TRANSLATED FROM DANISH

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[Letterhead of Sulisitsisut - Grønlands Erhvery, Greenland Business Association]

Department for Business, Trade, Raw materials, Justice and Equality

Sent via e-mail mlsa@nanog.gl.

Nuuk, 23. February 2024 Letter N: D24-3532 Case N: S24-106

Consultation response to the EIA and SIA on the Nalunaq Gold Mine Project.

Greenland's Business Association (GBA) has reviewed the above statements and based on this, has the following consultation response:

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.

In addition to the intention to use Greenlandic labour to the greatest extent possible, it is mentioned in the SIA report that there are positions that require a specific educational background.

Since the SIA itself mentions that Greenlandic workforce will be trained in relation to the prerequisites (skills) that the project calls for, GBA assumes that this, if possible, also applies in relation to the positions that the SIA mentions will be occupied by foreign labour.

In the later respect, GBA agrees with the point of view expressed by the Greenland Police in its letter of 31 January this year, according to which foreign labour cannot be "transported directly to the area from Narsarsuaq" until the necessary permits are available to bring this foreign labour into Greenland. It is also assumed that the experience gained from the previous gold exploration is used in the current project to the extent that it is possible, so that the project can be carried out responsibly and to the benefit of Greenlandic society from a health, economic, employment, safety, and environmental considerations.

Yours sincerely Lars Krogsgaard-Jensen Legal Consultant