

August 2, 2022

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

Sent VIA Email: info@nirb.ca

RE: NIRB 22TN037: Notice of Screening for F.K. Warren Ltd.'s "Swan Hellenic Vega - Arctic Cruises 2022" Project Proposal.

Dear Ms. Pelletier,

On behalf of the Government of Nunavut (GN), please find attached comments pertaining to the Nunavut Impact Review Board's (NIRB) Notice of Screening for F.K. Warren Ltd.'s "Swan Hellenic Vega - Arctic Cruises 2022" project proposal.

The GN has reviewed the information provided to the NIRB regarding the above-mentioned project and Culture and Heritage has provided the following detailed comments pertaining to Archaeological and Paleontological Sites.

Should you have any questions regarding this submission, please contact me at 867-975-7828 or by email at asimonfalvy@gov.nu.ca.

Qajannamiik,

Agnes Simonfalvy
Avatiliriniq Coordinator
Government of Nunavut

GN-01: : Archaeological and Paleontological Sites	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	F.K. Warren Ltd.'s "Swan Hellenic Vega - Arctic Cruises 2022" project
References	NIRB Notice of Screening 22TN037
CONCERNS	
<p>Swan Hellenic Vega is planning two cruises in Nunavut during their 2022 cruise seasons. According to the designated landing locations described in the application documents, it is likely that visits to certain areas will overlap with known archaeological sites and subsequently require an application for an archaeological permit. The Department of Culture and Heritage also notes that one of the location (Akpatok) is in the Nunavik Marine Region.</p> <p>Under the Nunavut Archaeological and Palaeontology Site Regulations (Nunavut Act) the Government of Nunavut Department of Culture and Heritage is the responsible agency for the management and protection of Nunavut's archaeological heritage. This is achieved through legislation, policy, and procedures including the requirement to obtain authorization, in the form of a permit, from the GN. Since 2005, the GN has required that commercial tourism operators likely to visit or come in contact with archaeological or palaeontological sites obtain a Class 1 Permit*.</p> <p>The permit process addresses the following issues:</p> <ul style="list-style-type: none"> • 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; • Concerns expressed by archaeologists, tourists and local residents about site protection arising from ship borne tourism; • Incidents of site disturbance; • Potential cumulative effects of large-scale and unregulated site visitations; . • The need for accountability with respect to site disturbance arising from tourist activities. <p>The permit process also provides the following benefits:</p> <ul style="list-style-type: none"> • 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. 	
RECOMMENDATIONS	
A Class 1 Archaeology Permit is required from the GN-Department of Culture and Heritage.	

The applicant must apply for a Class 1 permit yearly. 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 areas.

**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*

For activities conducted on Akpatok Island a proposal must be submitted to the Nunavik Marine Region Planning Commission (NMRPC).

ADDITIONAL COMMENTS

N/A