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Hearing response to the consultation on the EIA and SIA assessment regarding Greenland Anorthosite Mining's anorthosite project Majoqqap Qaava, at Qeqertarsuatsiaat Kangerdluat:

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.

SIK acknowledges the draft EIA and SIA report regarding the Anorthosite project Majoqqap Qaava at Qeqertarsuatsiaat Kangerdluat:

Social Sustainability Assessment: September - 2024.

- 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.
- 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.

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 %

- 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.
- 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.
- Overall schedule for the project:

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.

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.

The processing plants will include the following main systems.

- 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.
- 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.

Royalties and corporate taxes:

- 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.
- 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.

Environmental impact assessment (EIA), Greenland Anorthosite Mining, Majoqqap Qaava.

- 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.

Camp facilities in Majoqqap Qaava:

- 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.
- 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.

Diesel consumption:	A Liter	B Liter
Mining	1.507.000	1.606.000
Processing plant	458.000	685.000
General infrastructure, accommodation,	581.000	595.000

warehouses, harbour facility		
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Location of explosives storage:

- Of packaged emulsion explosives
- Emulsion explosives in bulk

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.

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.

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.

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.

SIK has no further comments on the consultation draft.

Inussiarnersumik inuulluaqqusilluta

Med venlig hilsen / Best regards



Axel Lund Olsen

SIK