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Clyde River Hunters & Trappers Association
P.O. Box 149 ~ Clyde River ~ Nunavut ~ X0A 0E0
Phone: (867) 924 - 6202 ~ Fax: (867) 924 - 6197



February 11, 2020

Talia Maksagak
Manager, Technical Administration
Nunavut Impact Review Board

***RE: NIRB 19TN048: Notice of Screening and Comment Request for Canadian Arctic Holidays
"Clyde River Land Use Permit"***

Dear Ms. Maksagak,

Thank you for the opportunity to comment on Canadian Arctic Holidays' "Clyde River Land Use Permit".

This letter expresses concerns from Iliasaqivik Society, the Ittaq Heritage and Research Centre, and the Nangmoutaq Hunters and Trappers Association in Clyde River. We have coordinated and combined our concerns in this letter.

First, let us state at the outset that we are strongly against this proposal. In this letter, we lay out our specific concerns and reasons. We have organized our comments around three main themes: environmental concerns, wildlife concerns, and socio-economic impacts.

Environmental concerns:

- Ayr Lake is a known fishing location for the community. There are Arctic char in the lake and the river downstream that runs to the ocean. This area is part of a larger char ecosystem.
- The Webers (owners of CAH) are wrong when they say the area is not a hunting or fishing location. This is a fishing location and an area used for polar bear hunting. It is linked to other important areas and Inuit travel through here.
- Although CAH says they do not have an impact on the lake, their activities do pose risks. A fuel/gas leak or spill would have serious negative impacts on the lake and fish.
- CAH dumps their human waste on the land, but it is unclear exactly where and what impact this has. Also, community members travel through this area. The operation may leave their waste to melt for others to find.
- Helicopter operations create a lot of noise and it is unclear how this disturbs wildlife in the area.

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would be setting them up in Sam Ford Fiord so that they wouldn't have to have their clients in Clyde River. Clients were flown in and transported directly to the site. Naujaaraaluit was not able to book up during the month as it had already turned people away and lost revenue. During this season Weber would only rent rooms very last minute, often times outside of normal hotel operating hours, when their clients were weathered out or there were flight plan changes. So CAH had/has a plan in place to create their own infrastructure and not use the local hotel. This creates less opportunity, not more.

- Beyond the impacts to the hotel, there are very few local economic benefits from this operation.
- The company sites hiring drivers, laundry service, or renting snow machines. These are very minimal and tokenistic jobs.
- There is a strong workforce in Clyde River that can be guides, polar bear monitors, quality cooks and bakers, cultural interpreters, and other roles. These are not used by the company.
- Past experience and evidence show that the benefits and opportunities of this operation are becoming less for the community, not more, as it continues and expands. Over time the operation has become more independent and private instead of growing jobs or any meaningful opportunity.

With the examples and concerns we provide above, along with the fact that our community has already expressed concerns about the camp and their activities (see letters from other community groups and individuals) we put forward our voice that this camp not be permitted to proceed.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Apusie Apak
Chair
Nangmoutaq HTA
Clyde River, NU

Malcolm Ranta
Executive Director
Ilisaqsivik Society
Clyde River, NU