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**DCE and GINR comments to the application “Evaluation of Environmental and Socio-economic Impacts of the construction of 3 camps and associated works”(December 9, 2011)**

As part of the 2012 activities under its Exploration Licence, London Mining wishes to install three temporary field camps; one at Taseraarssuk Bay, one on the north side, and one on the south side of the Kugssua River. The components of the field camps will be transported by ship, and unloaded to land by barges. Each camp will have a capacity of about 80 persons and will consist of about 50 containers for accommodation, catering, toilets, and services. A landing area at the fjord will be constructed as well as a lay-down area next to the camp at the fjord. The initial activities will start in spring 2012. It is planned that a small number of container camp units and associated equipment will be towed on a snow trail from the Taseraarssuk Bay to the river crossing at Kugssua. In spring, a temporary river crossing will be constructed to bring material and equipment to the northern bank, and this temporary river crossing will be removed before the beginning of the high flow period. In May-June 2012, a camp near the fjord and an access trail following the same route as the snow trail will be constructed from the lay down area at the fjord to the river crossing.

It is noted that the report covers the main potential environmental impacts of the planned activities including alterations of the landscape and habitats, rock excavations and earth works including removal of material from sand and burrow areas, disturbance of wildlife in particular caribou, loss of vegetation, and accidental oil spills.

Below specific comments are given to the application “Evaluation of Environmental and Socio-economic Impacts of the construction of 3 camps and associated works” (December 9, 2011).

The report states that the access trail will be overgrown by itself. It should be stressed that the trail will be visible for many years (decades) after closure/discontinuation of the project. The budget for close down of the trails should include activities to accelerate natural regeneration of vegetation and



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removal of the trail to restore the landscape. The report states that the access trail will be overgrown by itself.

Disturbance of wildlife, in particular caribou, is expected to be high during the construction of the trail, and it is expected that caribou will avoid a corridor of a certain width along the trail during construction. It is concluded that the human presence and activity in the areas during the exploration works will imply a significant but localized disturbance of caribou. The only measure to minimize disturbance of the caribou is regulation of the access and movements of staff.

Caribou is a valued resource for Greenlanders and public concern has been expressed in relation to potential effects on the caribou from human activities associated with the trail. The level of disturbance is expected to be high during the construction of the trail, and we expect that caribou will avoid a corridor of a certain width along the trail during construction. We propose to set up a monitoring program to study what actually happens. The knowledge gained will be useful as documentation to the public, for future planning of construction works and for assessing the need for mitigating regulation of future activities.

Gravel and sand for the construction of the trail will be sourced from burrows along the trail and also supplied by crushing boulders. The amount of material to be used for this purpose has been estimated to approximately 200,000 m<sup>3</sup>. This is a considerable amount with a potential significant effect on the landscape. It is stated that a plan for sand and gravel burrows will be submitted to BMP before the start of activities. It is important that this plan takes the effect on the landscape into account. This plan will specify the locations, maximum amounts of materials to be extracted and moved, and specification of final grading of the terrain after closure of the burrows.

The application indicates that an environmental officer will participate in the project. We recommend developing detailed guidelines and descriptions of the responsibilities for the environmental officer. It is highly important that all activities and structures in the project take account of vulnerable habitats, endemic and rare plant species. We also recommend that the construction work is inspected closely by BMP/DCE/GINR in order to secure that environmental impacts are minimized.

Kind regards

Kim Gustavson and Josephine Nymand