

White Paper for the SIA Social impacts

TANBREEZ Project

English version

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A short description of the white paper for the SIA for the TANBREEZ Project - the content and its purpose

TANBREEZ Greenland Mining A/S (TANBREEZ) holds exploration license 2006/04 for exploration of minerals in a delineated area at Kringlerne in South Greenland.

TANBREEZ has submitted an application for an exploitation licence to MLSA (then BMP) for the above-referenced delineated area. The application consisted of a Draft EIA Statement, a Draft SIA Statement and a Feasibility Study.

The Draft SIA Statement and the Draft EIA Statement has gone through a public consultation. During the public consultation numerous questions, statements and comments have, since then, been submitted to the MLSA and EAMRA respectively.

As part of the process, public hearing meetings were conducted in Qaqortoq, Alluitsup Paa, Nanortalik and Narsaq.

This white paper contains all SIA-related questions and statements from private citizens, NGOs and other institutions, which have been submitted to the the MLSA during the hearing period as well as minutes of the public hearing meetings conducted in South Greenland.

The white paper contains answers, comments and statements from TANBREEZ and The as well as specific references to where in the updated SIA Statement these proposed changes are to be found.

TANBREEZ and Naalakkersuisut wish to thank all citizens, NGOs and other institutions for having participated actively and enthusiastically in the public hearing process. This will give the project a solid foundation in the Greenlandic society.

**I. Written responses submitted concerning the
Draft SIA Statement (Impacts on the society)**

No. 1. Employers' Association of Greenland (Grønlands Arbejdsgiverforening)

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
1.1	With the purpose, to involve the local community and local businesses, it is proposed the establishment of dialogue group (s)/ dialog forum. GA seems the proposal is very positive. However, it is central to the group that the mandate and objective are clear from the beginning. In addition, how this group is to act and relate to any IBA committee and the Greenland contracting parties in general. This initiative is particularly functional in cases where communication is directed to the local economy in terms of drawing attention to the tasks being offered and what is required for firms working for the project.	No answer is required from TANBREEZ.		None
1.2	The project should after GA's assessment encourage local businesses to create partnerships with other national companies and foreign or in the cases where the existing companies do not have the opportunity to bid for specific tasks. The item and objectives should be included in monitoring plan.	Comment taken into account. Aspects of creating partnerships will be included in the monitoring plan.	Appendix 2 in the Impact Benefit Agreement stipulates requirements for the project's procurement policy including selection and awarding criteria for contract packages, which have to be tendered. The requirements ensure that bids will have to be drafted on the basis of Greenland terms, include information about the extent of involvement of Greenland Enterprises and Greenland Workers	The monitoring Plan (chapter 9 Monitoring Plan) will include the aspects of creating of partnerships.

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
1.3	To attract and retain local labour (through local companies) GA agree with the proposals made for further description of the jobs, skills requirements, etc. GA recommends that early in the process of being established cooperation with educational institutions in order to ensure the temporal planning of when the competences is needed for the project and when it is present in educated or trained.	Comment on collaboration with the education institutions is taken into account.	Different education measures for improving the Greenlandic workforce skills with regard to mining activities are included in Appendix 3 of the IBA.	Collaboration with education institutions will be added to the proposed measure in section 8.2 Education and training.

No. 2. Danish Working Environment Authority (Arbejdstilsynet)

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
2.1	Working Environment Authority (WEA) has read the VSB report, of the proposed mining for the Tanbreez project. Initially, it should be noted that the Working Environment Authority sees the SIA with regard to health at the workplace and the risk of accidents as an interim general framework, which subsequently will be fleshed out and implemented in the preventive work environment. The Working Environment Authority assess that the preliminary plan - predominantly referred clay risks associated with accidents - could usefully be supplemented by considerations of heavy lifting, musculoskeletal disorders, exposure to chemicals, dust, noise and vibration.	A detailed plan for the working environment will be developed later in close cooperation with the WEA.		None
2.2	Compared to the rest period and rest days appears from the section 5.9.4, that the employees will work at a predetermined rotation, which probably will be four weeks of work and two weeks off. To this Working Environment Authority must note that after OHS (Occupational, Health and Safety) Act § 41 and § 4 Order No. 23 of 23 January 2006 on rest and rest days in Greenland, employees must be given a weekly day off,	Comments from WEA are taken into account.		The conditions of the OHS Act 41 and §4 in order No 23, will be taken into account in section 5.9.4.

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	which will be located in the immediate connection to a daily rest period. It is possible to agree that there can be 12 days between 2 rest days, cf § 19.			
2.3	<p>For your information, The Working Environment Authority intends to issue the following orders to take effect in early 2014:</p> <ul style="list-style-type: none"> * Order on working with the extraction of minerals in Greenland * notices respectively layout and use of technical aids, * amending the decree on compulsory training in occupational health and safety (OHS) education programs to allow for provision of web-based occupational health and safety education for coordinators of OHS in the construction and civil works area in Greenland. 	Comment from WEA. No response it required by TANBREEZ.		None

No. 3. SIK

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
3.1	<p>SIK basically supports exploitation in Killavaat, as we believe that it can significantly alleviate the current unemployment in South Greenland.</p> <p>Nonetheless, SIK believes that the processing should take place in Greenland as this report among other places, mentions that processing can take place in Denmark. According to our knowledge in SIK, there are currently no (chemical) plants in Denmark with the required capacity. Hence, mentioning Denmark as a place for processing somehow puzzles us, since we know that the costs are higher in Denmark than in Greenland. Therefore, we believe that there is basis for establishing in Killavaat, thus creating jobs there.</p>	<p>Statement/comment to the Self-government. No answer is required from TANBREEZ.</p> <p>Comment from TANBREEZ:</p> <p>For an annual production of 500,000 tons ore, the location of a chemical plant in Greenland seems to be unfeasible environmentally, economically and socially based on the following:</p> <p>The environmental potential impact and risk for accidents from transport and use of chemicals and thus subsequently impact on the environment well as the fishing and hunting activities (commercial and subsistence) are considered to be significant.</p> <p>The expenditure of acquiring and establishment of the processing plant (CAPEX) will be 35% higher in Greenland than outside Greenland and similar the expenditure of operating the plant (OPEX) will be 84% higher for operation in Greenland than outside Greenland.</p> <p>The potential benefits for Greenland will be the created job at the plants as well as the related tax</p>	<p>Ministry of Mineral Resources</p> <p>Processing locally will create more jobs and secure a larger tax base. Local processing is therefore highly prioritized by Naalakkersuisut.</p> <p>According to the Mineral Resources Act § 18 (3) the extent of the company's processing of exploited mineral resources in Greenland can be specified. Dispensation may be granted if processing will entail significantly higher costs or greater inconvenience.</p> <p>As the application does not include processing in Greenland, the Ministry of Mineral Resources have asked the company to substantiate the significantly higher costs or inconveniences and at the same time account for this in greater detail.</p> <p>Based on an extended dialogue during the last 7 years the mining company and the Greenland Government have agreed to that processing shall take place in Greenland 10 year after the time limit set in the license for commencement of exploiting minerals unless</p>	<p>If a chemical treatment plant becomes a part of the project, major revisions of the SIA reports shall be made.</p>

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		<p>revenues. It is foreseen that the plants will create 160 jobs, where 80 will be local and 80 will require skills and educations which are not available in Greenland for the moment. It is unlikely that Greenland, in the short run, will be able to provide this number of qualified persons from a small population. And thus, these jobs will be employed by people outside Greenland which will create potential social and health risks. Furthermore, there are a number of concerns with regard to occupational health and safety issues on chemical plant.</p> <p>Although the project will create some benefit for Greenland it is assessed that the location of the chemical plant in Greenland will be unfeasible from an economically and that the potential environmental impacts are significant and much higher than the potential benefits.</p> <p>Saying this it is likely that TANBREEZ will increase of the annual production to 1.5 million tons of ore at a later stage and at this stage reconsider if it is convenient, practical and financially viable to have the chemical process for TANBREEZ located in Greenland.</p>	<p>the Greenland Government decides otherwise.</p> <p>If chemical processing of eudi-alite concentrate, does not take place 10 years after the deadline set in the license for when exploiting minerals have to commence, the licensee has committed the company to pay an increased royalty rate. Given that chemical processing does not take place in Greenland, the company has committed it self to increase the royalty rate with</p> <ul style="list-style-type: none"> - 2,69 percentage points for eudialyt concentrate - 3,0 percentage points for rare earth elements. 	

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3.2	It is mentioned on how long future miners are to stay and work at the mine - and subsequently how long time off work they get. We encourage Tanbreez to contact SIK, so we can have a debate on these issues; since it is through negotiation we solve any issues.	TANBREEZ welcomes the invitation; see also question 2.2 (WEA) and the response.		The conditions of the OHS Act 41 and §4 in order No 23, will be taken into account in section 5.9.4.
3.3	Similarly, according to the IBA, we consider agreements as being important as some of the topics involve the terms of the future employees.	Comment from SIK. No answer is required from TANBREEZ.	The IBA does not regulate terms of employments, which are regulated by collective agreements or any other relevant legislation.	None
3.4	Furthermore, SIK supports wholeheartedly the establishment of a council / group.	Comment from SIK. No answer is required from TANBREEZ.		None
3.5	SIK also believes that the majority of employees' training must take place on the worksite – similar to the method practiced in Norway, as should the same be a requirement to Tanbreez. SIK believes that as much as possible of the workforce must be locals – efforts have to be made achieving that goal.	Comment on the training activities to take place on site is taken into account from TANBREEZ. However, the on-the job training is mentioned in section 8.2. Education and Training.	Different obligations for training are spelled out in Appendix 3 to the IBA.	The description on the 'On-the job training' will be made clearer in section 8.2, Education and Training.

No. 4. KANUKOKA

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
4.1	<p>Comments to SIA- Assessment of social impacts</p> <p>A SIA must provide for the public and the decision-makers a full covered picture of how a large project will affect the existing community and how possibly negative impacts can be limited and positive effects supported and enhanced.</p> <p>The proposed SIA give in the municipalities' view, not an exhaustive picture of the influences that are in the community from future mining activity, and the opportunities the project creates both locally and across the country. KANUKOKA therefore believes that the SIA one on a number of points should be expanded and changed.</p>	<p>The SIA is developed based on the SIA Guidelines prepared by the BMP. A draft version of the SIA was submitted to BMP for BMP to check if the SIA is in compliance with the current legislation and in compliance with the Guideline on SIA. The BMP concluded that the SIA was in compliance with legislation and the SIA Guideline before it was made public available as a part of the public hearing.</p>	<p>It is possible for a SIA report to both meet the minimum criteria of a number of guidelines and at the same time take into account that stakeholders have additional input for the report.</p> <p>The purpose of the hearing process is precisely to shed light on any gaps and missing issues. Furthermore, the SIA Statement has gone a revision based on the public consultation.</p>	<p>The SIA Statementet has been changed in several sections based among others on the comments submitted and raised during the public consultation.</p>
4.2	<p>The physical design of a project (infrastructure) can sometimes be very important for the impact on socio-economic and labor conditions. E.g. the decision for or against the establishment of a direct road between the town and mine affect the opportunities for attracting and retaining local labor. Local workers' daily lives will far more adversely affected if the work is divided into longer periods</p>	<p>The project does not contain a road connection between the mine-site and Qaqortoq. Thus, this is not included in the assessment.</p> <p>However, TANBREEZ is in an ongoing dialogue with the local municipality about the road.</p>	<p>There is no statutory basis for demanding that the mining companies shall establish a road between the mine site and Qaqortoq</p>	<p>None</p>

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	of time away from the family than if the base is home with daily or shorter-term work periods.			
4.3	The SIA should generally illustrate the consequences for the local community of this type alternatives for project design, including explaining the background for any recommendations / choice. (energy die-sel power station / hydro-power, waste management, location of processing plants, etc.) Decisions relation to touch areas served by the municipality should not be undertaken until there has been a dialogue with local authorities on possibilities of tasks are performed by or in cooperation with the municipality (e.g. waste management)	<p>Comment noted.</p> <p>TANBREEZ has been in dialogue with the municipality. TANBREEZ will continuously be in dialogue with the municipality.</p>		None
4.4	The consequences of the increased pressure on local public services which the mine-project will cause is not well examined in SIA. This applies, for example. increased pressure on the transport system, health sector, police and courts, as well as the general municipal service to citizens.	<p>Comments taken into account. More information will be added to section 8.3 in the SIA Report.</p>		Section 8.3. has been expanded with aspect on pressure on the public service.
4.5	The SIA should contain general considerations about the economic impact on the local community of the different scenarios are.	The SIA is developed based on the SIA Guidelines prepared by the BMP. A draft version of the SIA was submitted to BMP for BMP to	According to the SIA Guidelines, the mining company must describe the economic impact of the	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
		check if the SIA is in compliance with the current legislation and in compliance with the Guideline on SIA. The BMP concluded that the Draft SIA Statement was fulfilling the minimum requirements for being released for public consultation on the government's website..	project on the public service sector and economy. The Guidelines have thus taken into account that the mining company must describe the economic consequences.	
4.6	It is not clear what is meant in the SIA when speaking of "local employees". KANUKOKA emphasizes that the whole country is considered for labor, understood so that company first seek foreign labor when the potential of the country have been explored.	In chapter 2. Definitions and abbreviations is 'local workforce' explained as the workforce from the municipality of Kommune Kujalleq. Preference will be given to the local labour which lives near the operation, then to employ Greenland people elsewhere in the country then foreigners with a Greenlandic heritage, then Europeans etc.	How the term local should be interpreted has been outlined in Appendix 6 of the IBA	None
4.7	The SIA lack a concrete analysis of how the interaction between TANBREEZ project and the other current mining projects will affect the community's opportunity for benefit most e.g. in relation to the labor market and local business.	Comment taken into account. The cumulative effects from the other planned mining projects will be added to the SIA.		A section 8.8 has been added to cover the potential cumulative effects of the different planned mining projects.
4.8	By preparing contingency plans this should be close cooperation with the municipal emergency, police and/or other relevant sectoral authorities responsible for Greenland - for a secure consistency	The contingency plans will be developed in close cooperation with local and national authorities at a later stage.		None

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	with existing resources, and to ensure maximum local involvement.			
4.9	The description of the secondary effects for local labour and business is not good enough described/assessed. There is a lack suggestions for how to potentially positive secondary effects can be supported.	<p>The comment will be taken into account. Section 8.1.2. covers the aspects of the multiplier effects. This section will be expanded and also including additional information on the multiplier effects.</p> <p>The multiplier employment factor used in the SIA is based on studies from Canada and Alaska which indicates a multiplier factor of 1.6-1.8. This information was verified in 2010 by Keith Storey (Department of Geography at Memorial University, Newfoundland).</p> <p>Due to Greenland's very large proportion of imports the SIA propose to use a multiplier effect of 1.3.</p> <p>However, the use of 1.3 is considered to be very conservative. A study from the Mining Association of British Columbia (Economic Impact Analysis by PWC October 2011) which was referred to at the web-site indicates a multiplier employment factor of 2.2.</p> <p>As no experience exists on the multiplier employment effect in Greenland the SIA will add consid-</p>	How to support the positive effects have been spelled out in the IBA.	<p>Section 8.12 has been expanded with consideration of the conservative scenario (with the use of a multiplier employment factor of 1.3) and the more optimistic scenario (with the use of multiplier employment factor of 2.2).</p> <p>The reference: <i>Economic Impact Analysis, Mining Association of British Columbia, October 2011</i>, will be added to the list of references (Chapter 11).</p> <p>No additional measures will be added as the measures for simulation of business life will also stimulate the indirect and induced jobs, primary in regard to the establishment of the business forum for local businesses.</p>

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		<p>eration of the conservative scenario (with the use of a multiplier employment factor of 1.3) and the more optimistic scenario (with the use of multiplier employment factor of 2.2).</p> <p>The proposed measures for the business life will also stimulate the indirect and induced jobs, primary in regard to the establishment of the business forum for local businesses.</p>		
4.10	The proposals for action regarding training in attachment to my project lacks career planning for the workers who linked in the mine, so as to ensure that local workers not only members performing the simple jobs, but constantly upgraded to ever-more advanced features.	Comment taken into account. Proposal for development of target for local workforce for all level will be developed together with training and education programmes which encourage upgrading for all positions.	Appendix 3 in the IBA addresses issues regarding training and education in relation to the project throughout the life of mine	
4.11	<p>Comments on specific sections of the report</p> <p>In 6.4 Secondary sources are official data on Greenland, Nuuk and TANBREEZ's mining area. It is expected that it should be ".. Greenland, Municipality Kujalleq and ..."</p>	Comment taken into account.		The second sentence in section 6.5 will be changed to: The secondary sources are official data about Greenland, Kommune Kujalleq and"
4.12	The figures and tables throughout Chapter 7 are inconsistent, messy and more places unreliable! The entire chapter should be review	Comment taken into account. A review of the chapter will take place.		Revised chapter 7 is included in the final SIA.

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	critical and adjusted before the SIA can be approved. There is no correlation between similar tables for example. Table 7.13 shows the total employment in Greenland by sectors in 2010 and table 7.14 shows the number of employed women and men in relation to sectors in 2006. It is hard to see how the two tables can both be right.			
4.13	In table 7.2 Qeqqata Municipality are included twice while Qaasuitsup municipality is not included.	Comment taken into account.		Table 7.2 will be corrected.
4.14	Figure 7-11 is lacking label and in the text below is written "At the second place following rape crimes with an average of 356 persons convicted". It is expected that instead of rape crime should stand violent crimes.	Comment taken into account. However, Figure 7-11 includes the label.	It is figure 7.11 in the approved version	The sentence for figure 7.11 (in the approved SIA) has been changed so it will be violent crimes and not rapes.
4.15	In Table 7.16 is misleading information, for example, says "Nanortalik unemployment has also increased dramatically in comparison with Qaqortoq" this is not reflected in the table. The text in the table says "The mean number of unemployed in South Greenland and in Greenland in total in 2006 and 2012," but the table itself is that the numbers are from 2006 and 2010.	Comment taken into account.		The table has been updated and the text has been corrected

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
4.16	Below Table 7.18 says "women experience very low unemployment". This is considered misleading when unemployment as is clear from the table is of 8.5%.	Comment taken into account.		Sentence will be changed to "women experience a lower unemployment than men."

No. 5. Municipality of Kujalleq

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
5.1	<p>Kujalleq municipality's comments concerning the planning process</p> <p>It is the opinion of Kujalleq Municipality that it is important, for both the resource sector and the local community, that an effective communication process with citizens of the community, local businesses and the local authorities is implemented before an exploitation license is issued. All parties must accept that the communication process leads to the formation of opinions and criticism. The council's objective is to improve the communication process towards all citizens.</p> <p>Kujalleq Municipality wishes to express satisfaction with the fact that the Self-Government is considering to improve the guidelines for the preparation of the SIA. These improvements should be transparent and should be carried out in close cooperation with all relevant parties. Kujalleq municipality wishes to actively participate in this process.</p> <p>It is the understanding of Kujalleq Municipality that SIA reports for mining projects have evolved to some extent to legitimize "that we</p>	<p>Statement by Kommune Kujalleq – no answer required by TANBREEZ.</p> <p>Comment by TANBREEZ: The Project Manager from the consultant team conducting the SIA process of the TANBREEZ project is certified process facilitator including public participation.</p>	<p>No specific certificates should be required as this might lead to local companies being left out; companies that might contribute with local knowledge. However the authorities have had a continuously dialogue through many years with the industry about how the mining companies can increase their engagement with local companies and citizens of Greenland.</p> <p>The authorities observe who prepares the reports and the extent to which local knowledge is included in the preparation of the reports.</p> <p>Furthermore, the cooperation between the municipality and the mining company is regulated by the IBA.</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>have something" and not a process through which all common benefits as well as issues and conflicts can be raised. The Self-government of Greenland is therefore considering requiring certification for consultants carrying out SIA processes and thus ensures that the consultants have a thorough knowledge of Greenland's socio-economic conditions.</p> <p>The proposed SIA does not sufficiently illustrate the many aspects of potential cooperation between the local community and the mining activities. This public hearing response attempts to shed light on these shortcomings.</p>			
5.2	<p>The contribution of mining activities to the municipality's overall objectives.</p> <p>Kujalleq municipality believes that the Tanbreez mining project, along with other mining projects in the municipality, can be crucial for the development of not only Southern Greenland, but for Greenland as a whole. With this SIA and EIA public hearing process, Kujalleq Municipality expects that the negotiations and communication with the local community will intensify significantly.</p>	<p>Statement – no answer required by TANBREEZ.</p> <p>Comments from TANBREEZ: The company sees some merit in such a development and suggests a working group to establish ways forward as an excellent idea. However TANBREEZ strongly suggest that the mining companies should be either represented in the group or have some set method of access. This would avoid the introduction of ideas that would be detrimental to a mining industry being established.</p>	<p>Kujalleq Municipality has been directly involved in the IBA negotiations together with the mining company and the Greenland Government</p> <p>The general subjects of the IBA are, among other things, the involvement of local businesses, the involvement of the Greenlandic workforce, upgrading of qualifications and education as well as local deliveries. Funds is also part of the agreement.</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>In this context, Kujalleq Municipality is preparing a more detailed planning process in which all societal aspects will be assessed with regards to creating the best possible interaction between communities and the mining activities.</p> <p>Kujalleq Municipality is currently experiencing a decline in the Municipality's population. New Growth Businesses will, together with a more equitable public localization policy, be crucial in re-establish the population growth in the local area.</p> <p>Unlike many other business activities, the preconditions for sustainable exploitation of non-renewable resources, is to ensure that the overall result of mining projects leaves the local area in a favorable position where the economic growth continues despite termination of the mining activities. The mining project thereby fulfills both aspects of the concept of sustainability, as defined by the Brundtland report: Not only the existing, current need for development, but also the basis for future development.</p> <p>It is primarily the responsibility of Kujalleq Municipality to create the</p>	<p>To some extent the road in the short term is good example of this.</p>		

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>necessary framework for exploiting the potential for growth and development, brought about by the projects, including the TANBREEZ mining project. However, it can only succeed if the mining company and The Self-government of Greenland actively support this.</p> <p>Mining projects, of which the TANBREEZ project is the most advanced among the largest, is expected to be of such magnitude that its activities will form the basis for business development in the local area, which over time can create full employment for local working age citizens. This does not only relate to creating renewed growth in the existing businesses in the Municipality, but to creating new businesses in areas, that even after termination of the mining project, will continue to create jobs in local communities in the Municipality of Kujalleq.</p> <p>The Municipality of Kujalleq looks forward to working with relevant development companies within The Self-government of Greenland and not least to cooperating with mining companies and its subcontractors in creating a framework enabling local industry to optimally</p>			

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	<p>exploit the coming mining activity. In this relation, it is also the opinion of the Municipality of Kujalleq a development fund should be established to supports this objective.</p> <p>The target for the development of the labor market in the Municipality of Kujalleq is to provide a framework for the highest possible remuneration of the local labor by increasing productivity; by increasing the population's level of education; and by creating full employment. Full employment and an increase of the education level of the population is crucial for the development of local communities. It is therefore desirable that strong focus be placed on how future mining projects can contribute to achieving these goals in the near future.</p> <p>A prerequisite for local community development is infrastructure, in particular supply of energy. Mining projects are essential in relation to the way infrastructure can be developed in the future. This applies to air-transport, transport by sea, the potential for construction of roads to and from mining sites as well as energy and waste manage-</p>		<p>There is no statutory basis in the Mineral Resources Act for demanding that the mining company shall finance a road from the mine site to the town of Qaqortoq.</p>	

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	<p>ment for the mining and processing plants. The Municipality of Kujalleq would like to see further clarification of these opportunities and would like them to be subject to negotiation between the Self-government of Greenland and the mining company before exploitation license is granted. The Municipality has a very strong interest in creating a permanent road link between the mine and Qaqortoq, preferably in connection with the establishment of an airport in Qaqortoq.</p>			
5.3	<p>Local economic impacts of the mine</p> <p>A substantial doubt associated with mining projects is whether mining companies benefit significantly more from the resource contracts than the Greenlandic communities do. It is therefore important that such information is communicated in a way that gives everyone confidence that the agreement is beneficial to both parties. Most are well informed about the major risks associated with the investment. At the same time, the investments are so large that Greenland is not able to undertake them alone. Finally, in mining projects, speed of return</p>	<p>Statement – no answer is required by TANBREEZ.</p> <p>Comment by TANBREEZ: Greenland has to understand the mining industry and that a mine must be economic to its owners or it will migrate somewhere where a better profit can be made (E.g. the cancellation of \$100 billion plus in mining because of high costs associated to labour, taxes etc. in West Australia).</p>		None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	on investments is often rather low. If these issues are communicated well, all stakeholders will understand that investors have to be able to earn considerably on a mining projects, for it to be attractive to them. For Greenland, it is also important that the society proceeds from mining activity has an order of magnitude that is acceptable in comparison to what other countries earn from similar activities.			
5.4	<p>The above calculations have not been included in public hearing materials. The Municipality of Kujalleq finds this problematic because the experience shows that it is important knowledge for community assessment of whether a reasonable agreement is being made. Kujalleq Municipality must demonstrate this shortcoming of SIA for the Tanbreez project.</p> <p>Shedding light on these issues requires information on global market prices for the metals included in eudialyte, as well as how the price of these metals is expected to develop in the future.</p> <p>It appears that during the preparation of the feasibility study,</p>	<p>The SIA contains the required information according to the Guideline on SIA. The Feasibility Study contains detailed financial information, which is not available for the public due to confidentiality.</p> <p>Regarding the chemical processing plant see question 3.1.</p>	<p>Ministry of Industry and Mineral Resources</p> <p>See section 4.6. regarding the economic descriptions in the SIA.</p> <p>Ministry of Mineral Resources</p> <p>It must be emphasized that the Ministry of Mineral Resources -</p>	None

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	<p>there have been concrete negotiations between the BMP and the mining company about the location of the processing plant outside Greenland. Kujalleq Municipality wants complete transparency in this matter, meaning that the question should be well documented in this SIA. Kujalleq Municipality finds this very issue of vital importance for the creation of social sustainability in connection with the use of this non-renewable resource in our local area.</p>		<p>and not the MLSA - is the responsible authority in relation to socio-economic issues, including processing locally.</p> <p>No concrete additional negotiations have taken place before the consultation period. This sentence should therefore reflect that the mining company and the authorities have discussed the possibility of local processing according to § 18 (3) of the Mineral Resources Act.</p>	
5.5	<p>The Municipality is not in favor of a solution in which the majority of the jobs and income are placed outside the country. This is not acceptable. We must in this context strongly urge the Government of Greenland to cooperate with the Municipality to ensure that as much processing as possible is undertaken in Greenland and that as many of the 240 jobs outlined be placed in Greenland. It is a requirement from Kujalleq Municipality that the company's management will be residing in one of the towns of South Greenland and that the company's headquarters be located in southern Greenland.</p>	<p>This is a matter for the Government of Greenland.</p> <p>Comment from TANBREEZ: See question 3.1 on the chemical plant.</p>	<p>Ministry of Mineral Resources</p> <p>The Municipality has in a letter dated 5th of January 2018 to the responsible minister declared that the municipality does not want that the project is delayed due to further research concerning whether chemical processing of eudialyt concentrate should take place in Greenland or not. The comment from the municipality from 2013 is therefore by the Ministry of Mineral Resources regarded as being modified by the letter from the municipality dated the 5th of January 2018.</p>	<p>Section 5.2.1. has been updated to reflect due to among others the municipalities modified position when it comes to processing of eudialyte concentrate in Greenland.</p>

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			It is stated in Appedix 4 to the IBA that "The Licensee shall establish, maintain and use an administrative office in the Municipality."	
5.6	The SIA also lacks a specific analysis of how the interaction between the TANBREEZ mining project and other mining projects, (for example Isua project at Nuuk, Kvanefjeld-mining project) and existing plans for major infrastructure constructions (Qaqortoq Airport) will affect the achievement of the highest possible society proceeds in Greenland as a whole and in the local area. There should be drawn up various scenarios for how the realization and planning will affect the reaction time, which we have for planning of financial, business and labor market conditions, so that societal proceeds of especially non-renewable natural resources is as high as possible.	<p>Comment taken into account. The cumulative effects from the other planned mining projects will be added to the SIA (see also question 4.8).</p> <p>Comment from TANBREEZ: The concept of calling a mine a <u>non-renewable resource</u> is rather insulting to geologists. It has been shown over and over again once a mine is established and profitable, geologists will continue to find (or renew) that resource because it has shown to work economic in that environment. There are plenty of examples of projects that did not get developed because people thought they were "non-renewable".</p> <p>Again there is a good example from West Australia where iron ore was banned from export in 1939 as it was felt there was insufficient iron ore for Australian steel making needs.</p> <p>After lifting and the resultant discoveries, Australia now exports 500+ million tons of iron ore and</p>		A section 8.8 will be added to cover the potential cumulative effects of the different planned mining projects.

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		steel making has largely stopped. As for reserves, today Australia exports more iron ore per month than what it considered were is total reserves in 1939. Thus non-renewable resource is a rather offensive term to geologists and shows a misunderstanding of the real situation.		
5.7	The mining project as a catalyst for the development of the municipality's labor market and the population's education level	Headline		None
5.8	Reaching a high proportion of local manpower in the TANBREEZ mining project will require close cooperation between the mining company, the Self-government of Greenland and municipal authorities. In this context, the SIA should illustrate which initiatives Naalakkersuisut will take in relation to education strategies and employment plans to support the integration of domestic manpower in the Tanbreez mining project and how likely Kujalleq Municipality is to be involved in this process.	<p>The planned initiatives by the Government of Greenland should be stated by the Government of Greenland.</p> <p>The Education Strategy is public available information, but does not contain concrete initiatives towards the mining sectors. http://naalakkersuisut.gl/~media/Nanog/Files/Attached%20Files/Uddannelse/DK/Uddannelses-strategi%202012.pdf</p> <p>The employment strategy's initiatives will be included in the SIA (http://naalakkersuisut.gl/~media/Nanog/Files/Publications/Arbejds-</p>	<p>Ministry of Mineral Resources</p> <p>The tripartite negotiations (IBA negotiations) has taken part together with the municipality (one of the parties)</p>	The proposed initiatives in the Employment strategy has been added to chapter 4.

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		marked/DK/LOVPLIGTIG_ARBEJS-MARKEDSREDEGORELSE_2012_2013_DK_281013.pdf)		
5.9	Recruitment is complicated by the fact that manpower is to live at the mine, instead of that, as originally planned, establishment of road construction. There is no doubt that a mining job where it is necessary to live in a mining camp is not as attractive as a job where employees can go home after work. A road between the town and the mining site should be constructed. It is furthermore expected that the mining company offers higher compensation to miners as working away from home and family should be compensated in addition to the regular salary.	<p>A previous project proposal with a bigger yearly production than the current of 500,000 tons included a road.</p> <p>The current project does not contain a road between Qaqortoq and the mine site.</p> <p>The road is not included due to that the investment costs as well as issues with regard to maintenance, safety and insurance.</p>	<p>Ministry of Mineral Resources</p> <p>There is no statutory basis in the Mineral Resources Act to demand that the mining company should construct a road between the mine site and Qaqortoq.</p>	None
5.10	Kujalleq Municipality finds it worrying that one or maybe two parents must be away from their children for weeks, even though the mine is only located a short distance from the Municipality's major settlements, Qaqortoq and Narsaq. Kujalleq Municipality cannot accept that these problems for the local workforce will compromise local participation in the mining project. A solution where the royalty are compatible with the	<p>The comment is to the Government of Greenland and the further IBA process.</p> <p>TANBREEZ aims to employ as many locals as possible in order to have stable and possible long-term employees with a high retention rate, which will enable TANBREEZ to develop and train the employees.</p>	<p>Ministry of Mineral Resources</p> <p>The use of local labour in the mine is outlined in the IBA concluded between the Municipality, the mining company and the Greenland Government</p>	None

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	<p>mining company's preference for using local labor must be found. Kujalleq Municipality would like to see this incorporated in the SIA after this public hearing, and the municipality will enter into a direct dialogue with the Naalakkersuisut in order to avoid undermining of the opportunities for local workers. Existing formulations concerning the use of local labour in the mine is not binding in this SIA. Thus, it must be a key requirement in connection with the issuing of an exploitation permit.</p>			
5.11	<p>In the long run, Kujalleq Municipality wishes to see local manpower at all levels in the mining operation. The Municipality will not accept if Greenlandic manpower is used exclusively in the lowest levels of the hierarchy. Therefore, the local authority would like to have training schemes established (eg. Assistantships), where local workers at all levels are upgraded to technical positions, middle management and positions at management level. The objective is of course that the local area, after mine closure, have a local workforce will have a much higher level of education than we know today,</p>	<p>Comment taken into account. Proposal for development of target for local workforce for all levels will be developed together with training and education programmes which encourage upgrading for all positions. (See also question 4.11).</p> <p>However, workers will only be hired for positions for which they are qualified; mine safety for example cannot be compromised by the need to employ locals.</p> <p>It is the opinion of TANBREEZ that if local workers show attitude to develop into higher level jobs, this progression will and should be encouraged. However, the company</p>	<p>Ministry of Mineral Resources</p> <p>The IBA includes provisions concerning education and training which will increase the likelihood that more and more Greenlanders during the life of mine will qualify to positions, which requires more specialized skills.</p>	<p>Section 8.2 will include a paragraph on continuously up-grading of competences at all levels.</p>

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	through Naalakkersuisut's Education strategy and cooperation with the mining company.	also does not want to be in a situation where it has to employ people who are unqualified as that leads to safety issues and ultimately losses that could threaten overall economic viability.		
5.12	For all upgrading and training activities that are directly related to mining activity, the Municipality is convinced that neither Greenland nor Kujalleq Municipality can contribute financially to education and training activities that are not approved and certified by The Resource School. Local courses that do not have the required standards will be a risk to local manpower, because they cannot immediately obtain employment with other mining companies if their qualifications are not approved. Moreover Kujalleq Municipality would like the Resource School to establish a department in South Greenland already prior to the commencement of production.	<p>Comment from Kommune Kujalleq – no answer is required from TANBREEZ.</p> <p>Comments from TANBREEZ: The education system within Greenland and its location is something for Greenland, its government and people to decide.</p>	<p>Ministry of Mineral Resources</p> <p>Education, upgrading of qualifications etc. will take place in close dialogue between the mining company, relevant educational institutions and other relevant stakeholders.</p>	None
5.13	It seems inappropriate that the SIA undermines the value of the jobs that are associated with multiplier effect of the mining project. They may be small, but in a southern Greenland context they are large and very important. At the same time, these multiplier effects	<p>Section 8.1.2. covers the consideration of the jobs that are related to the multiplier effect.</p> <p>The sentence below will be changed in order to acknowledge a small benefit with regard to job</p>		<p>New wording of the paragraph.</p> <p><i>"To conclude, some jobs will be created directly in connection with the project while other jobs will be created indirectly even also as part of the overall expected increase in economic activity in</i></p>

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	are very important, especially for the business sectors that will remain after the mining activity ends.	opportunities will have a big impact for Greenland. "It can be concluded that, while some jobs will be created by the project, this is expected to be of low significance compared to direct jobs and indirect jobs created by business opportunities."		<i>Greenland and the local area. But all the opportunities that will be created by the project both to local business and direct jobs are very important for Greenland in general and for the Kujalleq in particular".</i>
5.14	The mine project's contribution to the development of local business and industry The mining company will out-source services to other companies.	Introduction		None
5.15	Kujalleq Municipality recognizes that the legislation requires all companies registered and based in this country to be treated as domestic companies. But at the same time it is a fact that measures undermining the law's objective of promoting Greenlandic companies' opportunities are actively carried out. The Municipality has no concrete proposals solving this problem, but asks the Self-government of Greenland to take this issue seriously and assess how to avoid that so called "mailbox companies" outperform local businesses on unequal conditions	Comment for the Government of Greenland. Comment from TANBREEZ: The company is aware of the need to employ locals at all levels. However there is a problem here in distinguishing for example what happens if one "mailbox" company uses many more local workers than a local company, assuming they have quoted the same price. There is a need for some definitions to help the mining industry.	Ministry of Mineral Resources It is stated in Appedix 4 to the IBA that <i>"The Licensee shall establish, maintain and use an administrative office in the Municipality."</i>	None

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	of competition and thus undermines the Mineral Resources Act's political intentions to ensure Greenlandic companies' access to assignments in the resource sector. An adequate number of internship positions must be made available at the companies involved.			
5.16	Kujalleq Municipality would like to see an assessment of whether the contracts between the mining company and its subcontractors have been prepared on the basis of Greenlandic law. If there is a problem, it is proposed that the extraction permit specifically requires that contracts related to the mining project can only be subject to Greenlandic law.	<p>Comment for the Government of Greenland.</p> <p>Comment by TANBREEZ: TANBREEZ is a Greenlandic company and subject to Greenlandic law. However Greenlandic companies still have to be competitive with offshore companies.</p>	<p>Ministry Mineral Resources</p> <p>The Ministry of Mineral Resources has in cooperation with municipality addressed this in the IBA where it states contracts with contractors etc. has to be concluded on Greenlandic terms.</p>	None
5.17	Kujalleq Municipality wants full transparency regarding the mining company and its subcontractors' purchase of goods and services. The Municipality proposes that all orders above a certain amount is advertised well in advance on a public website. It is also proposed that the mining company annually informs the public to extent it has used local suppliers; the level of imports of goods and services and these imports covered.	Comment for the Government of Greenland and will be covered in the IBA negotiations.	<p>Ministry of Mineral Resources</p> <p>Supply and purchasing of goods etc. is addressed by the IBA</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
5.18	To what extent will the Self-government of Greenland, through business development company and other business development initiatives support new creation or development of existing businesses in the local area to reduce imports of goods and services and thus benefit increased value added in the country? Kujalleq Municipality again proposes the establishment of a dedicated fund for this purpose.	<p>Comment for the Government of Greenland and will be covered in the IBA negotiations.</p> <p>Comment from TANBREEZ: the majority of all the equipment for the mine has to be imported and cannot be constructed locally. In addition, the mine will require some services, especially during construction which will require experienced people who will have to come from offshore.</p>	<p>Ministry of Mineral Resources</p> <p>Funds for local developments are stipulated in Appendix 4 to the IBA</p>	None
5.19	Kujalleq Municipality would like to see a contract with the local fishermen and hunters on the supply of goods for the mining camp for use in the canteen and ships calling at the camp port. In connection with the IBA negotiation Kujalleq Municipality proposes that the Municipality, in close collaboration with the Self-government of Greenland, negotiates possibilities of also establishing a development fund for the hunting and farming communities. The exploration and exploitation activities of the mining company occupy land that for centuries has been used by local hunters and farmers, and these particular groups of self-employed will only indirectly through tax	<p>Comment for the Government of Greenland and will be covered in the IBA negotiations.</p> <p>Comment from TANBREEZ: TANBREEZ is very interested in buying food from local suppliers. However, this has to be organised and centralised and ensured that local health regulations are followed.</p> <p>In section 8.7.2 is stated: "The conclusion of the Local Use Study states that overall mining activities will have little negative impact on local use of natural resources. Fishing is the most important activities that could be potentially affected. However, fishing close to the site where the mining facilities will be established, is limited and</p>	<p>Ministry of Mineral Resources</p> <p>See section 5.5.3.</p> <p>Funds etc. is part of the IBA .</p>	None

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	revenues to the municipality derive greater benefits from mining activities.	involve only few people from the local communities." It is proposed to include a monitoring plan for the fishing and hunting activities in order to monitor any potential effect of the mine activities on the fishing and hunting activities (commercial and subsistent).		
5.20	Opportunity for collaboration between the Self-government of Greenland, the Municipality and the mining company for the development of the municipal infrastructure	Headline		None
5.21	Kujalleq Municipality expects that the mining activity will necessarily cause significant construction activities as a result of indirect and induced effects of the construction and operation of a mine of this magnitude. For example, Kujalleq Municipality expects that residential construction in local communities will increase and the mining project will also necessitate the improvement and streamlining of other infrastructure. Therefore, it is relevant to consider that construction activity in southern Greenland should have higher priority than that in the rest of Greenland, if the mining project is	Construction priorities by the government and municipally are a local concern and it is not up to the company to comment on spending or priorities needs of either. However, section 8.3 in the SIA Report will be expanded due to the comments on the pressure on the public services as stated in question 4.5).		Section 8.3 has been expanded with aspect on pressure on the public service.

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	<p>started before similar mining operations elsewhere in the country.</p> <p>Kujalleq Municipality wants this be clear in the SIA, as an increase in construction activity in South Greenland will mean significant additional costs for the municipality for many years because it needed building, renovation and expansion of local public institutions are likely to be significantly more expensive due to overheating of the construction sector.</p>			
5.22	<p>The SIA states that the mining company is planning to burn solid waste in an incinerator in the mine area. Kujalleq municipality wants to work with the mining company to conduct a detailed assessment of how the solid waste can be treated at the local incinerators, where waste heat can be utilized for energy in one or more settlements.</p>	<p>TANBREEZ and the municipality will discuss the waste management issues in details. However the economic consequences will be evolved properly and does depend on what volume of material is involved.</p>	<p>The Ministry of Mineral Resources:</p> <p>The issue concerns environment and should therefore be addressed in the Environmental Impact Statement (EIA) and the White Paper concerning the Environment. In case of any conflict between the SIA and the EIA on the environmental issue of waste treatment the EIA prevails.</p>	None
5.23	<p>Kujalleq municipality wishes to clarify that a significant unsustainable aspect of the mine activity is the use of energy from diesel fuel. The municipality requires more information on possible of using re-</p>	<p>The expansion of the Qorlortorsuaq hydro power plant is a matter for the Greenland authorities. However, TANBREEZ is prepared to use hydropower if it becomes available at a competitive price. (See also Memo in reply to section</p>	<p>The Ministry of Mineral Resources:</p> <p>When deciding whether hydropower should be used or not economic consideration concerning</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>newable energy in the mining project. In connection with the establishment of relatively large new business activities in a local area, it should be nationwide energy company and the Self-government of Greenland included in an assessment of whether this provides the basis for revising existing planning on energy in the local area. It should in this context be considered to sell hydroelectric energy at the same price level as the fishing industry-one. The consequences should be analyzed. It is essential that the hydropower plant in Qorlortorsuaq extended as required so that it can ensure the energy supply as mine demand and within a time phase, which means that the expansion can be ready by the commissioning of the mine.</p>	<p>10, Nukissiorfiit's hearing response).</p>	<p>whether it is feasible or not should also be taken into account.</p>	
5.24	<p>Considerations and requirements around risk of pressure on the public service-state, self-directed and municipality</p>	<p>Introduction</p>		<p>None</p>
5.25	<p>Mining Projects of this magnitude will increase the pressure on public services. Kujalleq municipality is not happy with the summary statement on the interaction between mining operations and local public service. This is in addition</p>	<p>Section 8.3 in the SIA Report will be expanded due to the comments on the pressure on the public services as stated in question 4.5).</p>		<p>Section 8.3 has been expanded with aspect on pressure on the public service.</p>

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	to the local authority services to citizens by the Greenland Self-managed service for example transport sector (air and sea traffic, and both freight and passenger), health, customs functions and also the National Service in the performance of functions such as police and court.			
5.26	Kujalleq municipality already experiencing a relatively low service for the citizens on the service activities which the State and Self-government iare providing in the local area, and a further pressure on these services are forseen and need to be adressed before mining activities are established , for the benefit of ensruing that the public services for local citizens are not further impaired.	Comment for the Government of Greenland.	Ministry of Mineral Resources This is a matter between the Municipality, the state and the various Ministries of the Greenland Government It is not immediately apparent from the question, which specific area this is about.	None
5.27	Kujalleq municipality asks why there will only be carried out check of tuberculosis and sexually transmitted diseases? Why does not require the actual health certificates for out of external manpower?	TANBREEZ will make use of health check when employing local as well as international workforce. The details of the health check will be coordinated with the health authorities (see section 8.6)	Tanbreez will have to comply with rules in force in Greenland at any time. This also includes rules concerning easily tramissable vira such as Sars Cov-2.	None
5.28	Considerations and requirements around risk of environmental impacts and injuries.	The issue regarding tailings is addressed in the EIA part (question 11.5).		None

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	Refer to separately note from the technical committee on this topic, but it should at the same time be emphasized that it is Municipality wish that instead of dispose tailings in Foster lake consider instead the opportunities for alternative use options or alternative deposit options.			
5.29	<p>Demands for transparent and effective communication with their citizens.</p> <p>Kujalleq municipality wants the total project through, inter alia, above information must be made more transparent for the municipality's citizens and businesses. It is a common requirement for the municipality, mining company and the state authorities in Greenland. The result of greater transparency and more effective communication will reduce conflict and, hence, for the benefit of all parties.</p>	Statement. No answer is required by TANBREEZ.	<p>Ministry of Mineral Resources</p> <p>More transparency and efficient communication is within the framework of the law fully supported by the Ministry.</p> <p>The Mineral Resources Act was changed in 2014 for the benefit of ensuring a higher degree of public involvement and transparency.</p>	None
5.30	The municipality asks for a detailed description of the socio-cultural conditions and actions it envisages to attend and to create.	TANBREEZ aims to make the mine as much as possible to fit in with the existing cultural conditions and as such attempt to cause as little change as possible.		Section 8.7 has been expanded with additional information on the socio-cultural conditions.
5.31	At public meetings, it has been criticized that a number of technical reports that underpin the preparation of the SIA and EIA	Statement. No answer is required by TANBREEZ.	The public consultation period was extended, which means that the stakeholders should have had time	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>have not went up part of the consultation material. These technical reports have been released immediately before the consultation deadline has been published.</p> <p>Against this background, the municipality will, if deemed necessary, after consultation deadline, submit additional questions and comments regarding this material.</p>		<p>to consume the additional material before the expiry of the public consultation period.</p>	

No. 6. Ministry of Health and Infrastructure

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
6.1	<p>Introduction</p> <p>The Ministry of Health and Infrastructure would like to thank you for the opportunity to comment on the statement regarding the SIA for the Tanbreez project.</p> <p>The Ministry of Health and Infrastructure would like to make this comment: The health services is an important partner in relation to mining projects. In order to avoid factual errors and undesirable weighting of health needs and requirements, the Ministry of Health and Infrastructure should be included as a pre-consultation partner in connection with future SIAs.</p> <p>We recommend that the MLSA update "Guidelines for Social Impact Assessment" to ensure that future assessments of impact on social sectors are included in the SIA.</p>	<p>Introduction</p>	<p>Ministry of Industry and Mineral Resources</p> <p>The SIA falls under the Ministry of and Mineral Resources' purview. We have noted Health's request about becoming a pre-consultation partner.</p> <p>The guidelines concerning the SIA has been updated in 2016</p>	None
6.2	<p>General information about SIA</p> <p>It is encouraging that in this SIA has done much to ensure knowledge of the effects and on parts of the public funded sectors such as health care and public health.</p>	<p>Comment taken into account. Recently published data from Landslægeembedet will be included in the final SIA.</p>		Chapter 7 has been updated with more recent data

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	Unfortunately, some of the report's health data is not updated. This applies to about abortions, sexually transmitted diseases and tuberculosis. Also, you have not been paying attention to new strategies and plans in the health field. This applies to some public health (Inuu-neritta II program period 2013-19), Tuberculosis (The national TB strategy 2012-16), suicide (National Strategy for Suicide Prevention in Greenland from 2013 to 2019). Updated data is important, as you would expect an impact on public health.			
6.3	<p>Specifically, for on-the impact on public health</p> <p>Any mining project will have a certain impact on public health, directly or indirectly. The SIA project is assessed to have a medium negative impact on public health. This proposed SIA countered by promoting healthy lifestyles.</p> <p>It is recommended that the project's prevention and health promotion initiatives are consistent with the plans of the public health framework, Inuuneritta II.</p>	Comment is taken into account.		The final SIA has a reference to the initiatives in Inuuneritta II.
6.4	The SIA propose to monitor cases of STI, tuberculosis and unwanted	.		None

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	pregnancy. This is already happening under the auspices of the national health authorities and is published annually by the National Board of Health. It will be important to monitor public health and generally not only locally but also nationally through periodic population surveys.			
6.5	It is expected that Tanbreez contribute financially to over sampling in Narsaq area in the established baseline population surveys throughout Greenland and the project's monitoring of health indicators extended to include relevant indicators from the population studies (health).	The details of the monitoring plan on health will coordinated with the Health authorities and the extent of the monitoring plan will be a part of the IBA negotiations.	The Minister for Industry and Mineral Resources has based upon legal advised and dialogue between the Ministry of Mineral Resources and the Ministry of Health decided that the mineral industry with regard to financing public health studies shall and cannot be treated differently than other industries unless there is clear statutory and reasonable basis, which justify a different treatment of the mineral resource industry. There is presently no statutory basis in the mineral resources act for demanding that Tanbreez as mining company shall pay for public health studies, which normally are financed by means from the public budget.	None
6.6	In addition, Tanbreez is planning initial and periodic health check of staff employed specifically for STDs and TB.	TANBREEZ will make use of health checks when employing local as well as international workforce. The details of the health check will		Section 8.6 includes the information on the health check to be coordinated with the Health Authorities.

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>With the increasing proportion of the population with wealth fare related diseases is it desired this check supplemented with check for lifestyle diseases. For foreign personnel it is also re-quired to include vaccination equipment as specified by the Chief Medical officer's recommendations and depending on the country of origin including relevant communicable diseases and carrier states to counter the risk of introduction of new infectious diseases or resistant bacteria.</p>	<p>be coordinated with the health authorities (see section 8.6).</p>		
6.7	<p>Social and Health Services</p> <p>The SIA states that health care is generally under pressure and it is expected that Tanbreez project will have a negative impact on the health care system through an increase in the load on the system. The solution proposed to this is to develop clear criteria for the use of local health services and to ensure cooperation with the health service.</p> <p>From the Department of Health and Infrastructure side expected</p>	<p>TANBREEZ will enter into an agreement with the health authorities on the health service. Foreign staff will be required to have a health insurance.</p>		<p>Section 8.5 includes that TANBREEZ now will coordinate with the Health Authorities and ensure that all foreign staff will have a health insurance.</p>

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>and perceived necessary that TAN-BREEZ project includes an actual agreement of around the healthcare provided to the project. Moreover it is expected that TAN-BREEZ imposed for foreign staff employed to establish insurance schemes besides transport covers all types of treatments and service benefits in the Greenlandic health service statement.</p>			
6.8	<p>Occupational safety and health preparedness</p> <p>The SIA sets the risk of accidents as 'medium'.</p> <p>A ROS analysis (risk and vulnerability analysis) should be developed which will be included in the planning of the project's resources. In addition, to ensure a continuous monitoring of areas defined as risk and vulnerability areas include ensuring current statistics on accidents and diseases among workers of the project and that such information is submitted to BMP and cooperation partners such as the Department of Health. It should be required that the personnel at the mine has the necessary education so that they can assess the damage and disease</p>	<p>A ROS analysis has never been requested by the Greenlandic authorities at this stage of the project.</p>	<p>It would pursuant to law not be reasonable to demand such an analysis, if the authorities do not demand a similar analysis for construction of airports or for employing foreign labours in the fishing industry. Review of contingency plans in relation to mining project is conducted by the Department for Inspection and Technic in the Mineral License and Safety Authority.</p>	<p>None</p>

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	severity and handle them throughout the period before the transfer can take place.			
6.9	<p>The Department of Infrastructure has the following comments</p> <p>The Department of Infrastructure is of the understanding that the maritime activity will be regulated in accordance with international and national maritime legislation.</p>	Yes, all activities on sea will comply with national and international legislation.	Maritime regulation concerning safety etc. is under the purview of the Danish Maritime Authority.	None
6.10	<p>The department for Infrastructure has noted that in connection with the mining project planned new infrastructure, including road, port facilities and amenities and possibly construction of a helipad. It is the understanding of the department of Infrastructure that the responsibility related to planning, execution, maintenance and monitoring of these systems is governed by the Mining Act, and therefore this is part of the BMP. However, it added that the aviation sector is not taken home, and thus the Danish authorities and laws that must be respected. The NRA's supervisor in the aviation field, and a helipad will be subject to regulations of Civil Aviation issued by the Transport Authority.</p>	<p>Comment for the Government of Greenland to clarify internally.</p> <p>Comment from TANBREEZ: There are undoubtedly several departments which control different aspects of such a mine.</p>	The Ministry of Mineral Resources agrees to the comment made by the Department of Infrastructure on official competences.	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
6.11	The department of Infrastructure has noted that TANBREEZ Mining Greenland expects to take advantage of Narsarsuaq Airport, including to replace international staff. Infrastructure department should in this context to point out that if there established an airport by Qaqortoq cannot be expected to Narsarlussuaq airport will continue in his current capacity. This will mean that all flights of both national and international character will have to go through Qaqortoq airport. It should be mentioned here that it cannot be expected to Qaqortoq airport will have a size that allows flights with jet planes.	<p>Comment. No answer is required by TANBREEZ.</p> <p>Comment by TANBREEZ: size and location of the airport in South Construction of airports in Greenland is a Greenlandic decision and hos nothing to do with TANBREEZ.</p>		None
6.12	The department of Infrastructure cannot recognized the described scenario where that would be pressure on tickets to and from South Greenland. Given that Air Greenland today have excess capacity on the routes between southern Greenland and Kangerlussuaq, it is not immediately the department of Infrastructure's view that it is correct to state that increased domestic flight will put pressure on domestic transport. The area which potentially can be put under pressure is not the commercial network, but the regional	Comment taken into account.		Section 8.3 will be changed according to the comment.

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>service contract for helicopter flights, especially during periods of pack ice where the transport of passenger depend on the helicopter transport. The department may indicate that if the mining industry intends to use this, and thus put pressure, the current service contracts, then it must be a requirement that the mining industry compensates the self-government for the additional expense as this may cause.</p>			
6.13	<p>The Department of Infrastructure points out that parts of the Greenland telecommunications market has been liberalized, so it is not correct to state that TELE Greenland has a monopoly on public communication in the country. TELE controls thus not "all telephone and Internet connections" as stated in the SIA.</p>	<p>Comment taken into account.</p>		<p>Section 7.4.8 will be changed according to the comment.</p>

No. 7. Flemming Hybholt

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
7.1	An agreement must ensure better exploitation of the resource; either by Tanbreez or by bringing in other players to exploit the resource	<p>Comment to the Government of Greenland.</p> <p>Comment by TANBREEZ: TANBREEZ has exclusive rights over its claimed land – to bring in other players on this land is against the primary consideration of all western miners acts. The right of exclusivity has to be the paramount importance for the Government of Greenland; without this no mining can or will occur.</p> <p>In a restricted market it is up to TANBREEZ to maximise its production.</p>	Within the framework of law the licensee is free to decide whether a partner is necessary or not.	None
7.2	Political decision as to whether or not Tanbreez and/or Kvanefjeld should be exploited simultaneously considering the available manpower	<p>Comment to the Government of Greenland.</p> <p>Comment by TANBREEZ: TANBREEZ/Kvanefjeld would not compete with each other and will probably complement each other. Manpower is a problem that may have to be closely studied at some time in the future especially if full employment is needed.</p>	<p>Ministry of Mineral Resources</p> <p>The Ministry is focusing on this problem.</p> <p>Manpower is being addressed in connection with the tripartite negotiations (IBA agreement) between the mining company, the municipality and the Greenland Government</p>	None
7.3	The possibilities of utilizing hydro-power should be planned and coordinated to ensure optimal use of	<p>Comment to the Government of Greenland.</p> <p>Comment by TANBREEZ: Hydro-power is dependent on the</p>	When deciding whether hydro-power should be used or not economic considerations are normally also taken into account.	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	the hydropower resources available	amount of water and that judgement can only be undertaken by the electricity company in their own timeframe.		

No. 8. WWF World Wildlife Fund

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
8.1	WWF Verdensnaturfonden is supportive of plans to outsource activities related to transportation of goods and staff as well as servicing of the camp. This will have significant impacts on business life in the region.	Statement from WWF		None
8.2	4.3.1 One international convention highly relevant is the International Labour Organization's Indigenous and Tribal Peoples Convention, 1989 (ILO 169), ratified by Greenland and Denmark in 1996. Articles 14 and 15 are especially relevant for this project.	<p>In the SIA is stated that "The International Labour Organizations Conventions have been incorporated in the Greenlandic legislation for working conditions."</p> <p>All together 189 different ILO Conventions exist.</p> <p>With regard to the mentioned ILO's Indigenous and Tribal Peoples Convention (No 169 from 1989), this has not been directly emphasized due to the following considerations. Article 14 focuses on the rights of ownership and possession of the peoples concerned over the lands which they traditionally occupy whereas article 15 focuses on the consultation and engagement of people.</p> <p>The EIA guidelines require that a Local Use study be carried out in order to know what the current use of the area is.</p>	The ILO Convention No.169 has been ratified by the Kingdom of Denmark for Greenland. A joint-drafted statement between the Danish and the Greenlandic Government, which clarifies access and ownership to land was attached to the ratification instrument. The joint-drafted declaration can be found (in Danish) on the following link: https://www.retsinformation.dk/eli/ltc/1997/97	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
		<p>In addition the approach in the SIA guidelines is a high engagement of the relevant stakeholders through the whole SIA process.</p> <p>However, the SIA process in Greenland is constantly developing as well as the focus on concerns of the stakeholders.</p>		
8.3	4.3.2 Tanbreez Mining Greenland A/S will pay dividend tax and corporate tax based on profit shown in annual reports. The company will not be paying royalties or exploitation fees in accordance with the Mineral Resources Act. WWF Verdensnaturfonden note that taxes based on exploitation of resources rather than on company profits are more transparent as companies will be paying for the resources mined and exported out of the country.	<p>Statement from WWF. No answer is required by TANBREEZ.</p> <p>Comment by TANBREEZ: The company disagrees with that assessment – in any business world-wide 80% of all tax is paid by P.A.Y.E. tax of employees. Also gone are the days of transfer pricing etc. – that left us in the 1990's it is not practiced today in major mining countries.</p>	<p>Ministry of Mineral Resources</p> <p>A royalty agreement has been negotiated as part of the exploitation permit, which is issued pursuant to Section 16 of the Mineral Resources Act.</p>	None
8.4	5.13 If Tanbreez at a later stage decide to develop further processing of concentrate in Greenland and/or to increase annual production from 500 tons to 1.5 million tons of ore, a new EIA and SIA must be completed and new studies on the consequences of deposition of tailings in Fostersø must be prepared.	<p>Statement from WWF. No answer is required by TANBREEZ.</p> <p>Comment from TANBREEZ: The company will naturally follow all government rulings.</p>	<p>Ministry of Mineral Resources</p> <p>According to Section 76 of the Mineral Resources Act, an SIA must be prepared if activities are assumed to have significant impacts on social conditions.</p> <p>Naalakkersuisut decides the specific provisions on the criteria to be used for the decision.</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
8.5	6.2 The introduction to the methodology of the SIA report is detailed and gives a fine introduction to the analysis. We note the early engagement of stakeholders dating back to 2010, where input for the scope of the study was collected. A list of stakeholders identified is included in the document. Early engagement of stakeholders in the scoping phase to allow for input on what is studied and how studies are conducted is one of the key recommendations that WWF Verdensnaturfonden have brought forward in the discussions about consultation processes in Greenland.	Statement from WWF. No answer is required by TANBREEZ.		None
8.6	6.3 The SIA has information about construction, operation and closure stages of the mine, indicating that the mine will operate in 10 years. This information is missing in the EIA report (see comments for section 8). Furthermore, the information in the English version of the SIA is not consistent with the information in the Danish version (plans are pushed 1 year).	This issue is addressed in question 13.3 (part of the EIA). If there are any inconsistency in timing between the English and Danish version this will be taken into account and will be changed in the final version.	The version approved by the Greenland Government has gone through a thorough review and there should be no inconsistency between the Danish and English versions of the SIA.	None
8.7	7.1 Description of social baseline conditions for Kommune Kujalleq reflects earlier studies of mobility,	Information on employment in Greenland in general and in Kommune Kujalleq are included in the		None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	documenting that training and job security is an important aspect in mobility. Later sections have information on employment in Kommune Kujalleq, but this information is relevant here too.	description of the socio-economic baseline and is included in chapter 7.		
8.8	<p>7.3.3 NGO's are developing rapidly in Greenland these years, and a much needed debate has developed on where Greenland is heading and what the consequences of new industry is in relation to both nature, environment and society?</p> <p>In relation to environmental organizations; the SIA includes Avataq, Earth Charter and Timmiaq. But other groups also exist even if they often have a local focus and even if they have developed in opposition to a mining project: Friends of the Nuuk Fjord/ Nuup Kangerluata Ikinngutai opposes the Isua mining project, and the 16. August group argues for local use of the Aappaluttoq Mountain, where True North Gems have plans to mine rubies, and lately the Naamik organization has been protesting the lifting of the zero-tolerance ban on uranium mining. Furthermore, Transparency International Greenland is a strong voice in the debate about new industry as well as ICC Greenland</p>	<p>Statement from WWF. No answer is required by TANBREEZ.</p> <p>Comment from TANBREEZ: The SIA team has been fully aware of the different NGOs in Greenland and their different focus. The SIA team has previously been involved as SIA consultants for both London Mining, True North Gems and GME and are therefore fully informed about the NGOs that have emerged responding to specific issues on the mentioned mining projects.</p> <p>However for this particular SIA we have only included the NGOs which either have a general focus as AVATAQ or local focus relevant for the local area in Southern Greenland as the Earth Charter (Narsaq).</p> <p>Transparency International Greenland was not established when the SIA engagement activities took place.</p>	<p>Ministry of Mineral Resources</p> <p>The draft SIA report has been published on the web portal of the Greenland Government from 4 September 2013 until 6 January 2014 in connection with the hearing process.</p> <p>In this period, all stakeholders have had the opportunity to comment on the material.</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	the latter is working with WWF Verdensnaturfonden on a project set out to promote better consultation processes.	Regarding ICC, the organization was invited to participate in engagement activities from the very beginning of the SIA process.		
8.9	<p>7.3.5 Has important insights on local harvest of living resources. The section documents the importance of living resources for the people of South Greenland but does not distinguish between subsistence hunting and non-subsistence hunting. Furthermore, we note that the harvest of harbor seal (<i>Phoca vitulina</i>) is not in accordance with current regulations (§4, stk. 3 Selvstyrets bekendtgørelse nr. 16 af 12. November 2010 om beskyttelse og fangst af sæler).</p> <p>http://dk.vintage.nanoq.gl/Emner/Erhverv/Erhvervsomraader/Fangst_og_Jagt/Jagttider/~media/A076905</p> <p>D02D143AB93FE60F230EB42E4.as hx</p> <p>The SIA also documents that there is widespread use of the region; locals spend the summer sailing and camping in the fjords and large numbers of tourists travel to South Greenland. Hiking trails go near the mining site and Hvalsø 6</p>	<p>In section 8.7.2 is stated: "The conclusion of the Local Use Study states that overall mining activities will have little negative impact on local use of natural resources. Fishing is the most important activities that could be potentially affected. However, fishing close to the site where the mining facilities will be established, is limited and involve only few people from the local communities."</p> <p>It is proposed to include a monitoring plan for the fishing and hunting activities in order to monitor any potential effect of the mine activities on the fishing and hunting activities (subsistent and non-subsistent).</p>		A measure has been included in section 8.7 to include a monitoring plan for the fishing and hunting activities in order to monitor any potential effect of the mine activities on the fishing and hunting activities (commercial and subsistent).

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	km from the mine is an important attraction for the region.			
8.10	7.4.4 SIA information on unemployment stresses the need for new investments and jobs in the region.	Statement from WWF. No answer is required by TANBREEZ.	Ministry of I Mineral Resources Local jobs is a issue that has been part of the tripartite negotiations (IBA negotiations) between the mining company, the municipality and Greenland Government.	None
8.11	8.1.1 WWF Verdensnaturfonden notes the dominant use of local workers for both construction and operation. And plans to outsource support to local businesses. Job creating and training/courses is an important and positive aspect of mining industry for a local community. 91 pct. of the workforce employed locally is a positive yet ambitious plan. We note that Tanbreez Mining Greenland A/S plan to take in 4 apprentices. Education and training is a long-term investment in society and we encourage the company to see if they can accept even more apprentices for the project.	Statement from WWF. No answer is required by TANBREEZ. Comment from TANBREEZ: It is TANBREEZ's major aim to employ as many local people as possible. We agree locals should and could get higher positions but we, like you, realise this is a major aim that will take employers, employees and government mush effort to be able to achieve fully.	Ministry of Mineral Resources Apprentice positions is also part of the tripartie agreement(IBA) that has been concluded between the mining company, the municipality and Greenland Government	None
8.12	Furthermore, we see no reason why key management work cannot be offered to locals at least after proper training. WWF Verdensnaturfonden recommends a	Comment taken into account. Proposal for development of target for local workforce for all level will be developed together with training and education programmes which		Section 8.2 has been revised so it includes a paragraph on continuously up-grading of competences at all levels.

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>goal of having locals in management positions at some realistic time during the production phase.</p> <p>Early local dialogue on requirements and training as proposed (p 93) is important. We encourage Tanbreez Mining Greenland A/S already established in Qaqortoq, to prepare job descriptions and information for the community and to work with Kommune Kujalleq to make sure that local job creating reaches the 91 pct. target.</p> <p>As mentioned in the text, there is a risk that already employed workers will seek jobs with Tanbreez Mining Greenland A/S leaving new job openings for people currently unemployed (p 92). In the region there is a risk that increased demand will push wages up if not supplemented by an increase in supply, e.g. unemployed workers joining the work force or workers moving to South Greenland.</p>	<p>encourage upgrading for all positions.(see also 4.11)</p>	<p>Ministry of Mineral Resources</p> <p>This issue has including but not excluded to been part of the IBA negotiations among the municipality and the company.</p>	
8.13	<p>Finally, the English version of the SIA is inconsistent with the Danish version regarding information about start of construction and operation of the mine.</p>	<p>If there are any inconsistency between DK and UK version, consistency with regard to the start of construction and operation of the mine will be made.</p>	<p>The version published on the Greenland Government's website has gone through a thorough review and there should be no inconsistencies between the English and the Danish Version of SIA Statement.</p>	<p>None</p>

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
8.14	8.1.4 Pressures on services like transport and accommodation in the region may create a potential conflict with other businesses, including tourism, but the region may benefit if increasing demand in the long run leads to better connections and more flights, more hotels etc.	Statement from WWF. No answer is required from TANBREEZ (see also 4.5)		None
8.15	8.1.6 Plans for closure of the mine that incorporate lessons discussed in this section are important. Tanbreez Mining Greenland A/S must discuss with Kommune Kujalleq how to minimize the negative effects of closure. Plans must be sketched in the start-up phase of the project. WWF Verdensnaturfonden wish to stress that training / apprentice opportunities are important for the long-term social sustainability of the project.	Statement from WWF. No answers are required by TANBREEZ. Comment from TANBREEZ: TANBREEZ hopes for a long life so that close down is several generations away.	Ministry of Mineral Resources The ministry agrees that handling of closure must be discussed; also in relation to people working at and around the mine. The ministry also agrees that apprentice positions are important in relation to this project.	None
8.16	8.5.1 The section on occupational health does not assess the long-term consequences of working in a production that creates large amounts of dust.	The content of the occupational health section is based on the OHS risks identified as part of the technical tests prepared as part of the EIA. The technical tests have not indicated any potential risks of long-term consequences of working in the production. (The dust levels here are small compared to many other industries and mines.)	Occupational health and safety including protection against long term consequences is regulated by the Greenland Working Environment Act, which is enforced by the Working Environment Authority in Greenland.	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
		<p>The OHS focus of the SIA has therefore been on the risk of accidents related to the production.</p> <p>However, a detailed plan for the working conditions will be prepared as well as a detailed monitoring plan in accordance with the regulations and instructions from the Working Environment Authority. Furthermore, there will be regular supervisions from the relevant authority regarding the working conditions.</p>		
8.17	<p>WWF Verdensnaturfonden would like Tanbreez Mining Greenland A/S to consider how continued dialogue and access to complaints, e.g. in the case of local pollution, violation of land use rights etc., be handled. We suggest that a complaint mechanism be established follows and brings attention to the following resources:</p> <p>UN guiding principles on business and human rights:</p> <p>http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf</p> <p>The Equator principles – a financial industry benchmark for determining, assessing and managing envi-</p>	<p>TANBREEZ is taken into account the proposal of establishment of a Grievance mechanism. TANBREEZ will consider further how to establish this mechanism.</p>	<p>Ministry of Mineral Resources</p> <p>As part of the IBA the Company has committed to establish, maintain and use an administrative office in the Municipality. This office can be used as point of contact for the citizens in the municipality. Furthermore, the municipality is a party to the IBA and any complaints about the project can be raised by a citizen in the municipality, which is also potential voter in the municipality. This can possibly be done through the local political representatives in the municipal council-.</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	<p>ronmental and social risks in projects: http://www.equator-principles.com/resources/equator_principles_III.pdf</p> <p>As such a mechanism will increase the credibility of the company and will be a way of monitoring its position in society.</p>			

No. 9. Frederik Lund

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
9.1	In relation to TANBREEZ Mining Greenland A/S open consultation about the license application for the extraction of rare earths, including Eudialyte and feldspar in Killavaat Alannguani, I will submit my ideas / advice - as I expect this request, concerning TANBREEZ Mining Greenland A S's application , also will be considered by the Self-Government - I expect to get some feedback on what they think about my inquiry.	Comment/Introduction		None
9.2	I would like to come up with my ideas / advice regarding the following : "Assessment of Environmental Impact TANBREEZ Mining Greenland A/S - temporary assessment of Environmental Impact from March 2012 and revised in August 2013 " point " 5.13.2 extraction using additives - location of the workplace during the extraction using additives. "	Frederik Lund refers to the SIA section 5.13.2 and not as stated the EIA.	Ministry of Mineral Resources Chapter 5 has gone through a very detailed revision during the last several years. The issue concerning chemical processing of eudialyte concentrate will be solved in due time before the 10 th year of production.	Chapter 5 (project description)

9.3	<p>In connection with this I am of the opinion that jobs which could be created here in Greenland are actually going to be created abroad. If the Self-government approves an application with this text, it will in my opinion mean a free gift to the mining company as it will mean lost revenue for our country.</p> <p>This is not in our country's interest, and that this solution should not be considered.</p> <p>I believe that TANBREEZ must work to create a profitable production and creating jobs in our country for the extraction with the use of chemicals.</p> <p>With the use of taxes one should convince TANBREEZ Mining Greenland A/S that it is ultimately cheaper to create all the jobs in Greenland.</p> <p>Understood in this way, that if jobs are moved offshore this will results in taxes so high that it will be more attractive to have all workplaces in our country.</p> <p>From TANBREEZ Mining Greenland A/S's perspective, it must be the case that having all the jobs in Greenland must be the cheapest possible alternative.</p>	<p>Comment to the Government of Greenland.</p>	<p>Ministry of Mineral Resources</p> <p>The Ministry agrees that as many jobs as possible should be created in Greenland. Section 18 of the Mineral Resources Act governs these matters and emphasizes that local enterprises, local labour and local processing is the general rule. According to these regulations, dispensation may be granted if local labour and services etc. are not available or will result in significantly higher costs or greater inconvenience.</p> <p>These issues has been part of the coming tripartite negotiations (IBA negotiations) between the mining company, the municipality and Greenland Government.</p> <p>Based on an extended dialogue during the last 7 years the mining company and the Greenland Government have agreed to that processing shall take place in Greenland 10 years after the time limit set in the license for commencement of exploiting minerals unless the Greenland Government decides otherwise.</p> <p>If chemical processing of eudi-alite concentrate, does not take place 10 years after the deadline set in the license for when exploiting minerals have to commence,</p>	None
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	<p>If TANBREE Mining A/S is not interested in corporation in connection with the extraction of the rare earths, one must be able to find other parties , maybe not tomorrow, but maybe in the course of a few weeks? (These REEs are rare on our planet –more rare than investors)</p>		<p>the company has in the exploitation licensed committed it self to pay for an increased royalty rate. The company has committed it self to increase the royalty rate with</p> <ul style="list-style-type: none"> - 2,69 percentage points for eu-dialyt concentrate - 3,0 percentage points for rare earth elements. 	
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No. 10. Nukissiorfiit

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
10.1	Consultation response dated 29 th of November 2013.	Tanbreez assesses that the data upon which the consultation response is based needs to be updated. Tanbreez will therefore when prepare the general exploitation and closure plan or the specific activity plans engaged in a dialogy with Nukissiorfiit concerning possibly supply of power.	Ministry of Mineral Resources The Ministry supports that TANBREEZ commences a dialogue with Nukissiorfiit in order to find a useful solution in relation to the power supply for the mine. However based on the decrease in oil prices since 2013 and potential also due to change in Nukissiorfiit's price structure, the Ministry of Mineral Resources assesses that Tanbreez as well as Nukissiorfiit appropriately should update the information which constitute the basis for this dialogue.	None

No. 11. Amos Ezekiasen

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
11.1	<p>I have the following questions to the Minister for Minerals and for those who wish to make a mine in Killavaat regarding the small quantity of uranium in the area:</p> <p>When the mine becomes operational and raw materials are extracted, a small quantity of uranium will have to be separated, depending on the annual quantity of extracted raw materials. We are not talking about kilos or tons, but the quantity will increase over the years. When uranium is separated, a quantity will be accumulated over the years which "for certain" can be sold at a very profitable price.</p> <p>With the use of chemicals, the separated uranium may account for the following:</p> <p>If there is a uranium amount of 0.18 to 20.20 grams per ton per 500,000 tons exploited, this will make up 10,000 kg (10 tons); what would be of value of this to the Tanbreez company?</p> <p>When it comes to taxes, the uranium as a byproduct is valuable; remember that zero tolerance has</p>	<p>Statement/question to the Self-government.</p> <p>Comment from TANBREEZ:</p> <p>The uranium level is below background radiation and therefore not economically feasible to mine.</p>	<p>Ministry of Mineral Resources</p> <p>The uranium question is not relevant, when uranium is found in so small quantities, that the uranium will not be leached. Very small amounts of uranium are associated with the eudialite, feldspar and arvedsonite, respectively. Arvedsonite is planned to be tailings if another application for the product is not found.</p> <p>There is no economic reasons to take uranium into account</p>	None

No.	Question/comments	TANBREEZ' answer	Comments from authorities	Changes to SIA
	been removed, and our country can profit from uranium.			

II. Questions from public meetings related to the Social Impact Statement or society (SIA)

No. A1. Questions from public hearing meeting in Qaqortoq on 17 November 2013

Subject: Emergency and contingency

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
A1.1	<p>Citizen Otto Ottosen</p> <p>Serious situations can arise in all mining districts and a need for emergency services may become imminent. There is no mention of emergency services. What happens if a serious situation should arise at these places? Are there any arrangements for emergency services? And who will be in charge of this?</p>		<p>Ministry of Mineral Resources</p> <p>In the approval pursuant to Section 19 and Section 43 of the Mineral Resources Act general requirement for contingency plans will be set. Further specific requirements will be set in the authority's specific approval pursuant to Section 86 of the Mineral Resources Act. This procedure has also been applied to the ruby mine as well as Hudson Greenland's mine project near Kangerlussuaq.</p>	none

Subject: Education

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
A1.2	<p>Citizen Anders Kielsen</p> <p>Education was not mentioned very much in this process. What are the opportunities for young people? What are the prospects for further education, what can you offer in terms of education, etc.? It is too limited, for instance, for Greenlandic pilots.</p>	<p>Greg Barnes</p> <p>Our aim will always be that at least 90 % of the employees are from the local community. The remaining 10 % will be people from specialist fields which cannot be found in Greenland. We must continue to educate and enhance the qualifications of the local citizens as they will be in the country for many more years than the ones from outside Greenland.</p> <p>Rikke Carlsen</p> <p>It must be emphasised that education is included in the SIA report, but is not part of the presentation due to the prioritising of the topics to be discussed here.</p>	<p>Ministry of Mineral Resources</p> <p>Different educational initiatives during the life of mine are spelled out in Appendix 3 to the IBA. In general the educational initiatives have pursuant to law to be related to the mineral resource area.</p>	<p>none</p>

Subject: Infrastructure and Energy Source

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
A1.3	<p>Citizen Otto Kreutzmann</p> <p>It is stated that diesel energy/energy from diesel generators oil will be used in connection with the energy production and this will increase the CO2 emission. Why has Qorlortorsuaq not been considered as an energy source?</p>	<p>Nikolaj P. Brandt</p> <p>The mine will require a minimum of 4.5 MW. At that time, Nukissiorfiit and the contractor were involved in arbitration proceedings, and therefore we were only able to obtain the information that a maximum of 1 MW would be available in years with adequate precipitation. In August 2012, a settlement between Nukissiorfiit and the contractor was signed and then Nukissiorfiit was able to enter into a constructive dialogue. Nukissiorfiit is currently making investigations to assess whether or not there is sufficient water to install a third turbine.</p> <p>If the price of hydro-generated power is competitive compared to diesel-generated power, then Tanbreez will also look positively at this kind of power supply.</p> <p>In any events, an emergency diesel generator will be installed at the site. Besides, the distance between Qorlortorsuaq and the planned mining site is 7 kilome-</p>	<p>Ministry of Mineral Resources</p> <p>The company will when planning construction of the facilities become aware of the project's specific energy/power need. Normally the mining company will based it's energy generation on economic and environmental considerations</p>	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
		tres. However, it should be mentioned that a constructive dialogue has been established with Nukis-siorfiit.		
A1.4	Citizen Jens Jørgen Petersen The fuel used will be diesel oil. Who will supply this and how much will be used?	Nikolaj P. Brandt We have approached Polaroil among others. They know the area and have the vessels. Approx. 6.7 million litres of diesel oil will be required per year which will be delivered to the plant four times a year.	Ministry of Mineral Resources Procurement of fuel is regulated by Appendix 3 to the IBA and Greenland Enterprises shall therefore be given the opportunity to bid on delivery of fuel to the project. (The IBA does not regulate any environmental issues with regard to fuel)	none

Subject: Employment, Growth and impacts on other industries

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
A1.5	<p>Citizen Jens Peter Kielsen</p> <p>How high is Greg Barnes' motivation to continue the project with so many being against the mining project, because it is very important that the project is commenced in an area with decreasing activities? We need it because it is a good project.</p>	<p>Greg Barnes</p> <p>I have spent DKK 240 million on the project and my motivation for getting something for my money is very high.</p>	<p>Ministry of Mineral Resources:</p> <p>The Ministry of Mineral Resources is working for realizing GREENLAND'S MINERAL STRATEGY 2020 – 2024, which has as one of its goal to develop the mineral resources sector into a leading industry in Greenland.</p>	<p>Reference to the new strategy has been inserted in Section 4.5 in the Social Impact Statement and measures from the old strategy has been deleted.</p>
A1.6	<p>Citizen Simon Simonsen</p> <p>The company structure of Nalunaq has been very closed and has caused great challenges for us politicians. Will it be possible to get (buy) shares in Tanbreez? We also wish to know the extent to which we can be involved.</p> <p>Under which company form is Tanbreez established? What are the plans concerning the ownership structure – as in our experience it can be difficult to follow the activities which can be discontinued without warning?</p>	<p>Greg Barnes</p> <p>It is a privately owned company, perhaps it may become relevant to list it on the stock exchange. That will depend on the IBA negotiations between the parties. If we have to find funds, we can include the local citizens. Whether it should be a one-man business or a business with several owners will depend on the future negotiations. We find it important that several from the local community become owners of our activities. We must enhance the qualifications of the local citizens, also for executive positions.</p>	<p>Ministry of Mineral Resources:</p> <p>It is a requirement that the exploitation license is only issued to a company registered in Greenland. There are a number of reasons for this; one of the most significant reasons being that it is easier to control a Greenland-based company, not least as regards tax payments.</p>	<p>None</p>
A1.7	<p>Citizen Simon Simonsen</p>	<p>Greg Barnes:</p>	<p>Ministry of Mineral Resources</p>	<p>None</p>

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
	Can chemical processing takes in Greenland? The 160 jobs are needed here. We know that the Gold mine Nalunaq is closed. Can Nalunaq be used for processsing	Very little can be used, the facilities at Nalunaq is different from our mine. The processing technology which we will apply is radical different. Processing is not economic feasible in Greenland.	<p>It has been agreed among the Licensee and the Greenland Government to delay the final decision concerning chemical processing. This means that unless the government decides otherwise chemical processing has to take place in Greenland from the 10th year of production.</p> <p>Chemical processing of eudialyte concentrate is significant different compared to processing gold ore. Hence, facilities at Nalunaq cannot directly be used for chemical processing of eudialyte concentrate.</p>	

Subject: Political issues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
A1.8	<p>Citizen Sofiannguaq Lund</p> <p>Which other minerals will it be possible to find than those from the extraction and how will they be handled? Will the bi-products be hazardous to the environment? What will the effects of the minerals be?</p>	<p>Greg Barnes</p> <p>We expect that we can use the black part in bricks, besides to other minerals we extract. The white part will be used in glass. Clay will also be used, for instance for bathroom floors. What we have showed you today can, for instance, be used in fish tanks. Investigations will be conducted and these will show which other alternatives that may be exploited.</p>	<p>Ministry of Mineral Resources</p> <p>The zero tolerance for uranium has been cancelled in 2013 by a Decision by the Greenland Parliament. However, the level of radioactive minerals such as uranium and thorium in Kringlerne is very low, so it is not commercially viable to exploit uranium and thorium. If Tanbreez discovers uranium and thorium in the licence area, which Tanbreez' intends to exploit then Tanbreez will have to submit a specific application for a licence to exploit these minerals.</p>	none
A1.9	<p>Citizen Sofiannguaq Lund</p> <p>We know there are uranium in the project. We are not allowed to ask questions about it? But what are your thoughts?</p>		<p>Ministry of Mineral Resources</p> <p>The zero tolerance for uranium has been cancelled in 2013 by the Greenland Parliament. However, the level of radioactive minerals such as uranium and thorium in Kringlerne is very low, so it is not commercially viable to exploit uranium and thorium. If Tanbreez discovers uranium and thorium in the licence area, which Tanbreez' intends to exploit then Tanbreez will have to submit a specific application for a licence to exploit</p>	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
			<p>the minerals, which includes these elements</p> <p>Furthermore, in Greenland there is freedom of expression. Hence the authorities cannot recognize that questions concerning uranium should be banned.</p>	
A1.10	<p>Citizen Sofiannguaq Lund</p> <p>How will the project affect the surroundings and the environment? What about bi-products? How will that affect the sheep farmers and the fish?</p>		<p>Ministry of Mineral Resources</p> <p>This is mainly a question concerning environment, so it should be addressed by the environmental authorities. However, the SIA states in section 8.1.5 the following concerning a possible impact on the fishing:</p> <p><i>"Conflict with hunters and fishermen is also discussed elsewhere in detail in the EIA. Essentially as there is extremely limited vegetation on the licence animals are limited so hunting does not take place. Fishing within the fjord and the Lakseelv river currently does take place to a limited extent. The environmental assessment sees little change in the ability to fish in this fjord."</i></p>	

No. B1. Questions from public hearing meeting in Nanortalik on 18 November 2013

Subject: Political issues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
B1.1	<p>Citizen Josef Korneliussen</p> <p>(Refers to a radio programme broadcast this day where an ICC representative participated in discussions of this topic). Is Tanbreez in the process of developing a new kind of colonisation? Is the Government of Greenland or a company laying down the policy?</p>	<p>Greg Barnes</p> <p>It is our aim to employ as many local workers as possible and as early in the process as feasible because this will be most beneficial from a financial perspective. In the beginning, a number of the managers will be foreigners, but we have already seen that the locals are capable of undertaking any kind of work. We have no plans to import Chinese labour. For operations in Greenland, it is best to use local labour.</p>	<p>Ministry of Mineral Resources</p> <p>Greenland legal status is regulated by the Act on Greenland Self-Government. In the act Greenland is recognized as people as pursuant to international law. Furthermore Section 21 (1) of the act has the following wording:</p> <p><i>"Decision regarding Greenland's independence shall be taken by the people of Greenland"</i></p> <p>Finally, when it comes to the mineral resource area, then since 1st of January 2010 the Greenland Government has been the competent authority to adopt and enforce policies concerning exploiting mineral resources in Greenland.</p>	none
B1.2	<p>Citizen Amos Ezeikiassen</p> <p>You are saying that there is no uranium. But how high is the presence of uranium? Will there be a bi-product consisting of uranium? It is necessary to perform measurements in any environment.</p>	<p>Greg Barnes</p> <p>The level of uranium in Killavaat Alannguut is the level that is found in fish and human beings. We export fish with no problems.</p>	<p>If the licensee discovers uranium which can be exploited (commercially) then the licensee will have to submit new application before any commencement of extracting uranium can take place.</p>	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
		Uranium will not be a bi-product of the mining operations in Killavaat Alannguat.		

Subject: Public revenues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
B1.3	<p>Citizen Tage Frederiksen</p> <p>The aim to create jobs is positive</p> <p>In relation to the question concerning tax income: If the income exceeds DKK 75 million, will the Danish state then take any exceeding amount? Who will ensure that the local work will be for the Greenland people?</p>		<p>The Ministry of Mineral Resources</p> <p>The Act on Greenland Self-Government was adopted in 2009. According to the act the situation will be as follows when Greenland takes over the raw materials area:</p> <p>Income from raw materials activities from licensees in Greenland therefore goes to the Greenland Government. Such income includes e.g. royalties, company and dividend taxes etc.</p> <p>Income of the nature listed above goes to the Greenland Government. if it in any given year the revenues exceeds DKK 75 million (In 2020 around 85 mill DKK), then the Danish Government's subsidy to the Self-Government</p>	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
			<p>authorities (Greenland Government) shall be reduced by an amount corresponding to half of the part of the revenues, which in the year concerned exceed 75 M DKK.</p> <p>It should be noted that the income will go to the Mineral Resources Fund once it has entered into force.</p>	

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Subject: Employment

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
B1.4	Citizen Tage Frederiksen The aim to create jobs is positive		The Ministry of Mineral Resources Without processing of eudialyte concentrate, the project will create 80 jobs during the production phase. If the Greenland Government and the licensee reached an agreement on processing of minerals in Greenland, before commencement of the 10th year of production, the project can potentially create up to 240 jobs in total. However, this will pursuant to the present law require an update of the Social Impact Statement.	none
B1.5	Citizen Tage Frederiksen Use of labour: Small advertisements are used for recruiting local labour. But how is it actually verified that local labour in fact is recruited?		The Ministry of Mineral Resources The Mineral Resources Act states that the Government must lay down the extent to which the licensee must use labour from Greenland. As part of the IBA it is decided that " <i>The Licensee shall at least post job openings in the Greenland and Danish languages in various Greenland media and relevant national job portals such as www.suli.gl.</i> "	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
			The authorities are presently considering how a reporting scheme for this requirement can be established in a business friendly way.	
B1.6	Citizen John Ole Kleist Neqi and the fish factories constantly need labour. How do we avoid that the mining operations worsen these labour problems?		If there is lack of labour in Greenland, it is possible to use foreign workers. However, the licensee has to document that they have tried to find Greenlandic workers for the mine.	none
B1.7	Citizen Telef Levisen We are very anxious for the new jobs to be created. I have been a fisherman, and I have always heard about the mining plans, also London Mining. I am looking forward to the start-up of mining operations. When will the mining operations commence?		The Ministry of Mineral Resources: It depends on whether the licensee is able to secure finance for the project. However, in the license there are deadlines, which the licensee will have to meet.	none
B1.8	Citizen Emilius Josenius I have worked in Nalunaq for four years, and I know how chemicals must be treated. If Tanbreez will open up for the use of chemicals, will we then be first in line of the people to be employed? Where will you train people? We are experienced workers.	Greg Barnes We will not be using chemicals but magnetic sorting.	Ministry of Mineral Resources Jobs for citizens of Greenland as well as educational initiatives related to the project's mineral resource activities are regulated byt IBA, which are concluded between the municipality, the company and the Government of Greenland.	

Subject: Infrastructure and energy source

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
B1.9	Citizen Heinrich Petersen Why are additional generators needed when there is one in Narsaq and in Qaqortoq? There is one available in Qaqortoq, a diesel one.		The Ministry of Mineral Resources The company will when planning construction of the facilities become aware of the project's specific energy/power need. Normally the mining company will base its energy generation on economic and environmental considerations	none
B1.10	Citizen Heinrich Petersen Why is it not possible to install a 3 rd turbine in the water power plant in order not to increase CO2 emission?		See reply above	none

No. C1. Questions from public hearing meeting in Alluitsup Paa on 18 November 2013

Subject: Employment

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
C1.1	<p>Citizen Elisa Nikolajsen</p> <p>Which possibilities will there be for unskilled workers?</p>	<p>Rikke Carlsen, Grontmij</p> <p>Once the exploitation licence and financing are in place, initiatives to upgrade labour skills will be initiated in consultation with the municipality.</p>	<p>The Social Impact Statement contains a table with the different positions, which are expected to be available during the construction phase and the operation phase. Furthermore, the Impact Benefit Agreement requests that the mining company submit specific job titles for the construction phase and for the subsequent operation phase in the following years.</p>	<p>none</p>
C.1.2	<p>Citizen Mina Adolfsen</p> <p>I would like to thank Tanbreez for coming here for the second time this year to tell us about their project. The politicians have been very slow in creating employment opportunities, and it is about time that something happens.</p>		<p>The Government of Greenland has adopted a Mineral Strategy, which has as one of its goal that the mineral resources sector shall be developed into a leading industry in Greenland that differentiates the economy and creates new jobs, skills and business for the existing industries.</p>	<p>The SIA has been updated so it reference the most recent mineral strategy</p>

Subject: Infrastructure

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
C1.3	<p>Citizen Konrad Ananiassen</p> <p>As regards the runway; would it not be possible for NATO to establish an airport at Qaqortoq close to the contemplated mine?</p>		<p>The Greenland Parliament has in 2018 adopted legislations which facilitate construction of airports in Greenland incl. Qaqortoq. The tendering process concerning construction of an airport at Qaqortoq is yet to be completed (July 2020)</p>	<p>A reference to the construction of the airports has been inserted in section 7.4.8.</p>

Subject: Public Revenues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to EIA/SIA
C1.4	<p>Citizen Ortooraq Poulsen</p> <p>For many years, raw materials/minerals have been exported from this country with no benefit to the local population.?</p>		<p>Since 1st of January 2010 revenues from mineral resource activities have accrued to the Greenland Government. Furthermore, a royalty has been inserted in the standard terms for exploration license, which means that the royalty applies for exploration licenses which are issued after the 1st of July 2014.</p> <p>Furthermore the company has committed itself to fulfil local development initiatives through the IBA (see e.g. appendix 4 in the IBA)</p>	<p>none</p>

Subject: Political issues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
C1.5	Name of citizen unknown What will happen if uranium is found?		If the company discovers uranium on site, which the company intends to exploit an application for exploiting uranium has to be submitted to the Greenland Government.	none

No. D1. Questions from public hearing meeting in Narsaq on 19 November 2013

Subject: Employment, growth and industry development

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
D1.1	<p>Citizen Jørgen Nathanielsen</p> <p>Since 1969, investigations in Killavaat Alannguat have been conducted, and mining operations have been a topic for discussion for many years. The number of employees at the town hall of Narsaq continues to decrease. Could it be an idea to place the Mineral License and Safety Agency here?</p>		<p>The Ministry of Mineral Resources:</p> <p>If the Tanbreez' mining project and the Greenland Mineral's mining project both are realized, Narsaq's workforce is not of sufficient size to supply all the workers for these two projects. It is therefore likely that to some extent foreign workers will be used in these two projects.</p>	none
D1.2	<p>Citizen Theo Kruse</p> <p>Will the local employees be fired if they do not come to work. For how long will local labour be used</p>		<p>The Ministry of Mineral Resources</p> <p>It is the company who has the right to hire and fire employees. However the company will at any time have to follow the law etc. in Greenland and the requirements spelled out in the IBA when hiring and firing employees</p>	none
D1.3	<p>Citizen Theo Kruse</p> <p>The citizens of Narsaq are located between Kuannersuit and Killavaat Alannguat, and there is uncertainty as to how problematic the uranium issue will be. Narsaq will</p>		<p>The Ministry of Mineral Resources</p> <p>Concerning uranium please see response under A1 8 above.</p>	none

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
	have possibility of jobs in both projects (Kuannersuit and Killavaat Alannguat). There will be concerns as to choosing between Tanbreez and Greenland Minerals & Energy.		Both project will (if realized) be competing about the same labour force. Greenland has within law (incl. collective labour agreements) a free labour market, so it is basically up to the potential employer and the potential employee to negotiate an employment contract.	
D1.4	Citizen Rikard Efraimsen Once Tanbreez commences the extraction, the mine will be close to the trout areas. It has been said that the extraction will not have an effect thereon. If that seems to be the case after all, and the fishermen's business is affected – who will then be left with the responsibility for this? And what will happen to the fishermen?		The Ministry of Mineral Resources A potential loss of income for the fishermen will in last resort be settled according to the law of tort, which applies in Greenland.	none

D1.5	Citizen Suka Frederiksen We note that foreign food is imported for major activities, the tourists bring their own food. What are the prospects of using food produced in Greenland?		The Ministry of Mineral Resources It is stated in Appendix 2 to the IBA that <i>"The Licensee shall enter into contracts with local fishermen, farmers and hunters on the supply of food for the mining camp."</i>	none
D1.6	Citizen Jan Retmer Petersen (?) The rare earth elements are not as rare as at least 200 projects are competing against each other at the moment?		Ministry of Mineral Resources It is true that "rare" in the name of this group of elements is actually somewhat misleading. The rare earth elements are relatively abundant in the Earth's crust	
D1.7	Citizen Jakob Mikaelson Which language will be used at the mining site?		Ministry of Mineral Resources For safety reason some knowledge of English is expected to be required. However this is something which can address during the meetings, which will be held pursuant to the IBA	

Subject: Public Revenues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
D1.8	<p>Citizen Jens Christian Dahl</p> <p>How much corporation tax and royalties will they have to pay? And how much will the company get out of it? And what are the plans with Nuna Minerals?</p>		<p>Ministry of Mineral Resources:</p> <p>A royalty scheme has been negotiated between the Government of Greenland and Tanbreez, which is set in the License.</p> <p>Due to lack of sufficient details concerning the project design it is not possible to give an estimate of how much royalty Tanbreez will be paying during the first 10 years of production. However, corporate tax is by Tanbreez estimate to be around 1 billion DKK.</p>	none
D1.9	<p>Citizen Jan Retmer Petersen</p> <p>We have noted that China has reduced the market price for rare earth elements. For Tanbreez, an income for the community of DKK 1 billion over a period of 10 years is estimated. Are these figures based on present values?</p>	<p>Greg Barnes</p> <p>The figures have changed/change fundamentally, but there are other minerals. The Chinese will compete by dumping prices – this is their strategy. Yet, we make efforts to be able to compete with the Chinese.</p>	<p>Ministry of Mineral Resources</p> <p>It is preferred that number is in present values</p>	

Subject: General societal impacts and political issues

No.	Question/comments	Response from TANBREEZ' representatives and further comments from the company	Comments from the authorities	Changes to SIA
D1.10	Citizen Theo Kruse Is the conclusion that it will not have any effect at all on us as human beings and our descendants if mining activities are established in this area? Will this not disturb the small birds?		The Ministry of Mineral Resources: The significant impacts on society are described in the Social Impact Statement. The impacts are assessed for a 2 year long construction periode and 10 year long production period.	none
D1.11	Citizen Jens Christian Dahl Why is the time limit for the hearings so short when the company has had so many years to work on it?		The Ministry of Mineral Resources: 8 weeks of publication consultation follows the standard in countries such as Canada and Denmark. Furthermore, companies exploratory work incl drilling operations are something that normally takes several years. It not therefore not uncommon that an exploratory period for a mining project takes years or even decades.	none