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Til: Officiel post til Bureau of Minerals and Petroleum

Emne: Høringssvar til London Mining Greenland A/S' ansøgning om udnyttelsestilladelse til et jernmineprojekt ved Nuuk

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På London Minings website (<http://www.londonmining.co.uk/sustainability.aspx>) står der bl.a. om bæredygtighed:

"We are looking to the future and how we will live and work together with the communities and organisations around our operations now and in the years ahead. We recognise the importance of exploring fully all the options that will enable us to meet our long term responsibility for our resources and surroundings. This genuine commitment to sustainability is a key part of the way we will contribute, endure and prosper."

I "Inatsisartutlov om mineralske råstoffer og aktiviteter af betydning herfor (råstofloven)" står der i §1:

"Ved inatsisartutloven tilstræbes **en hensigtsmæssig udnyttelse af mineralske råstoffer** og anvendelse af undergrunden til lagring eller formål vedrørende råstofaktiviteter samt regulering af forhold af betydning for råstofaktiviteter og undergrundsaktiviteter.

Stk. 2. Ved inatsisartutloven tilstræbes, at aktiviteter omfattet af loven **udføres forsvarligt med hensyn til sikkerhed, sundhed, miljø, ressourceudnyttelse og samfundsmæssig bæredygtighed** samt hensigtsmæssigt og i overensstemmelse med, under tilsvarende forhold, anerkendt god international praksis."

Endelig kan jeg forstå at London Mining vil søge China Development Bank (CDB) om at blive investor i ISUA projektet. CDB skriver på deres websider (<http://www.cdb.com.cn/english/NewsInfo.asp?NewsId=4161>) om sustainable development:

A Sustainable Development Initiative was issued today at the eighth Council meeting of the Shanghai Cooperation Organization (SCO) Interbank Association in Beijing, calling on member banks to strengthen financial cooperation and advance the cause of corporate social responsibility and "green" economic growth. The initiative represents a joint commitment by the six members banks of the SCO Interbank Association: China Development Bank (CDB), Kazakhstan Bank of Development, the Settlement and Savings Company of Kyrgyzstan, Amonatbank of Tajikistan, Russia's Vnesheconombank, and the National Bank for Foreign Economic Activity of Uzbekistan.

On the basis of the SCO Charter and the SCO Interbank Association Cooperative Agreement, the initiative requires member banks to strengthen cooperation in the field of sustainable development. Member banks are urged to:

1. Develop financing mechanisms and methods of sustainable development that reflect the diverse conditions and needs of each SCO member state.
2. Utilize financing support to promote cooperation on large projects that spur regional development in the economy, society, and environment.
3. Provide priority support for industry, agriculture, environment, public services, and infrastructure (including the transportation, building/construction, and energy sectors).
4. Maintain close cooperation in the field of energy, with the goal of securing sustainable energy resources.
5. Strengthen financial cooperation in support of underdeveloped regions, remote populations, and SMEs.
6. Fully recognize the importance of the "green economy" in the quest for sustainable development, especially in terms of economic rebalancing, climate change, and public well-being.
7. Adhere to international protocols and norms governing corporate social responsibility, establish effective CSR management systems, and contribute to the field by sharing experience and know-how.
8. Affirm that sustainable development is the common aspiration and responsibility of all nations, and requires the broad, deep participation of government, civil society, and the private sector. Clients and

stakeholders are called upon to join together in meeting this task and make new contributions to sustainable development.

Med ovennævnte in mente ønsker jeg med dette høringssvar at London Mining og Grønlands Selvstyre understreger vigtigheden af at ISUA projektet gennemføres med vandkraft eller i en kombination af en (mindre) dieselgenerator (hvis det er strengt nødvendigt) og vandkraft.

Hvis CDB ønsker at være en seriøs, troværdig og langvarig investor i Grønland og Arktis, bør det være muligt at understrege overfor dem, at deres investering bør være en langvarig og så bæredygtig investering som mulig og at de derfor ikke kan forvente et hurtigt afkast, men i stedet forvente et længere og mere bæredygtigt afkast ved brug af vandkraft.

Selvstyret bør åbne en dør for, at hvis Alcoa planerne tages af bordet, så skal London Mining straks gå i gang med at bygge vandkraftværk til brug for ISUA projektet.

Med håb om en velvillig behandling

Janus Chemnitz Kleist