



## Appendix I

### Template for Responses/Comments to any written submission

Please return completed templates by **5PM EASTERN TIME FEBRUARY, 24<sup>th</sup>, 2023** to the Nunavut Planning Commission,  
by email at [submissions@nunavut.ca](mailto:submissions@nunavut.ca), by fax at 867-979-3443, or by mail at Box 1797, Iqaluit, Nunavut X0A 0H0.

| IDENTIFICATION                                       |  |
|--|--|
| Date   | February 10, 2023  |
| Your Name:   | Frigg Jorgensen  |
| Your Title/Position                                  | Executive Director   |
| Your organization (if applicable):                   | Association of Arctic Expedition Cruise Operators (AECO)   |
| Your Contact information (email, Tel, mail, or fax): | Email: <a href="mailto:frigg@aeco.no">frigg@aeco.no</a><br>Cell: +47 913 90 554<br>Postboks 162, 9252 Tromsø, Norway |

\*Add enough rows and pages as needed

|   | NPC REGISTRY FILE #   | SECTION OF THE SUBMISSION  | YOUR RESPONSE/COMMENT  |
|---|---|--|--|
| 1 | DRAFT NUNAVUT LAND USE PLAN - JULY 2021 (21-011e-2021-07-08-2021) | <u>2.4 Walrus Terrestrial Haul-Outs</u><br><i>Marine vessels less than 50 ft (~ 15.2 m) in length must remain at least a 0.5 nautical mile (~ 0.9 km) away from a walrus haul-out; (b) marine vessels 50-100 ft (~ 15.2 to 30.5 m) must remain at least 1 nautical mile (~ 1.9 km) away from a walrus haul-out; and (c) marine</i> | AECO is concerned that these proposed setback distances to terrestrial walrus haul-outs may limit the general public's opportunity to experience these animals in their natural habitat. In addition, the proposed setback distances to terrestrial walrus haul-outs will result in certain areas becoming off-limits, even if walrus are not being visited. Lastly, the setback distances may represent a challenge for vessel operations.<br><br>AECO members operate with a non-disturbance principle for wildlife, and has, in collaboration with researchers, developed <a href="#">guidelines for walrus</a> that members of AECO are obliged to follow. As far as we are aware, all expedition cruise vessels size 13-500 |



|  |  |   |
|--|--|---|
|  | <p>vessels greater than 100 ft (30.5 m) must remain at least 3 nautical miles (~ 5.6 km) away from a walrus haul-out. 2.4-3 No proponent of a project is to operate or anchor a vessel or conduct other project-related marine activities within 3 miles (~ 4.8 km) of a walrus haul-out referred to in section 2.4-1.</p> | <p>passengers operating in Arctic Canada are members of AECO and obliged to follow these guidelines.</p> <p>AECO would like to question the basis for the proposed setback distances from walrus terrestrial haul-outs and asks for evidence to support the proposed distances.</p> <p>The reference used in the comments submitted (16-18E-2018-11-26) on setback distances to walrus haul-outs (refer to: <a href="#">U.S. Fish and Wildlife Service Approach &amp; Viewing Guidelines for Pacific Walruses</a>) states that:</p> <p><i>“Motor vessels should maintain a buffer from walruses hauled out on land or ice to avoid disturbance:</i></p> <ul style="list-style-type: none"> <li><i>o Marine vessels 50 feet in length or less should remain at least 0.5 mile away from hauled out walruses.</i></li> <li><i>o Marine vessels 50 - 100 feet should remain at least 1 mile from hauled out walruses.”</i></li> </ul> <p>AECO cannot find any submitted comments regarding any research/observation-based evidence of a proposed setback distance for vessels greater than 100 ft (30.5 m).</p> <p>As far as AECO is aware, there is evidence to support that vessels do not disturb walrus haul-out.</p> <p>In surveys carried out by the Norwegian Polar Institute, walruses are not shy towards humans and <b>no disturbance effects from vessel traffic have been detected.</b></p> <p>“Tourists on land and boats near the haul-out sites (with a single exception) <b>did not disturb walrus haul-out behaviour significantly</b> (<math>p&gt;0.05</math>) at any of the sites. In addition, most polar bear visits were not associated with detectable disturbances. However, polar bears did significantly disturb walrus herds at Andr  etangen (<math>p=0.003</math>) and Stor  ya (<math>p=0.002</math>) in some years. These disturbances were likely associated with predation attempts on calves.”</p> <p>(Reference: <a href="https://nammco.no/wp-content/uploads/2018/10/ren-et-al.-2018.-walrus-cameras.pdf">https://nammco.no/wp-content/uploads/2018/10/ren-et-al.-2018.-walrus-cameras.pdf</a>)</p> |
|--|--|---|

|   |   |   |  |
|---|---|---|--|
|   |   |   | AECO would like to propose that walrus haul-outs can be visited if <a href="#">AECO's walrus guidelines</a> are applied, in addition to existing regulations.  |
| 2 | DRAFT NUNAVUT LAND USE PLAN - JULY 2021 (21-011e-2021-07-08-2021) | <p><i>All migratory birds:</i></p> <ul style="list-style-type: none"> <li><i>All transiting ships: 1.5 km setback from nesting colonies or seabirds, coastal waterfowl and sea ducks.</i></li> </ul> <p><i>All Seabirds: Seasonal (when birds are present)</i></p> <ul style="list-style-type: none"> <li><i>500 m setback for ships from seabird colonies when birds are present</i></li> <li><i>100 m setback from seabird colonies for zodiac, kayaks and other small launch vessels</i></li> </ul> <p><i>Ivory Gulls: Seasonal (when birds are present)</i></p> <ul style="list-style-type: none"> <li><i>2 km setback distance from breeding sites</i></li> </ul> <p><i>Coastal Waterfowl and Seaducks: Seasonal (when birds are present)</i></p> <p><i>500 m setback distance from seaduck colonies, moulting aggregations of seaduck and waterfowl</i></p> | <p>AECO is concerned that very long setback distances will be difficult to apply in practice.</p> <p>AECO is not currently aware of evidence to support that the proposed setback distances are required for non-disturbance.</p> <p>We believe some of the species (e.g., Seabirds) may not be very affected by human activity while in their vicinity.</p> <p>In Greenland and Svalbard, the setback distances are shorter or non-existent. In these regions there are speed limits within a certain distance, to avoid disturbance.</p> <p>AECO, with support from researchs and bird specialists, has developed <a href="#">guidelines for Arctic birds</a>. As far as we are aware, all expedition cruise vessels size 13-500 passengers operating in Arctic Canada are members of AECO and obliged to follow these guidelines.</p> <p>AECO hopes guidelines, and potential speed limitations in areas around birds, can be considered as alternative management tools.</p> |
| 3 | DRAFT NUNAVUT LAND USE PLAN -                                     |   | <p>Some AECO members operate in the Canadian Arctic starting in the end of July.</p> <p>AECO members must follow the below <a href="#">operational guidelines</a> regarding the breaking of ice:</p>   |

|   |   |   |
|---|---|---|
|   | <p>JULY 2021 (21-011e-2021-07-08-2021)</p> <p><i>No person is to conduct icebreaking activities (The North Water (Sarvarjuaq) Polynya) from December 1 to July 31.</i></p> <p><i>No person is to conduct icebreaking activities during the indicated seasons: (a) in the Northwest Passage/Coronation Gulf between Victoria Island and the Mainland (Dolphin &amp; Union herd), from October 15 to February 15 and April 1 to May 31; (b) in Peel Sound and Franklin Strait (Peary), from February 1 to August 14; and (c) in the narrow seaways between Bathurst Island and the Small Islands North of Bathurst Island (Peary) from December 1 to July 31.</i></p> | <p><i>“Do not break fjord ice during spring and summer.</i></p> <p><i>Breaking of any ice should always be avoided if there if there is a risk of negative impact on the environment.”</i></p> <p>We encourage regional icebreaking measures to be included in Transport Canada’s Notice to Mariners.</p> |
| 4 |   |   |

|   |  |  |  |
|---|--|--|--|
| 5 |  |  |  |
| 6 |  |  |  |
| 7 |  |  |  |



|   |  |  |  |
|---|--|--|--|
|   |  |  |  |
| 8 |  |  |  |
| 9 |  |  |  |



