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Building *Nunavut* Together  
*Nunavut* liuqatigiingniq  
Bâtir le *Nunavut* ensemble

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Government of Nunavut  
Nunavut Kavamat  
Gouvernement du Nunavut

March 16, 2020

Jaida Ohokannoak  
Technical Advisor II  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

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

**RE: Notice of Screening for the Arctic Kingdom's "Arctic Kingdom Floe Edge Camp Day Trips - 2020" Project Proposal (15AN029)**

Dear Jaida Ohokannoak,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the Arctic Kingdom's "Arctic Kingdom Floe Edge Camp Day Trips – 2020" Project proposal. The GN reviewed the proposed project and has prepared two (2) comments for your consideration (see Appendix).

Should you have any concerns with our comments, please contact me by phone at (867) 975-7805 or by email at [nograde@gov.nu.ca](mailto:nograde@gov.nu.ca).

Qujannamiik,

[Original Signed By]

Natalie O'Grady  
*Avatiliriniq Coordinator*  
*Government of Nunavut*

## Appendix

GN-01: Minimum Flight Altitudes	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Minimum Flight Altitudes
<b>References</b>	<ul style="list-style-type: none"> <li>• Arctic Kingdom, 2015, Wildlife Policies</li> <li>• Government of Nunavut, 2003, Nunavut Wildlife Act</li> </ul>
CONCERNS	
<p>The Proponent's Wildlife Policies Document contains a section related to the use of aircraft for the purposes of wildlife observation. This section does not contain information pertaining to minimum flight altitudes that will be maintained by aircraft to avoid wildlife deterrence.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends that aircraft should maintain an altitude of 600 m, except when approaching a landing site. Prior to landing or take off, a visual inspection of the surroundings should be conducted to detect the presence of wildlife. If wildlife is detected, aircraft should delay take off and wait until animals have left the area.</p> <p>Additionally, the Government of Nunavut recommends that the Proponent not circle any wildlife that are observed as circling results in undue stress to wildlife. <i>Section 74(1)</i> of the <i>Nunavut Wildlife Act</i> states:</p> <p style="padding-left: 40px;">“No person shall chase, weary, harass or molest a wild animal”</p> <p>And, <i>section 87(d)</i> of the <i>Act</i> also states that:</p> <p style="padding-left: 40px;">“...no person shall use a vehicle or other conveyance to harass wildlife”</p>	

GN-02: Polar Bear Interactions	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Polar Bear Interactions
<b>References</b>	<ul style="list-style-type: none"> <li>Arctic Kingdom, 2015, Wildlife Policies</li> </ul>
CONCERNS	
<p>The Proponent has listed a number of methods regarding the interaction with, safety around, and deterrence of Polar Bears. The GN has identified a number of concerns with the Proponent's policies.</p> <ol style="list-style-type: none"> <li>1. The Proponent has stated that the minimum distance they will maintain from swimming polar bears is 10 meters. This is too close to bears and poses a substantial risk of causing undue stress to the bear.</li> <li>2. The Proponent has listed the use of "lead shot" (Arctic Kingdom, 2015) as a non-lethal measure for the deterrence of polar bears. Lead shot is not an approved measure for the deterrence of polar bears in Nunavut. The use of lead shot is a lethal measure that is likely to result in serious injury to the bear it is used on. Non-lethal measures include: bear bangers, rubber slugs, and bear spray.</li> </ol>	
SUGGESTIONS AND RECOMMENDATIONS	

The GN recommends the Proponent maintain a distance of 100m in water and a minimum distance of 300m on the ice or land from Polar bears. All bears encountered should be allowed to travel on a path of their choosing and should not be pursued. At no times should a bear be surrounded by multiple boats.

Project groups should include a certified bear monitor. At no time should lead shot be used in the deterrence of bears. Use of lead shot may result in serious injury to the bear that may then result in the bear's demise, or the requirement for the euthanizing of the bear. Other types of deterrents that do not require a firearm should be considered in addition to shotgun deterrents for use by guides, for example hand launched bangers and screamers, air horns, and noise makers.

Any interactions between people and wildlife should be immediately reported to the closest local conservation officer. The Proponent should only utilize non-lethal deterrence measures that are approved by the Government of Nunavut: 12-gauge shotguns with bear bangers and rubber bullets. At no time should lead shot be used in the deterrence of a bear. If a situation occurs of immediate danger to a human being, then the proper ammunition to euthanize a bear is a 12-gauge rifled slug.