

POSEIDON ARCTIC VOYAGES

UK reg office: 59 Mansell St, London, England, E1 8AN (Reg. 04622095)

11 July 2024

Ms. Kathrine Ødegård Naalakkersuisut / Government of Greenland P.O. Box 1601 3900 Nuuk GREENLAND

Re: Proposed Greenland Tourism Law

Dear Ms. Ødegård,

We are in possession of a translation of newly proposed legislation by your government regarding the licensing and restricting of certain tourism activities in Greenland. The "unofficial" translation was provided to us by AECO, the association of Arctic Expedition Cruise Operators, of which we are a member in good standing.

As a relatively small private company that has been successfully operating a 114-passenger expedition ship in Greenland waters since 2015 — without incident, we might add — Poseidon Expeditions has serious concerns about the current draft of the tourism law. In that time, we have operated in late May and June, but more frequently in August and September of each year. These expedition cruises — where we employ experienced multi-lingual naturalists, ornithologists, marine biologists and historians as guides on every cruise — have achieved a notable level of success with guests from all over the world: Europeans, Americans, Japanese and Chinese, Australians and New Zealanders.

We take immense pride in our ability to show the beauty of your country to these inquisitive visitors, taking them to places of great natural beauty as well as to small villages and towns where they interact with local guides to learn about your culture and society. Since 2015 when we began offering such cruises, Poseidon Expeditions has spent in excess of US \$1 million in Greenland through port fees and services provided by local agents, chandlers, etc.

As we understand it, our business model, which has been well-received by Greenland and local communities, would be significantly disrupted by such proposed legislation. Unfortunately, Poseidon Expeditions would not be exempt, nor would we qualify for a license, if such a law were passed. We do more than just transport passengers to and from Greenland; we provide expert and experience tourism activities and guiding services while in your national waters. We are the U.K. Company. We carry our own guides, usually 12-13 per cruise, and do not have the capacity to transport an equal number of licensed local guides—which, it appears, would be necessary—if that would become a requirement. You should also be aware that our guides must also be well-versed in the natural environment and tourism requirements of Iceland and Svalbard, destinations which are often included in our expedition cruises that encompass Greenland. It would simply not be possible economically or logistically to change out our cadre of guides while in Greenland waters. Would guides provided by a licensed (and more than 50% owned) Greenlandic company be able to speak Chinese, Spanish, German or other languages as Poseidon's multi-lingual staff currently do?

The consequences of such a law, as presently proposed, is that Poseidon Expeditions would have to vacate Greenland as a destination for our popular expedition cruises. This would be most unfortunate. Each year, hundreds and hundreds of passengers from all over the world would be deprived of the opportunity to visit Greenland in a manner that currently works well for everyone: Greenland local businesses and communities, Poseidon Expeditions and its guiding staff and its international passengers.

We hope that further drafts of this legislation are more flexible regarding the requirement for tourism activities in Greenland. As currently written, the law would not permit us to be a provider and advocate for tourism to your country. We fail to understand how incoming tourism numbers could increase or even remain stable, with the money these guests currently bring to Greenland, should this law go into effect.

We look forward to reading translations of further drafts of this proposal and hope that it presents a more realistic and viable plan for the continuation of expedition cruising and tourism activities in Greenland waters.

Respectfully,

Angelica Vorea

CEO

Poseidon Expeditions

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