

Attn:  
Ministry of Business, Trade, Mineral Resources,  
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**Consultation of SIA report on Nalunaq gold mining project**

Air Greenland has no comments on the EIA report. Air Greenland has the following comments in the SIA statement:

In the Social Impact Assessment (SIA) for the Nalunaq Gold Project of 28 December 2023, Air Greenland has been mentioned 10 times, primarily under the following topics:

1. Use of Greenlandic companies
2. Pressure on public infrastructure and services
3. Aviation and transport services

**1. Use of Greenlandic companies**

With regard to the use of Greenlandic companies and pressure on the public infrastructure, mention is made of the importance of establishing a close dialogue with Air Greenland. Risks are generally mentioned that Greenlandic companies may lack sufficient capacity to invest in supply, as well as be non-competitive compared to international companies.

In relation to dialogue, Air Greenland welcomes this. It is further elaborated that such a dialogue should be divided into two main tracks:

- a. Scheduled services, including passenger service contracts
- b. Other commercial air services and services

With regard to risks, Air Greenland must claim that the Air Greenland Group is a professionally run airline under Danish and Greenlandic company law. Air Greenland has invested more than DKK 1 billion since 2019, primarily in fleet renewal, of which funding has been obtained on international financial loan markets. Air Greenland is therefore in a position to solve all types of air transport services in Greenland and to invest in additional capacity if there is a commercially viable basis.

## **2. Pressures on public infrastructure and services, including transport infrastructure (Section 12)**

In relation to the pressure on the airborne commercial traffic in South Greenland, especially out of Narsarsuaq, Qaqortoq and Nanortalik, Air Greenland sees itself in a position to expand capacity in the region if the Nalunaq Gold Project results in such a significant increase that there is a commercial basis for expanding the existing timetable.

As mentioned in SIA, Air Greenland and Naalakkersuisut have entered into a service contract for passenger transport in South Greenland until 2030. A dialogue on expanding capacities for airborne scheduled traffic should therefore primarily take place between Air Greenland and Naluna A/S or its owner representatives. This takes into account that Air Greenland, as a service contract provider in South Greenland, possesses knowledge of capacity limits, the wishes of other commercial stakeholders, and alternatively to absorb commercially the increased traffic demand so that it does not burden the service contract's social obligations inappropriately.

Air Greenland also notes that section 12.1 Air transport concerning, among other things, the development of airport extensions has not been updated. Thus, information is fsva. phased runway in Nanortalik, completion of Nuuk and Ilulissat lu ports, and final construction of Qaqortoq lu harbor not accurate.

The SIA is dated December 28, 2023, however, there was already October 12, 2023, public the following press coverage regarding the status of the airport construction in Qaqortoq ([https://sermitsiaq.ag/kair-landet-a the Ale-lu port construction-i-Qaqortoq](https://sermitsiaq.ag/kair-landet-a-the-Ale-lu-port-construction-i-Qaqortoq)).

## **3. Aviation and transport services**

### *a. Scheduled services, including passenger service contracts*

As stated above, Air Greenland, as the provider of the service contract for airborne passenger transport in South Greenland, will be the closest interesting to discuss the impact of Nalunaq A/S on traffic flow. At the date of submission of this response, such a dialogue has not yet begun. Air Greenland looks forward to any inquiries from Nalunaq A/S and/or its owners and partners via the undersigned.

### *b. Other commercial airborne services and services*

Includes all air services and services besides scheduled traffic, primarily helicopter activities within surveys, research, passenger transport outside government-approved landing areas.

For helicopter operations outside government-approved landing sites, the so-called Specialised Operations (SPO) cf. EASA (European Union Avia on Safety Agency), particularly high minimum standards should apply to operations in Greenland, given the naturally limited factors for e.g. health services in South Greenland, as well as Greenland in general.

Air Greenland generally encourages that minimum standard for work and rest regulations, as well as avia on safety, be defined more clearly in relation to classification criteria for transport tasks in Greenland. Minimum standards for air transport operators should be set on the basis of internationally recognised industry standards, such as the Basic Avia on Risk Standard (BARS),

which is increasingly being demanded by major international players in mineral research and extraction, although not yet is a legal requirement in Greenland.

Other relevant air services, e.g. chartering of phased aircraft on domestic and/or international flights, cargo (cargo), dispatch and travel agent services, are currently offered by, among others, the Air Greenland Group. In cases where Greenlandic providers exist, given the size of the Nalunaq Gold Project, it should be possible to bid for services and services in tenders where objective.

Classification criteria - especially price, quality and local anchorage/ownership - are included.

Nuuk, 01 March 2024

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