



Nes-Akkrum, 30-04-2022

Dear all,

With this letter Wylde Swan Expeditions, the operator of SV Noorderlicht // Reade Swan expresses her concerns about the many new regulations that are proposed for operating in Svalbard for us as not Norwegian company.

This is a response to the following regulatory proposals:

1. Proposal for amendment of Svalbard Environmental Protection Act - and regulations/orders given with authority in this Act from the Norwegian Environmental Agency, with reference 2021/9496; and the
2. Proposal for substitution of "Regulations related to tourism" with "Regulations related to field safety" and the proposal to apply the Package travel Act in Svalbard, from the Norwegian Ministry of Justice and the Ministry of trade and industry, with reference 21/4952 - MAKO

Swan Expeditions with SV Noorderlicht // Reade Swan is a professional company that is operated by passionate sailors and guides. We have been operating in Svalbard since 1994, almost 30 years. We are very small. We have only 20 guests, 2 guides and 5 crewmembers.

The mission of Swan Expeditions is to offer a meaningful, life-changing expeditions to our guests. Note that the mission is not to make profit. The only aim is to offer our guests an experience and, in the meanwhile , keep our crew and vessel in good shape. Svalbard is our favorite destination for this.

The only way to make sure this mission can be fulfilled, is to run a safe operation for the environment, the guests, crew and sailing vessel. The new rules that are proposed do not seem to aim for a safe operation and therefore are a concern to us.

For example, some of our very experienced guides maybe have to be replaced by less experienced guides. The reason for that lies in the new ideas for weapon certificates. It hurts us that regulations can have a negative effect of general safety.

The proposed taxrules are very difficult for us: We are a very small company with limited resources. The new tax regulations forces us to spend our money on taxes in Svalbard instead of investing in safety. With only 20 guests that must provide the resources to realize a well-trained crew + a good maintained sailing vessel, there is no room for many percentages of taxes to withdraw.

Our crew consist of professionals, but also their mission is to provide our guests with the best experience in Svalbard. It is not their mission to make a full living out of their work on board. Many are even on professional but voluntary basis. It would not be good the let these people pay taxes in Svalbard, or to execute crewchanges every 30 minus 1 day to avoid taxes. That will reduce a safe operation.

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I hope that these proposed new regulations will be discussed and that other ways to regulate Svalbard Tourism can be found. A company like ours with 1 sailing ship with only 20 guests in Svalbard are not the right target for this aim.

Swan Expeditions B.V.
Christophe Meijer