

White Paper

Social Impact Assessment (SIA)

Greenland Anorthosite Mining ApS (License no. 2019-162)

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Forwarded written hearing replies regarding the terms of reference for the SIA report

1. Reply from the Municipality of Qeqertalik

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
1.1	The Municipality of Qeqertalik has no comments to the pre-hearing.	No further comments.		No change.

2. Reply from the Ministry of Foreign Affairs, Trade, Business and Climate

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
2.1	The Ministry of Foreign Affairs, Trade, Business and Climate has no comments to the pre-hearing.	No further comments.		No change.

3. Reply from the Ministry of Housing, Infrastructure and Gender Equality

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
3.1	<p>The Ministry of Housing, Infrastructure and Gender Equality thanks for the notification of the abovementioned pre-consultation.</p> <p>On this basis, the Ministry states that the consultation material does not give rise to any comments, as we assume that the building legislation is observed to the extent possible under the circumstances when establishing buildings in the mining town.</p>	GAM is familiar with the Greenlandic building regulations, and will comply with this as far as possible in the project area in connection with the establishment and construction of the mine project's infrastructure and housing stock.	The Mineral Licence and Safety Authority notes that the Greenlandic building regulations are being re-evaluated to a 2021 version. This process is currently unfinished. When the regulations come into force, there will be a transition period which will last for a few months. During the transition period, it will be optional whether you want to follow the current scheme or switch to the new scheme.	No change.

4. Reply from the Greenland Police

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR

4.1	<p>The Greenland Police have reviewed the consultation material, and in this connection have the following remark:</p> <p>If the establishment of infrastructure, including the establishment of an explosives depot, fuel and other flammable and/or explosive substances in relation to the mining town and the mine, takes place in accordance with the rules laid down by the Naalakkersuisut, cf. Greenland Parliament Act No. 14 of 26 May 2010 Chapter 6 on preventive measures, the Greenland Police have no comments on this.</p>	GAM will comply with the current rules for the establishment and storage of explosives and flammable materials in the project establishment.	Noted.	<p>Table 2-2 (page 5) makes the following change:</p> <p><i>"Emergency management (Act no. 14 of 26 May 2010 on rescue preparedness in Greenland and fire and explosion prevention measures)" is deleted and replaced by:</i></p> <p><i>"Greenland Parliament Act No. 14 of 26 May 2010 on the emergency preparedness in Greenland and on fire and explosion prevention measures"</i></p>
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5. Reply from the Ministry of Finance and Home Affairs

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
5.1	<p>As a start, 2 figures are shown:</p> <p>Figure 1. shows the main employment after 2008 by gender. It can be seen that for men it was declining until 2010, from 205 to 199. It then increased up to 241 in 2011. It was declining again until 2016 when it was slightly down to 110 men in</p>	<p>GAM will, if the competencies exists, employ both men and women for the project.</p> <p>The SIA will uncover existing professional qualifications in the local area, and to what</p>	The Mineral Resources Act does not stipulate specific provisions on the distribution of sex in connection with raw material projects.	<p>ToR SIA Section 3.3.2 text block 2:</p> <p><i>"GAM expects that there is a need for 30-40 employees in the construction phase".</i></p>

<p>raw material extraction as the main occupation. From 2016 to 2018 it was slightly rising and then falling again in 2019 to 120.</p> <p>For women, the number started at 28 in 2008 where it fluctuated slightly between 28 and 48 to 2011. The number decreased slightly to 33 in 2014, where it then again increased steadily until 2018 to 53, in 2019 there were 46 women with raw material extraction as main occupation.</p> <p>Figure 2. shows the number of companies engaged in raw material extraction from 2009-2019. It started in 2009 with 64 companies where it then rose sharply to 84 in 2011. It then only fell sharply from 2011 to 2014 to 35 companies and steadily declining to 28 companies engaged in raw material extraction in 2019.</p> <p>It can be seen that there is a tendency for the number of companies and the number of men and partly women who are engaged in raw material extraction in Greenland, to follow each other. 84 companies and with 289 men and women with main employment in raw material extraction when it peaked in the year</p>	<p>extent this workforce can be used.</p>		<p>TOR SIA Section 4.1.1 text block 5 p. 18:</p> <p><i>"GAM will, as far as the competencies are present, employ both men and women for the project."</i></p>
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	<p>2011, and followed roughly each other by declining number of companies and number of workers in raw material extraction. Number of companies and job opportunities tend to follow each other.</p> <p>With these words AN welcomes the new project at Majoqqap Qaava and wishes the best forward in the preparation of the Social Sustainability Assessment and Environmental Impact Assessment, which shall culminate in a productive basis for the Impact Benefit Agreement.</p>			
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6. Reply from Greenland Business, GE (Sulisitsisut),

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
6.1	<p>Greenland Business (GE) thanks for the opportunity to submit a consultation response in connection with the above-mentioned pre-consultation.</p> <p>GE has no comment on the submitted material.</p>	No further comments.		No change.

7. Reply from Air Greenland

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
7.1	<p>In connection with the mining project Greenland Anorthosite Mining ApS (GAM) on the exploration permit 2019/162, Air Greenland has the following comments:</p> <p>Throughout the start-up of the exploration phase, Air Greenland has worked closely with GAM with helicopter support for crew replacements, sling tasks and geophysical measurements.</p> <p>This cooperation has been smooth and GAM has provided detailed plans for their work and, to the extent that the weather has proved cooperative, adhered to the plans. There has also been a thorough contingency plan and really good communication with the customer.</p> <p>It is our opinion that the company, to the extent possible, manages to employ local labor and companies.</p>	No further comments.	Noted.	No change.

8. Reply from the Settlement Council

No.	Questions/comments	GAM's reply/comments	Reply/comments from the Mineral Licence and Safety Authority	Amendment – section or page in ToR
8.1	<p>Regarding the exploration permit 2019-162 for Greenland Anorthosite Mining ApS. The settlement council takes note of this and of course expects to be contacted and wishes to participate in the open hearing.</p> <p>Therefore, we would like the settlement council to be contacted. In addition, we would like the fishing and hunting association in Qeqertarsuatsiaat to be contacted.</p>	<p>GAM has already had an introductory citizen meeting with the locals in the Qeqertarsuatsiaat, and will continue this practice going forward as part of the VSB', and the next 8-week consultation period.</p>	<p>The main objectives of the SIA process is to inform and involve relevant and affected citizens and stakeholders in an ongoing dialogue. The SIA process also intends in a meaningful manner to involve affected cities, settlements and communities (citizens), which are affected throughout the life of the project.</p> <p>In connection with the public consultation on environmental impact assessment (EIA) and social impact assessment (SIA), the Government of Greenland holds consultation meetings in towns and villages during the consultation period that are particularly affected by the activities</p>	<p>No change.</p>

9. Reply from the Ministry of Fisheries and Hunting

No.	Questions/comments	GAM's reply/com-ments	Reply/comments from the Mineral Licence and Safety Au-thority	Amendment – section or page in ToR
9.1	<p>The Department of Fisheries and Hunting (APN) has received the submitted consultation material from the Mineral Licence and Safety Authority regarding pre-hearing of the terms of reference for the SIA and EIA report for the Greenland Anorthosite Mining project at Qeqertarsuatsiaat.</p> <p>APN has the following comments:</p> <p>APN is generally satisfied with the previous baseline studies and the resulting assessments in the EIA report of the potential impact on the surrounding wildlife, including terrestrial and marine mammals as well as seabirds. However, it is recommended that mitigation measures be taken as far as possible in connection with the activities on land and the increased maritime traffic in the bay and fjord system, so that disturbance and other effects on the surrounding wildlife can be averted or reduced.</p>	<p>An account of mitigation measures will be part of the EIA report. The potential impact of noise, dust and ship traffic on terrestrial and marine wildlife will be included in these assessments.</p>	<p>The Environmental Agency for Mineral Resource Activities (EAMRA) is the administrative authority for environmental matters relating to mineral resource activities, including protection of the environment and nature, environmental responsibility and EIA</p>	<p>No change.</p>

9.2	<p>The project area is located in a reindeer region (region 5), which is a hunting area for reindeer. In this connection, with the intended activities, the necessary precautions and considerations must be taken so that potential nuisances to reindeer and thus the hunt for them are avoided. Reindeer hunting in the region usually takes place in the period 1 August - 31 December. APN therefore expects the field rules to be strictly adhered to.</p>	<p>GAM is aware of the area's use for reindeer hunting by the local population, and that the applicable field rules are complied with.</p> <p>The company will therefore, as far as possible, take the necessary considerations into account in this investigation, establishment and construction phase.</p>	<p>Applicable field rules shall be complied with when carrying out activities</p>	
9.3	<p>Attention is drawn to the fact that when staying in Greenland, one must be aware of current guidelines and precautions in areas where the risk of encountering polar bears is present. The guidelines for meeting polar bears are therefore included for information. Guidelines for observing injured or dead and stranded whales are also included.</p>	<p>GAM is aware of the risk of encountering polar bears in Greenland, and will ensure that employees comply with the company's safety rules in this regard. The necessary equipment for scaring bears away, etc. will be present both in the mining town and at process and port facilities.</p> <p>With regards to whales , GAM will follow the</p>	<p>Applicable guidelines must be complied with by the company, and relevant authorities shall be contacted if a need arises.</p>	

		guidelines if dead or stranded whales are encountered.		
9.4	<p>In addition, APN kindly points out that fishing and hunting are not permitted without hunting licenses, fishing licenses and licenses, which is why all fishing and fishing activities without these will be considered illegal and what follows.</p> <p>In addition, APN has no further comments on the hearing.</p>	<p>GAM is aware that all the general Greenlandic rules in relation to hunting and fishing also apply to the project area.</p> <p>Anyone with employment or other relationship to the project will be informed of the rules upon arrival at the project area.</p>	<p>Hunting and fishing in connection with mining projects is not be permitted without hunting licenses, fishing licenses and licenses issued by the relevant Greenlandic authorities.</p>	