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White Paper

Nalunaq Gold Mine Project

Hearing responses – EIA

Comments from EAMRA and DCE/GINR included

27th May 2024

1. Grønlands politi / Greenland Police

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	No comments relevant for the EIA	-	-	-

2. Søfartsstyrelsen / Danish Maritime Authority

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
2.1	In Section 3.6 reference can be made to the Danish Maritime Authority's website: https://www.sofartsstyrelsen.dk/sikkerhed-til-soes/arktis where all relevant rules for sailing are listed.	Noted – no answer is required by Nalunaq A/S.	None	None.	No comments.	No comments
2.2	It is mentioned in Section 3.6 (of the EIA) last section, that there is an agreement between MLSA and the Danish Maritime Authority regarding the investigation of navigation safety conditions (Navigation Safety Investigation - NSI). However, the EIA report does not seem to contain any details about navigational safety. Only a brief description of scope of sailing in Section 5.7.8 and on pollution at sea due to a ship accident in Section 12.3. The Danish Maritime Authority must request that an NSI be carried out according to previously agreed	Nalunaq A/S has initiated the preparation of a Navigation Safety Investigation (NSI) which follows the applicable principles and requirements for content.	EAMRA notes that Nalunaq A/S has initiated the required work on preparing an NSI.	The NSI must be added as a background report to the EIA, and elements in the NSI with implications to the environment must be	No comments.	The NSI 1 st draft has been prepared and is currently in review with the DMA

	<p>principles and content. It must include documentation that the survey at sea and ENC map for the area are according to contemporary standards. An NSI must cover the fjord from the entrance at Nanortalik and to the east of the mine area's bridge and landing pad. It is possible that the NSI from the previous mining project in the area can be reused with relevant updates.</p>			<p>incorporated in the EIA.</p>		
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3. Forsvarskommandoen / Defence Command Denmark

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	<p>No comments relevant for the EIA</p>	<p>-</p>	<p>-</p>	<p>-</p>

4. Grønlands Erhverv / Greenland Business Association

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
4.1	Greenland Business Association (GBA) does not have the technical prerequisites to assess whether the EIA report raises a need for further investigations. However, GBA agrees with DCE/GN's (Danish Centre for Environment and Energy/Greenland Institute of Natural Resources) call to carry out follow-up actions with a view to providing sufficient data to verify the assumptions on which the draft EIA report is based.	Nalunaq A/S will implement an Environmental Monitoring Plan in accordance with the Greenlandic guidelines to monitor the predicted residual effects of the Project and the effectiveness of implemented mitigation measures. This will comprise sampling of water, air, and soil from numerous locations in and around the mine site and the results will be submitted to the authorities for review. A conceptual monitoring plan is included in the EIA as Appendix II (see also the answer to	<p>The topics listed in EAMRA's letter of May 15th 2023 concerning further requirements in relation to the EIA draft of 17 March 2023 must be met before a final approval of the EIA can be given.</p> <p>Nalunaq A/S must elaborate on this answer/comment to address the topics mentioned.</p>	Topics 1 and 2 must be incorporated into the EIA before final approval.	<p>DCE/GINR assess that the company's reply is incomplete as it does not address all the action points referred to by GBA, but only focusses on the coming Environmental Monitoring Plan.</p> <p>As listed in Bach et al, 2023, DCE/GINR have identified a list of topics which should receive additional attention:</p> <p>1 – Alternative locations for the tailings storage facility (DTSF)</p> <p>2 - Water treatment techniques</p> <p>3 – Environmental impacts from dust emissions</p> <p>4 - Annual precipitation range</p>	<p>This report is complete and has been provided to EAMRA and DCE.</p> <p>This report is complete and has been provided to EAMRA and DCE.</p> <p>An assessment is presented in the EIA and a programme of dust monitoring is being implemented and are included in the monitoring plan.</p> <p>The precipitation range used in the EIA was updated in line with DCE's request. Precipitation will be recorded as part of the ongoing monitoring programme and are included in the monitoring plan.</p>

		question number 11.2).			<p>As stated in Bach et al, 2023, DCE/GINR recommend that topics 1 and 2 should receive attention before approval of the project (approval of EIA + white paper) but can take place after the EIA has been into the public consultation process.</p> <p>Topics 3 and 4 are actions that are recommended to be included in the monitoring plan for the project.</p> <p><i>Bach, L, Juncher Jørgensen, C, Bomholt Dyrholm Jacobsen, I, Jia, Y. 2023. DCE/GINR – Review of 'Nalunaq Gold Project, Environmental Impact Assessment, March 2023'. Aarhus University, DCE – Danish Centre for Environment and Energy. – Scientific briefing. 4 April 2023</i></p>	<p>Confirmed.</p> <p>Confirmed</p> <p>Confirmed</p>
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5. Jewelry workshop Kassoq by Palle Møller

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	No comments relevant to the EIA			

6. NUKISSIORFIIT / The Greenlandic Energy Company

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
6.1	Nukissiorfiit perceives it as positive that a hydropower plant will be constructed and will follow the studies for this with great interest.	The Company is working on a feasibility study connected with building a smaller hydropower plant to supplement the diesel generators for power generation at the Nalunaq mine site. It looks forward to working with the authorities as it moves forward in this work	EAMRA notes that Nukissiorfiit has a positive perception of Nalunaqs plans concerning hydropower. EAMRA take note of Nalunaq A/S comment.	None.	No comments	No Comment

7. NUKISSIORFIIT / Ministry of Children and Youth

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	No comments relevant for the EIA	-	-	-

8. Arbejdstilsynet/ Danish Working Environment Authority

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	No comments relevant for the EIA			

9. Air Greenland

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA
	No comments relevant for the EIA			

10. WWF Verdensnaturfonden/WWF Denmark

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
10.1	It is positive that DCE/GN considers that the current edition of the EIA report is improved compared to previous editions, but it would have been beneficial if it had been stated exactly how it differs.	Noted – no answer is required by Nalunaq A/S.	No changes to EIA required	None.	No comments	No comment
10.2	Some assessments of the environmental impacts are theoretical predictions and thus associated with uncertainty. WWF therefore joins DCE/GN's call to take follow-up actions with the view to verifying the assumptions in the EIA report, quantifying the potential environmental impacts and risks and developing mitigation strategies.	Nalunaq A/S will implement an Environmental Monitoring Plan in accordance with the Greenlandic guidelines to monitor the predicted residual effects of the Project and the effectiveness of implemented mitigation measures. This will comprise sampling of water, air, and soil from numerous locations in and around the mine site and the results will be submitted to the authorities for review. A conceptual monitoring plan is included in the EIA as Appendix II. If the unlikely situation occurs that, despite the implemented	The topics listed in EAMRAs letter of May 15 th 2023 concerning further requirements in relation to the EIA draft of 17 March 2023 must be met before a final approval of the EIA can be given. The Company must elaborate on this answer/comment to	None.	Incomplete reply. Please refer to DCE/GINR's comments at entry No. 4.1.	Refer to response to 4.1. The additional studies recommended have been provided to EAMRA/DCE and dust and precipitation monitoring is incorporated into the environmental monitoring programme.

		mitigating measures, undesirable impacts on the environment occur, Nalunaq will, in cooperation with the Greenlandic authorities, agree on new measures.	address all the topics mentioned.			
10.3	<p>As described in the EIA guidelines, the purpose of the EIA process is, among other things, to form a basis for public participation in the decision-making process. The Non-technical Summary is particularly important in this context as it provides a brief and concise overview of the project and inform citizens about the most important environmental impacts that are expected, as well as how these are averted.</p> <p>In the Danish and Greenlandic versions of the important Non-technical Summary the language is poor and should be improved.</p>	Nalunaq A/S acknowledges that it is important that the Non-technical Summary is written in a clear and easily understood language. We will therefore go through the text again and ensure that the project, including the potential environmental impacts, appear more clearly.	<p>EAMRA notes that Nalunaq A/S will revise the Non-Technical Summary in the Greenlandic and Danish versions.</p> <p>EAMRA has no further comments.</p>	The Danish and Greenlandic editions of the Non-technical Summary will be revised.	No comments	The Danish and Greenlandic editions of the Non-technical Summary will be reviewed and revised as appropriate.

<p>10.4</p>	<p>It is strictly necessary that DCE/GN's recommendations for an alternative location of the tailings facility (DTSF) are followed before any approval of the project. This applies to all four criteria regarding the location (see WWF's consultation response). It is important to limit and preferably eliminate the environmental risks the DTSF will pose instead of dealing with it through technical solutions.</p>	<p>The location of the tailings facility has been the subject of long and thorough consideration, both in relation to the practical conditions at the mine, but not least to minimize the risk of contamination of the surroundings, including the Kirkespir River (see Section 5.9.2 and 5.9.3 of the EIA report). Additional data has subsequently been collected during an investigation of the potential alternatives carried out in autumn 2023, that specifically assessed potential physical constraints and hazards and carried out reconnaissance level geomorphological mapping, level geotechnical testing and level hydrological testing at each identified potential alternative location.</p> <p>The chosen solution has been thoroughly discussed with the Greenlandic authorities and their advisors and an agreement has been reached that the proposed location and method of storage is environmentally safe, and any identified risks can be mitigated. This means that the base for the deposit is considered stable, the risk of flooding and erosion from the river is assessed to be very</p>	<p>The topics listed in EAMRA's letter of May 15th 2023 to Nalunaq A/S concerning further requirements in relation to the EIA draft of 17 March 2023 must be met before a final approval of the EIA can be given.</p> <p>Nalunaq A/S must elaborate on this answer/comment to address the topics mentioned.</p>	<p>Topics 1 and 2 must be incorporated into the EIA before final approval.</p>	<p>As stated in Bach et al, 2023, DCE/GINR recommend that additional field investigations are conducted to ensure that the approved location for the DTSF has a risk profile that is as low as reasonably practicable considering potential impacts and failure modes in all phases of the project, including the post-closure phase (i.e. from mine closure to perpetuity).</p> <p>DCE/GINR recommend that a final reporting on this topic is presented for the competent Authority prior to the potential approval of the EIA-assessment.</p> <p>Please refer to DCE/GINR's comments at entry No. 4.1. concerning alternatives options for the DTSF.</p>	<p>The requested additional investigation of potential alternative locations has been delivered to EAMRA and DCE.</p> <p>A technical note of potential water treatment options, if required, has been completed and delivered to EAMRA and DCE.</p>
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		<p>small and the discharge of contaminants into the river will be very small and well below the Greenlandic limit values, whereby there will be no significant pollution of the river water or environmental impact on its population of char.</p>				
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10.5	<p>In relation to the chemicals to be used in the flotation process, there is a lack of information on their toxicity, bio-degradability and accumulation and this must be included in the final EIA.</p>	<p>Three chemicals will be used in the mineral flotation: MIBC, xanthates and dithiophosphates. MIBC, which is readily biodegraded, suggesting that the chemical will be rapidly and completely removed from water and soil environments, including biological wastewater treatment plants</p> <p>(Bach et al. 2016). Consequently, MIBC is unlikely to persist in the environment, has low bioaccumulation potential and little toxicity (Bach et al. 2016). The fate characteristics and low toxicity of this chemical combined indicate that MIBC poses a low environmental risk (Bach et al. 2016).</p> <p>Standard test results indicated that xanthates and their degradation products are toxic to aquatic invertebrates but less toxic to fish species and that they may bioaccumulate (Bach et al. 2016). Xanthates also increase the toxicity and bioaccumulation of metals (Bach et al. 2016). Dithiophosphates are known to be toxic to aquatic life.</p> <p>In order to test whether the process water will be toxic to</p>	<p>EAMRA notes that Nalunaq A/S will add further information on the toxicity, bio-degradability and accumulation of chemicals used in the flotation to the EIA</p> <p>EAMRA has no further comments</p>	<p>More information on the toxicity, bio-degradability and accumulation of chemicals used in the flotation will be added to the EIA.</p>	<p>Review of the revised version of the EIA is pending.</p> <p>DCE/GINR note that four chemicals are declared in the EIA, including also FLOPAM FO4140.</p> <p>DCE/GINR note that the use of process chemicals is subjected to specific approval by the competent Authority prior to usage.</p> <p>DCE/GINR note that a survival rate of nearly 100% in the standard ecotoxicity test does not guarantee that no harm to the environment can occur under standard operation.</p> <p>DCE/GINR recommend that special attention is directed towards monitoring the ecosystem impacts from process chemicals.</p>	<p>A stand alone technical note is prepared regarding the environmental fate of process chemicals and is delivered to EAMRA and DCE.</p> <p>Chemicals to be used when the plant is operating will be applied for as part of the processing plant commissioning permit.</p>
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		<p>aquatic life in the Kirkespir River, a series of tests were carried out with process water from both flotation and gravity test facilities. The study did not show increased mortality for either char or daphnia (Section 5.7.5.1 of the EIA report).</p>			<p>DCE/GINR also refer to the comments at entry No. 4.1. concerning documentation of water treatment techniques.</p>	<p>As noted above a technical note on water treatment options has been prepared and provided to EAMRA and DCE.</p>
10.6	<p>There is a lack of consideration of alternatives to the use of the most environmentally harmful chemicals.</p>	<p>The selected chemicals are, among other things, chosen because experience and the completed study shows that they are not expected to pose a risk to the environment.</p>	<p>EAMRA agree with WWF on this comment</p>	<p>Nalunaq A/S must include a description and discussion of</p>	<p>DCE/GINR recommend that the revision of the EIA concerning process chemicals (see entry 10.5) also includes a description and</p>	<p>A stand alone technical note is prepared regarding the environmental fate of process chemicals. This include a commitment that a review of</p>

				alternative process chemicals with a more benign environmental impact – and include an argumentation for the choices made.	discussion of alternative process chemicals with a more benign environmental impact.	chemical use will be undertaken on a regular basis to evaluate if alternatives are available which present a reduced risk to the environment.
10.7	There must be strict environmental requirements for the discharge and monitoring of waste water into the river to ensure that the water environment in general and the char population in particular are not negatively affected by mining.	The Environmental Monitoring Plan (Appendix II of the EIA report) specifically describes monitoring activities at the Kirkespir River, which will include analyses of water from the tailings run-off, and water from Kirkespir River collected at stations above and below the discharge point of tailings water.	EAMRA agree with WWF on this comment.	None.	No comments.	A programme of environmental monitoring will be implemented as described in the EIA.
10.8	There is a need for monitoring of the tailings run-off as well as possible cleaning to avoid release to the environment.	Analyses of water from the tailings run-off are part of the Environmental Monitoring Plan (see 11.7 above).	EAMRA agree with WWF on this comment	None.	No comments.	A programme of environmental monitoring will be implemented as described in the EIA.
10.9	metals in the environment. This must	The ore has a natural content of arsenic and cadmium. During the	The topics listed in EAMRA's letter of	Topics 1 and 2 must	As recommended in Bach et al (2023),	As noted above a technical note on

	<p>be explained more clearly in the EIA, as the area (around the mine) is also used by the local population. It is expected that demands will be made for the company to document that discharges of excessively high concentrations of metals will not occur.</p>	<p>crushing and grinding of ore in the process plant, some of these metals will be released. Since these activities will take place inside a building equipped with a dust suppression system, cadmium and arsenic will not be released into the environment during this process.</p> <p>Cadmium and arsenic could theoretically be leached from the deposited tailings. But long-term tests of the leached metals from tailings show that the concentration of all the Potential Contaminants of Concern (PCOC) including cadmium and arsenic are low and significantly lower than the Greenlandic guidelines (Section 12.4). On this basis, the risk of contaminating the environment with cadmium or arsenic is unlikely.</p>	<p>May 15th 2023 concerning further requirements in relation to the EIA draft of 17 March 2023 must be met before a final approval of the EIA can be given.</p> <p>Nalunaq A/S must elaborate on this answer/comment to address potential methods of watertreatment and possibilities of implementation for all relevant contaminants.</p>	<p>be incorporated into the EIA before final approval.</p>	<p>DCE/GINR recommend that additional documentation is provided prior to a potential approval of the project, showing that active water treatment techniques exist and can be implemented for all relevant contaminants if monitoring results show that it is needed.</p> <p>Please refer to DCE/GINR's comments at entry No. 4.1.</p>	<p>water treatment options has been prepared and provided to EAMRA and DCE.</p>
10.10	<p>In connection with the previous mining operations, dust control was insufficient. It should be a requirement to carry out dust suppression measures such as watering of gravel roads or to have roads with hard surfaces. Great attention should also be paid to dust and water</p>	<p>The dust control activities are described in Section 10.2.1. of the EIA. Here it is explained that crushing and grinding of ore will take place in a building equipped with a dust suppression system and stockpiles and haul roads will be sprayed during dry periods.</p> <p>To ensure that the dust control activities are effective, measurements of dust dispersal and deposition will also take</p>	<p>EAMRA has taken note of WWFs statement, and will take the recommendation from DCE/GINR into consideration for future applications.</p>	<p>None.</p>	<p>DCE/GINR recommend that a "dust management plan" is included as part of any future permitting of specific activities. This plan should include, but not being limited to, a description of possible mitigation techniques to limit dust emissions and</p>	<p>Noted. This will be included in the environmental management and monitoring plans for the site. Dust monitoring is currently being implemented.</p>

	from the planned stockpiles, where disposal in the mine itself is clearly preferable.	place as part of the environmental monitoring (see the Environmental Monitoring Plan, Annex II).			how they can be implemented.	
10.11	The company's investigation shows that it is possible to install wind turbines and solar cells, but it is concluded that it is not a technically or economically viable way to produce electricity with the current project design. Further arguments do not appear in the EIA report. WWF in Greenland assesses this as a deficiency that should be addressed.	Renewable energy is discussed in Section 5.9.5 where reference is made to a specific report on this topic (NIRAS 2020. Nalunaq Gold Project - Potential Wind and Solar Resources, August 2020, - Report from NIRAS Denmark A/S). The study concluded that renewable energy could make a contribution and substitute for fuel consumed by the diesel generators. As mentioned in answer 6.1 during the contemplated feasibility study other sources of renewable energy will be investigated.	EAMRA notes that Nalunaq A/S will investigate the potential for use of renewable energy further. EAMRA encourage Nalunaq A/S to elaborate further on this topic in the EIA report.	None.	No comments	The EIA will be updated to note that renewable energy will be considered as an option where practicable.
10.12	WWF in Greenland considers the use of renewable energy in energy-intensive industries to be very important. Even a partially green energy supply will limit the negative impacts from production based exclusively on fossil fuels. The emission of soot particles (black	Statement – no answer is required by Nanulaq A/S.	EAMRA has taken note of WWFs Statement	None.	No comments	No comments

	carbon) has a very harmful effect in the Arctic, where the reflection of snow and ice is limited by the dark particles and accelerating the warming of the Arctic.					
10.13	WWF in Greenland also wants HFO (heavy fuel oil) not to be used as fuel for ships there provides transportation to the project. The international organization IMO has introduced a ban from 2024, (however with the possibility of exemption), as HFO poses a major threat to the environment in the event of a release. The Greenland Self-Government should take the lead and phase out HFO as soon as possible and make demands for this before the possible approval of the project, since an amendment to the Act on the Protection of the Marine Environment in	This is a matter for the Naalakkersuisut. Nanulaq A/S will ensure that the ships that will call in at the mine port comply with applicable regulations in Greenland. HFO is now banned in Greenland EEZ. It should be noted that HFO will not be used in connection with the activities on land.	EAMRA has taken note of the WWF Statement	None.	No comments	-The Navigational safety Investigation Report states the fuels permitted within the applicable local regulations.

	<p>the exclusive economic zone by Greenland, aims to implement a ban on the use of HFO, which must through legislation in the Danish Parliament in February-March 2024.</p> <p>WWF in Greenland also wants HFO (heavy fuel oil) not to be used as fuel for ships there provides transportation to the project. The international organization IMO has introduced a ban from 2024, (however with the possibility of exemption), as HFO poses a major threat to the environment in the event of a release. The Greenland Self-Government should take the lead and phase out HFO as soon as possible and make demands for this before the possible approval of the project, since an amendment to the Act on the Protection of the Marine Environment in the exclusive economic</p>					
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	zone by Greenland, aims to implement a ban on the use of HFO, which must through legislation in the Danish Parliament in February-March 2024.					
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11. Kommune Kujalleq / Kujalleq Municipality

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
11.1	<p>The Municipality of Kujalleq understand that the project involves meeting the environmental requirements in connection with mineral extraction. This applies to the processes in the processing plant, recirculation of water from the mine and from precipitation, monitoring of the level of pollutants in water, and securing the landfill after closure of the mine.</p> <p>It is estimated that 750,000 tonnes of waste rock will be produced during the first 5 years of mining. The waste rock will be deposited inside the mine shafts.</p> <p>The mine company also expects to produce 6-7 tonnes of gold from approx. 540,000 tonnes of ore during the first five</p>	<p>It is correct that in connection with previous mining at Nalunaq, a system of cavities and mine tunnels was created in the mountain, which today are empty. Here it is the plan to deposit the 750,000 tonnes waste rock generated from the underground excavations that is not suited for construction and road maintenance as unconsolidated waste rock backfill.</p> <p>It has been considered to also deposit tailings in the stopes inside the mountain as underground paste tailings backfill (see Section 5.9.2.2). However, due to a number of disadvantages, including management of bleed water in the previously mined stopes, this solution was not chosen.</p>	<p>A discussion of this potential closure alternative must be included in the revised EIA</p>	<p>A discussion of this potential closure alternative must be included in the revised EIA</p>	<p>DCE/GINR assess that backfill of tailings at mine closure could be a viable DTSF closure alternative, depending on the geochemical profile and leaching behaviour of leachates from the DTSF.</p> <p>To accommodate the request by the Municipality of Kujalleq, DCE/GINR recommend that a discussion of this potential closure alternative is included in the revised EIA.</p>	<p>The EIA will be updated to include a discussion on the use of underground backfill of tailings on closure.</p>

	<p>years. There will be approx. 540,000 tonnes of tailings left. Some tailings are planned to be deposited in the valley near the process plant. Will there be opportunities to deposit tailings in the underground facilities created by mining? In connection with the former mining operation at Nalunaq, all the ore was exported, and significant space have been created (inside the mountain) where tailings could be deposited. Therefore, should the 540,000 tons of tailings from the processing be deposited underground.</p>					
11.2	<p>Environmental studies from the historic mine show that waste rock deposition on the mountainside does no harm which is noteworthy. Can this option become relevant?</p>	<p>In connection with the new mining activities at Nalunaq, the waste rock that is not used for roads, foundations for buildings and the like will be deposited in the old mine tunnels as backfill (see also 11.1).</p>	<p>EAMRA take note of Nalunaq A/S answer and have no further comments</p>	<p>None.</p>	<p>No comments.</p>	<p>No comments</p>
11.3	<p>Will the deposition of tailings in the valley eventually lead to seepage of "soap residues" and sulphide residues from the flotation, so that the trout</p>	<p>Thorough investigations have been carried out into whether this will take place (see Section 12.4). The conclusion is that there is very little risk that</p>	<p>EAMRA take note of Nalunaq A/S answer and have no further comments.</p>	<p>None.</p>	<p>No comments.</p>	<p>No comments</p>

	<p>population is displaced from the river? Not only during the operational period, but also in the years after mine closure?</p>	<p>pollutants will seep into the river in concentrations that exceed the Greenlandic limit values. The trout population in the river will therefore not be affected by the mining activities. After mine closure, the water quality in the river will still be monitored (see the Environmental Monitoring Plan, Appendix II), so that steps can be taken if, for example, contaminants start to seep into the water.</p>				
11.4	<p>The municipality is interested in monitoring of the impact on wildlife, in particular musk oxen around the mine.</p>	<p>A draft environmental monitoring program can be found at the end of the EIA report. The final program will be agreed with the Greenlandic authorities before construction activities begin. Here it will also be agreed whether wildlife, including the population of muskox, should be included in the monitoring.</p>	<p>EAMRA take note of Nalunaq A/S answer and have no further comments</p>	None.	No comments	No comments
11.5	<p>With regards to the options for disposal/burning of waste, reference must be made to the general provisions that burning waste is not permitted in built-up areas.</p>	<p>Waste will be handled in accordance with all relevant regulations, including the statutory order nr. 3 of 7 th January 2021 from The Government of Greenland</p>	<p>EAMRA take note of Nalunaq A/S answer.</p> <p>EAMRA will evaluate the handling of waste</p>	None	No comments	No comments

	<p>Reference is made to Self-Government executive order on waste per 7 January 2021.</p>	<p>about waste (Selvstyrets bekendtgørelse nr. 3 af 7. januar 2021 om affald).</p> <p>An incinerator on site will be used to treat selected waste streams with the exceptions being hazardous waste, hydrocarbon waste and recyclables. The incinerator will be containerized, complete with its own diesel fired generator and will be able to treat 250 kg/day of domestic waste. The emissions from the incinerator will conform to the European Union Directive 2010/75/EU on industrial emissions (see section 5.7.19).</p>	<p>according to Governing Law as part of the ongoing permitting process.</p>			
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12. Sulinermik Inuussutissarsiateqartut Kattuffiat

[Translated from Danish]

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
12.1	SIK expects the mine to be operated in accordance with the guidelines laid down by Naalakkersuisut.	Both the construction of the new mine, the operation and the closure will be carried out in full compliance with Greenlandic legislation where in particular the Mineral Resource Act is important in relation to environmental matters.	EAMRA agree with SIK and take note of Nalunaq A/S comment.	None.	No comments.	No comments
12.2	SIK looks forward to that Nalunaq Gold Mine will use renewable energy sources to supply the area with electricity etc. SIK encourages the use of solar energy, wind turbines and possibly a small waterworks to supply the area with energy.	Renewable energy, including wind, solar and hydropower resources have been considered (see 10.11). See answer 6.1 relating to planned renewable energy feasibility studies.	EAMRA notes that Nalunaq A/S will investigate the potential for use of renewable energy further.	EAMRA encourage Nalunaq A/S to elaborate further on this topic in the EIA report	No comments.	The EIA will be updated to note that renewable energy will be considered as an option where practicable.
12.3	Regarding the camp facilities in Nalunaq Gold Mine: dormitories, kitchen and canteen, laundry and changing rooms as well as leisure	Nalunaq A/S regularly seeks the views of employees regarding the facilities at the Mine site and makes changes as required.	EAMRA takes note of Nalunaq A/S answer and have no further comments.	None.	No comments.	No comments

	buildings and administration office, will be able to accommodate up to 100 people. SIK naturally considers it important that the employees of the Nalunaq Gold Mine have good facilities.					
12.4	The camp will have a sewage treatment plant, drinking water treatment plant, fire protection system, fresh water pumps, diesel generator plant, and it is important that these are built according to Greenlandic building regulations.	All camp facilities are built according to Greenlandic legislation including the building and construction requirements in the Mineral Resources Act.	EAMRA has taken note of SIKs statement.	None.	No comments.	No comments
12.5	SIK will pay attention to whether regular exercises are held to ensure that the crew is well trained in the event of a spill accident. And that exercises are planned to include both emergency procedures in a winter and summer situation. SIK also emphasizes that training is provided in handling oil and chemical spills, for the core employees in the	Nalunaq A/S is very aware that regular exercises, both summer and winter, as well as training and clear procedures for how different spill accidents should be handled are essential to ensure that accidents are handled quickly and efficiently. Therefore, the following is specified in Section 12 on Environmental Risk Assessment: ▪ It is essential to have contingency plans and procedures for detecting	EAMRA has taken note of SIKs statement.	None.	No comments.	No comments

	camp and in the mining area.	and combating operational spills in place, including procedures for operational spills in sea ice; and ▪ Regular training must take place to ensure readiness for emergency responses. Planning must include winter and summer response procedures and training.				
12.6	SIK is satisfied with the announcement that the destruction of explosives, explosive objects, blasting and incendiary agents takes place by burning or blasting in accordance with the Greenland Blasting Act No. 16 of 16 July 2007 on explosives.	Comment– no answer is required by Nalunaq A/S.	EAMRA has taken note of SIKs statement.	None.	No comments.	No comments
12.7	Wastewater from all buildings will be treated in the sewage treatment plant before being discharged to the sea. Since the sewage treatment plant will comply with strict waste water guidelines, the discharge to the sea is, according to the EIA, assessed to have a negligible impact on marine life around the outlet.	Comment– no answer is required by Nalunaq A/S.	EAMRA has taken note of SIKs statement.	None	No comments.	No comments

12.8	SIK is aware that mine personnel may not hunt or fish during the construction, operation or closure of the mine.	Comment– no answer is required by Nalunaq A/S.	EAMRA has taken note of SIKs statement.	None.	No comments.	No comments
No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	
12.9	SIK sees the importance of reducing especially dust pollution inside the plant, at the stock piles and along the roads by watering as often as possible, especially to suppress dust formation.	The crushing and grinding of ore will take place in a building equipped with a dust suppression system and the stockpiles and haul roads will be sprayed during dry periods. To ensure that the dust control activities are effective, measurements of dust dispersal and deposition will also take place as part of the environmental monitoring (see the Environmental Monitoring Plan, Annex II).	EAMRA has taken note of SIKs statement and will take the recommendation from DCE/GINR on Entry 10.10 into consideration for future applications	None.	Please refer to DCE/GINR comments to entry no. 10.1 regarding the “dust management plan”.	A dust management plan will comprise part of the site environmental monitoring and management procedures.
12.10	As regards hazardous waste, SIK supports that it is transferred to Europe or North America where it will be handled in accordance with the applicable regulations in the relevant countries.	Comment– no answer is required by Nalunaq A/S.	EAMRA has taken note of SIKs statement. EAMRA will evaluate the handling of waste according to Governing Law as part of the ongoing permitting process.	None.	No comments.	No comments

12.11	<p>SIK expects that a Greenlandic incineration plant in the area will be used or that ISANI A/S will be used for the disposal of hydrocarbon and wood waste. All hydrogen carbon waste is collected and sent for disposal at a suitable facility in Greenland.</p>	<p>An incinerator on site will be used to treat selected waste streams (see also 11.5). All hydrocarbon waste will be collected and stored and returned with supply ships for disposal at a suitable off-site facility. Plastic and wood waste will, if it cannot be reused on site, be sent to appropriate off-site recycling facilities, either in or outside of Greenland.</p>	<p>EAMRA has taken note of SIKs statement.</p> <p>EAMRA will evaluate the handling of waste according to Governing Law as part of the ongoing permitting process.</p>	None.	No comments.	No comments
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Questions from public hearing meetings related to the EIA report.

Translation services were provided during the meeting.

Speakers used their preferred language from the options: Greenlandic, Danish, English.

13. Public meeting in Narsarsuaq 29/01/2024, at Hotel Narsarsuaq

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
13.1	<p>[Translated from Greenlandic]</p> <p>Whom is it, up to Government, or to whom? I would like to ask when it is supposed to get closed?</p>	<p>[English]</p> <p>The mine will start this year, production. Currently, we have seven-year mine life. Every year, we drill further, further up in the mountain. So, we always try to maintain the mine life.</p>	<p>[Translated from Danish]</p> <p>It is not up to Naalakkersuisut. What is important to us in the administration is that when it (the mine) closes, there is money to re-establish and get the area back to, as far as possible, the way it looked before and clean up. So, when we give a permit, we hope the mine can run well for many years, but it is important to us that they (the company) also have the money to leave the area properly when they do leave it. So, we provide a framework around the project, and then it is up to the company how they can get business out of it.</p>	None.	No comments.	No comments
13.2	<p>[English]</p> <p>You're talking about producing electricity, there's windmills or hydropower plants, is it included in the license to operate, or will that be like a separate project, that you will get everything,</p>	<p>[English]</p> <p>The short answer is no, it's not possible, they're licensed firms, however, it's the vision of the company, and it's something we're bringing up here, to the ministers here, and they have to listen to it, and the mayor. On our mining sites, we need diesel generators to heat the</p>	<p>[Translated from Danish]</p> <p>If green energy is to be developed so that it becomes part of the (mine) project, then this activity will also be subject to an EIA. There will therefore also be a citizen involvement process in connection with the development of green energy.</p>	None.	No comments.	No comments

	<p>information in, and the people in the area can say, you know, what they think about it, or how is that going to be?</p>	<p>Camp, to run the process plant, and so on. What we want to start is the dialogue with the government saying, we can buy electricity of power plants, we can help you build the power plants, and by the way, your local towns can then benefit, because effectively, we are helping, generating revenue for that power plant. We haven't started a formal dialogue with the government about this, but this is very much our intention to do that, and we would want to do that, because then we leave something long term behind, and its good business for us.</p>				
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14. Public meeting in Tasiusaq 30/01/2024 at Skolen

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
14.1	<p>[Translated from Greenlandic]</p> <p>How many years of operations are planned?</p>	<p>[English]</p> <p>Currently we have 7 years. But we believe we can operate for 20 years. What we do every year is we drill further and further in, to make the life of the mine longer.</p>	<p>If the preconditions of the permission changes significantly Nalunaq A/S will have to submit a new Environmental Impact. A significant prolongation of the mines lifespan will require a new/updated environmental assessment and approval by the authorities.</p>	None.	<p>DCE/GINR note that a significant expansion of mining activities will require a separate environmental impact assessment (EIA) prior to potential approval.</p>	Noted.
14.2	<p>[Translated from Greenlandic]</p> <p>Was there a study performed about live fish?</p>	<p>[English]</p> <p>Yes, all of those environmental surveys have been done. We don't have any impact on that area, the mine is far away. The only impact will be on the trout on the river. We participate in a program on tagging salmon. Additional information: A study was carried out to test how the char in the Kirkespir river would react to the discharge of water from the mine. The study showed that no fish died.</p>	No further comments	None.	No comments	No comments
14.3	<p>[Translated from Greenlandic]</p>	<p><i>No answer from the company was requested.</i></p>	<p>The comments must be worded out in the Whitebook.</p>	None.	No comments.	No comments

	General comments with regard to local waste management system and regulation on usage of incinerators.					
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15. Public meeting in Nanortalik 31/01/2024, Virtual

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
15.1	<p>[Translated from Greenlandic]</p> <p>There is a question on drilling. Will be the drilling continuous? That is, 24/7?</p>	<p>[English]</p> <p>The duration of the mine now is for 7 years. So, we will try to extend the mine living. Also, we have drilling from June to October in surrounding areas, to find some more resource</p>	<p>The question is whether the drilling activities will be continuous 24 hours a day/7 days a week. Nalunaq A/S does not answer this question.</p>	None.	No comments.	No comments
15.2	<p>[Translated from Greenlandic]</p> <p>We know, previous company produced gold inside the mine, using chemicals. Also, the ore used to be shipped abroad for further processing. Which method is going to be used? Here I am thinking about usage of chemicals inside the mine, I do not know how harmful it is if there is discharge to the river? However, which processing method are you going to use here? Are you going to ship the ore or produce the gold at Nalunaq, or gold production abroad?<u>to extract</u></p>	<p>[English]</p> <p>Yes, it is correct in the old days they used cyanide. We have now demolished that plant. We are building a new plant outside. We are using the newest technology and there will be no harmful material in the process to capture the gold.</p> <p>Additional information The process plant is designed to have minimum chemical requirement; however, Flocculant will be used in the tailings thickening process and Flux (Borax, Silica, and Soda Ash) in the gold smelting process All areas of the Process Plant will be banded and contained to prevent any</p>	<p>Nalunaq A/S must elaborate on the second stage of gold recovery in their written answer, including the export of gold, residual chemicals etc to the off-site refinery of the flotation concentrate.</p>	None.	<p>As described in the EIA, gold will be recovered in 2 stages, where the initial stage is by gravity separation followed by froth flotation of residual gold associated to various sulphide minerals.</p> <p>DCE/GINR recommend that the company elaborates on the second stage of gold recovery in their written answer, including the export of gold, residual chemicals etc to the off-site refinery of the flotation concentrate.</p>	<p>A stand alone technical note is prepared regarding the environmental fate of process chemicals.</p>

		<p>spillage to the natural environment. The initial processing method is gravity</p>				
		<p>concentration. A Flotation circuit will be added to optimize recoveries. We are going to produce gold doré bars at the Nalunaq site.</p>				
15.3	<p>[Translated from Greenlandic]</p> <p>On hydropower, there has been talk on possible site in Tasiisaarsik for many years. Since it is brought up again, somebody asks when it will be done and how realistic it is?</p>	<p>[English]</p> <p>One of the best way to build these facilities, is that you can use it both for industry which would be in our mine but also for the local community. And the industry can help to put into the investment, and the work to build the power plant and when the mine is finished can be used by like Nanortalik. So this is the least that we would like to discuss with the Minister in Energy to see if we could cooperate to build the green energy to the site also for Nanortalik.</p>	<p>EAMRA notes that Nalunaq A/S will investigate the potential for use of renewable energy further. EAMRA encourage Nalunaq A/S to elaborate further on this topic in the EIA report.</p>	None.	No comments	<p>The EIA will be updated to note that renewable energy will be considered as an option where practicable.</p>

16. Public meeting at Alluitsup Paa 31/01/2024, Virtual

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	Amaroq
	There were no questions to the EIA at the meeting.			None.	No comments

17. Public meeting in Qaqortoq 01/02/2024, at Hotel Qaqortoq

No.	Questions/comments	Nalunaq A/S' answer/comment	Comments from authorities	Changes to EIA	DCE/GINR comments	Amaroq
17.1	<p>[Translated from Danish]</p> <p>I have read the reports the best I can, but what exactly is tailing? Is DTSF tailings deposit going to be completely dry? There is also a process called thickening - what do you add to thicken the tailings?</p>	<p>[English]</p> <p>Summary of the answer: When we mine the material (the ore), it becomes consolidated rock that is like my fist in size. The material is then put into the crushing plant. The first step is the so-called dual crusher that makes the material like this size (knuckle). Then the material goes into a mill, which is like a treadmill with steel poles, and turns around, and the material will be like flour. We then add</p>	No further comments	None.	No comments.	No comments
		<p>water, and it is piped to a cone which shakes, and then the gold falls off because it's heavy. Then the material goes to two processes and then we end up drying it to a level that is completely dry. Then the material is taken out of the plant and stacked in a designated area. When we stack it, we first put a layer (of tailings), then material from inside the mine which is not having any gold, and you put that in between, so it becomes condenses and holds very well together, and then you have a dry stack tailings area. Once you have done that, you start putting clumping or</p>				

		<p>vegetation on top, so it blends into the environment.</p> <p>Additional information Tailings are the materials left over after the process of separating the gold from the uneconomic part of the rock. After thickening, tailings will be filtered to remove moisture using a filter press. The DTSF is an uncapped facility and so will not be completely dry. Flocculent is used in the tailings thickening process.</p>				
17.2	<p>[Translated from Danish]</p> <p>This tailings depot it's going to be there for 1000 years, or it will be there forever, that's how I understand it. And then there will be monitoring of it. This is what you will leave behind on the day the place is vacated. And there is also a drain, so when rain on it</p>	<p>[English]</p> <p>Summary of answer: We have calculated (the impact of) a 1000-year flood and elevated the area (for the tailings deposition) quite a bit with large rocks. We are drying it (the tailings), and it costs</p>	<p>Nalunaq A/S must elaborate the answer further regarding Ecotox tests involving fish</p> <p>The concept of half-life for relevant process chemicals and leaching rates of elements from the DTSF</p>	None.	<p>DCE/GINR assess that the company did not yet provide a written response under entry 17.2 regarding:</p> <ul style="list-style-type: none"> - Ecotox tests involving fish - The concept of half-life for relevant process chemicals and leaching rates of elements 	<p>A stand alone technical note is prepared regarding the environmental fate of process chemicals.</p>

					from the DTSF	
	<p>[the DTSF], and snow on the dry deposit, then there will be a flow (of water) into the river. And I know there have been some studies on how it affects the char. In those experiments, it was found that all the char survived, but it is not clear for how long.</p> <p>And another thing, if the tailings depot is to be there forever, what is the half-life and when is it no longer dangerous?</p>	<p>us a lot of money to do, and you need energy. We then stack it with fine material, big material, fine material, just like the soil is. It is not only fine material, and it (the deposition) is designed and engineered to stay like this and just be part of the mountain.</p> <p>Additional information Please see section 10.4</p> <p>The tailings facility is designed to provide long term stability from erosion and is located so as to mitigate the risk of contamination to groundwater and surface water in the Kirkespirdalen. Construction of the facility will be subject to a formal process of construction quality control (CQA) to verify that what is designed is built.</p>				
17.3	<p>[Translated from Danish]</p> <p>In the DCE report, they question the location of the tailings facility,</p>	<p>[Translated from Danish]</p> <p>We have investigated several different options, which have different advantages and disadvantages. Our overall assessment is that it is most optimal to have it as suggested. In</p>	Please refer to answer/comment regarding entry 4.1	None.	Please refer to DCE/GINR's comments at entry No. 4.1.	A report on the investigation and assessment of potential alternative locations has been provided to EAMRA and DCE.

	because it is right next to the river and because there will be some runoff from the tailings (to the river).	relation to the river, a strong protection is made so that the river cannot reach the tailings facility. Huge stone blocks are laid out together with the tailings material. This will ensure that there is no risk of the river reaching it. Additional information Please also see answer 10.4				
17.4	[Translated from Danish] Who will keep an eye on it (monitoring the tailings facility)? Who will carry out the studies?	Additional Information The company agree with the answer given by the authorities	[Translated from Danish] It is clearly both the company's responsibility and the authorities' responsibility. It will be a requirement that an environmental monitoring program be established, which runs continuously in the very first period. The company is required to carry out some measurements itself,	None.	No comments.	No comments
			but we come on regular inspections. We usually take our advisers from Denmark and employees from the Nature Institute with us, so we have the best expertise with us. This means that measurements are made both from the company's side, and the authorities also make some control			

			measurements, to ensure that the limit values that we set are respected during the life of the project.			
17.5	[Translated from Greenlandic] Summary of the question: Concerns about pollution in fishing areas near mine.	[English] It's just the only thing I can say is, as a fisherman myself, we will make sure that we will be extremely cautious because this is one of the biggest enjoyments for myself (and the community) to be part of. This is why it's important to us to leave behind things as well as we possibly could. So, to your question earlier, that we are obviously doing mining, we're making a hole in the mountain, and we understand that. We're not saying we're not doing	The comment should be cited in more detail. What are the concerns raised?	None	No comments.	No comments
		anything, but it's the question of how we can minimize the impact and try to make the site as a kind of a long-term opportunity for Greenlanders, rather than just mine and then leave. This is why we think about energy, we think about reforestation, we think about all of these different initiatives that we're working in around them. Additional information Also see answer 14.2 and 17.6				
17.6	[Translated from Greenlandic]	[Translated from Danish] An extensive monitoring program is being made, and one of the	See comments to entry 4.1. Nalunaq A/S must submit a detailed plan for monitoring and	None.	Please refer to DCE/GINR's comments at entry No. 4.1.	A technical note on potential water treatment options, should they be

	<p>I am however kind of apprehensive of possible pollution of the water. There is a very large discharge of water at the site after all and I am concerned about the claims that the water will be cleaned very thoroughly. The process water. Which contents are going to be removed. Also, is the discharged water going to be as clean as the water before mining starts? That is what I like to know since it is claimed that process-water is going to be thoroughly cleaned before it is discharged.</p>	<p>things we focus a lot on is precisely the water. And the water must comply with all the requirements set by the authorities. This means that the water must be clean in the Kirkespir River. It also means in relation to the fish in the sea that nothing should come out of the project that can damages the sea in any way. But a program is being made, it includes that regular samples are taken to document the water quality, and if we see signs of a change in the wrong direction, then action is taken in relation to carrying out purification, so that the water in the Kirkespir River not affected.</p>	<p>possible treatment techniques before a permission is given.</p> <p>Water quality will be part of the authorities monitoring.</p>		<p>concerning water treatment techniques.</p>	<p>required, has been provided to EAMRA and DCE. Environmental monitoring and management procedures are being put in place to include monitoring of the river.</p>
17.7	<p>[Translated from Danish]</p> <p>It surprises me that you (the company), in relation to the household waste, want to burn it. How did you get permission to do so? Are you allowed to burn waste? Is it still possible to burn</p>	<p>[English]</p> <p>What we have designed for is an incinerator, which has been built on the newest technology. But we have been in discussion with the municipality about where we should take (the waste) for example to Nanortalik or another place, so we're happy to do that. But our technology is sort of set up and what matters is that it is as clean as humanly possible.</p>	<p>[The Naalakkersuisoqs (Ministers) Kalistat Lund remarks on wastehandling must be included in full as stated in the minutes from the meeting;]</p> <p><i>"I do not know if the question on</i></p>	None.	No comments.	No comments

	<p>waste in settlements or the cities? I am anxious to hear whether you have been granted a dispensation.</p>	<p>The same thing goes with any kind of human waste. We have, waste plant, a septic tank, and waste plant so effective you can almost drink from it, which is not always the case from the towns in Greenland. So, we are very proud of that because we want to have that at the top of the agenda - I mean by this,(I don't know) if you know that I've worked in the energy industry in Iceland and other countries.</p>	<p><i>waste management will be answered. However, I have noticed it from the start and I said back then that burning of waste is no longer allowed in Greenland. And should not be done. It is so on mine sites and villages as well. We had a dialogue with Municipality of Kujalleq last few days on these issues and solutions. That is why we have started to transport the waste. We will also start transporting waste from areas outside of towns. And there will no burning of waste in Nalunaq"</i></p> <p>EAMRA will evaluate the handling of waste according to Governing Law as part of the ongoing permitting process.</p>			
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17.8	<p>[Translated from Danish]</p> <p>It is mentioned that there are few musk oxens. The municipality intent to count the musk oxes in the area because the hunters say there are many – how will this affect the project? Can hunting be done?</p>	<p>[English]</p> <p>Our experience with the musk oxen in the valley is that they generally stay high up in the valley. However, I have met musk oxen further down. There are especially a couple of times some males that have stayed down by the tent camp. But what I have seen is peaceful coexistence with the mining project. As far as I know, there have been no conflicts with musk oxen. I imagine they might still be there. Surely, they can also be up in the valley. As for the mining operation itself, you can't have musk oxen walking around when there are people driving around on the roads, but outside the mine area itself, you can have musk oxen, like everywhere else.</p>	<p>[Translated from Danish]</p> <p><i>Citation Zenica g. Larsen EAMRA: "We have been told in the EIA report that there are relatively few musk oxen. If a count shows that there are more musk oxen in the area than we thought, then of course it is something we have to decide on. But it is new to us if there are problems with the animals or a conflict with hunting activities in the area. But it is of course something that we will decide on and assess how it should be handled."</i></p>	<p>The mentioned count of musk oxen has been made and is very close to being finalized and published.</p> <p>NALUNAQ A/S should include the results in the EIA, if publication of the results are within the timeframe of the finalization of the EIA.</p>	No comments.	If the results of the musk oxen survey are available they will be appended to the EIA.
17.9	<p>[Translated from Greenlandic]</p> <p>EIA says that some of the tailings will be shipped away. What exactly is going to be shipped away and why are will they be shipped away and where will these tailings shipped to? Why [transport some of the tailings] to Canada?</p>	<p>[English]</p> <p>Summary of the answer: 70% of the gold is recovered at Nalunaq. The rest, you cannot recover unless you put it into a smelter. We don't want to have this in Greenland for environmental reasons, so we move the material to a plant in Canada.</p>	Nalunaq A/S must add a remark concerning the question on shipment of tailings – the answer covers shipment of ore.	None.	No comments.	No tailings will be shipped off site only ore concentrate. Tailings are placed in the DTSF as documented in the EIA.

17.10	<p>[Translated from Greenlandic]</p> <p>In previous mining activities cyanide was used. There surely will be waste of that product. Where did it end up?</p>	<p>Additional information</p> <p>The Company agree with the answer given by the authorities</p>	<p>[Translated from Danish]</p> <p>In the former mine was a facility where gold was extracted with cyanide inside the mine. We were up (at the mine) in October this year (2023), and similarly in 2019, 2017, 2016, 2014, 2013 and 2012, we took samples of the water in the Kirkespir River and inside the mine, and they were also analyzed for cyanide. The results we have obtained from this year show that there is no measurable cyanide in nature. It was not expected either, because cyanide in nature reacts with oxygen and sunlight and is thereby broken down.</p>	None.	No comments.	No comments
17.11	<p>[Translated from Greenlandic]</p> <p>Concerning green energy. The Company will initially use diesel for power generation and wants to construct maybe two small hydropower generators during operational phase. What percentage these generators can</p>	<p>[English]</p> <p>If in Nalunaq we were to develop wind and hydro energy, it would be only in a smaller scale, and it would not provide all of the energy we would need for the plant, so it would maybe give 1/3 of our energy requirements. We want to explore (other) options, for example, up in Tasiilaq where you have a close to 5 MW power option. We don't need all 5 MW. The municipality</p>	<p>[Translated from Greenlandic]</p> <p>It should be noted that this comment is a statement from the Minister Kalistat Lund Concerning the question;</p> <p>I would like to tell that we are aware of that diesel will be phased out, also internationally. Currently international community has not set a</p>	None.	No comments.	No comments

	<p>provide? Very large hydropower plants are shown in the picture, but in there report there are only small plants.</p>	<p>and Nanortalik could use what they need, and then we could use the rest of it. By doing that, based on the economic model, number one, it is obviously very good for the environment, but it is also economical because running on diesel, the cost of energy is very expensive. Whereas, for hydropower, it is expensive to build them but once they are operating it is less expensive and more secure. So, that is the kind of dream we have, to create these kinds of energy infrastructures also for Qaqortoq and Narsaq. And we should also think about the town focusing on the Narsaq to run completely on renewable energy. One of the factors of this, now referring to my old industry which is renewable energy, is the shift in terms of energy demand actually dipping. From diesel to electricity, would make a significant impact. It's really helpful for the government because they don't have to import all these fuels. This is the benefit we have in Iceland; 90% of our energy is renewable, geothermal, and hydro power. We built it when we got the aluminum smelters in Iceland; the industry built it and following that, tourism grew, etc., just like what we're trying to say. A lot of money can come from the mines,</p>	<p>date for final phasing out. We have hoped that date would be set in Dubai recently for finally phasing out use of the polluting fuels like diesel, gasoline etc. However, it is now expected that these dirty energy sources will become more expensive than clean energy sources next 15 years. We will participate from Greenland in that endeavour. Large lake like Tarsartuup Tasersua, Tasersiaq in Maniitsoq area. If these are developed there will four times energy of all the energy consumption in Greenland; in marine navigation, airplanes, household heating and illumination. So, it is our very clear objective that mines that cannot be supplied with hydropower will be supplied with wind energy. If it is not possible, then our goal is we become capable of producing clean fuel ourselves. As members of the global community our goal is to phasing out dirty carbon based</p>			
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		<p>and then they will finish, but can we leave something behind for the longer period? That's the discussion we need to have with the government. We haven't made any agreements; this is just our wish right now. We would want to do this right, and we need to work and try to see if it can be done.</p>	<p>energy production by 2050; therefore future is bright here in Greenland in terms of these goals. The future is bright because our objective is to produce our own clean fuel instead spending much money for importing polluting carbon based fuels like we do today. So, we are participating in global effort.</p>			
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