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Til: Firmapost - Sysselmannen på Svalbard

Emne: 20/02908-3 - midlertidige endringer i motorferselforskriften

I have lived on Svalbard for over 11 years. During this time I have mostly worked as guide with local tour operators as well as my own company based on land and at sea. I have also worked with international tour operators on expedition cruise vessels in the summer.

To whom it may concern.

I refer to the current hearing on introducing restrictions to motorised traffic on sea ice, in certain zones of Svalbard.

Simply put, I do not think creating blanket ban of motorised traffic in these areas, decided on an annual basis, is the way forward.

It has been mandated by the Norwegian government to increase and develop tourism on Svalbard. With all human activities on Svalbard, there will to some extent be a disturbance to wildlife. If this mandate is to be respected, then disturbances must be kept to a minimum and traffic controlled in a stricter manner.

My suggestion would be to continue to allow travel on sea ice with certain restrictions and harsher penalties. For instance :

- Local tour operators using qualified and certified guides should be able to judge if/when/how to travel on sea ice.
- A few individuals have been known to disturb polar bears on sea ice this has mostly been locals and not tour operators. These individuals, if found guilty, should be punished to the fullest extent of the law. This would in turn deter other individuals from doing repeating their actions.
- Tourists (non residents) not participating in organised tours or with locals should be banned from driving on sea ice. If found in breach of these guidelines, these individuals should also face the consequences of the law.

The past disturbances have been witnessed by Sysselmannen inspectors, as well as reports from other locals. Because of the relatively close vicinity of the described areas (Tempelfjorden osv) it has therefore been possible to report regulation abuses. This however has not been possible further afield.

Having worked extensively in the tourism industry, I feel that the disturbances on the mentioned fjords are small when put into a larger context: for example when comparing to the increasing number of foreign owned cruise ships which roam the fjords of Svalbard during the summer time, and are far away from the watchful eye of the Governor or other locals. The sheer number of

vessels and number of tourists on these voyages is a matter of concern, and it is impossible to believe that these vessels do not have an impact of wildlife. I have witnessed real disturbances - albeit not during the vulnerable period of March - June, but these have been disturbances nonetheless. This is where I believe real disturbances should be assessed, and where tighter restrictions are required

It is hypocritical to restrict access to fjords for law abiding locals and local tour operator, when what is going on during the summer with cruise ships has not yet been assessed and is still authorised.

With careful planning, tight guidelines, and harsher punishments, I believe the fjords can remain open in the Spring.

Best regards,

Yann