




Calvin Ehloak
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Nunavut Impact Review Board
P.O Box 1360
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Re: Notice of Screening for Arctic Kingdom's "Floe Edge Safari" project proposal

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding Arctic Kingdom's "Floe Edge Safari" project proposal, NIRB File 24TN011.

The GN appreciates participating in the screening of this project through the NIRB process. Should there be any concerns or need for follow-up, please do not hesitate to contact me at jbuller@gov.nu.ca.


Justin Buller

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN-01: Polar Bear Interactions	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Predator Mitigation
References	<ul style="list-style-type: none"> • NIRB Notice of Screening for “Arctic Kingdom’s Floe Edge Safari” Project Proposal, NIRB File No. 24TN011, NIRB Project No. 125887 (2024). • Revised “NIRB Application for Screening #125887 Arctic Kingdom Floe Edge Safari,” NIRB File No. 24TN011, NIRB Project No. 125887 (2024). • GN Screening Comments on Arctic Kingdom’s “Arctic Kingdom Floe Edge Camp Day Trips – 2020” Project Proposal, NIRB File No. 15AN029, NIRB Project No. 125511 (2020). • <i>Wildlife Act</i>, S.Nu. 2003, c.26.
CONCERNS	
<p>Arctic Kingdom’s (the Proponent) application for screening states the Proponent’s intention to potentially establish a basecamp on the sea ice near Bylot Island to facilitate trips from Pond Inlet to the floe edge near Eclipse Sound as well as related tourist activities (e.g., kayaking, snorkeling, hiking).</p> <p>The area of the Project has active populations of polar bear (the Baffin Bay polar bear subpopulation). As indicated in the Proponent’s non-technical summary, “interactions with mammals causing fatigue or stress [can] result changes to normal behaviour and waste unnecessary energy” (Arctic Kingdom, page 4). The territorial <i>Wildlife Act</i> offers protection to polar bears and other wildlife from human-induced disturbance. For example, section 74 (1) states: “<i>No person shall chase, weary, harass or molest a wild animal.</i>” Additionally, the GN notes that polar bears have occasionally behaved aggressively toward humans.</p> <p>The Project application and supporting materials do not include a predator deterrence plan or clarity regarding how disturbance to polar bears will be minimized. The Proponent states that “...wildlife policies and human-bear conflict management procedures... can be provided upon request” (Arctic Kingdom, page 9). The absence of this information hinders the GN’s complete review of the Project.</p>	
RECOMMENDATIONS	
<p>The GN recommends the Proponent submit a predator deterrence plan (i.e., human-bear conflict management procedures) and wildlife policies that will be used for the Project to the</p>	

NIRB for inclusion on the public registry. Additionally, the GN recommends the Proponent provide these materials in any future submission for similar activities.

The GN recommends that a predator deterrence plan include specifications on lethal and non-lethal devices to be used for defense and deterrence, and information on the use of bear monitors. It is recommended that a designated bear monitor be present during project activities.

The GN recommends the Proponent maintain a minimum distance of 100 m in water and a minimum distance of 300 m on the ice or land from polar bears (GN, 2020). 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 vehicles (GN, 2020).

ADDITIONAL COMMENTS

N/A

GN-02: Raptor Interactions

Department

Environment

Organization

Government of Nunavut

Subject/Topic

Raptor Interactions

References

- NIRB Notice of Screening for “Arctic Kingdom’s Floe Edge Safari” Project Proposal, NIRB File No. 24TN011, Project No. 125887 (2024).
- Revised “NIRB Application for Screening #125887 Arctic Kingdom Floe Edge Safari,” NIRB File No. 24TN011, Project No. 125887 (2024).
- GN Screening Comments, NIRB’s Notice of Screening for Arctic Kingdom’s “Navy Board Tourist Camp” Project Proposal, NIRB File No. 15AN029, NIRB Project No. 124687 (2016).
- Martínez-Abraín A., Oro D., Jiménez J., Stewart G., and Pullin A. (2010) A systematic review of the effects of recreational activities on nesting birds of prey. *Basic Applied Ecology* (11) 312–319.

	<ul style="list-style-type: none"> • Richardson, C.T. and Miller, C.K. (1997) Recommendations for Protecting Raptors from Human Disturbance: A Review. <i>Wildlife Society Bulletin</i> 25(3) 634-638. • Sumasgutner, P., Buiji, R., McClure, C.J.W, Shaw, P., Dykstra, C. R., Kumar, N., and Rutz, C. (2021) Raptor Research during the COVID-19 pandemic provides invaluable opportunities for conservation biology. <i>Biological Conservation</i> (260) 109149. • <i>Wildlife Act</i>, S. Nu. 2003, c.26.
CONCERNS	
<p>Arctic Kingdom's (the Proponent) application for screening states the proponent's intention to establish a basecamp on the sea ice to facilitate trips to the floe edge and other activities (e.g., kayaking, snorkeling, hiking). The location for the basecamp and related activities is in the Eclipse Sound, near Bylot Island.</p> <p>As recognized by the Proponent, peregrine falcons occur throughout the Project area. While the Proponent's submission materials recognize and offer guidance on minimizing potential impacts to seabird colonies, they do not discuss potential impacts to nesting raptors. The absence of this information hinders the GN's complete review of the Project.</p> <p>Evidence suggests that disturbance from recreation can result in various impacts such as the abandonment of breeding territories or the early fledging of nestlings from nests. These impacts can result in adult or juvenile mortalities (Martínez-Abraín et al., 2010; Richardson and Miller, 1997; Sumasgutner et al., 2021).</p> <p>The territorial <i>Wildlife Act</i> protects nesting birds. For example:</p> <p style="padding-left: 40px;">“72(2) <i>Unless lawfully harvesting down, no person shall injure, molest or destroy</i> <i>(a) the nest of a bird when the nest is occupied by a bird or its egg; or</i> <i>(b) the nest of any bird of prey or prescribed bird.</i>”</p>	
RECOMMENDATIONS	
<p>The GN recommends the Proponent submit their wildlife policies to the NIRB for inclusion on the public registry. The GN recommends that these materials be provided in all future submissions for similar project activities.</p> <p>The GN recommends that the Proponent refrain from approaching nesting raptors during the critical timing window (May – July 15) and particularly during poor weather conditions (GN, 2016).</p>	
ADDITIONAL COMMENTS	
N/A	

GN-03: Financial Benefit	
Department	Finance
Organization	Government of Nunavut
Subject/Topic	Arctic Kingdom Floe Edge Safari Project
References	NIRB Notice of Screening
CONCERNS	
No	
RECOMMENDATIONS	
No	
ADDITIONAL COMMENTS	
<p>The Arctic Kingdom Floe Edge Safari project, serving as a base for tourist activities, can bring both economic benefits and some financial challenges.</p> <p>Positive economic impact:</p> <ul style="list-style-type: none"> • This project has the potential to generate local revenue through accommodation, transportation services, tour packages and more. • The operation of this project can create employment opportunities for the residents, reducing unemployment and providing steady income streams for individuals and families in the surrounding communities. • Also, the potential influx of tourists can lead to demand for local goods and services, leading to the creation or expansion of small businesses in the surrounding communities. <p>Overall, community engagement and partnership, seasonal planning, targeted marketing, and promotion strategy to raise awareness of the project will attract visitors from the key target markets which can potentially offer a unique and memorable Arctic experience while contributing to sustainable development, cultural preservation, and economic growth.</p>	