



## Hearings respond regarding scoping for SIA and EIA for the titanium project at Pituffik

To Råstofstyrelsen, Postboks 930, 3900 Nuuk

[mlsa@nanoq.gl](mailto:mlsa@nanoq.gl) (with copies to [isiin@nanoq.gl](mailto:isiin@nanoq.gl) and [eamra@nanoq.gl](mailto:eamra@nanoq.gl))

15 May 2017

WWF World Wildlife Foundation (Verdensnaturfonden) acknowledges the opportunity to get information on, and also an opportunity to comment on, the ToR for the Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) for the titanium project at Pituffik.

We welcome prehearings of mining activities as it gives the local population information on planned projects located close to where they live at an early stage, and the activity is also an opportunity to provide input on issues the license owner should study before they can get a permission to utilize the resources. However, for us as a consulting party it is a challenge that the material presented for the hearing only comprise a brief project description, and a sketch to what will be studied. If the (results of) surveys and baseline studies the license owner has already carried out would also be made public we would be in a position to provide a much more qualified hearing response. At this stage we can only give a qualified guess as to which challenges the project might cause. Even basic information regarding which harmful constituents the titanium sand contains is lacking from the material.

Our initial assessment is that the titanium project is a minor raw material project. The activities comprise either excavation of dry material from the beach with bulldozers and excavators or wet material from the sea floor along the beach with dredgers or excavators on barges. The material is processed using magnetic separation, stored and shipped from the license area using freight ships.

The annual production is expected to reach 400,000 tons of ilmenite concentrate in up to 30 years. 5-8 annual call ins by freight ships will be required to ship the concentrate off and get supplies in to the mine. During the operational phase it is expected that 60-100 personnel will work at the mine.

In spite of the limited size of the titanium project and that no chemicals will be used in the processing the project will have local consequences in terms of disturbance in the mine area, storage of fuel for the machines and increased shipping to and from the area. Two different scenarios are described – one scenario with production on land and one with production from a ship – but from the available information it is not possible to determine which scenario will have the least impact on nature and the environment.

The license area is situated between two ecological important areas in North Greenland. Immediate outside the license area is the North Water polynya/ Pikialasorsuaq, which is the most productive polynya (open water area) in the Arctic. This area includes habitats for Polar bear, Walrus, Bowhead whale, Beluga, Narwhale and a number of seabirds, including Puffin, Thick-billed murre, Eider duck and Ivory gull. The North Water is recognized as one of just two particularly important ecological and biological areas in Greenland (so-called SUPER-EBSAs) and is assessed in recent reports by the DCE and Greenland Institute of Natural Resources as relatively sensitive to shipping<sup>1</sup>. South of the license area is the Melville Bay which today is protected from transit shipping because the area is critical habitat for Narwhales during summer and for Polar bear in winter and spring. In addition, the Melville Bay is an important migration corridor for whales and seabirds.

WWF notes that it is mentioned in the scoping for the EIA that the consequences of the project will be described for the license area, the adjacent offshore area and in the nearby sea area that will be impacted by shipping to and from the mine.

At the initiative from ICC a common Greenlandic/Canadian commission – the Pikialasorsuaq Commission – is right now consulting people on both sides of the North Water about their views on how a local strategy for protecting and managing the North Water should look like<sup>2</sup>. WWF encourage the (mine) company to initiate a dialog with the commission in order to determine how it is best secured that the project is developed to the benefit of the local population. A press release following the commissions consultations on the Canadian and Greenlandic side of the North Water last year, stress the common concern across the region for the consequences of climate change but also the consequences of new industries and related activities, including shipping.

WWF notes that it is mentioned in the scoping for the EIA that the consequences of the project will be described for the license area, the adjacent offshore area and in the nearby sea area that will be impacted by shipping to and from the mine.

Just outside the license area at the island Appat is an area which is important for the Baffin Bay Walrus population (previously (termed) the North Water population). This population winters mainly in the eastern part of the North Water while the western areas of the North Water at Ellesmere Island are the primary summer area. The Walruses are sensitive to noise and disturbance in particularly in shallow areas where they feed and where they use (sea) ice for resting.

1 <http://www2.dmu.dk/Pub/SR43.pdf>

2 <http://arcticjournal.com/press-releases/2559/canadian-and-greenland-inuit-call-inuit-management-region-and-freeaccesstravel>

It is vital that the EIA describes which consequences noise from mine operations, shipping and the associated risk for oil pollution can have for animals, including Walrus. Mitigating measures should include a specific shipping route that avoids the most sensitive areas as well as regulation the mine activities and shipping according to season.

It is WWF's judgement that there for this project should be imposed a requirement not to use or transport Heavy Fuel Oil (HFO) on ships used in connection with the project. A ship wreck or other pollutions with HFO will have immense consequences for the biologically very important North Water area and will be impossible to combat in sea ice.

In the ToR it is said that the (mine) company will specify the amount of fossil fuel to be used and the release of CO<sub>2</sub> and particles from the mine activities. WWF recommends that the EIA also describes what the company intent to do to limit the amount of fossil fuel used and the release of CO<sub>2</sub> and particles. Particles settle on snow- and ice-covered surfaces and contribute to accelerating the melting in an area that already experience increasing temperature. WWF suggests that the company study if part of the energy requirement could be covered by own production of sustainable energy from sun, wind or water. Every kWh produced locally will save the company money and will reduce the project's environmental impact.

In the description of the use of local resources in the area (page 12-13) the development of fishing in Qaanaaq is described. It must be stressed that the resource is Greenland halibut (*Reinhardtius hippoglossoides*), not Atlantic halibut (*Hippoglossus hippoglossus*), as it is wrongly spelled out in both the ToR for the EIA and SIA<sup>3</sup>. The Moriusaq area is probably still used for hunting trips and stays during the summer and it is vital to have dialog with the local population to map precisely where and when the area is used for hunting.

Mining in itself is never environmental sustainable – with every mine follows noise, disturbance and the risk of pollution and that a non-renewable resource is exploited – wherefore it is vital that a mine project scores high on social sustainability. The titanium project should as all other mine projects be measured by its contribution in terms of jobs, apprenticeships and local contracts in addition to the direct economic revenue to the Greenland Government. It is a good idea to get inspired by the targets other mine project have set in terms of social sustainability, currently the Ruby mine at Qeqertarsuatsiaaq which is mentioned in the ToR for the SIA, even though the situation in the Qaanaaq area is completely different when it comes to local business and also local labor. In spite of extremely high unemployment in Qaanaaq WWF fears that it will be difficult for the (mine) company to attract trained local workers to work at the mine, and that the activities will have to be based on fly-in-fly-out employees. For this reason the long term social effects of the mine – income and education – will not necessarily benefit the citizens of Qaanaaq. The company should already now initiate a dialog with the local authorities and education institutions in Qaanaaq in order to secure that the mine will generate local income and local jobs.

<sup>3</sup> <http://www.natur.gl/fisk-og-skaldyr/fisk/hellefisk/>

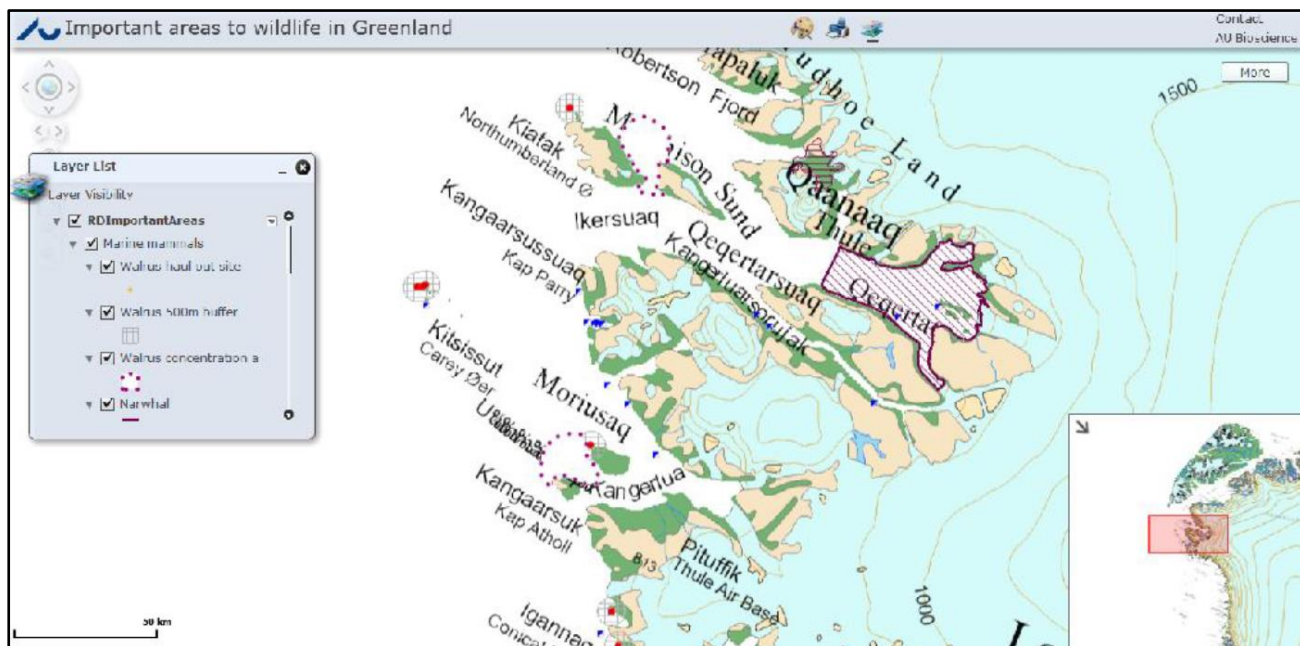


Figure 1. Map with the important nature areas in Northwest Greenland. The lilac dots indicate areas important to Walrus. One area is just outside Moriusaq, another is at Qeqertarsuaq at the mouth of the Inglefield Bredning. The map is sourced from the DCE GIS platform of important nature area in Greenland <http://gis.au.dk/RDImportantAreas/>. The small map (included at the left bottom) is from the ToR for EIA and shows the preliminary shipping route.

On behalf of WWF Verdensnaturfonden

Mette Frost and Kaare Winther Hansen