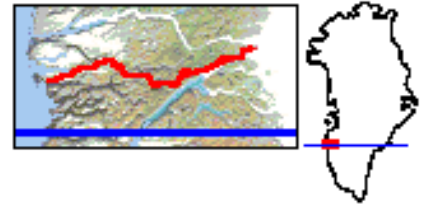


# ***Polar-Routen e.V.***

**Förderverein für Wandern und Naturschutz in Grönland**  
(Association for Hiking and Protection of Nature in Greenland)

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Datum: 28 May 2019

Additionally via email to [M.Rossler@unesco.org](mailto:M.Rossler@unesco.org)

**Concerning World Heritage List Property 1557, Greenland, State Party: Denmark**  
**“Aasivissuit – Nipisat: Inuit Hunting Ground between Ice and Sea”**

**Appeal to protect WHL Property 1557 against the threatening effects of a planned dirt road construction with reference to Article 11 (4) WHC.**

Dear Ladies and Gentlemen,

with reference to Article 11 (4) of WHC in connection with the Operational Guidelines item 179, IV.B, the List of World Heritage in Danger, (b), (iii), we inform you about a potential threat to World Heritage Property 1557, a cultural landscape, that, in our view, is based on a planned construction project for an ATV road through the World Heritage area, which cuts this area in two parts. In connection with this, there is also a danger for a long-distance hiking trail that runs through the World Heritage area, the "Polar Route" or the "Arctic Circle Trail", which is to be displaced to a considerable extent by this ATV road. Endangering the integrity of the property is further enhanced by the fact that an originally large area, which was entered in the Tentative WHL, was restricted to a narrow strip of land.

Since we did not get a reply to our previous submissions to the State Party (Kingdom of Denmark) and Greenlandic authorities, we now, after inclusion in the World Heritage List, have only the option to submit an application to the World Heritage Committee of UNESCO with reference to Article 11 (4) of the WHC.

We sum up the content of our application as follows:

“In 1996, the Nordic Council of Ministers published the report ‘Verdensarv i Nord’ – World Heritage in the Nordic Countries, proposing new Nordic properties, which the nation states were recommended to nominate to UNESCO. The report contained three proposals for Greenlandic World Heritage properties, one of which encompassed Aasivissuit – Arnangarnup Qoorua, Inuit Hunting Grounds in the former Maniitsoq and Sisimiut Municipalities, now Qeqqata Municipality.

In 2002, Greenland called on the Danish Government to be party to nominating these three areas for inscription on UNESCO’s Tentative List.” (Nomination text, Preface, p. 4)

In summer 2018 a property with the name “Aasivissuit – Nipisat. Inuit Hunting Ground between Ice and Sea” was listed in the World Heritage List (WHL). But not only the name was changed...

What happened? The largest size of the nominated area consists of parts that do not require protection because they are not part of the actual "hunting ground" to be protected, be it as part of the inland ice or the open sea, or because they are already protected

(Ramsar site). The "remainder" of the nominated area is reduced to a narrow "transect", while the largest part of the real cultural landscape that actually needs to be protected as "Inuit Hunting Ground" lies to the north and south of the nominated area. Only the immediate vicinity of Aasivissuit is an exception with a larger north-south extension and with the quality of a real cultural landscape as an "Inuit Hunting Ground"; but just this area is planned to be intersected by the ATV road, including the planning of tourist infrastructure (landing stages for boats, lodging facilities, tent sites, etc.), which would devaluate the World Heritage completely. And in the western part, mostly in the Valley of Nerumaq, one of the most prominent hiking trails of the world, called "Polar-Route" or "Arctic Circle Trail", will be replaced by the ATV road, while hikers are advised to use instead of this a path that is dangerous and difficult to access (according to a relevant guidebook). Thus, it can be said (in the nomination text) that both the planned ATV road and the hiking trail are mostly located outside the nominated area they only cross. But in fact they are part of the cultural landscape from beginning to end.

So from a formal point of view, the displacement of the hiking trail by the planned road can be interpreted as not being a violation of the nominated part of the cultural landscape. But actually it belongs to it!

We have doubts that reasons such as the alienated use of the scientific term "transect" were decisive for these changes, but economic interests.

In other cases (the reduction of a reserve for Arabian oryx antelopes in Oman to a small remaining zoo because of oil exploitation and the crossing of the Elbe valley by the Waldschlösschen bridge) such decisions have led to a deletion from the World Heritage List.

The preface of the management plan, which was attached to the nomination text, states:

"Elements of the draft management plan have, in the course of its formulation, been discussed with relevant stakeholders." (managementplan, p.5)

We have sent a memorandum, signed by 300 hikers, and some letters with detailed arguments to the applicant to UNESCO, but we never received a response and we were not invited to a discussion. Are 1,300 hikers on the trail every year considered to be irrelevant?

I come back to the question, what has happened. The sought-after status has been achieved with a minimum of protective measures that do not restrict other interests, but they are insufficient to protect a cultural landscape as World Heritage. But the status gives prestige, which is very useful for marketing purposes. Last but not least, this is also about a question of credibility of UNESCO. We expect you therefore to react.

With kind regards



Dr. Frieder Weisse, chairperson

For details we refer to the attached assessment and other attachments

# *Polar-Routen e.V.*

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date: 29 May 2019

## *Breaking News*

### **On World Heritage Property 1557 Aasivissuit – Nipisat. Inuit Hunting Ground between Ice and Sea Submission to UNESCO / World Heritage Center**

... a few minutes later, and the letter to UNESCO would have been sent without this supplement. That's when I saw a bulletin on the website of the Qeqqata Kommunia<sup>1</sup>, pointing to a new article<sup>2</sup> announced with the high-emotional call "Vejen til Frihed!" This is the Danish title of the Nelson Mandela movie "Long Walk to Freedom". At first, I thought it was an announcement that the bulldozers were already on their way to build an ATV road on the first part of the Polar Route / Arctic Circle Trail. But that apparently has not yet happened. We can still walk on the same trail from Kangerlussuaq to Sisimiut or from there to Kangerlussuaq. But how long?

But the first time I skimmed through the 21 pages of the text in the PDF brochure "Tourism Development via Arctic Circle Road", I got the impression that I do not have to rewrite anything from the 36 pages of my assessment. The recent release of the Qeqqata Kommunia contains nothing new. None of my critical objections in KamikPosten.gl of 25 June 2018<sup>3</sup> goes to the article. Nothing new is in it. Only the number of hikers on the Polar Route is said to be 1,500 per year since 2018. As far as I know, the municipality has not counted them at all, but simply added 200 hikers to my census of 2016, the first census since the opening of the trail 1990.

But one thing is clear with the article: **The hiking trail, as it is known to many thousands of hikers from all over the world, is in acute danger.** If not something is done now, it will soon be over. That's why I call, learn from Greta Thunberg:

**do something!**

Frieder Weiße

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<sup>1</sup>) see [www.qeqqata.gl](http://www.qeqqata.gl) or [https://www.qeqqata.gl/Nyheder/2019/05/ArcticCircleRoad?sc\\_lang=da](https://www.qeqqata.gl/Nyheder/2019/05/ArcticCircleRoad?sc_lang=da)

<sup>2</sup>) Download: [https://www.qeqqata.gl/-/media/naturvej/turismeudvikling%20via%20arctic%20circle%20road\\_spread.pdf?la=da](https://www.qeqqata.gl/-/media/naturvej/turismeudvikling%20via%20arctic%20circle%20road_spread.pdf?la=da)

<sup>3</sup>) <https://www.kamikposten.gl/2018/06/25/%F0%9F%87%AC%F0%9F%87%B1interview-dr-frieder-malik-weisse-atv-kangerlussuaq-sisimiut/>

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Datum: 28 May 2019

## Assessment on the World Heritage status of the WHL Property 1557 Aasivissuit - Nipisat with reference to Article 11 (4) WHC.<sup>1</sup>

submitted by  
Dr. phil. Frieder Weiße, Berlin

### 1. Purpose of the Assessment

This assessment is presented as a supplement to the application of 28 May 2019 concerning the endangerment of the World Heritage property 1557, Aasivissuit - Nipisat. Inuit Hunting Ground between Ice and Sea, by the planned road.

The intended purpose of this assessment is

- to gather, as possible, facts relevant for the necessity of an examination and decision under Article 11 (4) WHC in the abovementioned case,
- while also contributing the assessors own knowledge of the region and the trail between Kangerlussuaq and Sisimiut,
- to evaluate these facts,
- to report observations and opinions of hikers (tourists) and locals with relevance to the subject and
- to put forward proposals for a solution of the problem on basis of mutual agreement.

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<sup>1)</sup> To make the text easier to read, I have referred to some sources that are often quoted with abbreviated names. These are:  
*Nomination*: Nomination of Aasivissuit – Nipisat. Inuit Hunting Ground between Ice and Sea for inclusion on the World Heritage list. by Jensen, Jens Fog et al.; ISBN: 978-87-57519-86-1; © 2017; 192 pages. (The official application document, which has been published by the Qeqqata Kommunia. But it is also available as PDF-file)

*Managementplan*: Nomination of Aasivissuit – Nipisat. Inuit Hunting Ground between Ice and Sea for inclusion on the World Heritage list. ANNEX 2: Management Plan; 2017 (It is available now as a PDF-file <http://whc.unesco.org/en/documents/160522>)

Petersen 2010: Forvaltningsplan for Kangerlussuaq Juni 2010 af Bjarne Petersen. (Managementplan for Kangerlussuaq June 2010); [https://www.qeqqata.gl/-/media/nyheder/2010/07/14-07-2010\\_dk.pdf?la=da](https://www.qeqqata.gl/-/media/nyheder/2010/07/14-07-2010_dk.pdf?la=da); our excerpt in English <http://dl.polarrouten.net/files/managementplan.pdf>.

SEC: Samfundsøkonomiske. Konsekvenser Naturvej mellem Sisimiut og Kangerlussuaq. (Socio-Economic Consequences of Nature road between Sisimiut and Kangerlussuaq) <https://www.qeqqata.gl/-/media/Naturvej/Samfundsøkonomisknaturvejdk.ashx?la=da>; English translation: <http://dl.polarrouten.net/files/socioeconomic.pdf>

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### 3. The Cultural Landscape and its Value

Since 2018 the Property 1557 is listed on the World Heritage List as a unique cultural landscape of outstanding value. With an age of about 4200 years it is one of the oldest cultural landscapes in the world. But if you hike through this area today you can get an impression as if just a few years ago the first human beings might have set foot on this area, because it has not changed its face since the first humans came to it. This is unique in the world. Surely those ancient people, who came to this country 4200 years ago, had no scientifically based conception of sustainability – but they practiced it. And if an area can have a message to the world – this is one.

#### ***The natural trace***

According to UNESCO's definition a "cultural landscape" is the the product of the "combined works of nature and of man". The definition mentions for a good reason nature in the first and humans in the second position. And the first part of creating this landscape was done by nature, long time before people came there.

Whoever wants to hike across country somewhere else in Greenland will soon encounter insuperable obstacles stopping the trip. But in this area in West Greenland with the longest distance between ice and sea you can find something like a natural trace between ice and sea or a system of parallel traces formed by valleys of rivers and lakes and passes crossing mountain ranges. So the first people coming to Greenland 4200 years ago used this natural trace for their seasonal nomadic migrations between the winter camps at the coast and the hunting grounds, where they had summer camps near the big ice. And those nomads used it because since a few thousand years ago, since the end of the Ice Age, the reindeer herds had used this natural trace for their migrations.

When in the 1990es the first long-distance hiking trail was marked in this region, this "natural trace" was also used for it, connecting Sisimiut at the coast and Kangerlussaq near the ice, which was built around Greenland's international airport after 1941. On hiking maps this route is marked as "Polar Route", but today it is often called the "Arctic Circle Trail (ACT)", following the US-habit of naming long-distance hiking trails. There seems to be no agreement on a native Greenlandic name for the hiking trail. The association therefore prefers to use the original local name "Polar Route", which is also understood in almost all languages of the world and is therefore used as name for the international association "Polar-Routen e.V."

But if today someone plans to build a road, it is also a temptation to use this "natural trace" and to destroy the former trail shared collectively by wild game and humans. However, the property was included in the World Heritage List as a cultural landscape, which has been a migration area for more than 4,000 years – consequently, the "natural trace", the contribution of nature to it, is part of it. If essential parts of it are excluded, the integrity of the property is violated.

#### ***Topographic and climatic zones***

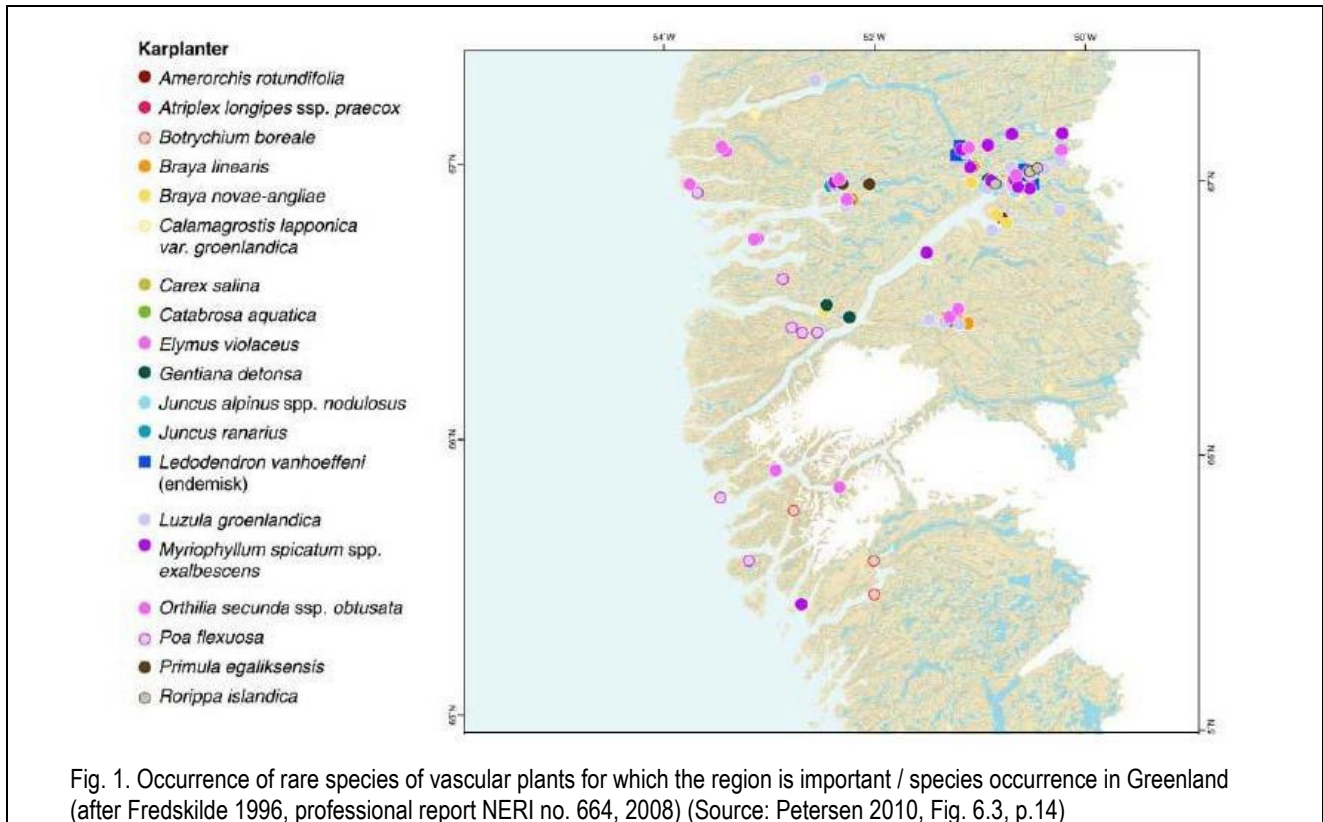
Characteristic of this permafrost region are zones with very specific micro-climates and fragile surface conditions. Bordering on the ice cap is a hilly and very dry belt, where only 150 mm of precipitation per year occur. Though this region is very cold in winter, the snow is not very high and so loose that reindeer and muskoxen can find enough lichens and shrubs underneath.

Further, the cold but dry climate protects reindeer and musk oxen, especially their calves, from the colds that plague many of them in wetter areas. Nearer to the coast a more alpine belt follows with very swampy valleys. The natural trace becomes narrower there, what

creates the mentioned problem. Then comes a belt of small islands and fjords at the coast. The open sea at the coast is free of ice year-round up to the area north of Sisimiut as the result of a side branch of the Gulf Stream. If you picture Greenland's typical cultural landscape type as characterized by seasonal migrations between the inland hunting grounds and the coast, then this area, through which the Polar Route / Arctic Circle Trail runs, is the very heart of it.

### The biotop

The cultural landscape is also an important biotop. The wild species of plants and animals there might be not as numerous as in other parts of the northern hemisphere. But you can find there a lot of plant- and animal-species, which are very rare or even extinct in other parts of the northern hemisphere.



In Germany, for instance, the “Sumpfporst” (English: “Labrador tea”, Greenlandic: “Qajaasaq”, scientific name: “*ledum palustre*”) can be found very seldom as for instance at some places in Niedersachsen, but it is on the “Red List” there. In this region in Greenland it is one of the most common wild plants – and you can make an excellent tea from it.

The same applies for animals. There is a large number of reindeer in the area since the first humans arrived there. But the musk oxen is a newcomer there. He is the only big game from the ice age that survived; and he found asylum here. As a threatened species, he has been reintroduced in different parts of the world in the last century. For example, Dovrefjeld in Norway today has a few hundred musk oxen. In the area mentioned in Greenland, 27 musk oxen were reintroduced in 1962. Today they are more than 10,000<sup>2</sup>. Thus, this area and not least also the UNESCO property there has a significance for the worldwide conservation of biodiversity. Of course, **this requires a certain minimum size of protected areas, and not just a symbolic area.**

<sup>2</sup> “... counts from 2005, 2006 and 2009 suggest that the musk stock is greater than 10,000 animals.” (Petersen 2010, p. 14)

## 4. Changes of the WHL Project from its first proposal to its nomination

If one looks back from the nomination of the World Heritage property in 2017 and its registration in the World Heritage List in 2018 to the first plans to list this area as world heritage one can see that the idea underwent some remarkable changes.

### ***The Tentative World Heritage List***

In the preface of the nomination document it is reported:

“In 1996, the Nordic Council of Ministers published the report ‘Verdensarv i Nord’ - World Heritage in the Nordic Countries, proposing new Nordic properties, which the nation states were recommended to nominate to UNESCO. The report contained three proposals for Greenlandic World Heritage properties, one of which encompassed Aasivissuit – Arnangarnup Qoorua, Inuit Hunting Grounds in the former Maniitsoq and Sisimiut Municipalities, now Qeqqata Municipality.” (Nomination, p. 4)

The other two proposed entities are the Ice Fjord near Ilulissat, which was first listed on the World Heritage List, and the former Viking settlements in South-Greenland, which was the second Greenlandic property on the World Heritage List.

And in 2003 the West Greenlandic Hunting Ground Aasivissuit - Arnangarnup Qoorua was listed on the Tentative World Heritage List under no. 1782. Before the property was listed in the World Heritage List, you could read in the Tentative World Heritage List:

“This region divides naturally into 3 parts, Aasivissuit and Arnangarnup Qoorua (the Paradise valley) in the east, close to the ice cap and the outer coast in the west. The inland areas chiefly consist of hill ranges intersected by broad river valleys. Further west, towards the ocean, the terrain initially becomes more alpine before finally ending in a highly dissected fjord and archipelagic landscape. ... **Aasivissuit and Arnangarnup Qoorua are entirely Eskimo cultural landscapes**, containing a wide range of constructions, such as inussuk cairns (designed to scare reindeer when they are being driven towards a trap), hides, stone meat caches, stone fox traps, graves, stone and turf foundations for temporary, overnight shelters, rows of jumping stones used when playing games, blocking walls used when driving reindeer towards traps, hearths, tent rings and tent houses. This cultural landscape, thus, has all the elements which the Eskimo hunter and his family used. The graves near the base camp show that the older generation was part of the family group, too. Aasivissuit and Arnangarnup Qoorua admirably testify to the way the Eskimos utilised the inland region for hunting and fishing for several thousands of years, archaeological investigations having shown that this utilisation lasted from the Palaeo-Eskimo Saqqaq and Dorset cultures, through the Neo-Eskimo Thule culture to the people living during the colonial era. Aasivissuit and Arnangarnup Qoorua can thus be said to have been the summer territory of reindeer hunters and trout fishermen from about 2150 BC until around AD 1950. Several hundreds of structures have been recorded, the most characteristic of which are those associated with the base camps and the wide range of hunting structures and systems, including rows of cairns, blocking walls and hides. Arnangarnup Qoorua was, moreover, the scene for a short-lived, but very special, religious revival late in the 18th century. The stretch towards the coast and the coastal region; The approximately 170 km long Kangerlussuaqfjord cuts diagonally through the area that has been defined. This large fjord was the waterway along which people sailed to their summer hunting and fishing areas. Archaeological reconnaissance has shown that this stretch of fjord and the district surrounding it has been the domain of hunters and fishermen for as long as people have lived on the west coast of Greenland. Their winter quarters were close to the ocean on the outer coast, particularly the stretch north of Kangerlussuaq and south of Sisimiut where there is a huge archipelago consisting of thousands of islands that form a biotope for a rich fauna of marine mammals, fish and birds, i.e. the basis for a hunting economy. The ruins of the winter quarters of the Eskimos, and later the Greenlanders, are in this archipelago, often so many together that they form small communities. Archaeological investigations show that the archipelago was populated by hunters right back to the 3rd millennium BC, and today, too, many seek their living out among the islets and skerries. All in all, this area has a historic depth of more than 4000 years, manifested by the ruins of houses, various kinds of structures and graves, which, together with the diversity of the landscape, testify to the annual cycle and the conditions which were so special for the Greenland hunter culture.”<sup>3</sup>

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<sup>3</sup>) This text was listed on the Tentative World Heritage List (<http://whc.unesco.org/en/tentativelists/1782/>), but after inclusion in the World Heritage List (No. 1557), the text is not longer found there.



### ***Reasoning for nomination – bizarre detours***

The preface of the nomination further continues that after 10 years of research and discussion,

“A new report was drafted on the cultural history of the area, with suggestions as to the boundaries of the new area (Andreasen 2013). It was also decided to include part of the inland ice sheet and of the open sea, and to change the title to: Aasivissuit – Nipisat. Inuit Hunting Ground between Ice and Sea.” (Nomination, p.4).

The quoted source of Andreasen (2013) is listed as an un-printed material in the bibliography of the nomination document<sup>4</sup>. The extension of the property to the inland ice and the open sea stimulated my curiosity about what additional aspects of protecting the cultural landscape it would include. But unfortunately the un-printed material of Andreasen (2013) was not available to me. But the nomination document claims to give a reason for expanding on the inland ice.

### ***Listing of hypothetical areas***

Concerning the extension of the nominated area on the inland ice the nomination document states that 4500 years ago the border of it was ca. 40 km more eastwards and:

“Radar images of the subglacial topography reveal that huge valleys, lakes and rivers, and therefore human hunting grounds, must have extended to the east of the present ice margin.” (Nomination, p. 28).

But this also means, at least 2000 years ago all remains of settlements there etc. have been destroyed by the ice. It seems to be very interesting that there probably once existed settlements, but this is only a hypothesis and, last not least, this does not lead to the necessity of protecting them today. The ice, as far as it has not destroyed the remains, will protect them better than any protecting authority. Nearly the same holds true for the extension of the nominated area on the open sea (apart from the coastal hunting zones for sea mammals). Though not mentioned there, a large part of a Ramsar-Area was also added to the property; but the nomination document does not point to any reason as additional protection etc. for this enlargement.

### ***No comment on, no mention of delisting, no map of the Tentative Property***

**A look on the Tentative List reveals another curiosity:** While the nomination document in connection with the name change from "Aasivissuit - Arnangarnup Qoorua" to "Aasivissuit - Nipisat" **speaks of an extension of the property, its area actually shrank from 10,210 km<sup>2</sup> to 4,178 km<sup>2</sup>**. This led to the assumption that the not plausible extension of the area should mask its drastic reduction, which is not mentioned by the nomination document with even one word, nor presents it any plausible reason for it. **And nowhere in the nomination document a sketch of the area of the entry in the Tentative World Heritage List is presented or compared** with the sketch of the nominated property.

Neither in the entry of the Tentative World Heritage Site 1782 nor in the nomination for inclusion in the World Heritage List itself was a map of 2003's entry with the initial 10,210 km<sup>2</sup> to be found.

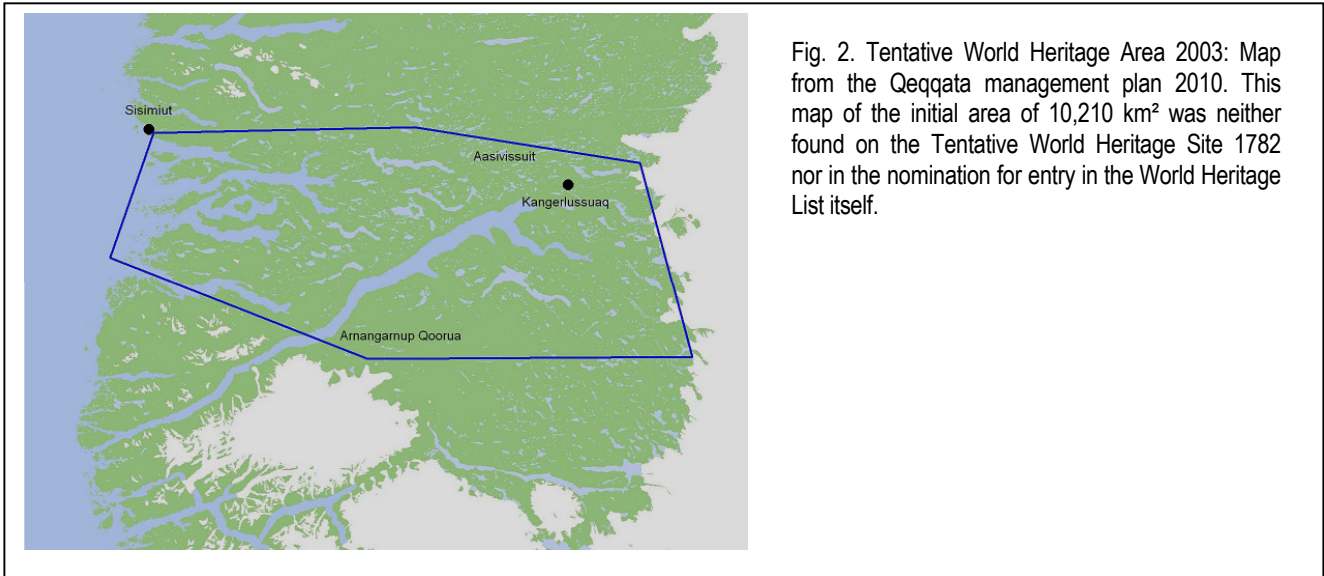
### ***Why this huge difference between the tentative site (2003) and the final site (2017)?***

Eventually, I came across such map (Fig. 2) in the management plan for Kangerlussuaq of June 2010 (as well as other valuable facts). The area is described there as follows:

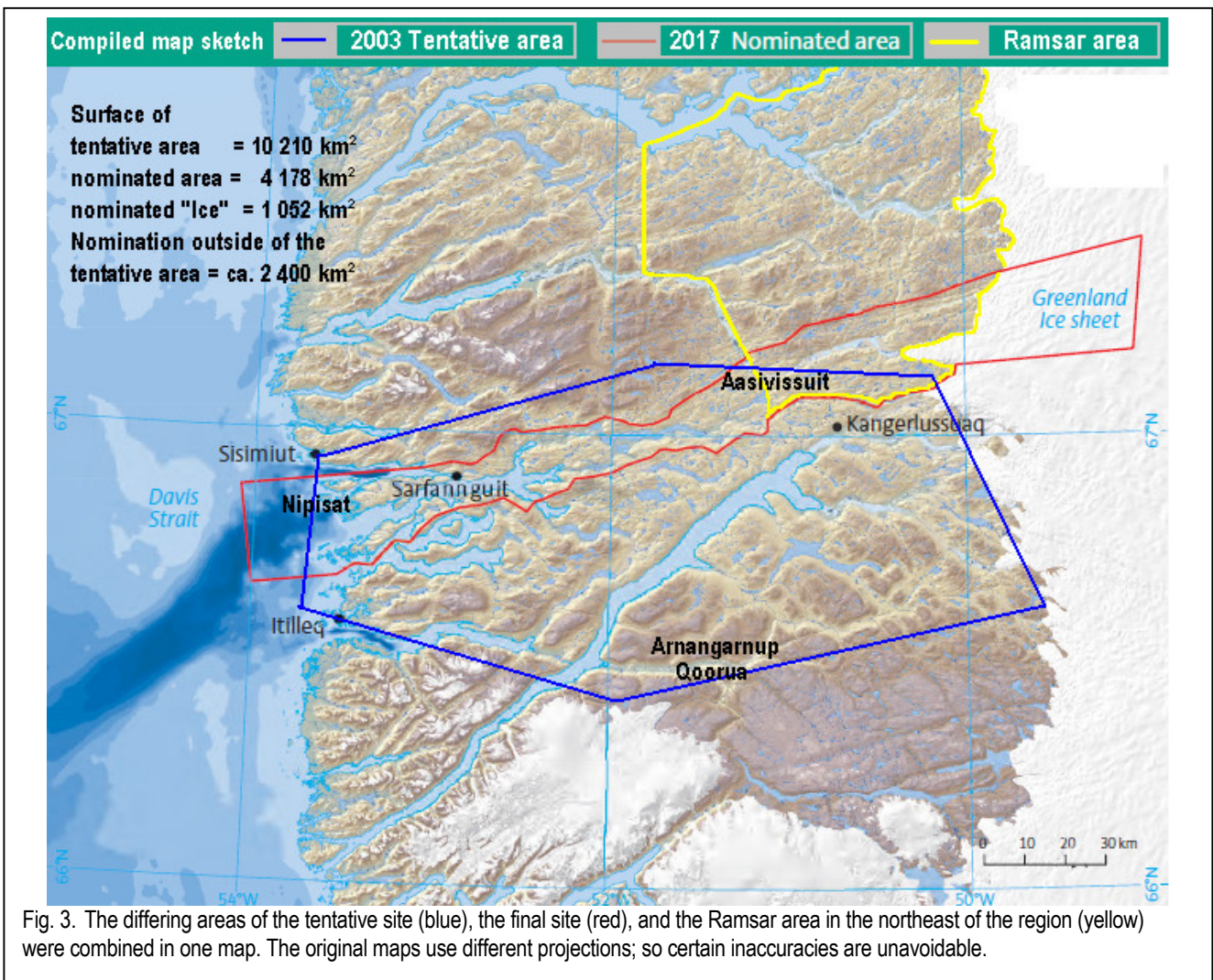
“The proposal covers an area of 10,210 square kilometers between Kangerlussuaq and the coast. The area is divided into three parts: Aasivissuit, Arnangarnup Qoorua (Paradise Valley) and the coast.

<sup>4</sup>) Andreasen, C., 2013: “Forslag til World Heritage område ved Sisimiut mellem Kangerlussuaq, Aasivissuit og Nipisat. Rapport til Qeqqata kommunia, januar 2013. Report on file at Qeqqata kommunia.”, Nomination, p.181.

Aasivissuit and Arnangarnup Qoorua have many important cultural remnants from summer hunting, while the coast has leftovers from winter settlements. The area includes a cultural history of 4000 years, and the remains include among others cairns, tent-rings and graves, especially concentrated around Aasivissuit and Arnangarnup Qoorua.” (Petersen 2010, p. 44)



For easier comparison, the **differing areas of the tentative site, the final site and the Ramsar area** were combined in a single map (Fig. 3).



It can't be stressed enough: **the 'added' areas on the ice and the sea contain nothing that would require additional protection as a cultural landscape, while on the other hand important parts of the area of the Tentative WHL have been delisted.** This also applies to the 'added' area that overlaps in part with the Ramsar area – that area is **already subject to strict protection regulations!** Looking closer, this means that **80% - 90% of the area designated as TENTATIVE area for entry in the World Heritage List have been excluded from this protection in the ACTUAL nomination.** But the nomination document does not mention any reason for this reduction of the area nor is it even mentioned specifically. Reference is made only to the 'added' areas with which no additional protection is associated. What remained from the Tentative World Heritage Area is a narrow corridor from the inland ice near Aasivissuit to Nipisat at the coast. The corridor is only slightly widened in the immediate vicinity of Aasivissuit, but this is where the planned ATV road cuts through the area.

The nomination document defines the nominated area by seven archaeological key sites, which are said to represent the relevant (pre)historical epochs of the area. But as the following map shows, there are hundreds of archeological sites, most of them outside of the nominated area, but not mentioned in the nomination document with a single word.

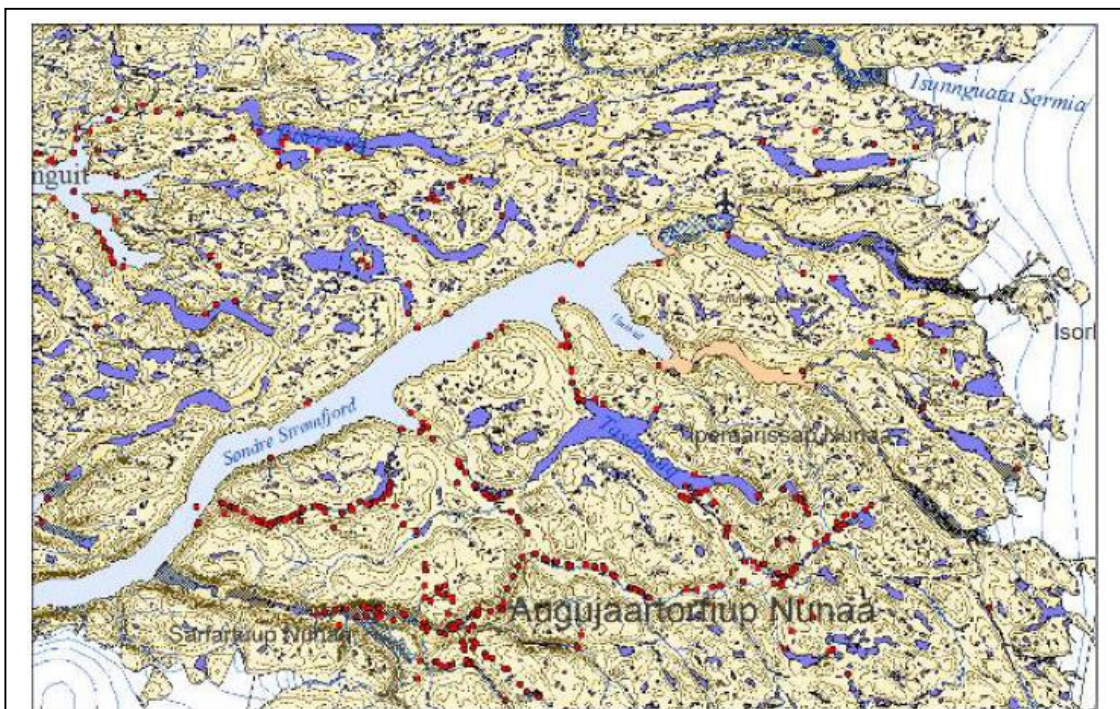


Fig. 4. Preserved ancient monuments (red dots). Source: Greenland's National Museum and Archives.

The management plan, which was not published together with the nomination document, shows some archeological sites out of the nominated area (Managementplan, Map 4, p. 23), but much less than the above presented map. On one hand the area around Arnangarnup Qoorua (Paradise Valley) was completely excluded from the area with the shift from the tentative to the nominated World Heritage Property. There still exists a natural reserve of Arnangarnup Qoorua<sup>5</sup> with an extension of 91,9 km<sup>2</sup>. But the whole area on both sides of the "Long Fjord" (Kangerlussuaq) and the area south to the fjord is not

<sup>5</sup>) The Government of Greenland, Ministry of Nature and Environment: Protected Areas:

"**Arnangarnup Qoorua - Paradise Valley** is designated as a protected area because of its scenic beauty and its cultural and scientific importance. All fishing and hunting are prohibited in this area."

<https://naalakkersuisut.gl/en/Naalakkersuisut/Departments/Natur-Miljoe/Natur-og-Klimaafdelingen/Natur/Fredede-landomraader>

part of the nominated property, though in the entry in the Tentative WHL such convincing arguments for including it in the World Heritage List were presented.

The same holds true for the northern parts of the former Tentative WHL property, which are not part of the nominated area. The first picture in the nomination book (p. 2) presents a phantastic look on Russel Glacier – but this is not part of the nominated area. Of course the name giving site of Aasivissuit is part of it. But why was the adjacent area north of Aasivissuit excluded? If you hike from Kangerlussuaq to Sisimiut, after one day you arrive at the lake of Amitsorsuaq and walk 24 km on the trail at its southern shore: it is really the pearl of the arctic. But the Amitsorsuaq area is excluded from the nominated property. And when you continue and come to the shore of the lake Tasersuaq the phantastic panorama of the mountain Pingu welcomes you on the northern shore. But except a narrow and steep strip of the lake shore, where no hunting is possible, this area north of Tasersuaq is excluded from the “Inuit Hunting Ground” listed as WHL property. And if you would ask me for a typical site to demonstrate that animals and humans are still using the same trails for their hikes, I would immediately point to the valley of Nerumaq and Innajuttoq. But they are excluded from the WHL property by its nomination.

What happened is: the selected archaeological remains have been separated from the “Inuit Hunting Ground”, what they represent. Of course, as a matter of fact the areas represented by those sites are still a part of the cultural landscape. But being excluded formally from the property by the nomination – without buffer zone – the cultural landscape loses the guarantee to be protected. Thus, the municipality can argue that it plans the ATV road mainly outside the nominated area (with the exception of crossing of the Aasivissuit area for 35 km).

***But the shrinkage of the property received a smart name: TRANSECT***

... because it sounds so scientifically. I would rather say that the selection of seven archaeological sites representative of the historical and prehistoric epochs is a composition or construction. A transect, on the other hand, is a procedure for selecting a sample WITHIN a property; but it is per definition not the whole property.

Apparently this fact was subject of discussions between the submission of the nomination document in January 2017 and the registration as World Heritage Property in July 2018. In the WHL-entry No. 1557 the circumstance is presented as the result of the application of a certain scientific concept, of which there is no mention in the nomination document. That's the concept of the TRANSECT<sup>6</sup>. Only on three pages in the nomination document the words "transect" or "intersect" are used, but not to explain the shrinkage of the large area from the Tentative WHL to the finally nominated narrow strip designated in the nomination document by 115 coordinates, but only as a methodological aspect to compare different sites in the arctic and in the world (Nomination, pp. 102, 111, 118).

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<sup>6</sup> “Transect” is a useful methodological concept in some scientific disciplines as biology, geology etc. and can be defined as:

“A transect is a path along which one counts and records occurrences of the species of study (e.g. plants). It requires an observer to move along a fixed path and to count occurrences along the path and, at the same time (in some procedures), obtain the distance of the object from the path. This results in an estimate of the area covered and an estimate of the way in which detectability increases from probability 0 (far from the path) towards 1 (near the path). Using the raw count and this probability function, one can arrive at an estimate of the actual density of objects.” (Wikipedia)

***Arising questions***

In the following chapters, I now want to pursue the following questions:

1. Can one also assume other reasons for the mentioned reduction of the area?
2. Is the concept of the “transect” suitable for describing a cultural landscape adequately as a WHL property?
3. What can be done to protect the whole entire cultural landscape and not only a part (transect) of it, which isolated from the rest of it can not preserve the property’s integrity?

## 5. Mining Interests in the former Tentative World Heritage Property

After the submission of the nomination to UNESCO by the Government of the Kingdom of Denmark, it was printed in book form and made available to the public. But Annex 2 to the nomination (management plan), which contains a hint to mining activities on p. 31 (point 6.9) and on p. 70 f., has not been published together with the nomination text. Apart from a publication by the University of Copenhagen, Annex 2 was not accessible until the documents were published by UNESCO. About mining the nomination text says only,

“the Ministry of Mineral Resources – which issues raw material licenses – has agreed not to issue prospecting licenses within the nominated World Heritage Site.” (Nomination, p. 18).

But this hint made me skeptical, because I saw in it only a promise for the future and only within the narrowly defined nominated area. Later, when I read Annex 2, I found my skepticism confirmed<sup>7</sup>. Obviously the quoted hint is an expression of the effort to keep the ball flat. I fear that the ministry's promise has contributed to the restriction of the site rather than its protection.

### *Mining prospects South of the nominated area*

The following map (Fig. 5) reveals mining sites which were licensed in 2016 in the immediate vicinity of the nominated area.

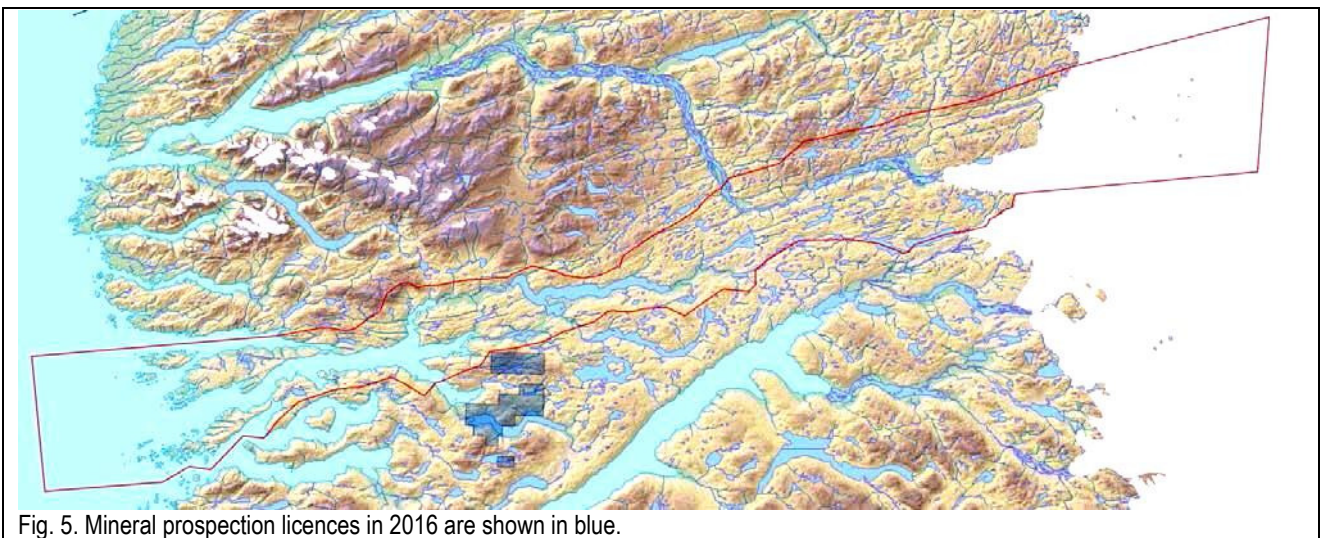


Fig. 5. Mineral prospecting licences in 2016 are shown in blue.

As one can see here, the northern border of the mineral prospecting area, which was licenced in 2016, is exactly identical with the southern border of the UNESCO property, which was nominated in 2017. That can not be a coincidence.

Annex 2 to the nomination document contains only this map with mineral prospectings. But in other sources more areas with mineral prospectings were found. Other licenses for mineral prospecting southeast of the Kangerlussuaq fjord are found in the “Management Plan for Kangerlussuaq” (Petersen 2010, p. 20). I quote from this source chapter 6.5.1 – Mining Exploration:

“In the area around Kangerlussuaq, many exploration licenses have been granted. **The yellow markings in Figure 6.4 [here Fig. 6] indicate areas where authorization has been given for raw material exploration or where applications for authorization to search for raw materials have been opened.**”

<sup>7</sup>) See: “The Ministry of Mineral Resources has stated, furthermore, that the nominated property will be granted exemption with respect to the issuing of future licences. It is, however, still possible that mineral resources projects will be established in the adjacent areas.” (Managementplan, p. 31)

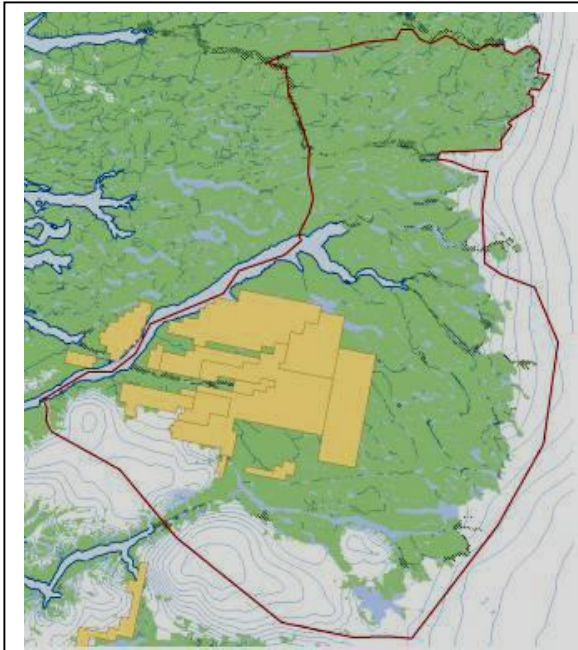


Fig. 6. Source: Petersen 2010, p. 20

In spring 2007, Hudson Resources Inc. performed seismic surveys in their field of study in the Sarfartoq region. The studies have mapped a diamond-bearing mountain species called Kimberly over a 1200 m stretch.

A total of 1604 diamonds have been found in the Sarfartoq area. Of which 441 macro diamonds, ie. with a grain size of 0.5 mm in three dimensions. The largest of the diamonds is 2.4 karat, which is the largest diamond found in Greenland to date.

Hudson Resources Inc. is planning to apply for exploitation permission and one mine will start production in 2011. Early launch of mining in the area of the Paradise Valley [in Greenlandic: Arnangarnup Qoorua] will mean easier access to the southern part of the management area, including help expand the hunting possibilities. Conversely, there will also be a risk of greater pressure on the protected area in the Paradise Valley, as access to this will also be easier. In addition to exploration of diamonds, niobium research is also being carried out in the area." (Petersen 2010, p. 20)

If one compares all this with the tentative area, one might ask: Was here a promise made by the Ministry of Mineral Resources to the mining industry or to UNESCO?

### ***Mining prospect within the nominated area: Niarqornarsuaq***



Fig. 7. View of the Niarqornarsuaq ultramafic complex from the southwest.

Size of orange stippled outline is 2,5x1km.

Source: [http://21stnorth.com/PDF-filer/The\\_Ikertoq\\_Ni-Cu-Co\\_Prospect.pdf](http://21stnorth.com/PDF-filer/The_Ikertoq_Ni-Cu-Co_Prospect.pdf)

But my research revealed that there are also mining concessions within the nominated area. According to "The Ikertoq Ni-Cu-Co Prospect.pdf" a licensed site for nickel-, copper- and cobalt mining exists within the nominated area. Its subtitle is: "high-grade nickel-copper targets in the Nagssugtoqidian orogen of west Greenland (contained within ex-

clusive license 2010/17)"; and then follows: **"The Ikertoq Ni-Cu project comprises exclusive mineral rights covering 151 km<sup>2</sup> in a widely unexplored segment of the Palaeoproterozoic Nagssugtoqidian Orogen in West Greenland."** The PDF-file name points to the Ikertoq fjord within the nominated area, and the site name "Niarqornarsuaq"

corresponds to the name of a peninsula at Ikertoq fjord vis-à-vis Sarfanguit called “Niaqornarsuaq”:

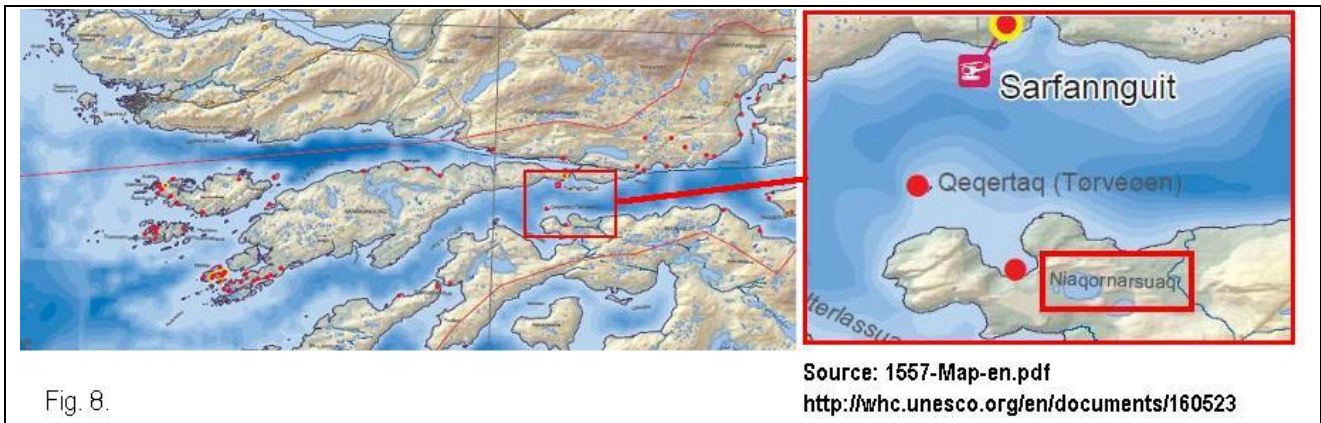


Fig. 8.

### Conclusions

I did not find any hint to mineral prospections north of the nominated area in the municipality of Qeqqata. I possess not enough knowledge on the geology of the region to make definite judgements about it. But it seems to me that with the exception mentioned above in the nominated area and in the area north of it, no relevant finds of mineral resources are to be expected there.

This leads me to the question, if what was quoted in the beginning of this section as a commitment of the Ministry of Mineral Resources, is based on a previous commitment (of the government or the municipality) to the mining industry not to nominate parts of a World Heritage site in the mining-interesting area in the southern part of the municipality of Qeqqata.

While Tentative WHL names three sub-areas, Aasivissuit, Arnagarnup Qoorua and the coastal region, the nomination has eliminated the southern of the three subregions, Arnagarnup Qoorua. The nomination does not give a reason for this. However, it can be concluded from the circumstances that consideration for mining interests was decisive.



## 6. The idea of a Road between Sisimiut and Kangerlussuaq

The "road project" is a matter of a long history for locals in West Greenland, perhaps vaguely comparable to what the "new airport" is to Berlin.

It has to be mentioned here that in whole Greenland no road exists, which connects two distant towns or settlements with each other. Roads, with very few exceptions, exist only within towns (byer) or settlements (bygder). One exception is Thule Air Base in the North, where a road has been built by the US Air Force. The other one is Kangerlussuaq International Airport, which also was once built by the US Air Force. The road at the Kangerlussuaq Airport runs on one side to the harbor (ca. 10 km) and continues for another 3 km to the (former<sup>8</sup>) Radar Research Center in Kelly Ville. In the other direction the road leads about 39 km towards the inland ice cap. The first shorter part up to a mountain called "Sugarloaf" was built by the US Air Force. The next part to the ice cap was built by Volkswagen, who once used it for testing cars on the ice. So the municipality there got about 50 km road without having to pay for it. The area round Kangerlussuaq is very dry, and the road does not cross swampy areas, as they occur in the coastal region near Sisimiut, only some sand in Sandflugtsdalen. Therefore, to build a road between Kangerlussuaq and Sisimiut would create many more problems than the 50 km road around Kangerlussuaq International Airport.

### ***The proposal of the US Air Force 1962***

The first proposal for building a road (i.e., a solid gravel road with a sound foundation, not only a mud track for ATVs) between the airport in Kangerlussuaq and Sisimiut (then "Holsteinsborg") was made by the US Air Force in 1962, who at that time ran the airport, but the plan was rejected by the Greenland Ministry in Copenhagen. There still exists a rumor in Sisimiut and Kangerlussuaq that this would have meant the chance to get the road completely financed by the US Air Force and that the rejection meant to have lost this chance. In the following years the former municipality of Sisimiut (Holsteinsborg) made different applications and proposals to the central government to build the road once proposed by the US Air Force. The mentioned paper on "Socio-Economic Consequences. ..." reports:

"The central authorities - first in the form of the Greenland Ministry and then as the Greenland Home Rule Government - have, since the first thoughts of a road arose, rejected the plans and did not want to finance the road nor even to co-finance it." (SEC, p. 4.).

And after the reform of municipalities in Greenland, by which the municipality of Qeqqata was formed by joining Sisimiut and Maniitsoq, the municipality of Qeqqata kept up the plea for a road.

### ***The road – never ending conflict between central government and municipality***

So after forty years of discussion a joint steering committee was formed by the Home Rule Government and the municipality, which presented its report in 2005. The report, though it did not arrive at final results and was far from arriving at agreements, stated among others:

"The most important source of income of the project is the relocation of existing traffic from air to road / ship [sic!]. A large part of the assumptions behind these estimates seem very likely and are a good starting point for further analysis. There are a lot of other consequences and assumptions that should be investigated further." (SEC, p. 5 f.).

This does not sound like much agreement between both sides, to say it carefully. A big difference between the positions of both sides was the estimation of the expected costs:

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<sup>8</sup>) As I was informed last year it is closed now due to the policy of President Donald Trump.

“Mittarfeqarfiit and Rambøll have arrived at estimated construction costs of 490 and 250 million, respectively. The difference is thus 240 million. Thus, quite a considerable amount.” (SEC, p. 6).

The Greenlandic word “Mittarfeqarfiit” means “Airport”, and this is the position of the Home Rule Government, which runs the airport. “Rambøll” is Scandinavia’s biggest enterprise for the construction of roads and other infrastructure. In this light one can therefore also see, why the municipality relies on Rambøll as a think tank by using its expertise, in particular its EIA concerning the ATV road.

### **Ignored Alternative: Boat Line**

It is worth mentioning that the report from the joint steering committee not only addresses the idea of a road to Kangerlussuaq, but also the **possibility of a ship line** – a solution, which was completely ignored in the preceding and following plans of the municipality. Boat lines once used to be the typical means of transportation in Greenland, because all towns (byer) and settlements (bygder) in Greenland with no exception are located on the coast and are accessible by boat. This is also true for the transport of cargo between Sisimiut and Kangerlussuaq. The Kangerlussuaq fjord even allows for large ocean-going vessels to commute between Sisimiut and Kangerlussuaq. And for some types of cargo,

e.g., kerosene, it is quite clear that it is transported to Kangerlussuaq airport by ship and that an ATV road cannot become an alternative.

Arctic Umiaq Line (AUL) maintained a regular passenger boat line also serving Kangerlussuaq at the end of the fjord until about 15 years ago. Today, the activities of AUL are reduced to a weekly coastal boat line with *M/S Sarfaq Ittuk* between Ilulissat in the north and Qaqortoq in the south, but leaving Kangerlussuaq unattended. It may be unprofitable for a big ship like the *M/S Sarfaq Ittuk* to run an extra 340 km up the fjord to the port of Kangerlussuaq and back – but smaller boat sizes could cover this connection between the fjord and the coastal boat lines! Decades ago one boat line after the other closed in Greenland, and people were said to use a helicopter of the government owned Air Greenland instead. However, in 2003 *Diskoline A/S* started its enterprise with only one boat to re-open coastal boat lines. It proved very successful.

Today *Diskoline A/S* has more than a dozen boats and ships, not only in the Disko region, but also in southern Greenland. A re-opening of regular boat lines in the municipality of Qeqqata would first of all present an enormous chance to connect Sisimiut and Kangerlussuaq – meaning the inland with the coast – at least as proficient as a proper road would. However, a re-connection with the coastal boat



Fig. 9. A suggested plan for connecting Qeqqata's towns and settlements with one another and the entire area with the capital Nuuk in the south and the Disko area in the north.

transportation system would not only connect Sisimiut and Kangerlussuaq, but all towns and settlements in the Qeqqata municipality with one another, and perhaps the entire area with the capital Nuuk in the south and Aasiaat in the north (see sketch to the left). And all this without harming the World Heritage Site.

Additionally, such a wide-ranging boat line system can activate manifold tourist activities and a trip along the beautiful fjord coast offers an excellent tourist attraction. With it's 170 km the Kangerlussuaq fjord is of equal length as the Sognefjord in Norway – and it is definitely as beautiful. And tourist numbers rise...

### ***Was the ATV road already mentioned in the application to UNESCO?***

Yes, the plans for the construction of the ATV road were mentioned in the UNESCO nomination. But this was done very casually and easily missed by a reader, who is not at home in the area. In this way, the Qeqqata municipality has done justice to the fact they planned an ATV road crossing the WH property 1557. They have not concealed it. But on a closer look, it seems they tried to play it down and they did not present a realistic picture of the probable consequences of an ATV road.

### ***Former ATV road after 10 years still not overgrown by vegetation***

The Nomination mentions a short ATV road near the hut Eqaugaarniarfik in the middle between Sisimiut and Kangerlussuaq (Nomination, p. 133 f.) of a length of ca. 5 km. It was made for only a few workers driving from the fjord Maligiaq, where they arrived by boat to reach a place up the mountain, where they had built a dam ten years ago. Nevertheless this road left a detrimental mark in the landscape. Even after ten years the torn surface has not recovered. Still, no grass grows in the still muddy tracks, only a few pioneer horsetails (equisetum) have eventually managed to conquer the wasted area over the length of 5 km. The road remains an open wound in the landscape giving a slight hint on



Fig. 10. Allegedly a formerly used ATV road after 10 years.  
Source: Nomination, p.134.



Fig. 11. Recent photo (2018) of the formerly used ATV road after 10 years. Source: Author.

what the planned ATV road might turn into when several thousand wheels each season leave their impressions. And one cannot control, if they remain on the road. Especially when it rains, this road is so deeply mud-covered that it becomes unpassable for hikers.

While muddy tracks and no vegetation being the reality, the Nomination to UNESCO (Nomination, p. 134) falsely presents (literally) quite a different picture. The photograph (Fig. 10) allegedly shows part of the formerly used short ATV track which now is allegedly perfectly restored by vegetation. The accompanying caption reads:

“Fig. 4.8. [here: Fig. 10] The 2009 track running northwards from Itinneq (Ole’s Lakseelv) to a small lake further north is no longer in use for vehicles, and the vegetation is now recovering. The original impact of the vehicles on the ground will be visible for years to come. The track is now part of the Arctic Circle Trail, a hiking route between Kangerlussuaq and Sisimiut.” (Nomination, p. 134)

It is believed by the author and interviewed knowledgeable hikers that the image shows a completely different area than the one in discussion.

I have often hiked the trail between the hut Eqalugaarniarfik and the former dam building site, but I don’t recall any part of the trail looking like that. Neither can all the hikers, who know the area and to whom the photo was shown. I dare to say that the photo is NOT taken on the aforementioned short ATV road between Maligiaq and the former dam building site. Consequently, I consider this picture along with its caption as **fake**.

The *in situ* reality shows a different “recovery” of the former road. My photo to the right (figure 11) depicts the landscape as encountered in September 2018 – nine years after the road was closed. The muddy tracks still don’t show any serious overgrowth! Some parts of the road even look considerably worse, especially during rainy times of the year. I have an idea why photos like this were not presented in the UNESCO Nomination of 2017...

The planned ATV road is meant to be used by several thousand ATVs annually! The result will be remarkably worse and wider spread than shown in the picture above (figure 11). In certain parts of the trail deep mud – especially after heavy rain – can cause a tired and hence less careful hiker to sink hip-deep into the mud (as it happened to me one year). Knowing this, I raise a vital question: What if an ATV sinks into the mud? What happens with the driver, what with the vehicle? A hiker is equipped to reach “civilization” self-sufficiently. A tourist on an ATV is not. An ATV road without a road bed is prone to surprise with “natural hazards”.

When last summer I was walking back from Russel’s Glacier to Kangerlussuaq, an ATV stopped near sugarloaf and offered me a lift to Kangerlussuaq. I had to hold on pretty well so as not to fall off. And that was on a “regular” road. On a road like the planned ATV road I would probably have to fear for my life. And shortly before Kangerlussuaq the driver stopped. He was afraid for the police and asked me to get off and said that it is forbidden to take a second person on an ATV. One might therefore ask what benefit a vehicle for only one person could have for passenger transport as an alternative to aviation at all.

### ***The shift to planning an ATV road***

Among the Greenlanders in Kangerlussuaq and Sisimiut, the road project is something of a never-ending story that divides Greenlandic society. It can lead to heated debates among locals that are often difficult to understand by people from outside. In Greenland I have friends both in the one and in the other camp. A friend of mine who supports the road project once told me that the people in Nuuk or the central self-government were biased against them in Qeqqata. It is worth to be mentioned that he did not care about the ATV road itself, for him it is just the first step to a real road. It seems that those, who want the road, are not so much interested in an ATV road, but they have the dream once to get a

regular road as they exist all over the world. An article on Kangerlussuaq Road Project starts by stating:

“The former Sisimiut Municipality and the following Qeqqata Municipality wanted to realize the road between Sisimiut and Kangerlussuaq. A two-track dirt road is expected to cost 300 to 500 million dkk, which are not available for funding.”<sup>9</sup>

And then in sentence 3 is added:

“Instead, it will be possible for the municipality to initiate the road between Sisimiut and Kangerlussuaq as a 3 m broad nature road<sup>10</sup>, which can eventually be upgraded to a regular road.”

But it is an indisputable fact that the upgrading of an ATV road without road bed to a regular road with road bed does not cost measurable less than immediately building a regular road. Perhaps it costs more: the 15 million dkk for the ATV road. So if the construction for a regular road is “not available for funding”, the same holds true for upgrading an ATV road to a regular road. Therefore, the municipality’s proposal of upgrading the ATV road to a regular road is far from being a realistic option.

For more than 50 years there is an ongoing discussion on building a **regular** road with a solid road bed, durable enough for even heavy trucks. But only a few years ago the plan of a (supposedly) cheaper ATV road came into discussion, as this text from the municipality’s website shows:

“In 2014, different options for the overall road project are being considered, and to start slowly at each end. That is, from Kangerlussuaq to the harbour and then up to Aasivissuit. Similarly from Sisimiut to the bottom of Kangerluarsuk Tulleq. The possibility of a connection between Sisimiut and Kangerlussuaq by road from Kangerlussuaq to the east end of Tasersuaq and then boat to Sisimiut is also considered.

Overall, the idea of a nature road (ATV track) occurs because:

- There can not be funding for a real road between Sisimiut and Kangerlussuaq.
- A new route north of Tasersuaq will be possibly without much major blasting work.
- Availability for concrete potentials is requested
  - near Kangerlussuaq to new port, **to lakes, to biltest areas, and to Aasivissuit.**
  - near Sisimiut to the ski area Solbakken and to the cottage area at the bottom of Kangerlusarsuk Tulleq.
- Motorized vehicles such as ATVs, UTVs and Unimogs<sup>11</sup> appear very mobile and can drive without expensive roads.

Qeqqata’s Municipal Council decides on February 26, 2015 that further work will be carried out with an ATV trace between Sisimiut and Kangerlussuaq, and that the Self-Government must be asked for the introduction of ATV tracker and safety device on ATVs.” (SEC, p. 10 f.)

Reading the proposal “for the introduction of ATV tracker and safety device on ATVs” the first time I was sceptical, if this could bring a solution and if it was more than pushing the responsibility to the other side. Illegal use of ATVs and its bad impact on the environment is a great problem in Greenland. Local politicians who are in favor of the ATV road must therefore distance themselves from this misuse. Recently I could read that the topic (but not on our memorandum, as proposed to me) also was discussed on the Qeqqata Municipal Council meeting on October 26, 2017. In a factual check attached to the council meeting’s protokoll is said about this proposal:

<sup>9</sup>) : [https://www.qeqqata.gl/Emner/Om\\_kommunen/Kangerlussuaq\\_vej?sc\\_lang=da](https://www.qeqqata.gl/Emner/Om_kommunen/Kangerlussuaq_vej?sc_lang=da), and in English <http://dl.polarrouten.net/files/atv-natureroda.pdf>

<sup>10</sup>) The word “nature road” here means “ATV road”.

<sup>11</sup>) The original text says „Umimoq“, but the picture presents an Unimog, what points rather to a construction road than a nature road.

"There is no legal basis for legislation to introduce it as statutory requirement, and in connection with ATV driving the self-government has rejected Qeqqata Municipality's proposal to introduce GPS trackers as legal requirements."<sup>12</sup>

So the proposal has become a part of the ping-pong-play between the municipality and the self-government concerning the road project, but it will not help to prevent the bad impact by illegal ATV-use on the area including the pospected UNESCO property, when an ATV road will be built.

### ***Is the ATV road an economical solution?***

And what about transporting cargo from Sisimiut to Kangerlussuaq, as Marius Olsen, the responsible council member for living ressource in the municipality of Qeqqata, has proposed it in an article Sermitsiaq<sup>13</sup>. With some (but not all) ATVs one probably can transport some cargo, but I guess not more than 100 kg. My friend E. in Kangerlussuaq owns five ATVs to rent them to guests for trips to Russel's Glacier (25 km) – of course trips in a convoi and on a regular road, not unguided trips and not cross country, which is illegal. To rent an ATV for the 25 km trip from Kangerlussuaq to Russel's Glacier costs 1,500 dkk (200,00 €), which is more than the price for a ticket from Kangerlussuaq to Sisimiut (180 km) by plane. When I asked E. for the use of ATV to transport persons and goods, he laughed and replied: "No Frieder, an ATV is no means for transportation, it is just for fun!" I asked him also for the costs of an ATV, and he said to me that one has to calculate about 10.00 DKK (1.33 €) per km for fuel, service, and amortization in an area like Kangerlussuaq. "You can not use an ATV here for more than 20,000 km," he said, "because then the transmission is worn out." Based on this information, I calculated, a trip of 180 km from Sisimiut to Kangerlussuaq might cost about 1,800 DKK. This is 50% more than a ticket for a plane. But this are only the operating costs. To rent an ATV for such a distance, if an ATV road is built, might cost about 8,000.00 DKK (1,080.00 €) according to E.'s information. This is more than the price of a ticket for a flight from Copenhagen to Kangerlussuaq and back. According to available information a good and modern plane, as it is used between Kangerlussuaq and Sisimiut or Copenhagen, needs about 3 l fuel per 100 km and per passenger; and an ATV needs in this terrain at least 5 times more. So, compared to an ATV, air transport still seems to be a green technology. And, unlike what Marius Olsen said in his article<sup>14</sup>, a fisherman from Sisimiut would rather send his salmon by air to Kangerlussuaq than by ATV. And that not only because it is much cheaper, but also for hygienic reasons. Which customer would like to buy a salmon after an uncooled transport of at least one day on an ATV through the wilderness?

<sup>12</sup>) The protokoll on council meeting on October, 26, 2017, reports:

**"Faktiske forhold**

Om sikkerhed/personsøgere til vandreturister, og anden færdsel som hundeslæder, snescootere og ATV'er i baglandet, og i særdeleshed på ruten mellem Sisimiut og Kangerlussuaq arbejder Erhvervsrådet - Arctic Circle Business (ACB) med løsningsforslag til udfordringen. ACB lancerede projektet med arbejdstitlen "Sikkerhed på Sporet" i november 2015. Emnet om sikkerhed på vandreruten og færden i det åbne land i øvrigt var desuden et emne på beredskabskommissionsmødet i december 2016. Der er umiddelbart ikke hjemmel i lovgivning til at indføre det som et lovkrav, og Selvstyret har ifm. ATV-kørsel afvist Qeqqata Kommunias forslag om at indføre GPS-trackere som lovkrav."

(<http://www.qeqqata.gl/-/media/Politik/KB%20Referater/2017/06%20%2026102017%20%20dk%20abent%20dagsorden.ashx?la=da>)

<sup>13</sup>) Olsen, Marius, Sermitsiaq, 2 November 2015: "Expect ATV tracks to boost food"

("Forventer ATV-spor vil give boost til fødevarer") <https://sermitsiaq.ag/forventer-atv-spor-give-boost-foedevarer>

see also: ATV spor mellem Sisimiut og Kangerlussuaq. Vejen til bedre udnyttelse af de levende ressourcer.

(ATV Trail Between Sisimiut and Kangerlussuaq. A Way to Better Exploitation of Living Resources; Marius Olsen, Chairman of Living Resources Commission, Municipality of Qeqqata), November 2, 2015;

[http://www.qeqqata.gl/Nyheder/2015/11/ATV\\_Spor.aspx?sc\\_lang=da](http://www.qeqqata.gl/Nyheder/2015/11/ATV_Spor.aspx?sc_lang=da)

<sup>14</sup>) The article can be found on the municipality's website under: [http://www.qeqqata.gl/Nyheder/2015/11/ATV\\_Spor.aspx?sc\\_lang=da](http://www.qeqqata.gl/Nyheder/2015/11/ATV_Spor.aspx?sc_lang=da)

We present it for you with an English translation under: <http://dl.polarrouten.net/files/StatementMariuOlsen.pdf>

The article on “Socio-Economic Consequences. Nature road between Sisimiut and Kangerlussuaq” states as benefit of the ATV road:

“Rent of motorized vehicles and bicycles as well as guided tours along the nature road will give revenue to tourist companies...” (SEC, p. 15).

I would like to leave it undecided whether the revenue of tourism companies will really meet these expectations. However, fact is that there are such plans of tourism companies, operating on international level, which want to expand their activities to Greenland.

### ***Summary fact check***

Although the planned ATV road was mentioned in the application to UNESCO, the picture presented there was not realistic and did not reflect reality (literally and metaphorically). The impact on the landscape has been glossed over. Neither is an ATV an economical vehicle suitable for passenger and freight transport, nor is the upgrading of an ATV road to a regular road a realistic perspective. The establishment of a boat line should be considered as an alternative.

## 7. Economic Interests around the planned ATV Road

Almost at the time, when I received the first information on the planned ATV road, two publications of the municipality appeared regarding the plan to build it, apparently with the aim of promoting acceptance among the local population. Both articles are available in Danish on the municipality's website; but I have translated them into English to make the text available to you.

One of them is written by the municipality council member for living resources Marius Olsen<sup>15</sup>. This article was also published in Sermitsiaq, Greenland's biggest news-paper (see p. 19, footnote 13). He argues in his article that an ATV road would offer fishermen and hunters from Sisimiut the prospect of cheaper transportation of their goods, fish and game, to the international airport in Kangerlussuaq. He tells there that once he sent salmon to Kangerlussuaq for 20 DKK / kg (2.65 €), which he considers to be an unreasonably high price. However, he does not say anything about how much that would actually cost in a transport with an ATV. In my own research, I came to the conclusion that a transport with an ATV would be much more expensive (see p. 19).

The other article – “Kangerlussuaq Road Project” - goes more into detail on the alleged costs and benefits of the ATV road project. The article once has been revised in two aspects, probably at the time, when the application was sent to UNESCO. One aspect is that in the second version the name “nature road” (“naturvej”) is used instead of “ATV road”. The other aspect is that a sketch on “business-potentials” in connection with the nature road (i.e., ATV road) is added within a new chapter on “socio-economic consequences” of it as well as a hint to a more detailed PDF-file on “Socio-Economic Consequences. Nature road between Sisimiut and Kangerlussuaq” (here abbreviated “SEC”). For better understanding I have translated all these files into English and made these translations available to you.<sup>16</sup>

The article on Kangerlussuaq Road Project starts, as has been reported on p. 18, by stating that building a regular road with road bed between Sisimiut and Kangerlussuaq is much too expensive for being considered as a realistic solution. But instead of that an ATV road for only 15 million dkk could be built. And this later one could be upgraded to a regular road, what means a gravel road.<sup>17</sup>

But as I have pointed out, the construction cost by upgrading an ATV road to a gravel road (with road bed) will not become measurable cheaper than building the gravel road without building an ATV road first. Therefore, the municipality's proposal of upgrading the ATV road to a regular road is far from being a realistic option.

The second version of the article on “Kangerlussuaq road project” presents the following map pointing to “business potentials at the road between Sisimiut and Kangerlussuaq” (“Erhvervspotentialer ved vej mellem Sisimiut og Kangerlussuaq”):

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<sup>15</sup>) The original text can be found on the municipality's website under: [http://www.qeqqata.gl/Nyheder/2015/11/ATV\\_Spor.aspx?sc\\_lang=da](http://www.qeqqata.gl/Nyheder/2015/11/ATV_Spor.aspx?sc_lang=da)  
We present it for you with an English translation under: <http://dl.polarrouten.net/files/StatementMariuOlsen.pdf>

<sup>16</sup>) The first version of the article is, as you can imagine, not longer found on Qeqqata municipality's website. But for reasons of reference you can download it in Danish <http://dl.polarrouten.net/files/atv-road-da.pdf> and in English <http://dl.polarrouten.net/files/atv-road-en.pdf> here. The later version of this article can be downloaded here [https://www.qeqqata.gl/Emner/Om\\_kommunen/Kangerlussuaq\\_vej?sc\\_lang=da](https://www.qeqqata.gl/Emner/Om_kommunen/Kangerlussuaq_vej?sc_lang=da) or here: <http://dl.polarrouten.net/files/atv-naturvej.pdf> and in English <http://dl.polarrouten.net/files/atv-naturerod.pdf>. The article “samfundskonomiske konsekvenser..” <https://www.qeqqata.gl/-/media/Naturvej/Samfundskonomisknaturvejdk.ashx?la=da> and its English translation <http://dl.polarrouten.net/files/socioeconomic.pdf>. To make quoting easier it is further on quoted by the acronym “SEC”.

<sup>17</sup>) : [https://www.qeqqata.gl/Emner/Om\\_kommunen/Kangerlussuaq\\_vej?sc\\_lang=da](https://www.qeqqata.gl/Emner/Om_kommunen/Kangerlussuaq_vej?sc_lang=da), and in English <http://dl.polarrouten.net/files/atv-naturerod.pdf>



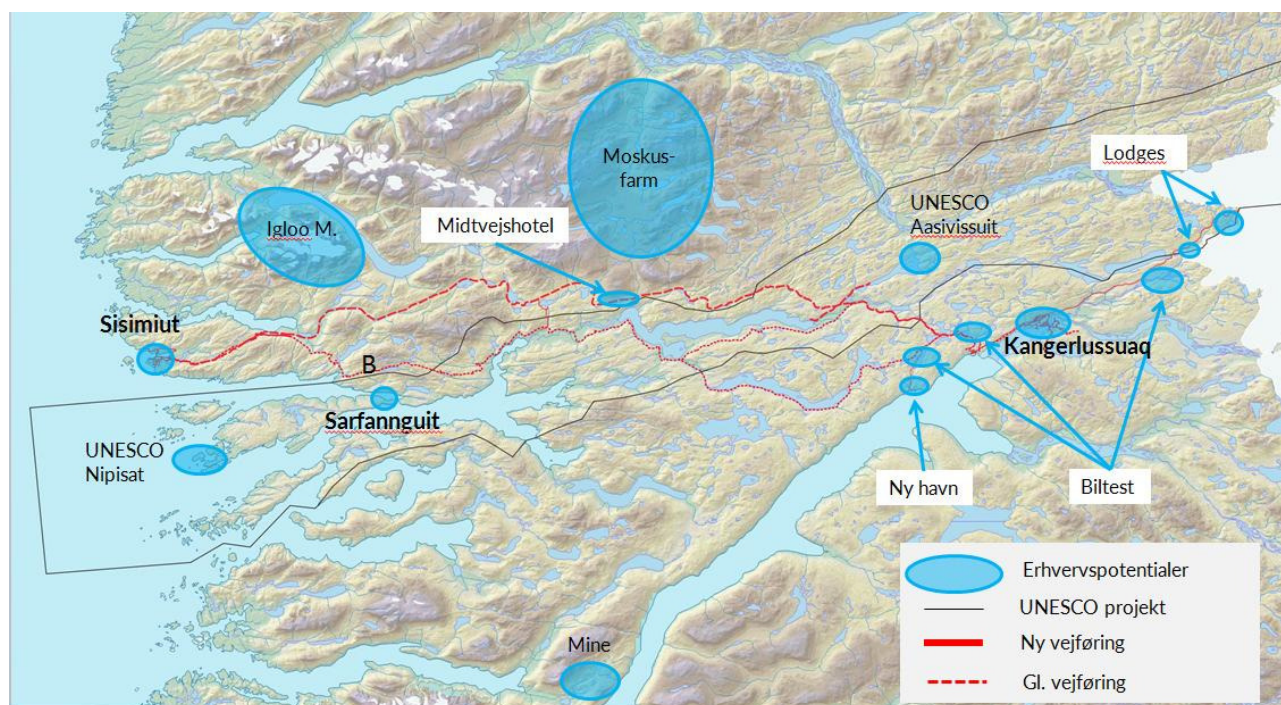


Fig. 12. Business potentials around the so-called “nature road”, in close proximity to the nominated World Heritage Property.

It has already been made sufficiently clear in Chapter 5 that the very small hint “mine” does not reflect the modesty of the mining industry.

As you can see there is the ATV road not only planned to cross the nominated area in its most sensitive area for 35 km, in the same region two access roads are proposed to connect lake Aasivissuit in north-east and lake Tasersuaq in south-west with the ATV road, with a total of about 15 km. Where the access roads reach the lakes landing stages for motor boats are planned – one for lake Aasivissuit (southern end), two for lake Tasersuaq (eastern and western end). And in addition to this “visitor centres to accommodate increased numbers of visitors” (Nomination, p. 134), “camping sites, rubbish bins, drying racks for fish etc.” (Nomination, p. 135) will follow accordingly.

There are even some more intended “business potentials” immediately bordering on the outlined World Heritage Property 1557: car testing areas, lodges, and more. What for instance is the use of a “Moskusfarm” in the center of an area with the world’s most numerous population of musk oxen?

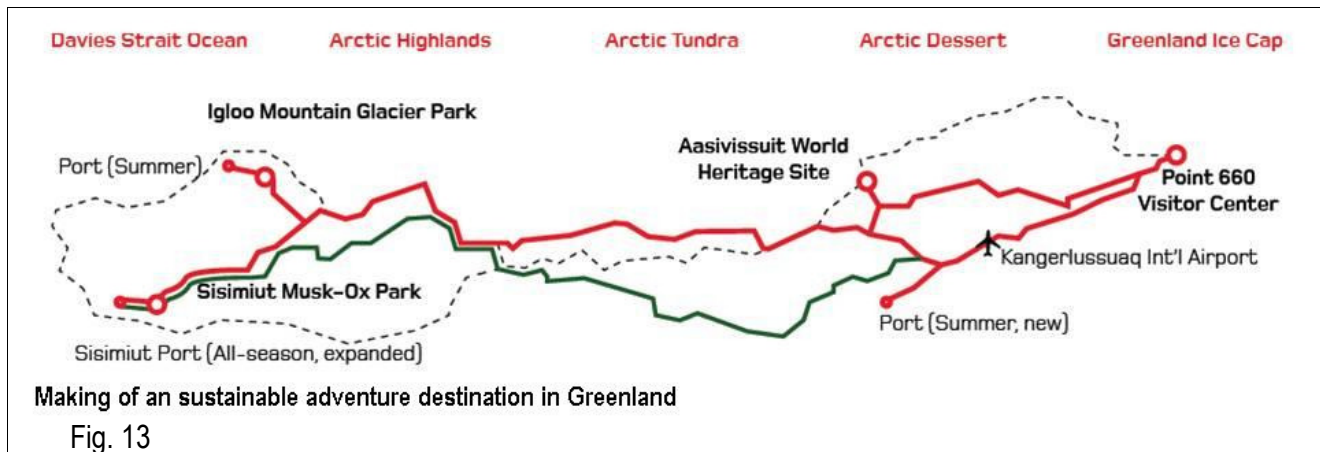
### **Announcement of 8,000 to 10,000 ATV trips per year**

The “potential” “Igloo-M.” obviously refers to one of the tourism companies, which are interested in the road project. Its full name is “Igloo-Mountain ApS”. “ApS” is a Danish or Greenlandic legal form, similar to the English “Ltd”. Although some might think that people in Greenland once lived in “igloos”, the word is not of Greenlandic origin. The word with the same linguistic root in Greenlandic is “illu” (formerly written “igdlu”), simply meaning “house” (not snow-house). The word “igloo” is used in Canada and Alaska/USA to designate snow-houses, and the “Igloo-Mountain” is a famous mountain in Denali Nationalpark in Alaska (but fortunately Igloo-Mountain in Denali Nationalpark is closed for ATVs). Nevertheless the firm is very interested to start business in Greenland:

“Igloo Mountain ApS was founded in 2008 by Greenland Venture A/S and 4 entrepreneurs in Sisimiut with a primary mission to facilitate the development of tourism in and around Sisimiut, Greenland ...”<sup>18</sup>

<sup>18)</sup> <http://www.ski.gl/IglooMountainApS.aspx>

The following sketch shows Igloo Mountain's business intentions:



With the heading “Making of a sustainable adventure destination in Greenland” this sketch proposes:

“Arctic Circle Region of Greenland - 200 km of pristine wilderness from the Davies Strait Ocean to the Greenland Ice Cap. A region with a historic depth of more than 4.000 years.” And: “Igloo Mountain pursue a sustainable plan of development with focus on three distinct market segments important for creating a balanced destination with year-around activities.” While segments 2 and 3 are directed to Iceland and Denmark, segment 1 is **directed to the nominated UNESCO area in Greenland** (see sketch) with “pre & post cruise stays’ for cruise ship operators” ... “In total **8.000-10.000 cruisers per season** distributed over 40 port-of-calls.”

**If this really happens, it will completely destroy the hiking trail**, i.e., the Polar-Route / Arctic Circle Trail as well as the cultural landscape, supposedly ‘protected’ as Property 1557 on the World Heritage List. And it sounds like a bad joke knowing that this is based on “the 10 sustainable principles of One Planet Living”.<sup>14</sup>

As reported, the ATV road can only be used in the 2 ½ to 3 months after the thaw in spring and before the onset of winter in September. In other words, it is planned to send around 100 ATVs a day through the protected World Heritage area. If 8,000-10,000 hikers were to be expected in this area during the summer season, this would pose a serious threat; 8,000-10,000 ATVs were an unbelievable disaster. But even if fewer tourists than planned by Igloo-Mountain ApS should be interested, the construction of the infrastructure, which is supposedly necessary, will be extremely destructive for the World Heritage Site. This is certainly its worst, but by no means only danger in connection with the planned ATV road.

In a way the UNESCO registration promotes the business projects by awarding prestige - despite the fact that the registration’s real task should be the protection of the cultural landscape against the destructive effects of business projects. The “nature road”, as the ATV road is called now, is thought of as a focal point for a number of business projects. Even the sites of Aasivissuit and Nipisat themselves are marked there as “business potentials”. And this has to be taken literally.

### ***Sometimes pictures can say more than words***

Nearly all of the business projects depicted on the above map sketch are immediately bordering on the nominated World Heritage property, and the planning of an ATV road is called a step to a necessary infrastructure for a World Heritage property in a highly sensitive cultural landscape in a permafrost region. Even outside of protected areas such as World Heritage properties and national parks it is strictly forbidden in Greenland to drive away from the few roads with ATVs. The police in Greenland considers it to be a difficult task to enforce this ban. And of all things, a World Heritage area that is supposed to protect a cultural landscape used by nomadic hunters for millennia, is intended to lift this ban. Sometimes pictures can say more than words:



Fig. 14. This picture was not presented in the nomination document. Why?

The picture was used as an illustration for chapter 5.2 - development of tourism – of the municipality's article "Socio-Economic Consequences. Nature road between Sisimiut and Kangerlussuaq." (SEC, p. 15). One of our guests on the campingsite in Kangerlussuaq commented it with the words: "Hells Angels Invading Greenland!" And indeed, ATVs are for bikers in Greenland something like a substitute for Harley Davidsons, because motorcycles are not allowed to be used in Greenland. The picture, taken from the mentioned article, is commented there with the words:

"Rent of motorized vehicles and bicycles as well as guided tours along the **nature road** [this means the ATV road] will give revenue to tourist companies, but private citizens and hunters will also be able to rent their motorized vehicles either directly to the tourist or to the tourist operators. Particularly interesting is that hunters use large-scale ATVs for winter hunting in January and February. These vehicles stand still and do not provide income for the hunters during the tourist season in the summer and partly in the spring months, although there is also a certain **trophy hunt with the use of ATVs.**" (SEC, p. 15 f.)

### Summary

Although an ATV road does not solve the problems of the transport infrastructure of the municipality of Qeqqata, there are efforts in parts of the tourism industry, which aim at the Greenlandic market, to use ATVs on a large scale. Although these enterprises make commitments to sustainable tourism, it is unlikely that this will happen in practice. Rather, irreversible damage to the cultural landscape is to be expected.

The fact that the proposed ATV road immediately to the north of the nominated area is passing through a type of landscape that the property claims to protect gives rise to the assumption that there is a connection between the boundary of the property and the trace of the road. At least the limitation of the property to a narrow corridor, a "transect," suggests this.

Farther is planned that the road near Aasivissuit should cross the nominated area and that a large number of tourist facilities will be created there within the World Heritage property in connection with that.

A declared strategic goal of these plans is to make the road a focus of commercial activities in the context of the property's World Heritage status.

## 8. The ATV Road and the Hiking Trail

### *Unsatisfactory hearing of stakeholders*

The nomination text claims that it had previously been the subject of a large number of consultations:

“The nomination document is the result of consultations with local, national and international contacts and extensive discussions. Work on the document has gathered momentum over the last six years and we are proud to commend this nomination to the World Heritage Committee of UNESCO.”

(Nomination, p. 3)

Nearly in the same way the managementplan states:

“Elements of the draft management plan have, in the course of its formulation, been discussed with relevant stakeholders.” (Managementplan, p. 5)

The question is now: Who is considered to be a relevant stakeholder? And for some given reasons, I would like to add something to it.

From my experience I have got the suspicion that those statements of stakeholders, which support the project, were used, while statements of others were ignored.

Yes, it is true, I was informed by the municipality as chairperson of Polar-Routen e.V. after the municipality had decided to build an ATV road.

### ***The first information about the plan to build an ATV road***

On 6 November 2015 I received an email from the destination manager of Arctic Circle Business in order of responsible representants of the municipality:

“I had a short discussion with L[...] and H[...] from Qeqqata Kommunia yesterday regarding the new ATV-track Qeqqata Kommunia will start on next summer. The track will affect the trail, though mainly on the west side (from Eqalugaarniarfik to Sisimiut).

At the same time, we are looking at alternatives in order to move the trail further south (see the attached photo), so we can maintain the same unique experience hikers today have on the trail.”



Fig. 15. This is the attached photo mentioned in the email.

In June 2016 I had to open Kangerlussuaq Campingsite, which from that time on is administered by the association Polar-Routen e.V. in connection with its aim and responsibility to inform hikers about the trail. It was a difficult situation for me. On one side I was largely indebted to one of the mentioned officers of the municipality, because due to his support we had got the chance to open the campingsite and to start our project concerning the hiking trail (Polar-Route or ACT). On the other side I felt a responsibility for the trail and against the hikers. And because of this responsibility I had to inform the hikers on the municipality's plan concerning the trail and the ATV road. Last but not least the information of the hikers also was my obligation with reference to the rental contract with the municipality for the campingsite:

“§ 4. The tenant communicates the municipality's concerns to the guests at the campsite and to the hikers on the Polar-Route and their concerns to the municipality.”<sup>19</sup>

### **The memorandum**

So it was according to the rental contract my obligation to inform the guests on the campsite and the hikers on the plan to construct an ATV road and in reverse to inform the municipality about their concerns on it. The hikers were very shocked about the expected construction of the ATV road. How could we convince hikers to make an active contribution to the maintenance of the hiking trail, when next year they had to expect bulldozers at least on a part of the trail. But the hikers stimulated me to bring together their opinions on the planned ATV road in a memorandum and to send it to the municipality. After one month, in July 2016, the text was formulated and the hikers started to sign it. In January 2017 the memorandum was sent with 217 signatures to the municipality together with the evaluated census<sup>20</sup>. The memorandum (in Danish, English and German language, a copy is attached)<sup>21</sup> was closed in July 2017 with 300 signatures.

The memorandum uses three main arguments:

1. As the most popular German tour guide recommends the hikers, the alternative southern route proposed by the municipality should not be used, because it is even dangerous for their lives<sup>22</sup>. This applies for a third part of the trail. We regard it as irresponsible to point people on one of the most famous hiking trails to a new trace, which is not passable for the normal hiker and therefore is classified as life-threatening. Should we wait until there are the first victims of accidents on the hiking trail?
2. But the complete trail is devaluated by being paralleled by the ATV road.

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<sup>19</sup>) The Danish text: “§ 4. Brugeren formidler kommunens bekymringer til gæsterne på campingpladsen og vandrere på Polar-Routen og disses bekymringer til kommunen.”

<sup>20</sup>) Download: <http://dl.polarrouten.net/files/census-2016-e-d.pdf>

<sup>21</sup>) Download: <http://dl.polarrouten.net/files/memorandum-3l.pdf>

<sup>22</sup>) English: "On the one hand, hikers often (involuntarily) disturb locals in the exercise of their profession (hunting / fishing). On the other hand, the main path [through the valley Nerumaq] is undoubtedly the safer option, not only with regard to the trail marks and the existing beaten tracks that facilitate orientation, but also with regard to the terrain itself. In particular, some parts of the southern trail option, which run directly along the fjord (Imertuninnguaq / Amerloq), are not only exhausting, but at times extremely steep if not impassable. Conditions can easily become hopeless and **even life threatening**, even without bad weather or damp surfaces ... We thus request you to please respect the concerns of the local population and not bring yourself unnecessarily in danger. Therefore, select the main path, which is marked and designated as Polar Route in the map."

The German original: "Nicht selten stören Wanderer, zum Teil aus Unkenntnis, die Einheimischen bei der Ausübung ihres Berufs (Jagd/Fischerei). Zum anderen stellt der Hauptweg [durch das Tal Nerumaq] zweifellos die sicherere Wegvariante dar. Dies hängt nicht nur mit den Steinmännchen und den vorhandenen Trampelpfaden zusammen, die eine Orientierung erleichtern, sondern auch mit dem zu begehenden Gelände. Insbesondere einige Teilstücke der südlichen Variante des Weges, die direkt am Fjord (Imertuninnguaq/Amerloq) verlaufen, sind nicht nur strapaziös, sondern stellenweise extrem steil bis nicht passierbar. Nicht nur bei schlechtem Wetter und feuchtem Untergrund können Sie hier in ausweglose und **lebensgefährliche Situationen** geraten. ... Von unserer Seite sei somit an Sie die ganz eindeutige Bitte herangetragen: Bitte respektieren Sie die Anliegen der einheimischen Bevölkerung und bringen Sie sich selbst nicht unnötig in Gefahr. Wählen Sie daher den markierten und in der Karte als Polar-Route bezeichneten Hauptweg." (Grönland: Arctic Circle Trail, Outdoor, 2004, 2<sup>nd</sup>. edition 2014, page 79 f.)

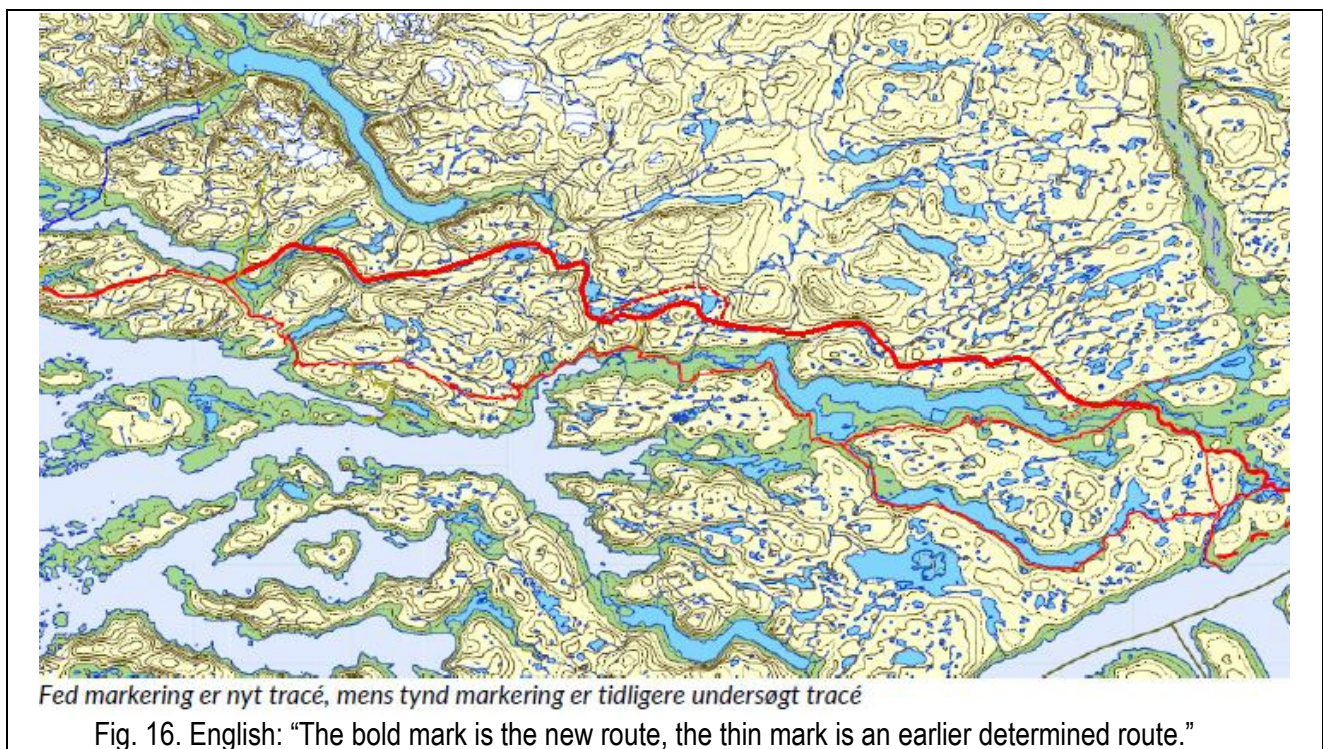
3. A boat line, as it a few years ago still existed, would be a much more attractive and economic solution than an ATV road.

A friend in Kangerlussuaq, who had worked there for some years in tourist business argued in that way: “Frieder, the day when an ATV trail is opened the hiking trail will be dead. Or do you build in Germany longdistance-hiking-trails parallel to the autobahn?” And this argument convinced me.

With concern to argument three our census revealed that the benefit for the Greenlandic GNP generated by the hikers on the Polar Route /Arctic Circle Trail is about 11 million dkk per year (ca. 1.43 million €), much more than what the municipality’s paper (SEC) expected as benefit from the ATV road. With regard to the Greenlandic economy as a whole, the ATV road seems to us to be disadvantageous. Therefore, not simply economic interests and protection interests for the World Heritage stand against each other, but the ATV road also harms a sustainable tourism economy.

### ***More clarification after the nomination to UNESCO***

The memorandum was formulated before the nomination was presented to UNESCO. And therefore the content of the nomination was not considered in the memorandum. But with the publication of the nomination the memorandum received additional meaning. When I was in Greenland in 2017 I found by internet research the PDF-file on “Socio-Economic Consequences ...” and in the file (SEC, p 10) the following map including the comment on it:



If you compare the thin line on the left side of the map of figure 16 with the yellow line on the photo of figure 15, then it becomes obvious that they are identical. What was proposed to me in the email from 6 November 2015, was not a new trace for the hiking trail but an old and now useless trace for planning an (ATV) road. The road, which was too inconvenient for the ATV riders, should now be used as a hiking trail.

It is explained in the context figure 16 in its source that there have been plans for a southern route of the road prior to the current plan to build an ATV road (SEC, pp. 10f.). If you look at the map, the road was initially planned on the trace of the hiking trail. It followed this trace from Kangerlussuaq and Kelly Ville on the southern shore of Lake

Amitsorsuaq and then to Lake Tasersuaq. Here the hiking trail becomes too steep for vehicles. Therefore, the road should run along the banks of the Tasersuaq and then through the valley of the Itinneq (Ole's lakselv) to the mouth of the Itinneq in the fjord Maligiaq. Here, the proposed route hit the short ATV road, which had been used 10 years ago as a link between the fjord and the dam construction site. This is where the hiking trail, through the valley of Nerumaq to Sisimiut, has been running for a long time. Because the road here is too steep for normal traffic, a route through the valley Nerumaq was initially out of the question. Therefore, a continuation on the southern route was planned, which should lead via Sarfannguit to Sisimiut. This is the trace that was later suggested for the hiking trail as an alternative. But this route proved to be too difficult and costly because of the required blasting on the banks of the Tasersuaq, the swampy landscape in the valley of the Itinneq and the spring floods there and not least because of the impassable steep slopes on the mentioned southern variant via Sarfannguit. The article on "Socio-Economic Consequences ..." of the ATV road reports on the matter:

"Due to the major challenges with the existing route in and around Itinneq (archeology, nature and environmental conditions, soft ground conditions in Itinneq as well as steep passages and lack of building materials east and west of Itinneq), a new northern route north of Tasersuaq will be investigated in the summer of 2012.

At the same time, it means that the route from Sisimiut to Kangerlussuaq can be conveniently placed via the Nerumaq valley." (SEC, "3.9 New Ideas on the Road", p. 9f.)

The text does not mention any consideration for the hiking trail. Although it was obvious that large parts of the hiking trail were no longer usable for the hikers, the search for an alternative for the hikers is given no importance there. The fact that not the entire hiking trail should be used as a route for the road, seemed to be solely due to the technical obstacles. The concern of the hikers had been alleged only in the email of 6 November 2015. I found that sobering and disappointing and asked for clarification in an email. That was especially due to the fact that I was responsible to the hikers for justification. Meanwhile, the UNESCO project was discussed everywhere. I asked therefore also in the email, what project had priority for the municipality, the UNESCO project or the road project. The email was sent to the destination manager with a copy to the head of the municipality. I received a response to the copy, an email (13.09.2017) with the following answers:

"The road-project has been part of this region's planning for 15 years, and the ATV-trail the last 5 years.

... we do focus on having the road on a northern route (along the present ACT) from Itinneq area to 1. Fjord and the trail along a southern route to Sarfannguit on this part of the route.

We have been open about this, but we acknowledge that you see it differently than the citizens of Qeqqata/Greenland.

...

We have openly told UNESCO about the road project, and there is no doubt among the politicians and the citizens: If UNESCO cannot accept the road project, then we don't have a UNESCO project. **The road is more important than an UNESCO nomination.** Sorry. But that said, we do not see it as a choice between two projects.

...

You are right about one thing. I haven't had time to write a case about the Memorandum against the road. I have an ambition to present it to the council in October."

In some way this was the only response of the municipality to our memorandum. There was a council meeting on 26 October 2017 with topics concerning the ATV road and the hiking trail, but the memorandum was no topic on the council meeting.

### ***The ICOMOS supplement to the nomination***

In 2017 I sent the memorandum also to UNESCO and ICOMOS. And according to the Supplementary Information of ICOMOS of 18 October 2017 and the Additional Information<sup>23</sup>, the content of the memorandum was also addressed by ICOMOS to the state party. It was asked by ICOMOS:

*“Could the State Party provide advice on whether there are any future plans to further upgrade the Arctic Circle Trail to a dirt/ATV-road?”*

And accordingly the state party (Denmark) answered:

There are absolutely no plans to upgrade the Arctic Circle Trail to any kind of ATV or dirt road. The Arctic Circle Trail is a highly valued hiking trail much appreciated by Qeqqata Municipality as well as by many hikers. The suggested changes in the course of the Arctic Circle Trail have been planned in order to

- 1) accommodate the planned dirt road without forcing hikers to have interference with motorized vehicles, and
- 2) integrate the settlement of Sarfannguit in the ‘experience package’ of the hikers choosing this route.

As I see the case, this is “absolutely” not true. Probably, there have been some misunderstandings. We never said that the entire hiking trail would be upgraded to an ATV road. As I have already said on page 25, our objections were:

- About one third of the current hiking trail will be used as a route for the ATV road.
- Instead, the hikers are offered to choose a southern alternative route, which according to recognized information (Guidebooks) is not usable by an average hiker.
- In addition, the trail is devaluated by the fact that the ATV road runs parallel on the rest of the route.

And these objections have not been invalidated.

Above all, our objection is that the boundaries of the property have been arbitrarily drawn so that the areas in question are outside the nominated property. In doing so, as I interpret it, the integrity of the cultural landscape is violated.

To point out that this is not only my individual point of view I quote the recently published guidebook of Paddy Dillon on the topic, which is the mostly used guidebook in English language on the Arctic Circle Trail:

*“This guidebook describes the trail as it existed up until 2018. Please note that there is a plan to convert part of the trail into a dirt road, and if this plan ever comes to fruition, expect to find quarries, bulldozers and other intrusive works. This plan might never come to pass, but it might also be your last chance to enjoy this remarkable trail.”<sup>24</sup>*

In 2018 we had planned to update our census and to ask for the opinion of the hikers about the planned changes on the way. This included a rating scale for the planned construction of the ATV road. The answer options were (1) excellent - (2) it is o.k. - (3) neutral - (4) not o.k. - (5) horrible. More than 90% of the hikers opted for (5) horrible. A few wanted to be polite and chose (4) not o.k. We have refrained from publishing this because we do not believe it to be helpful for starting a dialogue. It might have been interpreted as a polemic and would have triggered counter-polemics. But we are looking for a dialogue to solve the problem.

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<sup>23)</sup> File: 1557-2221-Supplementary Information-en.pdf, <http://whc.unesco.org/en/documents/163908>

<sup>24)</sup> Dillon, Paddy, 2019: Trekking in Greenland. The Arctic Circle Trail. From Kangerlussuaq to Sisimiut. © Paddy Dillon 2019. (First edition 2010) second edition 2019. ISBN: 978 1 85284 967 2. p. 12.



**Summary**

We regret that, despite intensive efforts, we have not yet been granted a hearing from the municipality or the state party. We expressly wish to thank UNESCO and ICOMOS for having addressed our memorandum in the recognition procedure. Unfortunately that did not lead to success. We will continue to work to preserve this unique cultural landscape and the hiking trail that crosses it. We ask UNESCO, the secretariat of the WHC, ICOMOS and the members of the World Heritages Committee for support.

## 9. Is the Integrity of the Cultural Landscape at risk?

Only in rare cases properties have been delisted from the World Heritage List. And we hope that also in this case a better solution will be found. But the two cases, when properties were delisted from the World Heritage List, are precedents, which can guide to a decision, that this does not happen again.

One case was a Sanctuary for Arabian Oryx Antelopes in the Sultanate of Oman. In 1994 it had been inscribed in the World Heritage List as a Natural World Heritage Property. After an unilateral reduction in the size of the Sanctuary and plans to proceed with hydrocarbon prospection UNESCO decided to delist this property, because UNESCO was convinced that the value and integrity of the property was destroyed by that. There still is a difference, because the one was an unilateral act after the inscription in the World Heritage List, which resulted in damaging the property, while the other happened after inscription in the Tentative WHL during the procedure of nomination for the World Heritage List and resulted in a relevant reduction of protecting measures while still not damaging it.

Although there are many differences, at least under one aspect and even if not in the same degree there exists insofar a parallel. And there remains the question, if in the case of Aasivissuit - the reduction of the size between the inscription of "Aasivissuit – Arnangarnup Qoorua" on the TENTATIVE World Heritage List in 2003 and the inscription in the World Heritage List as "Aasivissuit – Nipisat" in 2018 - the size of the property was reduced remarkably. In both cases prospecting of (hydrocarbon and other) mineral resources played an important rôle.

But except that in both cases reduction of the property's size as a consequence of mining interests occurred, the remaining question is that the reduction of the size of the cultural landscape in question, which is to be protected, is a reduction of protective measures and not a reduction of danger, which is the aim of the World Heritage Convention.

### ***A cultural landscape is an indivisible habitat and not just a transect***

According to UNESCO's Definition a cultural landscape is "representing the combined work of nature and man" and not only the isolated cultural remains of a society which might have largely depended on nature. In other words: A cultural landscape is an integrated and functional unity of cultural elements AND natural phenomena that are an outstanding expression of a cultural identity and way of life. It necessarily includes the habitat. This integrated and functional unity can be perpetuated, even if there are some changes, but it can not be perpetuated, if the natural elements have ceased to be part of it.

In the case of the seven keysites, by what the nomination of the property was defined, the habitat, to what the sites belong or once belonged, still exists. But by reducing the protective measures to the seven sites and a narrow corridor between them, what is designated by the (figuratively used) term "Transect", the protection becomes insufficient for the cultural landscape. To bring it to the point: The planned ATV road will run for 80% - 90% through the habitat, which is constitutive for the cultural landscape. But when I protest against it, I will hear a response like that: "Sorry, the ATV road lies (except the 35 km through the part near Aasivissuit) outside the area nominated by 115 coordinates." But nevertheless this will destroy the character of the cultural landscape.

### ***Intersecting the cultural landscape by the ATV road near Aasivissuit***

The term "trans-" or "intersect" gets another meaning, where near Aasivissuit the ATV road is crossing the for 35 km the nominated area in its most sensitive part. Here the precedent of Elbe valley can be applied, where the property was set on the List for World Heritage in Danger, because a cultural landscape was cut into two pieces, because a traffic project, the "Waldschlösschenbrücke", had crossed it.

***A hiking trail is an adequate means to experience a former migration area of nomads.***

A transect can be a useful methodological instrument to reduce the complexity of an area for a systematic investigation. In a metaphorical sense a hiking trail can open it in a similar way to the hiker for a personal experience. If numerous tourists want to do this in a fragile area like that in West Greenland a well organized hiking trail or, if the number of hikers rises, a network of hiking trails is a necessary means to protect the region. With regard to the increasing number of hikers hiking should be concentrated on the hiking trails, and cross country hiking should be avoided. In the same way the tourist huts at seven places of the trail are a good means to concentrate the stays over night at a few places. This helps to minimize the impact on the landscape of 1,300 hikers a year. While hiking trails and huts, if well organized, can be a protective means in a fragile nature, motor roads and luxurious houses or facilities should be avoided. In other regions of Greenland this is self evident, so for instance with regard to the WHL property of Ilulissat-Icefjord. There exists the rule:

“Visitor access to the area is limited by the wilderness character of the landscape, with no roads or human-made structures.”<sup>25</sup>

Instead of that the nomination text of Aasivissuit – Nipisat says:

“There is very little infrastructure in Aasivissuit – Nipisat and most parts of the area can only be reached on foot or by helicopter. Nomination of the site for inclusion on the Unesco World Heritage List also includes the planning of the infrastructure and visitor centres to accommodate increased numbers of visitors.” (Nomination, p. 134).

At this point I also want to end some prejudices like that, what I heard from a certified tourist guide in Kangerlussuaq, who said:

“A millionaire coming to helifishing or heliskiing<sup>26</sup> brings much more profit than a few dozen backpackers.”

Our 2016 census has shown that the hikers on the Polar Route / Arctic Circle Trail spend about 11 million dkk each year in Greenland, much more than the big money from tourists, who might use the ATV.

And especially in an ancient migration region of Inuit nomads a hiking trail is an excellent transformation from old to modern times.

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<sup>25</sup>) <http://whc.unesco.org/en/list/1149/>

<sup>26</sup>) This means flying by helicopter to a fishing trip or ski tour.

# 10. Outlook

From our point of view an essential problem in the matter ist that the planned road and with it the protected World Heritage property are looked at as a focal point for a lot of activities and projects, which are all concentred in a highly sensitive area. This is counter-productive for protecting the World Heritage site.

## Core zone and periphery

It has come into use for such protected areas to distinguish a core zone, which is strictly protected, from its periphery.

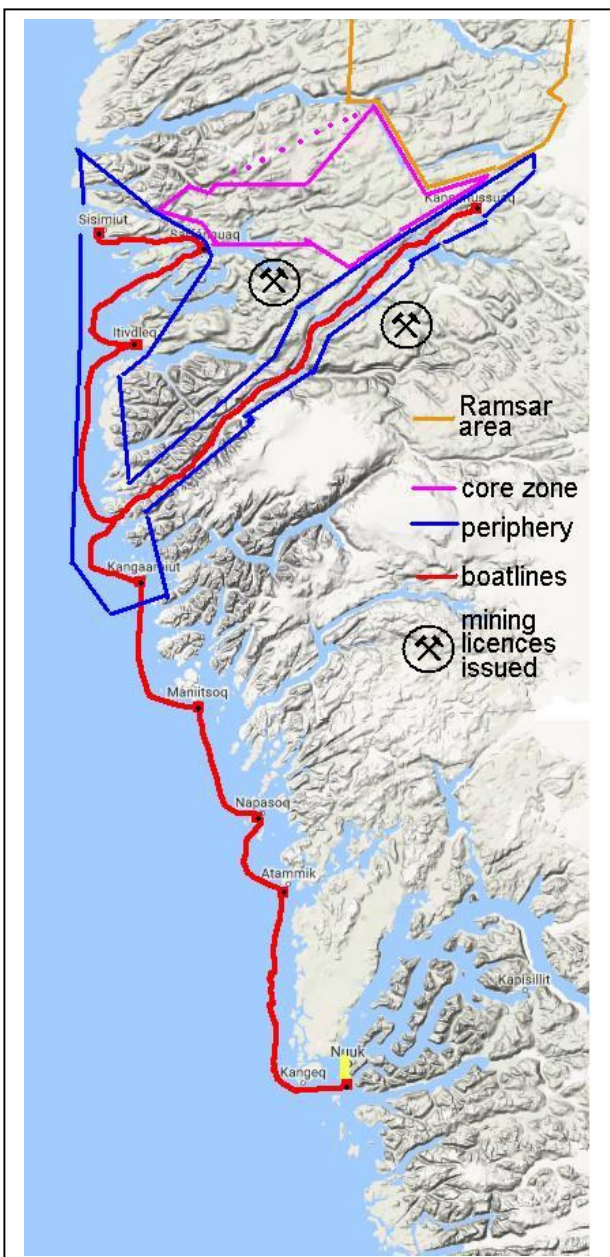


Fig. 17 . Core Zone and Periphery

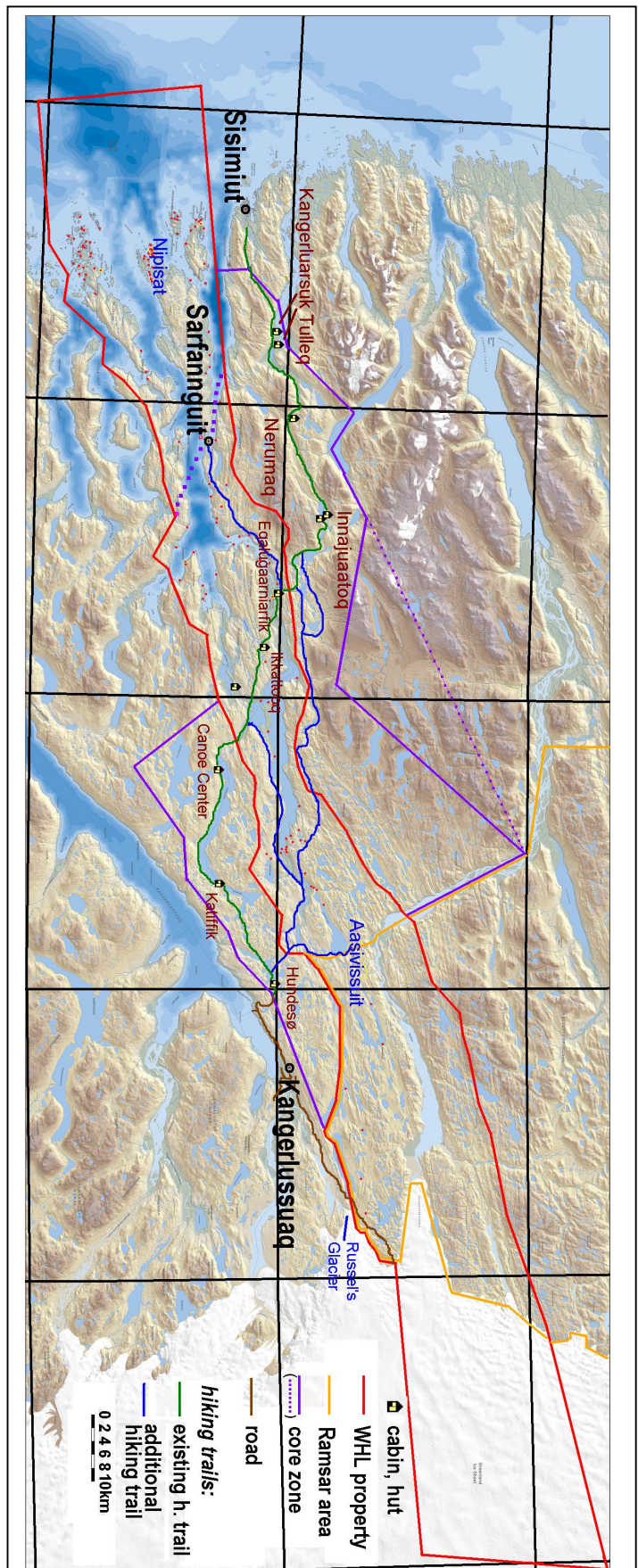


Fig. 18 . Defining the Core Zone.

Actions and facilities, which are counter-productive for protecting the core zone, will be outsourced and allocated in the periphery. Concerning the Aasivissuit-Nipisat property this principle is not only violated, it seems to be completely ignored respectively reversed.

Figures 17 and 18 may illustrate this. Figure 17 illustrates the relation of the core zone (purple border), the periphery (blue border) and the boat line (red line) to each other. The boat line forms the backbone of the periphery. There is also an empty area between the core zone and the periphery, because for the North of it mining licences are issued and the future of its southern part still seems (to me) undecided. Figure 18 illustrates, how the core zone was outlined. I regard it as a first proposal and not as a definite suggestion.

Though the core zone for a great part coincides with the nominated WHL property, it is not identical with it. The main reason for proposing the core zone is that the protected area should not be reduced to a symbolic strip connecting some some selected archaeological key sites, but that it is a real living cultural landscape with all features of an "Inuit Hunting Ground". Therefore in relation to the nominated area it is widened to the North and to the South. But it may be questioned, if it is necessary to include the Ramsar area (or an essential part of it) in the core zone, or if it might be – for practical reasons – better to define the particular responsibilities for protecting the sites particularly. It also is questionable, if the western part of the nominated area between Nipisat and Sarfannguit should be a part of the core zone, when at the same time the municipality plans there "Areas for holiday cabins and summerhouses" (Managementplan, p. 38). It seems better to me to define an area like that as a periphery.

First of all the core zone should include all parts of the present Polar-Route/Arctic Circle Trail with at least a tolerance zone on each side of the trail. This means the southern border of the proposed core zone begins at the end of the road at Kelly Ville, then it runs south of the trail to the west and further south of the lake Amitsorsuaq, then south-west of the way from Amitsorsuaq to Tasersuaq, and from there over the mountains to the valley of the river Itinneq and to the fjord Maligiaq.

In the North the core zone should include the lake Aasivissuit and its surroundings, parts north of it bordering to the Ramsar area and then in western direction the trace north of the lake Tasersuaq and south of the mountain Pingu, and from there to the region north of the hut Eqalugaarniarfik, where once the dam was built.

West of Eqalugaarniarfik the southern border of the core zone should be the shore of Maligiaq including a hiking trail to Sarfannguit, while the northern border should include the valley of Nerumaq until it arrives at the fjord Kangerluarsuk Tulleq, from where it reaches to the ski area of Sisimiut.

On this base the borders of the nominated area should be redefined. An interim solution might be to define those parts of the core zone, which are at present located outside the nominated area, as a buffer zone.

Within the core zone no roads and other trails except hiking trails should be opened or marked. In summer the core zone should be a hiking area, and in winter it should in addition to that be used for dog sledging. The tracks of snowmobiles, which can be seen everywhere on the way in the summer, suggest that at least the use of snowmobiles should be limited. This should also be used to promote and maintain dog sledging as a Greenlandic cultural tradition.

With regard to the increasing number of hikers on the Polar Route / Arctic Circle Trail it should be considered to open parallel hiking trails to the existing one. This should be the trace north of the Lake Tasersuaq. A shorter hiking trail could branch off of it near Hundesø ending at the eastern end of Lake Aasisissuit. For those, who want to hike to Aasivissuit, it would be better to use a marked trail than walking cross country. Farther a

hiking trail going between Lake Tasersuaq and Lake Amitsorsuaq could connect the present hiking trail with the proposed northern alternative hiking trail; there exists a trace, which can be used for that. And last not least a side-branch of the hiking trail could connect Eqalugaarniarfik and Sarfannguit.

In the core zone no houses or other facilities should be built except the existing huts. They help to concentrate the stay of 1,300 hikers annually at some points, thus reducing the environmental impact of the trail. To support this function, all huts should be equipped with toilets at short notice.

The municipality should restrain from building objects like the planned "Midtvejshotel" north of Tasersuaq. But, for instance, the former power building near Kelly Ville, where today the road ends and the hiking trail begins, could be used as a hostel.



Fig. 19. The former power building near Kelly Ville

Instead of the "midtvejshotel" in the middle of the ATV road the former power building in Kelly Ville (at the end of the existing road, where at present the hiking trail to Sisimiut starts) could be used as a hostel. It is easy to go there by car or ATV (but on the road) for someone, who wants to run this building.

Similarly, in the fjord Kangerlussuaq, which belongs to the periphery, one or a few hotels or hostels could be built for sport fishermen. The fjord is a stream fjord and would offer excellent fishing opportunities just near its mouth. The boat line would ensure easy access.

By combining the periphery with boat lines through the fjord Kangerlussuaq and along the coast, a network of tourist facilities could be built up, covering the entire fjord area and settlements along the coast and providing livelihoods for local small tourism businesses.

I am convinced that such a conception not only brings more sustainable tourism, but also contributes to the growth of tourism economy.

## 11. Demands and Proposals

On the basis of the information given in previous sections 3 - 10, we submit to UNESCO the following requests and proposals. Due to the announcement of the municipality Qeqqata, to begin the construction of the road, there is an urgent need for action.

1. We demand to stop the plan to build an ATV or gravel road between Sisimiut and Kangerlussuaq.
2. In particular, we demand the road through the demarcated World Heritage Area No. 1557 near Aasivissuit to be stopped. In this section, the road would irreversibly cut the cultural landscape in two parts and destroy it hereby. We refer to the precedent of the Elbe Valley near Dresden and demand equal treatment.
3. We further call for a stop so that the trail called "Polar Route" or "Arctic Circle Trail" does not give way to the construction of the road in the Nerumaq valley and that it will not be devalued along its entire length by the construction of a road.
4. As an alternative to the road we demand to reopen a boat-line to Kangerlussuaq.
5. We propose to combine this boat-line with a boat-line along the coast connecting the towns (byer) and settlements (bygder) with each other and with the capital Nuuk in the South and the Disko area in the North.
6. Furthermore we propose to deconcentrate the plannings of tourism business (and other business) around the World Heritage property and to define there a core zone as restricted area (see figure 17 and 18) and a periphery with more tourism business.
7. Besides the main part of the presently as World Heritage listed areas (No. 1557) the core zone should contain areas North and South of it, which are characteristic for an "Inuit Hunting Ground" as it forms the identity of the World Heritage site so that it is not only a transect of seven archaeological sites. Because of the urgency the parts of the proposed core zone out of the demarcated area of the property might be in a first preliminary step declared as a buffer zone.
8. In the same way, as it is the use for the World Heritage site of Ilulissaq Icefjord, visitor access to the core zone should be limited by the wilderness character of the landscape, with no roads or human-made structures except huts (shelters) for hunters and hikers, only equipped with those facilities (like toilets etc.) necessary to protect the environment. We demand for equal treatment of the different World Heritage sites in Greenland.
9. The periphery should be located primarily in the coastal regions and in Kangerlussuaq fjord region.
10. Besides towns and settlements and their surroundings adequate facilities of a touristic industry should be located and concentrated in the periphery. This will not only guide to more sustainable tourism, but also to the growth of tourism economy.

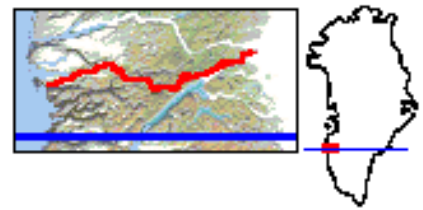


Dr. Frieder Weiße  
Chairperson

# ***Polar-Routen e.V.***

**Förderverein für Wandern und Naturschutz in Grönland**  
(Association for Hiking and Protection of Nature in Greenland)

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## **Annex: About the Association Polar-Routen e.V.**

In Germany, Austria or Switzerland, it is quite natural that there exists an Alpine Club for many years. And there are nature protection organizations in all European countries. So a few years ago I once looked for a similar organization in Greenland: in vain. It would be very important to have such an organization there, but I couldn't find it.

What reasons this lack has, one can only guess. One reason might be the size of the country with more than 2 million km<sup>2</sup>, another one the small population, not quite 56,000. And last but not least some remnants of the colonial era, in which one had resigned themselves to the fact that such things are done in Denmark. It will take time to change that, but the problems of endangering nature and the environment in Greenland are urgent.

Since 2006 I travelled every year to Greenland hiking on the "Arctic Circle Trail" or, how I prefer to call it, the "Polar-Route", the name, you can find on the hiking-maps and which is understood in every language. There was only one interruption: From November 2012 to May 2014 I suffered from a cancer and could not hike through Greenland. But now I have recovered from it. All together I have hiked the trail 13 times, nine times from Kangerlussuaq to Sisimiut and four times in the opposite direction.

The trail does not always look very nice. I remember one ironical entry in the guestbook of the hut of Eqalugaarniarfik: "The way to this hut is quite easy to find. After crossing the river Itinneq just follow the toilet paper." It hurts when you see that. On these hikes I had a lot of discussions about those problems with other hikers, who had hiked on trails like that in Canada, Alaska, Iceland or in other parts of the world. This inspired me to think that the problem could be solved with civic engagement and volunteer work (as it is for instance the use on hiking trails in the USA).

In one year I had injured my foot on the hike and therefore had to interrupt my trip round Greenland for 10 days in Sisimiut. I used the time to think about implementing an idea of founding an association for that. I talked to an official in the municipality about it, and he was enthusiastic about this idea. I said to myself, you can not start with the association at home in Berlin. You have to do it on the hiking trail. Because of my injury I had to cancel my planned tour round Greenland, and instead of that I hiked back to Kangerlussuaq. And on the way back the association "Polar-Routen e.V." was founded together with other hikers; and after returning home it was registered at the court.

In 2014 I realized that most hikers start their hike on the Campingsite in Kangerlussuaq; but the Campingsite, what was run by World of Greenland in the years before, was closed in that year. So I got the idea that "Polar-Routen e.V.", our association, could re-open the Kangerlussuaq Campingsite and use it as a starting-point for maintaining the trail by civil engagement of the hikers themselves.

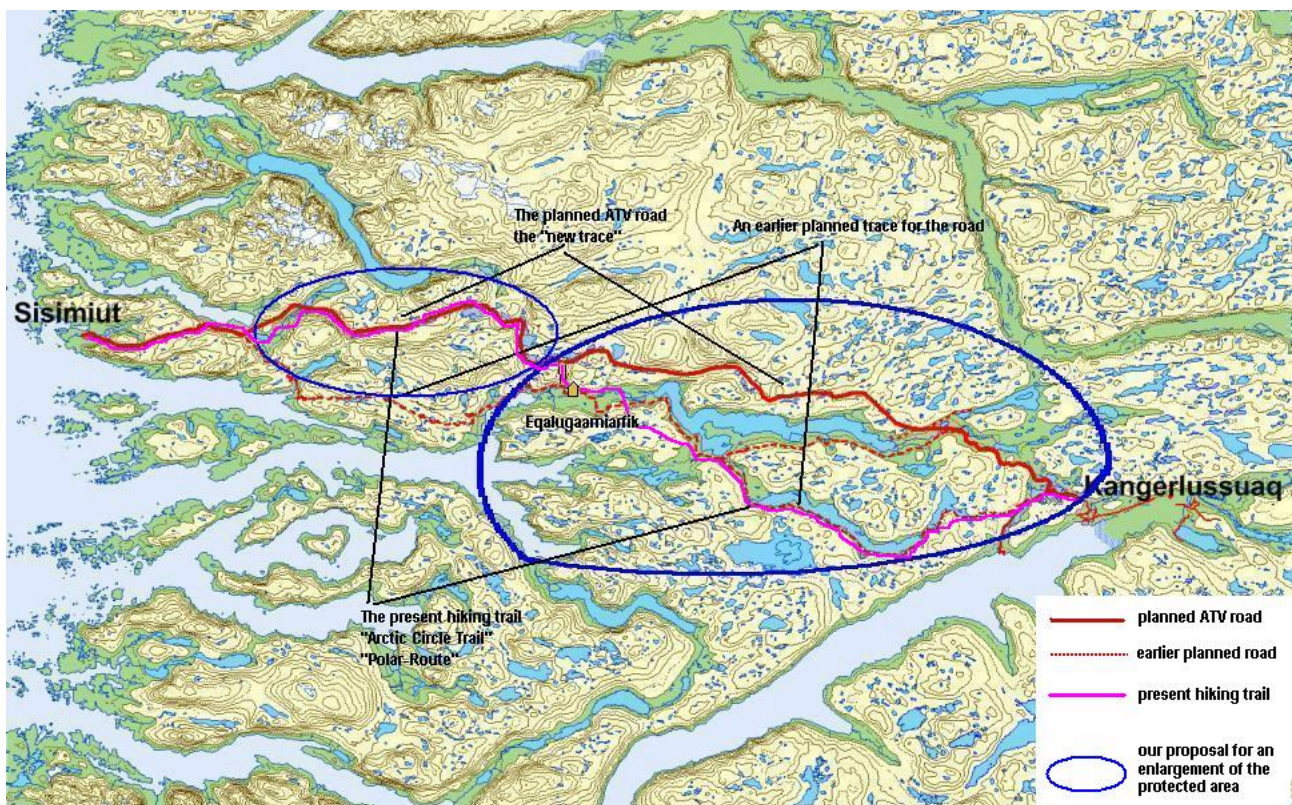
All land in Greenland is owned by the public and administered either by the municipality or by the central government in Nuuk, Greenland's capital. Therefore the ground of the Kangerlussuaq Campingsite was administered at that time by Kangerlussuaq International Airport, what is owned by the government. So I went to the Airport chief (whom I knew meanwhile) and asked her about it. To make it short, she ultimately told me to write an application. When I came back to Greenland



next year (2015), I still was waiting for a response. I went to the Airport chief and asked her: "R..., what's with my application for the Campingsite." "Oh, I have nothing to do with it, you have to ask now ...," she responded. After some talks, phonecalls, and letters I phoned to the officer in Sisimiut, who had supported me, founding the association. "Good that you call me," he responded, "I'll phone to someone in the ministry for inner affairs in Nuuk. I will ask him to hand over the campingsite from central administration to communal administration." Five days later I got a phonecall from Sisimiut and was said: "Go to the airport and ask Lars for the key for the little blue house on the campingsite!" I did not get the key, because Lars did not find it, but he opened the slot with a big hammer. Since that time the association Polar-Routen e.V. runs Kangerlussuaq Campingsite. The association pays a symbolic rent of 1 dkk per year for it, but has the obligation to run the campingsite only with unpaid personnel. And by the way I learned a lot of how politics works in Greenland.

A few days later the responsible officer from Sisimiut, who had arranged the thing, phoned to me and invited me to a meeting of the work group for the UNESCO project, how he called it. It was in September 2015. I should speak there about my idea to manage the trail by civic engagement. The participants of the work group were very interested in it.

Among others I told them that we had to manage the growing number of hikers. And one of the participants made the proposal to open a second trail between Kangerlussuaq and Sisimiut. This would be the trace, which is planned as the "new trace for the ATV road" on the following map. So, if the plan of the ATV road will be stopped, a network of hiking trails could be developed there.



This map has been compiled on the base of a map from the article on "Kangerlussuaq road project"<sup>27</sup>. According to a PDF-file<sup>28</sup>, which is referenced there, the thick red line is the planned new trace for the ATV road, while the red dotted line (thin line) is an earlier trace for a planned road.

I have some additions marked on the map. This is once the hut Eqalugaarniarfik in the middle of the way, also the purple drawn hiking trail, two blue ovals and some hints.

<sup>27</sup>) article: "Kangerlussuaq vejproject - ATV spor mellem Sisimiut og Kangerlussuaq"

<sup>28</sup>) see: Samfundsøkonomiske. Konsekvenser Naturvej mellem Sisimiut og Kangerlussuaq (Socio-Economic Consequences of Nature road between Sisimiut and Kangerlussuaq), p. 10.

As you can see there, the trace of the former road was planned to run between Kangerlussuaq and Eqalugaarniarfik on the trace of the hiking trail, with the exception of a short part near Lake Tasersuaq, because the slope on the hiking trail is too large there. Even north of the hut Eqalugaarniarfik the ascent would have been too steep to continue the road on the route of the hiking trail. Therefore, a southern route was chosen, which led to Sisimiut near Sarfannguit. But this trace proved to be unusable. Therefore, finally a route north of Lake Tasersuaq was chosen between Kangerlussuaq and Eqalugaarniarfik. A few kilometers north of Eqalugaarniarfik it meets again the route of the hiking trail and is to be continued on this trace through the valley Nerumaq to Sisimiut. Both plans of a road were therefore planned to use an essential part of the hiking trail, but every plan another one. The former trace for the road should use the eastern part of the hiking trail and the latter one the western part. A consideration of the hiking trail has been mentioned in the documents nowhere, but only more favorable routes or lower construction costs are mentioned for choosing one or another trace.

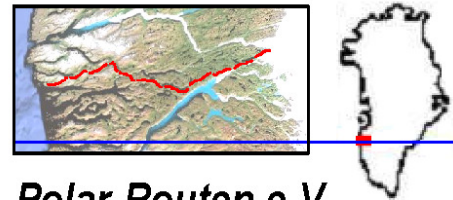
The two blue ovals are marking areas, which at any rate should be included in the protected cultural landscape (while coordinates might be determined later on).

When the trail was opened on 15 June 2016, the original plan to launch a program to preserve the footpath based on civic engagement has of course been overshadowed by the effort to preserve the footpath.

In the summer of 2016, hikers on the Polar Route / Arctic Circle Trail were counted by our association for the first time on the basis of scientific estimation methods (the Capture and Recapture method). The result exceeded all expectations: 1,290 hikers per year. Nearly all hikers said in this census that they were shocked, when we informed them about the plans to build an ATV road. One result of the census was also that the benefit for the Greenlandic GNP generated by the hikers on the trail is 11 million dkk per year; this is far more than the benefit expected as a result from the ATV road per year.

A positive effect of the commitment to preserve the trail was also that the organization of the association could be improved and that new members could be recruited, including Greenlanders, who now form the largest membership group.

To  
The Municipality of Qeqqata  
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**Polar-Routen e.V.**

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Til Qeqqata Kommunia / To the Municipality Qeqqata  
Rådhuset  
3911 Sisimiut

### Memorandum of hikers on the Arctic Circle Trail on the planned ATV trail between Sisimiut and Kangerlussuaq

Dear Ladies and Gentlemen, dear citizens in Greenland,

as hikers who have traveled to Greenland during the summer of 2016 and some of us also during the last year, we heard about the plans of the municipality Qeqqata to create an all-terrain-vehicle (ATV) trail, which should extend to a significant part where now a hiking trail runs, i.e. the "Polar-Route" or "Arctic Circle Trail" (ACT). Among all people worldwide, who are enthusiastic about the Arctic nature, this hiking trail is well known as almost no other one, and it should remain so.

The municipality Qeqqata published plans on its website to build the ATV trail and may already start construction in summer 2017.

According to those published plans the ATV trail would coincide with the ACT for about half of the current hiking trail, concerning mainly the western part of the ACT. On about one-sixth of it - the section from Sisimiut to Kangerluarsuk Tulleq and a small piece at the east end - hikers and ATV would share the same route. On the section between Kangerluarsuk Tulleq and Eqalugaarniarfik, which is about a third of the ACT, the ATV trail would use the track of the present hiking trail, while the latter would be moved to the south, where it passes near Sarfannguit.

Qeqqata's report argues that an ATV trail along the Southern route would be too steep for ATVs to pass. The statement literally says that, with regard to slope angle and other characteristics, the ATV trail should be passable for an "average citizen and tourist". The municipality's report does not raise the question whether the envisaged Southern trail may be too steep or dangerous for a "average citizen and tourist" hiker. However, the second edition of the guide book "The Arctic Circle Trail" (in German)<sup>29</sup> explicitly warns hikers not to use this southern route. Apart from merely being a dotted line on the hiking map, the southern route is completely unsuitable for the average trained hiker, even dangerous. The book says literally<sup>30</sup> (translated from German):

*"On the one hand, hikers often (involuntarily) disturb locals in the exercise of their profession (hunting / fishing). On the other hand, the main path [through the valley Nerumaq] is undoubtedly the safer option, not only with regard to the trail*

<sup>29</sup>) Grönland: Arctic Circle Trail, Outdoor, 2004, 2<sup>nd</sup>. edition 2014, page 79 f. The southern route in the plan for the ATV-trail departs for some km from that described in the book. At time we cannot estimate, what differences this might cause.

<sup>30</sup>) Grönland: Arctic Circle Trail, Outdoor, 2004, 2<sup>nd</sup>. edition 2014, page 79 f.:

"Nicht selten stören Wanderer, zum Teil aus Unkenntnis, die Einheimischen bei der Ausübung ihres Berufs (Jagd/Fischerei). Zum anderen stellt der Hauptweg [durch das Tal Nerumaq] zweifellos die sicherere Wegvariante dar. Dies hängt nicht nur mit den Steinmännchen und den vorhandenen Trampelpfaden zusammen, die eine Orientierung erleichtern, sondern auch mit dem zu begehenden Gelände. Insbesondere einige Teilstücke der südlichen Variante des Weges, die direkt am Fjord (Imertuninnguaq/Amerloq) verlaufen, sind nicht nur strapaziös, sondern stellenweise extrem steil bis nicht passierbar. Nicht nur bei schlechtem Wetter und feuchtem Untergrund können Sie hier in ausweglose und **lebensgefährliche Situationen** geraten. ... Von unserer Seite sei somit an Sie die ganz eindeutige Bitte herangetragen: Bitte respektieren Sie die Anliegen der einheimischen Bevölkerung und bringen Sie sich selbst nicht unnötig in Gefahr. Wählen Sie daher den markierten und in der Karte als Polar-Route bezeichneten Hauptweg."

*marks and the existing beaten tracks that facilitate orientation, but also with regard to the terrain itself. In particular, some parts of the southern trail option, which run directly along the fjord (Imertuninnguaq / Amerloq), are not only exhausting, but at times extremely steep if not impassable. Conditions can easily become hopeless and **even life threatening**, even without bad weather or damp surfaces ... We thus request you to please respect the concerns of the local population and not bring yourself unnecessarily in danger. Therefore, select the main path, which is marked and designated as Polar Route in the map."*

This is not only the opinion of the authors of this Tour-Guide. Hikers, who have experienced the southern 'alternative' to the main route of the Arctic Circle Trail have confirmed this information. Taking this for granted we do not consider it as acceptable to move the present hiking trail to the southern route, to make room for ATV trail.

The public statement, which calls the southern route from Kangerluarsuq Tulleq to Eqalugaarniarfik an alternative to the present hiking trail from our point of view conveys the wrong picture to the public. The offered alleged alternative is no real alternative, because it is impassable for the hiking "average citizen and tourist". By all practical means, the hiking trail would be sacrificed to the ATV trail.

Besides that the ATV trail will obviously cause significant harm to the landscape. We remind of the significant damage that has been done to the short section between the Maligiaq and the dam construction site above the hut Eqalugaarniarfik by ATV traffic of the workers. The road there looked like a gaping wound, and it took years for modest plant growth to reappear.

On top of that, the economic reasons brought forward in support of the ATV trail are in our view not supported by facts. Neither do the modest economic benefits justify such damage, nor are the arguments of such economic benefits convincing.

The council member Marius Olsen, responsible for living resources, supports his case for the ATV trail mainly by means of economic reasons. In his view, ATVs may bring significant economic benefits to transport of passengers and cargo. They may serve tourism, encourage the exchange of products between the inland and the coast, grant cheap access to Kangerlussuaq International Airport and so help Sisimiut open the door to the world. These reasons, however, are not convincing to us. So far we have not met a single tourist traveling Greenland by ATV. The same applies to "cargo" based on ATV and the hoped-for "opening the door to the wide world" by means of ATV.

Next to the fishing, tourism is the most important economic source of Greenland. We fear a decisive drop in tourism not only with regard to the southern trail-variant near Sarfannguit. Additionally, there is also a psychological aspect, which can in fact be observed for comparable hiking-trails all over the world. None of them, as we see it, runs parallel to a highway, railway-line etc. Insofar the absence of a street or other traffic-connection on land is a mental precondition for the touristic attraction of the Polar-Route.

On the one hand, hikers may refrain from travelling to Greenland or Qeqqata, respectively, because it loses its appeal due to the ATV trail. On the other hand, they may also avoid the hazardous hike over the southern route via the Sarfannguit area. We estimate that the ATV trail project will cause a negative impact on tourism for Greenland in general, and for Qeqqata in particular.

Without doubt, transport links to the coast as an alternative to air transport during the summer would be important for Kangerlussuaq. But to us, reuse of local shipping lines along the coast seems to be a far better option than an ATV trail. We propose to establish a shipping line for passengers and freight circulating at least once a week between Sisimiut and Kangerlussuaq with connection to Sarfannguit and Itilleq. Of course, such shipping line needs public support and especially good marketing. But costs for that will be far lower than annual maintenance costs for the ATV trail, even ignoring its one-time construction costs. The cited study of the municipality Qeqqata is quite silent about these ongoing maintenance costs. A shipping line would not only be significantly cheaper, it also would leave neither environmental traces, as ATVs do, nor comparable damages to the living resources of the municipality Qeqqata. A shipping line could further become a first class tourist attraction, much like attractions such as the Norway cruises through the Sogne or Geirangerfjord or with Hurtigruten.

With our memorandum we appeal to politicians and citizens in the municipality Qeqqata to drop plans for an ATV trail. We still hope that one day our children will be able to hike on the Polar-Route/Arctic Circle Trail.

The memorandum was opened for signing in July 2016 in Greenland (Kangerlussuaq) for hikers on the Polar Route and completed the following year with 300 signatures. In January 2017 it is presented with 214 signatures together with the result of a counting of the hikers on the Polar-Route - 1,290 in a year – to the municipality Qeqqata. An answer is still awaited (August 2017).