

White Paper

EIA

(Environmental Impact Assessment)

Hearing responses

Greenland Anorthosite Mining A/S (License no. 2019-162)

Version 01 (3/6-2025)

Introduction

Greenland Anorthosite Mining A/S has received six official hearing responses in connection with the public hearing process for the company's EIA and SIA reporting in the period 18-12 2024 -19.2 2025, 4 of which have no comments on the project.

The White Paper for EIA and SIA includes hearing responses from Søfartsstyrelsen, the National Police, Ministeriet for Samfundssikkerhed og Beredskab, Kommuneqarfik Sermersooq, Anlæg-Miljø, SIK and Greenland's Business Association. In addition, questions and answers from Greenland Anorthosite Mining's two citizen meetings in Nuuk on 20.1 and 22.1 2025 are included.

Questions related to the company's EIA are answered in the EIA White Paper, and questions related to the company's SIA are answered in the SIA White Paper.

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Hearing responses received regarding EIA

1. Hearing response from Søfartsstyrelsen

No.	Question/comment	GAM's response/comment	EAMRA's response/comment	Changes in page or section of EIA	DCE/GINR comment (June 12 th 2025)
1	<p>To the MLSA</p> <p>Thank you for the opportunity to comment on the below.</p> <p>The Danish Maritime Authority has no comments on the EIA and SIA report regarding Greenland Anorthosite Mining's anorthosite project.</p>	No comment.	No comment.	No change.	No comment.

2. Hearing response from the National Police

No.	Question/comment	GAM's response/comment	EAMRA's response/comment	Changes in page or section of EIA	DCE/GINR comment (June 12 th 2025)
2	<p>To the MLSA</p> <p>It is the National Police's immediate assessment that the bill has no relevance to the police. The National Police's j.nr. is 2025-172907.</p>	No comment.	No comment.	No change.	No comment.

3. Hearing response from Ministeriet for Samfundssikkerhed og Beredskab

Nr.	Question/comment	GAM's response/comment	EAMRA's response/comment	Changes in page or section of EIA	DCE/GINR comment (June 12 th 2025)
3.1	<p>Thank you for the consultation regarding Greenland Anorthosite Mining's (GAM) project.</p> <p>To begin with, I would like to mention that the responsibility for the pilotage area, sea markings, nautical information and navigational safety in connection with ex. mining projects, cf. royal resolution of 29 August 2024, together with the Safe Waters department, has been transferred from the Danish Maritime Authority (SFS) to the Danish Emergency Management Agency under the Ministry of Community Safety and Emergency Management (MSSB). Responsibility for the ships and their inspection, the polar code, etc. remains with SFS.</p>	No comment.	No comment.	No change.	No comment.

	<p>The EIA and SIA assessments (assessment of environmental impacts and assessment of social sustainability) have been retrieved from the link in the consultation below, and the background report on navigational safety (NSI) has been retrieved from the company's website.</p> <p>When reviewing the EIA and SIA, only matters relating to MSSB's areas of responsibility within navigational safety have been considered. The Navigation Safety Analysis (NSI) has been reviewed and compared with previous comments.</p> <p>As the Danish Maritime Authority has also received the consultation, no comments will be made on matters that may relate to the Danish Maritime Authority's jurisdiction.</p> <p>Sikre Farvande has the following comments:</p> <p><u>SIA</u></p>				
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	<p>This statement includes societal impacts and not navigational safety. Therefore, no comments.</p> <p>It is noted, however, that it is mentioned here that ships of up to 45,000 DWT, length 180m, width 28.5m and draft 10.5m are expected, and that the quay facilities will be floating barge quays.</p>				
3.2	<p>EIA</p> <p><u>3.2 Maritime regulations, obligations and guidelines</u></p> <p>The link provided to regulations etc. on the Danish Maritime Authority's website is not correct – it should be https://www.soefartsstyrelsen.dk/sikkerhed-til-soes/arktis</p> <p>(MSSB does not yet have its own website with, among other things, a list of regulations).</p>	The link has been updated.	Noted.	Section 3.2 page 25.	No comment.

3.3	<p><u>4.7 Infrastructure</u></p> <p>This includes mention of port facilities, navigation routes and aids for fjord navigation. However, there is no detailed description of expected routes or aids. It is also mentioned that ships of up to 45,000 DWT, length 180m, width 28.5m and draft 10.5m are expected, and that quay facilities will be floating barge quays.</p>	<p>Further information on shipping routes and aids is described in section 5.10.</p> <p>In addition, reference is made to the company's NSI.</p>	Noted.	No change.	No comment.
3.4	<p><u>4.9 Ship traffic</u></p> <p>It is noted that it is the SFS that is responsible for navigation safety issues with mining projects in Greenland. This should be addressed to the MSSB. However, responsibility for supervision of ships, the Polar Code, etc. remains with the SFS. Reference is also made to the NSI (see comments on this below).</p> <p><u>4.9.7 Route selection, hydrographic survey and nautical charts</u></p>	<p>SFS has been replaced with MSSB in the relevant places where this matter is mentioned.</p>	Noted.	Section 4.9 page 49.	No comment.

	<p>There are no immediate comments on the extracts from NSI (comments on this below).</p> <p>It is not clear whether an agreement has been made with the Geo-datastyrelsen regarding the preparation of the aforementioned charts (see also comments on NSI).</p>	<p>No agreement has been made on nautical charts at this time. This will be done when the mining license is finally approved. However, an offer has been received from the Geo-datastyrelsen and there has been ongoing dialogue on the subject.</p>	<p>Conditions regarding the choice of sailing route will be assessed as part of the Mining and De-commissioning Plan Permit and Activity Approval.</p>	<p>No change.</p>	<p>No comment.</p>
3.5	<p><u>NSI</u></p> <p>The Navigation Safety Survey (NSI) has previously been submitted for comment to SFS. See the attached correspondence.</p> <p>The latest version of the NSI (taken from the project website) is dated October 2024 and gives rise to a few comments. The only real outstanding challenge is seen to be the preparation of nautical charts for the area.</p> <p>For good reasons, the NSI refers to SFS, as the reorganisation of responsibilities was not known when the NSI was prepared.</p>	<p>The comment is noted.</p> <p>NSI has been updated to the latest version on GAM's website.</p> <p>See also the answer to 3.4.</p>	<p>Noted.</p>	<p>Reference to NSI update p. 5 and 50.</p> <p>(NSI updated).</p>	<p>No comment.</p>

	<p>Please therefore take into account that navigation safety is now handled by MSSB - with the exception of supervision etc. of ships, the polar code etc., which is still with SFS.</p> <p><u>2. Maritime regulations, obligations and guidelines</u></p> <p>Reference should be made to regulations etc. on the Danish Maritime Authority's website. https://www.soefartsstyrelsen.dk/sikkerhed-til-soes/arktis</p> <p>This reference should also be in section 10.3.6.</p> <p>However, reference is made in both sections to Appendix C, which has a link to the website (English). (MSSB does not yet have its own website with, among other things, a rule overview).</p>	<p>Link has been updated in NSI and updated to the latest version on GAM's homepage.</p>	<p>Noted.</p>	<p>Reference to NSI update p. 5 and 50. (NSI updated).</p>	
3.6	<p><u>4.5 Hydrographic surveys and maps</u></p> <p>It is stated that the Geodata Agency will not be able to produce the</p>	<p>Nautical charts will be produced before the planned</p>	<p>Noted.</p>	<p>No change.</p>	<p>No comment.</p>

	necessary charts until 2027. Whether this follows the expected start-up of the mining project is not known. However, it is clear from sections 7.4 and 10.3.3 that charts will be available before the project goes into operation.	start-up and sailing of the project. Cf. NSI.			
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4. Hearing response from Kommuneqarfik Sermersooq, Anlæg-Miljø

No.	Questions/comments	GAM's response/comment	EAMRA's response/comment	Changes in page or section of EIA	DCE/GINR comment
4	<p>Consultation response</p> <p>Draft EIA and SIA report, Greenland Anorthosite Mining</p> <p>The Department of Construction and Environment thanks you for the receipt of the consultation request regarding the draft EIA and SIA report regarding Greenland Anorthosite Mining's anorthosite project.</p> <p>The Department of Construction and Environment has no comments.</p>	No comment.	No comment.	No change.	No comment.

	The consultation response has been administratively processed.				
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5. Hearing response from SIK

No.	Questions/comments	GAM's re- sponse/comment	EAMRA's re- sponse/com- ment	Changes in page or section of EIA	DCE/GINR comment
5.1	<p><u>Hearing response to the consultation on the EIA and SIA assessment regarding Greenland Anorthosite Mining's anorthosite project Majoqqap Qaava, at Qeqertarsuatsiaat Kangerdluat:</u></p> <p>SIK would like to thank you for the opportunity to submit a hearing response to the draft EIA and SIA consultation for the anorthosite project at Majoqqap Qaava, at Qeqertarsuatsiaat Kangerdluat. The consultation was submitted on 18 December 2024 and the comments must be received by the Mineral Resources Agency no later than 19 February 2025.</p> <p>SIK acknowledges the draft EIA and SIA report regarding the Anorthosite project Majoqqap Qaava at Qeqertarsuatsiaat Kangerdluat:</p> <p>Social Sustainability Assessment: September - 2024.</p> <ul style="list-style-type: none"> The Greenlandic labour market is characterized by bipartite negotiations between employer and employee organizations. The most important parties are the Greenlandic trade union SIK, which represents virtually the entire Greenlandic workforce. 	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.

	<ul style="list-style-type: none"> • The trade union SIK is ready to initiate wage negotiations with the owners of Greenland Anorthosite Mining's mining project at Majoqqap Qaava, and the employees who will work in Majoqqap Qaava, Greenland. • Since SIK considers that the working conditions will be in accordance with the legislation in Greenland in every respect, e.g. in relation to working hours, overtime, remuneration and benefits. • The work at Majoqqap Qaava is planned as a rotation scheme with 4 weeks in the mining area and 2-3 weeks at home for posted foreign labour and for local labour. SIK considers that a proper collective agreement will be made for local labour. • It will create employment opportunities for Greenlandic labour, with 30-40 employees in the construction phase and around 60 - 90 employees in the operation phase. • SIK is satisfied that the use of Greenlandic labour is accommodated in the construction phase as well as in the operation phase, especially with skilled labour and unskilled labour. 				
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	<table><tr><th>Job function:</th><th>No. of employees:</th></tr><tr><td>Construction phase, ultimo 2025</td><td>30 — 40 persons</td></tr><tr><td>Infrastructure and buildings, expected completed in 2027</td><td></td></tr><tr><td>Operational phase, scenario A— scenario B</td><td>60 — 90 employees</td></tr><tr><td>Closure phase</td><td>10 — 15 employees</td></tr><tr><td>Mining</td><td>60 — 90 employees</td></tr><tr><td>Skilled</td><td>30%</td></tr><tr><td>Unskilled</td><td>60%</td></tr><tr><td>Administration</td><td>10%</td></tr><tr><td>Total:</td><td>100 %</td></tr></table>	Job function:	No. of employees:	Construction phase, ultimo 2025	30 — 40 persons	Infrastructure and buildings, expected completed in 2027		Operational phase, scenario A— scenario B	60 — 90 employees	Closure phase	10 — 15 employees	Mining	60 — 90 employees	Skilled	30%	Unskilled	60%	Administration	10%	Total:	100 %				
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Total:	100 %																								
	<ul style="list-style-type: none">• In particular, that the greatest possible local and regional level is taken into account, where employment opportunities for both skilled and unskilled labour are taken into account. Especially for the local area to attract labour from Qeqertarsuatsiaat Nuuk, Paamiut and from the rest of Greenland.• That the School of Mining in Sisimiut and other vocational training institutions be cooperated on the establishment of vocational and technical education (such as courses and project skills development for unskilled workers).• That pre-employment education and peer training courses be conducted in cooperation with local authorities, educational institutions and SIK.• That a strategy be developed for the skills development of Greenlandic workers, including retraining and upskilling courses.																								

	<ul style="list-style-type: none"> • SIK supports the use of Greenlandic companies, especially from the local area in Qeqertarsuatsiaat, Nuuk and Paamiut, to provide services and supplies to Majoqqap Qaava. • Especially consumer goods for the camp. • Security services. • Barge transport and sea/helicopter transport. • Furniture for the camp and offices. • Surface drilling equipment. • Fuel, oil and spare parts. • Equipment for earthworks. • Insist that a dialogue be entered into with Air Greenland, Royal Arctic Line and ISANI A/S regarding waste. • As well as a dialogue be entered into with Tusass about establishing the necessary communication services. • There is a risk of accidents and a risk of negative impact on employees at the mine. • Working conditions and the working environment must be in accordance with Greenlandic and Danish legislation and international standards, in order to minimize the number of accidents in relation to working hours and to avoid occupational accidents at Majoqqap Qaava. • SIK considers that a workplace assessment (APV) be 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. 				
5.2	Overall schedule for the project:	Comments on the hearing response	Noted.	No change.	No comment.

	<table><tr><td>Construction and start-up phase 2025</td><td>Preparation of camp and mine, 2 years.</td></tr><tr><td>Operational phase from 2027</td><td>Expected operation in 2027</td></tr><tr><td>Closure and restoration phase</td><td>Buildings, facilities and equipment, removal 1 year</td></tr><tr><td>Post-closure</td><td>Surveillance of the potential impact of mining following closure, 5 years.</td></tr></table> <p>SIK expects that the SIA report will be followed to the letter and hopes that the mine's lifespan can also continue after 25 - 30 years of operation, with new anorthosite in the area. So the employment of the Greenlandic workforce can still be possible after the discovery of new anorthosite in the area. SIK expects that the operational phase will start in 2027, for the benefit of Greenlandic society. Therefore, it is important to point out that collective bargaining negotiations are being initiated with SIK, especially regarding collective bargaining conditions for the employees of GAM, Greenland Anorthosite Mining.</p>	Construction and start-up phase 2025	Preparation of camp and mine, 2 years.	Operational phase from 2027	Expected operation in 2027	Closure and restoration phase	Buildings, facilities and equipment, removal 1 year	Post-closure	Surveillance of the potential impact of mining following closure, 5 years.	are provided in the SIA white paper.			
Construction and start-up phase 2025	Preparation of camp and mine, 2 years.												
Operational phase from 2027	Expected operation in 2027												
Closure and restoration phase	Buildings, facilities and equipment, removal 1 year												
Post-closure	Surveillance of the potential impact of mining following closure, 5 years.												
5.3	<p>The processing plants will include the following main systems.</p> <ul style="list-style-type: none">• Crushing.• Collection of dust.• Grinding• Gravitational concentration.• Flotation.• Tallings thickening.• Tallings filtering.• SIK sees the importance of reducing dust pollution in the plant, at the collection points and on the roads. So, watering should be done as often as possible, especially to suppress dust formation.• Handling of solid waste.	<p>GAM emphasizes that the processing at Majoqqap Qaava does not include gravity separation, flotation or tailings thickening/filtration.</p> <p>As stated in the company's EIA and SIA, the project will only include crushing and grinding</p>	<p>Conditions regarding the handling of dust and all types of waste will be assessed as part of the Mining and Decommissioning Plan Permit and Activity Approval.</p>	<p>No change.</p>	<p>No comment.</p>								

	<ul style="list-style-type: none"> Regarding hazardous waste, SIK would like to see this transferred to Europe or North America and handled in accordance with the relevant regulations in the relevant countries. SIK expects that Greenlandic incineration plants in the area or ISANI A/S are used for the disposal of hydrocarbon or wood waste. All hydrocarbon waste is collected and returned for disposal to a suitable facility in Greenland, Nuuk., but is in agreement with a local incineration plant on site. 	<p>combined with sensor sorting and magnetic separation.</p> <p>Dust and waste management are described in the company's EIA, and will be part of the company's waste management plan that must be approved by the authorities before operation.</p> <p>Should challenges arise in this regard, the company has described a number of possible mitigation measures in the company's EIA.</p>			
5.4	<p>Royalties and corporate taxes:</p> <ul style="list-style-type: none"> SIK would like to see that Royalties benefit society, especially in Qeqertarsuatsiaat and the surrounding area. That these benefit culture, sports associations, elementary schools, daycare centers, etc. 	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.

	<ul style="list-style-type: none"> Regarding income taxes and corporate taxes, SIK sees that it benefits the entire Kommuneqarfik Sermersooq, so that unemployment can be reduced in the area and in Greenland in particular. That there is frequent dialogue with Kommuneqarfik Sermersooq and that regular meetings are held with the local council in Nuuk, Paamiut and the village councils in Qeqertarsuatsiaat. That commercial fishermen and hunters in Qeqertarsuatsiaat are also used, especially regarding the purchase of local raw materials, for the benefit of fishermen and hunters in the area. 				
5.5	<p>Environmental impact assessment (EIA), Greenland Anorthosite Mining, Majoqqap Qaava.</p> <ul style="list-style-type: none"> SIK sees as part of the development of Greenland Anorthosite Mining's project that the Greenlandic authorities' guidelines are followed, especially that these are in accordance with the Naalakkersusiut guidelines. The new housing and logistics camp and the port facility will be used to service the mine during construction and during operation. A diesel-powered power plant that will be established near the camp and at the processing plant next to the open mine will be operated in accordance with applicable legislation. SIK is excited that Greenland Anorthosite Mining will use renewable energy sources to supply the area with electricity, etc. It is encouraged to use solar energy, wind turbines and possibly a small hydroelectric plant to supply the area with energy. Possibly to connect the plant to the hydroelectric plant in Buksefjorden. 	<p>Regarding renewable energy sources, it should be emphasized that these are not capable of powering the mine's essential functions, including processing and other energy-intensive work. However, solar cells can be an initiative on accommodation containers and the</p>	<p>Conditions for storage, filling and tapping of fuel, oil tanks etc. will be assessed as part of the Mine and Decommissioning Plan Permit and Activity Approval.</p> <p>Plans for handling and cleaning up marine and terrestrial waste and related equipment</p>	No change.	No comment.

	<p>Camp facilities in Majoqqap Qaava:</p> <ul style="list-style-type: none"> • Dormitories, kitchen and canteen, laundry and changing rooms as well as a recreation building and administration office will be able to accommodate a total of 60 - 90 people. • SIK considers that workers in Greenland Anorthosite Mining have good facilities, SIK would like to commend the Majoqqap Qaava project for the good work that has been initiated. However, it encourages the use of renewable energy sources to supply the area. • The camp will be connected to a wastewater treatment plant, drinking water treatment plant, fire protection system, freshwater pumps, diesel generator plant. These must be built according to Greenlandic building regulations. • Fuel will be transported to Majoqqap Qaava by fuel barge or Polaroil, through the Qeqertarsuatsiaat Fjord, and will be pumped up to the main fuel storage and distributed over a longer period. • The main process area will be fenced, according to legislation in the area. • In the worst-case scenario, oil spills during loading and unloading of ships. • That there must be correctly dimensioned equipment available to combat operational spills, including floating booms for ships at berth. • That there will be equipment to combat oil spills present. • SIK will ensure that regular drills are held to ensure that the crew is trained in the event of a spill accident. As well as that drills are planned that include emergency procedures in a winter and summer situation. 	<p>canteen as a secondary energy source.</p> <p>It was highlighted in connection with the company's ToR consultation that a hydroelectric power plant does not make economic sense in the area, as the establishment costs would be very high. Furthermore, the distance to the Buksefjord hydroelectric power plant is so great that it does not make economic or practical sense to establish a connection from Fiskenæs Fjord.</p>	<p>must be submitted for assessment and approval as part of the Mine and Decommissioning Plan Permit and Activity Approval.</p> <p>Conditions for wastewater management will be assessed as part of the Mine and Decommissioning Plan Permit and Activity Approval.</p>		
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	<ul style="list-style-type: none">• That training is provided in handling oil and chemical spills for core employees in the camp and in the mining area.• The total annual diesel oil requirement during operation is estimated at. <table><tr><td>Diesel consumption:</td><td>A Liter</td><td>B Liter</td></tr><tr><td>Mining</td><td>1.507.000</td><td>1.606.000</td></tr><tr><td>Processing plant</td><td>458.000</td><td>685.000</td></tr><tr><td>General infrastructure, accommodation, warehouses, harbour facility</td><td>581.000</td><td>595.000</td></tr></table>	Diesel consumption:	A Liter	B Liter	Mining	1.507.000	1.606.000	Processing plant	458.000	685.000	General infrastructure, accommodation, warehouses, harbour facility	581.000	595.000	<p>Fuel will be delivered via PolarOil tankers. It is not intended to use fuel barges.</p> <p>The company would like to point out that the area will not be fenced, except where required for safety reasons (e.g. explosives and fuel depot).</p> <p>GAM intends to comply with applicable guidelines when it comes to fuel spills/releases, and the mitigation measures and on-going management that are required.</p>			
Diesel consumption:	A Liter	B Liter															
Mining	1.507.000	1.606.000															
Processing plant	458.000	685.000															
General infrastructure, accommodation, warehouses, harbour facility	581.000	595.000															
5.6	<p>Location of explosives storage:</p> <ul style="list-style-type: none">• Of packaged emulsion explosives• Emulsion explosives in bulk	GAM has not commented on the destruction of explosives etc. in	Conditions for explosives storage, etc. will be assessed as part	No change.	No comment.												

	<p>SIK is satisfied with the announcement that the destruction of explosives, explosive objects, blasting and incendiary materials will be carried out by burning or blasting in accordance with the Greenlandic Explosives Act No. 16 of 16 July 2007 on explosives.</p>	<p>connection with the anorthosite project.</p> <p>As a rule, all explosives are used to operate the mine until the day it ceases.</p>	<p>of the Mining and Decommissioning Plan permit and Activity Approval.</p>		
5.7	<p>Wastewater from all buildings will be treated in the treatment plant before being discharged to the sea. Since the treatment plant will comply with strict wastewater guidelines, the discharge to the sea is assessed to have a negligible impact on marine life around the outlet.</p>	<p>No comments.</p>	<p>Conditions for handling wastewater etc. will be assessed as part of the Mining and Decommissioning Planning Permit and Activity Approval.</p>	<p>No change.</p>	<p>No comment.</p>
5.8	<p>SIK is also aware that mine personnel are not allowed to hunt or fish during the construction, operation and closure of the mine. However, Greenlandic employees, if they have a recreational hunting permit, must be allowed to go hunting and fishing for their own consumption.</p> <p>SIK in Greenland agrees with its comments on the consultation draft for the EIA and SIA report regarding the Majoqqap Qaava mining project and is ready to enter into an agreement with GAM Greenland, Anorthosite Mining, Majoqqap Qaava.</p>	<p>Comments on the hearing response are provided in the SIA white paper.</p>	<p>Noted.</p>	<p>No change.</p>	<p>No comment.</p>

	SIK has no further comments on the consultation draft.				
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6. Hearing response from Greenland Business Association

No.	Questions/comments	GAM's response/comments	EAMRA's response/com-ments	Changes in page or section of EIA	
6	<p>Greenland Business Association (GE) has gratefully received the above-mentioned statements in consultation.</p> <p>GE would like to announce that the association has no comments on the state-ments.</p>	No comments.	No comments.	No change.	No com-ments.

7-12. Hearings response from town meeting in Nuuk 20.1.2025

No.	Questionnaire	Question/comments	GAM's response/com-ment	EAMRA's re-sponse/comments	Changes in page or section of EIA	DCE/GINR comment
7.1	Josephine Ny-mand	[DK/ENG] To what extent can the local population still hunt and use the area recreationally?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No com-ments.

7.2	Josephine Ny- mand	[DK/ENG] Have you been in dia- logue with the School of Mineral Resources in Sisimiut about ap- prentices or apprenticeship train- ing?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No com- ments.
8.1	Natuk Lund Meire	[KAL/ENG] My name is Natuk Lund Meire. Here is my question. It con- cerns tailings, which you have not yet decided on placement on the surface or in a lake. What is the exact reason why you have not yet made that decision?	<p>[DK/ENG] This dates back to when we initiated the EIA process 5 years ago. Of course, we knew signifi- cantly less about tailings then than we do today. Therefore, it was important for GAM that we did not al- low ourselves to be limited by choosing in the EIA re- port before we had a full overview of the possibili- ties and consequences of both solutions, and had these properly described in the EIA report.</p> <p>At the same time, it was also our opinion that in the final dialogue with the au- thorities we were sure that both solutions were pre- sented in a proper way, so that they also had the knowledge needed to be</p>	Clarification and de- cision on the tailings solution must be made in connection with the Mining and Decommissioning Plan permit and as- sessment of specific conditions.	No change.	No com- ments.

			<p>able to define any conditions for one or the other tailings solution.</p> <p>Have we now decided which solution we want to use? No, we haven't quite yet. The cheapest solution is to create a land-based landfill, where you drive over with a truck and build the landfill in the right way, where in the lake you have to create a road and ramp with a pipe that takes the material down to the bottom of the lake at a depth of 40-50m. It is a more expensive solution to install. On the other hand, the lake solution has the advantage that once the material is on the bottom, the material transport will be minimal, and there will be no dust. The amount of leaching will also be less since the material is stable on the bottom. Visually, you will not be</p>			
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			able to see anything in the lake either.			
9.1	Naaja Hjelholt Nathanielsen	[DK/ENG] I was wondering if you could tell me a little bit about the opportunities for apprenticeships at your company, especially for young people outside the labour market. Is that something you can focus on in your hiring?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.
10.1	Avaaraq Olsen	[KAL/ENG] My name is Avara. It is not so much a question as a comment. When talking to the residents of Qeqertarsuatsiaat, I notice that it is not so much the reindeer territories that worry them, but rather the fishing grounds outside the settlement. It is a concern that I would like to convey here. We can see here in the plans that there will be a quite significant increase in ship traffic. This must obviously affect the fishing at some level. I would like to convey this concern of the citizens to you, also because I imagine that the matter will be raised in the coming days.	<p>[DK/ENG] In the EIA, we have focused a lot on shipping traffic, and although we have also received great support from Qeqertarsuatsiaat, it is important for us to be able to document that shipping traffic can be carried out safely and with a minimum of consequences for the local population. We have tried to be transparent, and we will continue to be so when we continue the dialogue with Qeqertarsuatsiaat.</p> <p>[DK/ENG] I would also like to make a comment. It is</p>	Conditions regarding sailing and choice of sailing route must be made in connection with the Mining and Decommissioning Plan Permit and Activity Approval.	No change.	No comment.

		<p>There is a reason why Qeqertarsuatsiaat is called Fiskenæsset in Danish.</p>	<p>absolutely true that when we have visited Qeqertarsuatsiaat, the residents are not that worried, and I think we are a bit lucky there because there has been a ruby mine. When you think of mining, you may often think of something black and polluting, but I believe that the residents of Qeqertarsuatsiaat have found that it works perfectly fine with a mine close by, and you can easily go hunting and have a normal daily life. So we are probably a bit lucky that the ruby mine has been there, and when I have visited Qeqertarsuatsiaat, it is my opinion that people refer to it as something that they have become accustomed to.</p>			
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11.1	Magnus Lund Nielsen	[DK/ENG] Two questions. You yourself mention that there is low unemployment in Greenland. Where are the first places you would look to fill that gap in labour if you have difficulty finding it locally?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.
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11.2	Magnus Lund Nielsen	[DK/ENG] The second question. I may have missed it at the beginning, but can you tell me something about the overall figures for how much the project will bring to the Greenland treasury over the entire life of the mine?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.
12.1	Esben Pedersen	[DK/ENG] Now that you are in the process of EIA and SIA consultation, and are expected to apply for a exploitation permit, what is the timetable for building a mine and eventual operation? Do you have a timetable for the start-up phase and the operation phase?	[DK] Roughly speaking, we expect that from the day we start the first blasting for the road down by the coast to the day we finish the entire infrastructure, it will be a good 2 years. That time is of course dictated entirely by when we receive the final permits from authorities related to the process we have gone through. That part can of course drag on, but you should expect about 2 years from when we start until we can make the first delivery. When can you expect us to make the first delivery of product? Of course, you have	Noted.	Expected start up mentioned in EIA. Section 1.3 p.15 Section 2 p.21	No comment.

			to be careful about guaranteeing that, but we are currently expecting 2028.			
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13-21. Hearing responses from the town meeting in Nuuk 22.1.2025

No.	Questionnaire	Question/comments	GAM's response/comments	EAMRA's response/comments	Changes in page or section of EIA	DCE/GNIR comment
13.1	Morten Johnsen	<p>[KAL/ENG] There is no such thing as Majoqqap Qaava in Qeqertarsuatsiaat. What I can see from the map is that it says "Kuussuatsiaat Kangia". It is important to be precise with place names.</p> <p>The place where it is intended to have an open mine is called "Itersarmiit allit saqqaa". I would like to be very precise when it comes to such an important project.</p>	[DK/ENG] We take note of the information about place names. The word Majoqqap Qaava has been used as it is the historical geological name for the anorthosite deposit, and not a place name.	Noted.	<p>Majoqqap Qaava changed to Piiaaffik Itersarmiut Allit</p> <p>Section 1.1 p.13</p> <p>Section 1.2 sp. 14</p> <p>Section 1.3 p. 14 and 15.</p> <p>Section 2 p. 21</p> <p>Section 4.1 sp. 27</p> <p>Section 4.3/4.3.1 p.30</p> <p>Section 4.3.2 p. 31</p> <p>Section 4.8 p. 48</p> <p>Section 4.9.9 p.55</p> <p>Section 4.10 p. 56</p> <p>Section 4.13 p. 65</p> <p>Section 5.5.2 p. 83</p> <p>Section 5.5.3 p. 84</p> <p>Section 5.6.4.3 p. 105</p> <p>Section 5.7.2.1 p. 117</p>	No comment.

					Section 5.7.5 p. 130 Section 5.8 p. 137 Section 6.1 p. 166 Section 9.5 p. 183 Section 10.2 p. 186	
14.1	Anda Nathanielsen	<p>[KAL/ENG] My first question is according to the presentation page 22. Here it says that we will be talking about ships that can carry more than 25,000 tons of cargo, and here there is an entrance that is only 50m wide and especially when there is a lot of current. It is only 10-15m deep. Here I have my concerns, and therefore I would like to have my concerns taken seriously.</p> <p>I also have concerns about the same place names that Morten has already mentioned.</p> <p>I would like to have a clarification of how long the quay facility is, how many meters long?</p>	<p>[DK/ENG] The barge itself is 120m long, so the starboard and stern of the ship protrude at each end.</p> <p>Regarding the mentioned current location, it is something we have had a lot of focus on, and as we also tried to show in the presentation, many studies have been done to uncover the subject properly. We have done studies and reports that meet current shipping rules, and also talked to shipping companies that are used to shipping cargo in that type of area, to be sure that it can be done in a safe way. In addition, there will be a tugboat in the mine, which will always be available when the ships enter so that if a</p>	<p>Awaiting updated NSI.</p> <p>Conditions regarding sailing and choice of sailing route must be made in connection with the Mining and Decommissioning Plan Permit and Activity Approval.</p>	No change.	No comment.

			<p>situation should arise, the tugboat can assist.</p> <p>Our survey of the fjord system has also been submitted to shipping and pilotage companies, so that they can make a professional assessment of current locations. The approach has been approved by the above.</p>			
14.2	Anda Nathanielsen	<p>[KAL/ENG] In Qeqertarsuatsiaat we remember back to the Ruby Project and the IBA agreement, which we have no good experiences with. We have been promised education and further training, and there would be cultural benefits and events that we had been promised in connection with the IBA. So far, none of us have had good experiences with that part. Naalakkersuisut must remember to be aware of</p>	<p>Comments on the hearing response are provided in the SIA white paper.</p>	Noted.	No change.	No comment.

		what has been promised, and we must ensure that these promises are not empty. Secondly, in connection with the meeting held here in Qeqertarsuaat in 2023, we mentioned the health aspect, and we are happy to see that the nursing station has been included in the presentation.				
15.1	Adolf Johnsen	[KAL/ENG] When you think about the product to be mined in Greenland, it is said that there are many such deposits around the world. How good is the quality in Greenland compared to other deposits in the world, since you have decided to open a mine in Greenland?	Comments on the hearing response are provided in the SIA white paper.	Noted.	No change.	No comment.
16.1	Ole Julius Henriksen	[KAL/ENG] It is said that large bulk cargo ships will be coming in. As you know, we do quite a lot of cod fishing in the area, and throughout the fjord,	[DK/ENG] Fisheries are one of the areas that the EIA report has examined, and many studies have been made on how the noise from the ships and the increased	Conditions regarding shipping and choice of shipping route must be made in connection with the Mining and Decommissioning Plan	No change.	No comment.

		<p>especially in the summer. When you talk about bulk cargo ships that will be sailing into our narrow fjords with up to 120m in length, my concern is that it will limit our cod fishing in the area. What do you have to say about that?</p>	<p>ship traffic is expected to affect fish and other animals in the fjord system. Comparisons have also been made with ship traffic from other marine areas in the world.</p> <p>The EIA report and NIRAS Greenland conclude that the ships, despite their size, will not affect the fisheries to a very great extent. The subject is described quite thoroughly in the EIA report, and I would recommend that you read the report if you want to know more about the subject. The report can be downloaded from our website.</p>	Permit and Activity Approval.		
16.2	Ole Julius Henriksen	<p>[KAL/ENG] I can't remember exactly when we first started discussing the place name in the area, but we have already pointed out that the wrong geological place name was used. That's</p>	<p>[DK/ENG] We take note of the question.</p>	Noted.	<p>Majoqqap Qaava changed to Piiaaffik Itersarmiut Allit</p> <p>Section 1.1 p.13</p> <p>Section 1.2 sp. 14</p> <p>Section 1.3 p. 14 and 15.</p> <p>Section 2 p. 21</p>	No comments.

		<p>why I'm surprised that the same geological designation is still used that we pointed out a few years ago. Majoqqap Qaava is found in several places, and is also a place name that is used in other places. So, especially for reindeer hunters, it is important that you are very accurate when it comes to the geographical or geological place names. I would like to encourage you to use the correct place names, and I hope you will correct this as it is important for us.</p>			<p>Section 4.1 sp. 27 Section 4.3/4.3.1 p.30 Section 4.3.2 p. 31 Section 4.8 p. 48 Section 4.9.9 p.55 Section 4.10 p. 56 Section 4.13 p. 65 Section 5.5.2 p. 83 Section 5.5.3 p. 84 Section 5.6.4.3 p. 105 Section 5.7.2.1 p. 117 Section 5.7.5 p. 130 Section 5.8 p. 137 Section 6.1 p. 166 Section 9.5 p. 183 Section 10.2 p. 186</p>	
17.1	Ole Jensen	<p>[KAL/ENG] I am surprised that one important thing is not mentioned in the presentation – it is us residents of Fiskenæsset. We have not really been mentioned in the entire presentation. How will we feel that there is mining going on just around the corner. Will there be</p>	<p>Comments on the consultation response are provided in the SIA white paper.</p>	Noted.	No change.	No comment.

		annual recognition for us, or how will you contribute to the daily development of the settlement?				
17.2	Ole Jensen	[KAL/ENG] This consultation is specifically aimed at adults and the elderly, and especially in our area. But we also have children and young people who I think are very important, and you should do a consultation specifically aimed at that generation. Because this project, as I see it, is going to run for a long time, and is going to have an impact on the next generation, which are children today. How many years do you plan for this to run, and what do you think about a citizens' consultation specifically aimed at children and young people?	Comments on the consultation response are provided in the SIA white paper.	Noted.	No change.	No comment.
18.1	Ingvar Motzfeldt	[KAL/ENG] There are two things I have noticed. Firstly, we are pleased	[DK/ENG] Comments on the consultation response regarding the nursing station	Noted.	No change,	No comment.

	<p>that during the consultation period, Paamiut and Qeqertarsuatsiaat were prioritized. We are really pleased with that. The best thing would of course be if you had been physically present, and we had had the opportunity to have a closer dialogue and discussion about the project, but now that is how it is. The most important thing is probably the next step we will take. Overall, I am pleased that the Mayor and the Government of Greenland are prioritizing the country's economy and the benefits of opening a mine there - they are for the country's best.</p> <p>But at the same time, I would also like to say that according to Claus's description and presentation, there will be 270 days a year when ships call, which means there</p>	<p>are given in the white paper for the SIA.</p> <p>Regarding shipping traffic, I have found the previous slide showing the number of ships in the fjord. It is absolutely correct that there will be a significantly increased number of ships on the day the mine is in full production. The shipping traffic that will be in the fjord is owned by shipping companies such as RAL and PolarOil, and is therefore self-propelled and does not need assistance. In the mine itself, however, we have a tugboat, where we will have some employees, and one can well imagine that people from the local population could be qualified for this task, and at the same time have some other functions in the port area.</p> <p>In relation to the mentioned 270 days a year with shipping traffic, it is primarily the small boats that are in</p>			
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		<p>are only 95 days a year when ships are not nearby. Of course, this also creates a lot of jobs for us, but with the activity that is planned, it is important for us in the settlement to make Naalakkersuisut and you aware that we need to improve our skills. We need to learn things so that we are also instructed in engine operation and the like, if we are to be qualified to get work there.</p> <p>Another thing is the health issue that Claus presented. As I said, our health system and health services are very poor. In Claus' presentation, I noticed that a nursing station will be established, and we are really happy about that. We would like to encourage Naalakkersuisut to prioritize this, so that it will also benefit us in the settlement who do</p>	<p>question. The large dry cargo ships will have significantly fewer annual calls.</p>				
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		not have a nurse. We will look forward to reading the consultation material closely, and you can probably expect that we will also submit a consultation response before February 19th.				
19.1	Stefan Boye	[KAL/ENG] I have two questions. There are two things I would like to clarify. In connection with the presentation, it sounds as if the entire project has already been approved by the Greenland Government. That is my understanding. It is as if it has already been approved, and therefore I would like to have a clarification of where we stand in terms of the entire process.	[DK/ENG] Naaja Nathanielsen replies: Thank you for the question. The project has not been approved yet, and no final approvals have been given. However, it is clear that we, as a country, have designated some areas for mining because we want activity. The company must show that they can do things in a responsible way, both in relation to the environment, but also in relation to the local community and Greenland as a whole. The company cannot get approval if these things are not proven. It is also a requirement in the legislation that it is a	Noted.	No change.	No comment.

			<p>project that can pay off for all of us.</p> <p>The process we are currently in is thus, among other things, designed to get the local population's opinion on the project, and also the opinion of professionals. In this way, Naalakkersuisut has some more material to consider.</p> <p>The local community and Greenland as a whole do not have ownership in the project, but we get money through taxes and royalties. In places where we see local mining, the local business community also experiences some income from increased trade. From the perspective of Naalakkersuisut, it is important that we have Greenlandic companies and Greenlandic workers employed, but we also get money if it is foreign labor. The project</p>			
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			must benefit society, but of course also the company.			
19.2	Stefan Boye	<p>[KAL/ENG] So another thing that I would also like to know is what chemicals are coming out into the fjord via the river system and via the lakes. You also say that there will be processing further down towards the port area, what chemicals are being brought out, and what chemicals are being released into nature? And then I would also like to ask if Greenland has co-ownership of the project?</p>	<p>[DK/ENG] In relation to the aforementioned question regarding the discharge of chemicals or other harmful substances.</p> <p>Firstly, anorthosite has the good property that it is a very pure rock that, from the start as raw ore, has a very low content of metals, sulphur and other potentially environmentally harmful elements. In our processing we do not use any chemicals, it is pure crushing and separation. So we do not add anything to the processing.</p> <p>The products that we sort out, what we call tailings, therefore also contain very low levels of metals, sulfur and other potentially harmful elements. A lot of studies have been conducted over several months, testing how water, weather and wind</p>	<p>Plans for the company's own monitoring must be submitted for assessment and approval as part of the Mining and Decommissioning Plan Permit and Activity Approval. In addition, a monitoring program will be set up by the authority and environmental inspections.</p>	No change.	<p>DCE/GN notes that there will be environmental monitoring activities that will clarify whether the expectations are in line with reality and what is described in the EIA report in relation to the dispersion of e.g. metals into the environment. For transparency, DCE/GN recommends that the report and results from the company's self-monitoring be made</p>

			<p>affect both the ore and the tailings. What is washed out over time, and are there any substances that pose a danger to the fjord system or are harmless amounts being diluted?</p> <p>What the EIA report and the associated studies conclude very clearly is that very small amounts of metals or other substances are being washed out, and the report therefore concludes that there is no danger to either the fjord system, lakes or rivers since the rock is so clean from the start.</p> <p>However, there is one other thing that can lead to the washing out of some trace elements. The explosives used in the mine can release nitrogen into the environment, and therefore it is important to blast in the right way and use techniques that</p>			publicly available in the same way as the authorities'.
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			<p>minimize the use of explosives.</p> <p>I can add that both GAM and the authorities are obliged to continuously monitor and supervise the leaching from our tailings. This means that we must continuously take samples to ensure that, despite the studies carried out, nothing harmful is released into the fjord system, and that we stay within the limits for water quality.</p>			
19.3	Stefan Boye	[KAL/ENG] One more thing. That huge road you have planned to build in from the fjord. It's an area where there are reindeer, and I would think it would be cool to drive on that road when I go reindeer hunting. What does the possibility of that look like?	Comments on the consultation response are provided in the SIA white paper.	Noted.	No change.	No comment.
19.4	Stefan Boye	[KAL/ENG] As we can see, we also have the Mayor present. I hope the Mayor	Comments on the consultation response are provided in the SIA white paper.	Noted.	No change.	No comment.

		<p>will use this opportunity to create closer cooperation on infrastructure with you. As you already know, it is very difficult to transport goods to our area, we do not have proper quay conditions, we do not even have so much as a pontoon. Therefore, it is important that the Mayor hopefully listens and sees this as a good opportunity to create better infrastructure conditions for us.</p>				
20.1	Egede Motzfeldt	<p>[KAL/ENG] This is a bit of an extension of the previous question. Who actually owns the company, who are you really? I've googled you, and I can see that before Corona you were an ApS, but now you are Greenland Anorthosite Mining A/S. Is Naalakkersuisut also above you, or how is it connected?</p>	<p>Comments on the consultation response are provided in the SIA white paper.</p>	Noted.	No change.	No comment.

20.2	Egede Motzfeldt	<p>[KAL/ENG] Thanks for the elaboration. According to the material, I notice that at the end of the materials you mention dust a lot. And I can also see from the materials that dust occupies quite a lot of space in the presentations. What is actually dangerous about dust in itself, I know that the material is to be used for fiberglass, and we also know that fiberglass dust is very dangerous. How dangerous is the dust actually?</p>	<p>[DK/ENG] When we talk about dust being dangerous, it is because when you breathe in dust and get it into your lungs, it is dangerous no matter what material it is. Even materials that are not harmful are unhealthy to get into your lungs as particles. This is absolutely fundamental for all types of dust.</p> <p>From a health point of view, it is important that those working in the processing are not exposed to dust that exceeds the amounts defined in the work regulations. That is why we have a lot of focus on dust in the EIA report.</p> <p>Then there is also an environmental aspect, where dust on exposed sections of the road can cover plants and blow into the river, and therefore there is also a focus on mitigation measures for that part.</p>	<p>Conditions for handling dust shall be included in the Mining and Decommissioning Plan Permit and Activity Approval.</p> <p>Plans for the company's own monitoring shall be submitted for assessment and approval as part of the Mining and Decommissioning Plan Permit and Activity Approval.</p> <p>In addition, a monitoring program will be set up by the authority and environmental inspectorate.</p>	No change.	<p>DCE/GN notes that there will be environmental monitoring activities that will clarify whether and what is described in the EIA report in relation to the dispersion of dust to the environment is in accordance with reality. For the sake of transparency, DCE/GN recommends that the report and results from the company's self-monitoring be made publicly available in the</p>
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						same way as the authorities' environmental monitoring report.
20.3	Egede Motzfeldt	[KAL/ENG] Last question – in connection with the presentation we can see that there is option A and option B. My question is regarding passenger sailing. There will be 55 sailings with smaller boats per year in scenario A, whereas under full production in scenario B there will be 82 sailings. I would like to encourage you to use exclusively Greenlandic-owned companies for this sailing.	Comments on the consultation response are provided in the SIA white paper.	Noted.	No change.	No comment.
21.1	Inuk Berthelsen	[KAL/ENG] This consultation is now underway, and it is underway across the electronic world. I would like to ask if in the future, and in the near future,	[DK/ENG] We completely agree with that, and as mentioned at the beginning, we are sorry that the weather has been as bad as it has been these days. It has been	Noted.	No change.	No comment.

		<p>you have plans for you to come down and visit us to have a physical meeting with us. Such an important project requires that you have at least seen each other.</p>	<p>beyond our control. Our plan was for everyone to be down in Qe-qertarsuatsiaat today, and not just Henrik from GAM. Therefore, we would also like to hold an unofficial meeting as we have done previously, where representatives from GAM will visit Qeqertarsuatsiaat. In addition to the consultation period itself, GAM can always answer questions about the project development.</p> <p>[DK/ENG] Naaja Nathanielsen responds:</p> <p>From the side of Naalakkersuisut, we are also very sorry that it was not possible to be physically present in both Qeqer-tarsuatsiaat and Paami-ut. We hope and expect that the company will increase its dialogue with the local population as the project moves closer to exploitation. There will be an opportunity for dialogue later. We</p>			
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			are sorry that it could not be done at this time.			
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