



NIRB File No.: 24TN011
NPC File No.: 150263

March 26, 2024

Kristyn Thoburn
Arctic Kingdom, Inc.
P.O. Box 6117
Iqaluit, NU X0A 0H0

Sent via email: permits@arctickingdom.com

Re: Opportunity to address comments received regarding Arctic Kingdom's "Arctic Kingdom Floe Edge Safari" project proposal

Dear Kristyn Thoburn:

On February 12, 2024, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Arctic Kingdom's "Arctic Kingdom Floe Edge Safari" project proposal from the Nunavut Planning Commission (NPC or Commission). On March 14, 2024, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by March 25, 2024.

On or before March 25, 2024, the NIRB received comments from the following interested parties:

- *Government of Nunavut (GN)*
- *Crown – Indigenous Relations and Northern Affairs Canada (CIRNAC)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125887.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

GN

- Concerns that 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 GN recommends that the proponent submit a predator deterrence plan (i.e., human-bear conflict management procedures) and wildlife policies that will be used for the Project. The GN also recommends that the Proponent provide these materials in any future submissions for similar activities.
- Recommends that a predator deterrence plan include specifications on lethal and non-lethal devices to be used for defence and deterrence, and information on the use of bear monitors.

- Recommends that the Proponent maintain a minimum distance of 100 meters (m) in water and a minimum distance of 300 m 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 vehicles.
- Concerns that the Project application and supporting materials do not discuss the potential impacts on nesting raptors. Evidence suggests that disturbance from recreation can result in various impacts. These impacts can result in adult or juvenile mortalities. 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.

CIRNAC

- Notes that the Proponent did not provide specific mitigation measures it would implement in the absence of snow cover. Mitigation measures for potential impacts to vegetation should be considered because air temperatures during June may facilitate snowmelt and expose underlying vegetation. Recommends that the Proponent outline mitigation measures it would take to minimize any impacts to vegetation from its tourism activities.
- Notes that the Proponent did not describe how it would respond if there is residual effect to the surrounding environment after applying the proposed spill prevention and mitigation measures (e.g., contaminated land, snow, ice, seawater, etc.). Recommends that the Proponent describe how it would respond if the surrounding environment is impacted by fuel spills.

The NIRB would like to provide Arctic Kingdom with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **April 9, 2024**.

If Arctic Kingdom determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4622 or motokiak@nirb.ca.

Sincerely,



Mia Otokiak
Technical Advisor I
Nunavut Impact Review Board

cc: Distribution List
Jared Ottenhof, Qikiqtani Inuit Association
Chris Spencer, Qikiqtani Inuit Association
Joel Fortier, Qikiqtani Inuit Association
Conor Goddard, Qikiqtani Inuit Association
Assol Kubeisinova, Qikiqtani Inuit Association
Justin Buller, Government of Nunavut – Department of Executive and Intergovernmental Affairs
Dianne Lapierre, Government of Nunavut – Department of Economic Development & Transportation
Jonas Azonaha, Government of Nunavut – Department of Economic Development & Transportation
Michele LeBlanc-Havard, Government of Nunavut – Department of Environment
Patrick Graillon, Government of Nunavut - Department of Environment
Lisa Pirie-Dominix, Canadian Wildlife Services
Marie-Claude Martel, Parks Canada
Jane Chisholm, Parks Canada