

Talia Maksagak
Manager, Technical Administration
Nunavut Impact Review Board

Dear Ms. Maksagak,

This letter expresses concerns from Ilisaqsiq Society, the Ittaq Heritage and Research Centre, and the Nangmautaq 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.

- 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.

- Wildlife concerns:**

- The Webers are misinformed about wildlife in the area and their response to previous concerns (Jan. 30, 2020) shows their lack of knowledge of the area. They also make claims such as 'the area is not favourable habitat for caribou or other mammals' – based on what knowledge? They only say that they haven't seen much. What qualifications does the company have to make assessments about the ecosystem, wildlife, or environment and then base their plans on them?
- As stated already, Ayr Lake is an important area for char. Our community members depend on harvesting these char. They don't even realize that they camp right in a traditional travel route.
- There are polar bear migration routes in the area. These have been documented by Inuit Qaujimaqatugangit studies (e.g. see Clyde River Knowledge Atlas, Nunavut Coastal Resource Inventory). Documented interviews with Clyde River hunters show that polar bears have been seen as well as hunted in March and April in the area (the time when CAH wants to hold operations).
- Also according to Inuit Qaujimaqatugangit, polar bears with cubs are moving in this area in the spring. The mothers with cubs could be sensitive to the noise and activities of this operation.
- Animals and fish that are disturbed may move away and when this happens, they may not come back.
- Showing their lack of knowledge of the environment and wildlife of the area creates a concern related to safety. For example, if the operators do not have a good understanding of polar bears in this area, they put their clients at risk. Since they do not use local guides, they are not aware of the risks that bears can pose nor how to act in order to reduce these risks or deal with an interaction with bears.



Socio-economic impacts:

- The potential impacts of this operation on Inuit use of the land and water, hunting and fishing, is significant due to disturbance to animals and fish resulting in them moving away (e.g. from helicopter noise, human activity, snow cat noise/travel, camp activities, etc.) and a lack of understanding of how activities are related – how impacts in one area can create impacts in another.
- The impacts can affect hunting and fishing and we take this very seriously
- The following points, related to direct impacts on our local businesses, deserve special attention:
- The interactions between this company and the local hotel have been damaging in the past.
- Specifically, CAH has directly caused loss of revenue to the Naujaaraaluit Hotel due to poor business practices:
- The Naujaaraaluit Hotel (a social enterprise with profits supporting the Ilisaqsiq Society) opened in 2015, the first year Weber Arctic started coming to Clyde River. They initially expressed a desire to partner with the hotel and community in their tourism operations. This may have been the case for a few years, however, over time, it has become clear that as they learned more about how to run business in and around Clyde, and learned the land and the routes on their own (therefore becoming less dependent on local knowledge and assistance), their desire and actions to partner with the community decreased.
- For example, there was still use of the hotel in the 2018 spring season. The company was notified that they could book up the hotel for an extended period of time and they did. They booked the entire hotel for a month and successfully ran their operations in Clyde River.
- Over time, though, the company was establishing their own, independent, private accommodations. They used the hotel less. They used local transport less (and have brought in their own snow cat). They use less local help. They claim that jobs will go up if they expand, but the evidence shows this to be the opposite. As they grow, they are becoming bigger but more independent and bringing in their own people. Even their website reflects this. When it once showcased the Naujaaraaluit hotel, it now features their own dome tents with no mention of local business.
- Moving ahead in time to last year, there are more examples of how this operator has distanced itself from using local business and even more, damaged local business. Well in advance of the 2019 spring tourism season (December 2018) Weber was contacted by Ilisaqsiq to have first chance to book rooms for the spring. They said they would like to book the hotel for a month. So Naujaaraaluit blocked off the rooms and started turning away other potential guests. Then Weber informed Ilisaqsiq that they were going to cancel the month. Ilisaqsiq then found out that they had bought dome tents and they

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