2023 and January 2024.

They proceeded to undertake a Summer 2024 field season anyway, without permits or research license.

Their livestreamed interview from Haughton Crater in August 2024 can be viewed at <https://www.youtube.com/watch?v=wtw2KJmVkKo&t=1s>

Do you have any suggestions or recommendations for this application?  
I recommend that this application NOT be approved.

I also recommend that NIRB, NRI and Nunavut Government undertake to learn more about the history of Dr. Glass' involvement with unpermitted, unlicensed research conducted at Haughton Crater, and about the prior experiences of PCSP staff, ATCO staff and local community members who provided services to those projects.

I recommend that any future field projects conducted by NASA at Haughton Crater be required to hire Inuit guides from the local community. I also advise that any NASA teams be required to share their safety plans and team rosters in advance of obtaining permits or undertaking travel.

It would be appropriate for researchers from NASA or any other US government entities conducting research in Nunavut to complete safety briefings, cultural & local awareness training, and bystander intervention training prior to approval of any future permits or travel, and to do so with local, Nunavut-based oversight.

Any additional comments?

Please feel free to contact me for further information at 613.539.0029, or at [sarahjseitz@gmail.com](mailto:sarahjseitz@gmail.com)

Do you support the project proposal?: No