

[Letterhead of Sulinermik Inuussutissarsiuqartut Kattuffiat]

Postboks 9, 3900 Nuuk

Mineral Licence and Safety Authority (*Råstofstyrelsen*)

Postboks 930

3900 Nuuk

Nuuk, 29-02-2024

No: D-24-18224

Consultation response to the draft EIA and SIA statements regarding the Nalunaq gold mine project in South Greenland

SIK firstly would like to thank for the opportunity to submit consultation responses to the draft EIA and SIA-statements concerning the gold mine project in South Greenland.

SIK approves the draft EIA and SIA report regarding the Nalunaq Gold Mine project and has the following comments to the reports:

Social Impact Assessment 2023

- The Greenlandic labour market is characterized by bilateral negotiations between employer and employee organisations. The most important parties are the Greenlandic trade union SIK, which represents virtually the entire Greenlandic workforce.
- *The trade union SIK is ready to start collective bargaining negotiations with the owners of Amaroq Minerals for the employees who will work in the Nalunaq Gold Mine.*
- *SIK considers, based on the SIA statement, that Nalunaq is determined that the working conditions in every respect must be in accordance with the legislation in Greenland, for example in relation to working hours, overtime, remuneration and benefits.*
- *The work at the Nalunaq Gold Mine is planned as a rotation arrangement with 30 days in the mine area and 26 days at home for posted foreign labour and for local labour, 14 days in the mine area and 14 days at home. SIK would like to start a dialogue about this in connection with entering into an agreement with the company.*
- The project will create employment opportunities for Greenlandic workers, with 100 employees in the construction phase and around 175 employees in the operational phase.
- *SIK is satisfied that the use of Greenlandic labour is accommodated in the construction phase and in the operational phase.*

Job functions:	Number of employees:
Mining	66
Processing	42
Camp	28
Shop, warehouse and machine operator	16
Administration	6
Safety, health, environment and quality	9
General and administrative services	9
Total	178

- *In particular, that both skilled labour and unskilled labour are catered for. Especially for the local area's attraction of labour from Nanortalik and its surrounding settlements.*
- *SIK is also satisfied that there will be cooperation with the Mining school (Råstofskolen) in Sisimiut and other vocational training institutions on the establishment of vocational and technical education (such as courses and competence development projects for the unskilled).*
- *SIK is also satisfied that training is carried out prior to employment and of the side employee training courses in collaboration with local authorities, educational institutions and SIK.*
- *SIK also finds it positive that a strategy is drawn up for competence development of Greenlandic workers, including retraining and upskilling.*
- *SIK supports the use of Greenlandic companies, especially from the nearby area of Nanortalik and Qaqortoq to provide services and supplies to the Nalunaq Gold Mine, including:*
 - Consumables for the camp.
 - Security services.
 - Barge transport and sea/helicopter transport.
 - Furniture for the camp and office.
 - Surface drilling equipment.
 - Fuel, oil and spare parts.
 - Surface drilling equipment.

SIK also considers it important to engage in dialogue with Air Greenland, Royal Arctic Line and ISANI A/S regarding waste, and with Tusass regarding the establishment of the necessary communication services.

- *SIK emphasizes that the working conditions and the working environment are in accordance with Greenlandic and Danish legislation and international standards. This is to minimize the number of work accidents in the Nalunaq Gold Mine.*
- *SIK considers it important that workplace assessments (APV) are prepared before the construction phase, so that it is in accordance with the requirements in executive order no. 1168 on the workplace assessment in Greenland.*

- Overall schedule for the project

Construction and start-up phase 2023-2024	Preparation of camp and mine, 1 year
The operating phase	With expected operation started this year, 5 years
Decommissioning and restoration	Buildings, plant and equipment are removed, 1 year
Post closure	Monitoring the potential impact after the closure of mining operations; 5 years

- *SIK expects the SIA report to be followed to the letter and hopes that the life of the mine can also continue after 5 years of operation, with new gold deposits in the area. So that the employment of the Greenlandic workforce may still be possible after the discovery of new gold deposits in the area. SIK expects the operational phase to begin during 2024 to the benefit of the Greenlandic society. It is therefore important to point out that collective agreement negotiations with SIK are initiated regarding the employees' salary and employment conditions.*
- Regarding the melting of the gravity concentrate to doré in the "gold room".

- *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 management of waste
- *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.*
- *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.*
- Royalties and corporate taxes
- *SIK would like Royalties to benefit society, especially in Nanortalik and the surrounding settlements. That they benefit culture, sports associations, primary schools, day care centres etc.*
- *As far as income taxes and company taxes are concerned, SIK would like to see that this will benefit the whole of South Greenland, so that unemployment in particular can be reduced in the area.*
- *That there is frequent dialogue with the Municipality of Kujallaq and regular meetings with the local council in Nanortalik and the settlement boards in the area.*
- *That commercial fishermen and hunters in Nanortalik are also used, especially in connection with the purchase of local raw materials, for the benefit of fishermen and hunters in the area.*

The Environmental Impact Assessment (EIA), Nalunaq Gold Project

- *SIK expects the mine to be operated in accordance with the guidelines laid down by Naalakkersuisut.*
- *SIK looks forward to Nalunaq Gold Mine using renewable energy sources to supply the area with electricity etc. SIK encourages the use of solar energy, wind turbines and possibly a small hydropower plant to supply the area with energy.*

Regarding the camp facilities in Nalunaq Gold Mine:

- *Dormitories, kitchen and canteen, laundry and changing rooms as well as leisure 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.*
- *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.*
- *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 the 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 camp and in the mining area.

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.

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 assessed according to the EIA assessment to have a negligible impact on marine life around the outlet.

SIK is also aware that mine personnel must not hunt or fish during the construction, operation or closure of the mine.

With the above-mentioned comments, SIK agrees with the consultation draft for the EIA and SIA reports regarding the Nalunaq Gold mine project. And as mentioned, SIK is ready for a dialogue with Nalunaq about pay and working conditions for the employees at the mine.

SIK has no further comments on the consultation draft.

Best regards

[signature]

Axel Lund Olsen | SIK