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### **Consultation response regarding SIA and EIA reports for Nalunaq gold mining project**

WWF (World Wildlife Fund) in Greenland has reviewed the consultation material "Consultation of SIA and EIA reports for Nalunaq gold mining project" and has the following comments solely on the EIA part.

#### **Generally**

It is positive that DCE/GN assesses that the current EIA report is an improvement compared to the previous version from the preliminary consultation. It would be useful to provide more detail on how it differs from the previous statement with precise points.

However, WWF in Greenland has also noted that DEC/GN has assessed that:

*"However, some parts of the EIA draft conclusions are based on either theoretical assumptions or desk and modelling studies. These conclusions are inherently subject to uncertainty regarding the quantification of potential environmental impacts, project risks and mitigation strategies."<sup>1</sup>*

WWF in Greenland endorses DCE/GN's call to carry out follow-up actions in order to provide sufficient data to verify assumptions in the EIA report and quantify the potential environmental impacts and risks, as well as mitigation strategies.

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<sup>1</sup>[https://naalakkersuisut.gl/-/media/horinger/2024/01/0501\\_nalunaq\\_guldmineprojekt/uafhaengig/n2023\\_73\\_dk.pdf](https://naalakkersuisut.gl/-/media/horinger/2024/01/0501_nalunaq_guldmineprojekt/uafhaengig/n2023_73_dk.pdf)



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### **Non-technical summary in Danish and Greenlandic**

As described in the EIA guideline, the purpose of the EIA process is, among other things, to form the basis for public participation in the decision-making process. The *Non-Technical Summary* is particularly important in this context, as it is intended to provide a brief and concise overview of the project and inform citizens about the main environmental impacts expected and how these will be avoided.

WWF in Greenland therefore urges that especially the language in *the Non-Technical Summary* is understandable and easy to translate into Greenlandic. In several places in the summary, far too long sentences are used, which results in some parts of the Greenlandic text not being understandable and easy to read. The final EIA report must be changed, otherwise it may result in Greenlandic-speaking citizens not being given the opportunity to relate to the project on an informed basis. Short and concise sentences are also preferred for the rest of the exposition, although some complexity cannot be avoided.

### **The location of DTSF must comply with all criteria set by DCE/GN**

WWF in Greenland sees it as strictly necessary that DCE/GN's recommendations for an alternative location in order for the tailings landfill (DTSF) to be complied with before any approval of the project. All of the 4 criteria below must be met:

1. *The described alternative should be placed on bedrock as opposed to the non-consolidated sediment above the local aquifer in Kirkespirdalen.*
2. *In contrast to the larger catchment area of Kirkespirdalen with associated flood risk, the described alternative should have a limited hydrological catchment area.*
3. *Unlike the preferred locations close to the Kirkespir river, the described alternative should be located in an area where DTSF cannot be eroded by nearby rivers.*
4. *Unlike the preferred solution where there is direct discharge to the Kirkespir river, the described alternative should not have outlets or drainage to sensitive recipients such as Kirkespir Elven<sup>2</sup>.*

This is important in order to limit and preferably eliminate the identified environmental risks posed by DTSF, instead of managing these risks with technical solutions.

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<sup>2</sup> Bach, L, Juncher Jørgensen, C, Bomholt Dyrholm Jacobsen, I, Jia, Y. 2023. DCE/GN – Environmental assessment of the 'Nalunaq Gold Project. Environmental Impact Assessment, March 2023', Aarhus University, DCE - Danish Centre for Environment and Energy . – Scientific briefing. 4 April 2023 | 73



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### **Use of chemicals and consequences are not described well enough in the EIA report**

It is positive that the company will not use cyanide for reprocessing and will instead use gravity sorting and flotation. However, other chemicals must be used for flotation and there is a lack of information on their toxicity, biodegradability and accumulability, and this must be included in the final EIA report.

There is also a lack of consideration of alternatives to the use of the most environmentally harmful chemicals.

In any case, there must be high environmental requirements for the discharge of wastewater, as well as self-monitoring in connection with discharge to the Kirkespir river to ensure that the aquatic environment in general, and the population of trout in particular, is not negatively affected by mining.

This also applies to the chemicals that will be used to make tailings for dry. Here, the need for requirements for self-monitoring is also essential, as well as cleaning to avoid release to the environment.

### **Metals**

The increased concentrations of, among other things, cadmium and arsenic in ores are worrying. Cadmium, which is known to bioaccumulate and pose a significant health risk. Arsenic, which is also a hazardous chemical for the environment, is consistently elevated in both HCT and the sporadic shake test tests, cf. section 5.11.3 of the report.

WWF in Greenland assesses that it is not clear enough from the report how the company intends to prevent and prevents the increased concentrations of cadmium and arsenic, as well as other metals in the new project. It is very important to be clearer in the statement, as the area is also used by the local population. It is expected that the company will be required to document that there are no emissions of too high concentrations of metals.

### **Environmental impact of dust**

In the previous projects with the production of gold in the area, there has been insufficient dust control. Pollution by particulate matter should be subject to higher requirements, including dust mitigation measures such as irrigation of gravel roads or the construction of roads with solid surfaces. Great attention should also be paid to dust and water from the planned depots, where disposal in the mine itself is clearly preferable.



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WWF in Greenland also agrees with DCE/GN's recommendation that the assumptions "*regarding potential dust impacts from the mining project be verified in connection with the environmental monitoring via field measurements at representative sites over time. This should be done to demonstrate that both concentrations and deposition levels of dust comply with the environmental air quality criteria for mining in Greenland*"<sup>3</sup>.

### **Renewable Energy Sources and Use of HFO**

The company's study shows that it is possible to install wind turbines and solar cells, but it is concluded that it should not be used as they are not technically or economically viable in relation to the current project design. The detailed arguments do not appear in the EIA report.

WWF in Greenland considers this a shortcoming that should be addressed.

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 of production based solely on fossil fuels. The emission of black carbon has a very harmful effect in the Arctic, where the reflection of snow and ice is limited by the dark particles and accelerates the warming of the Arctic.

WWF in Greenland also wants HFO (heavy fuel oil) not to be used as fuel for ships providing transport for the project. The international organization IMO has introduced a ban effective from 2024, (with the possibility of exemption), as HFO poses a major threat to the environment by spills. The Government should take the lead and phase out HFO as soon as possible and demand this before any approval of the project, as an amendment to the Act on the Protection of the Marine Environment in the Exclusive Economic Zone of Greenland aims to implement a ban on the use of HFO, which must go through legislative consideration in the Danish Parliament in February-March 2024.

Sincerely,

**Talea Weissang**

Environmental specialist

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<sup>3</sup>Bach, L, Juncher Jørgensen, C, Bomholt Dyrholm Jacobsen, I, Jia, Y. 2023. DCE/GN – Environmental assessment of the 'Nalunaq Gold Project. Environmental Impact Assessment, March 2023', Aarhus University, DCE - Danish Centre for Environment and Energy . – Scientific briefing. 4 April 2023 |73



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