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Høringssvar i forbindelse med Høring af VSB- og VVM-redegørelse vedrørende Hudson Resources ansøgning om udnyttelse af Anorthosit ved Qaqortorsuaq i Midtgrønland

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På Naalakkersuisut's høringsportal er fremlagt " Høring af VSB- og VVM-redegørelse vedrørende Hudson Resources ansøgning om udnyttelse af Anorthosit ved Qaqortorsuaq i Midtgrønland".

DCE/GN fremsender herved høringssvar vedrørende den fremlagte VVM-redegørelse. DCE/GN har forholdt sig til den engelske version af VVM'en og således ikke kommenteret oversættelser af fagudtryk mv. til dansk eller grønlandsk.

Generelt vurderes VVM'en at give en fyldestgørende og korrekt beskrivelse af projektets miljøeffekter. DCE/GN har kommentarer vedrørende en række punkter:

4.5.5 Solid Waste Disposal

The EIA states that disposal of organic waste will occur via incineration and hazardous waste will be disposed offsite. The EIA should also include a description of methods for disposal of inorganic non-hazardous waste, and how all waste will be handled prior to incineration or transport to an approved disposal facility, and the onsite incineration procedure.

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5.3.1 Water Quality

Only one water sample from each of the 5 stations is presented in the EIA . This is not enough. The guidelines from 2011 state that the baseline study should cover “some years”, often 2-3 years, and that seasonal and annual variation must be incorporated in the baseline description. This is particularly important as the samples are high in nickel, and as the copper concentrations exceed the water quality guideline values by a factor of four. The name of the laboratory that performed the analyses is missing.

Table 5.3. Not only are the values for Total Dissolved Solids unlikely high (as mentioned in the report) and should be discarded. There is usually a tight connection between dissolved solids and conductivity, but it is impossible to check as the unit in Tab 5.3 is mS and the unit is µS in the background field report Table 3. Also the amount of Total Suspended Solids (TSS) is unlikely high and indicates very turbid water – which apparently isn’t the case ,as the water system is described as “clear water lakes and creeks”. As TSS is a key parameter for the future monitoring program, it is important to establish new baseline values from direct measurements and not by inferring (faulty) NTU values.

7.3.1 Tailings Chemical Composition

The first paragraph of this section contains a sentence that needs correction and clarification to ensure accuracy. The EIA states “The major elements in the waste material, the “tailings”, are very similar to the original anorthosite other than significantly reduced levels of iron (Fe2O3) and magnesium (MgO). Figure 7.3 illustrates the difference in the chemical make up of the two rocks products”. The figure referenced is Figure 7.5, not Figure 7.3. Further, Figure 7.5 shows the chemical composition of the ore for shipping and tailings, but does not include the values for the original anorthosite. A reference to Table 4.1 should be made. It appears from the figure and from the description of the process in 4.3.2 that this sentence should state that the tailings contain increased levels of iron and magnesium compared to the original anorthosite, not reduced levels.

7.3.2 Tailings Lake Description (p. 98) and 7.3.3 Tailings Impacts on Fresh Water (p. 100)

We have repeatedly advised that 1 meter of water freeboard above the tailings deposition in Lake A is not sufficient. We agree that it is important that tailings are not re-suspended by disturbance (ice or wind) as stated in the EIA. It is our recommendation that no less than 5 meters of water will cover the tailings in the lake. Monitoring data of water depths, ice depths and suspended solids once the mine is operational can then be used to evaluate if the depth can be reduced further, if or when the extra volume is needed later in the mine life. The recommended 5 meters of water freeboard will help ensure a sufficient retention time for settling of suspended solids. It will also more likely allow safe management of suspended particles across seasonal and annual variation in lake water levels, allow up to 2 meters of ice formation in winter while still allowing a level of unfrozen water to allow settling over winter and also account for uncertainty in future water levels associated with climate change.

The EIA should also better describe how sluicing will be done to ensure tailings are deposited at the bottom as intended and how this will be managed in early spring when operations resume and maximum ice cover on the lake is likely to present. The lake may be ice covered from November to June and the mine is to be operational from March through December.

9 Environmental Monitoring Program

The Environmental Monitoring Program has to be described in greater detail in a separate document when an exploitation license has been approved. Comments below are intended to advice on the information presented in the EIA, and do not necessarily represent a final or complete evaluation of the monitoring program that GN/DCE recommends be implemented.

9.1 Marine Monitoring Program

Only one monitoring site is planned in Itilleq Fjord, which will receive the effluent from the tailings lake. If the freshwater monitoring indicates any freshwater impacts, additional marine monitoring may be necessary in the future.

9.2 Freshwater Monitoring Program

Water quality monitoring every three months will not be sufficient, given the seasonality of flows and the few samples that have been collected during baseline studies years. A high sampling frequency has to be applied during the first years and especially during the first months after the water has started running. Once the pattern of seasonal variation is established the program may be revised.

Water outflow from Lake A must also be measured continuously using e.g. a water level logger.

Med venlig hilsen

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