

Thank you for the consultation regarding Greenland Anorthosite Mining's (GAM) project.

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.

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.

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.

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.

Sikre Farvande has the following comments:

#### **SIA**

This statement includes societal impacts and not navigational safety. Therefore, no comments.

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.

#### **EIA**

##### **3.2 Maritime regulations, obligations and guidelines**

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>

(MSSB does not yet have its own website with, among other things, a list of regulations).

##### **4.7 Infrastructure**

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.

##### **4.9 Ship traffic**

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).

#### 4.9.7 Route selection, hydrographic survey and nautical charts

There are no immediate comments on the extracts from NSI (comments on this below).

It is not clear whether an agreement has been made with the Geodata Agency regarding the preparation of the aforementioned charts (see also comments on NSI).

#### **NSI**

The Navigation Safety Survey (NSI) has previously been submitted for comment to SFS. See the attached correspondence.

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.

For good reasons, the NSI refers to SFS, as the reorganisation of responsibilities was not known when the NSI was prepared.

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.

#### 2. Maritime regulations, obligations and guidelines

Reference should be made to regulations etc. on the Danish Maritime Authority's website.

<https://www.soefartsstyrelsen.dk/sikkerhed-til-soes/arktis>

This reference should also be in section 10.3.6.

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).

#### 4.5 Hydrographic surveys and maps

It is stated that the Geodata Agency will not be able to produce the 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.

Kind regards

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