

Environmental Agency for Mineral Resource Activities (EAMRA)

DCE/GINR hearing response to FinnAust, Scope and Terms of Reference for the Environmental Impact Assessment for the Pituffik Titanium Project

Hereby DCE/GINR's comments to the Scoping and Terms of Reference (ToR) for Environmental Impact Assessment for the Pituffik Titanium Project, final version, which has been available for the public hearing process.

Regarding the report's Part II, Terms of Reference for EIA, DCE/GINR acknowledge that text and Table 3, p. 32, has been amended from Version 04 in accordance with DCE/GINR memo dated 16th February 2017. Here it was recommended that: "the planned aerial surveys for marine mammals has to be carried out also in 2018 to elucidate the temporal variation in migration and in abundance between years" and that "it is important to stress that the planned studies of seabed fauna shall include more organisms than just mussels and clams, as the results shall map feeding opportunities also for e.g. birds as well as contribute to describing baseline".

Table 3 now includes aerial survey for 2017 and 2018, however, it is not included in the report text. A separate note on the aerial survey methodology is currently under development (Dundas Titanium, Note on aerial count methodology of marine mammals, 6 pp) and is recommended included in the ToR.

Regarding the benthos study, although included in the text, it is still not quite clear in Table 3 that the purpose of the benthos study also is to provide data for describing baseline. This issue was additionally discussed at a meeting between Orbicon, EAMRA and DCE 9th May 2017, and it was agreed upon that the 2017 benthos sampling will increase the sampling grid to obtain sufficient data for a statistical analyses of heterogeneity of the benthos community as recommended by DCE/GINR in earlier memos. This analysis will form base for design of a benthos sampling programme in 2018, and to be included in the Environmental Study Programme for the mining project.

It is not within DCE/GINR's expertise to assess 12.11 Archaeology and Cultural Heritage, however, we recommend that the Greenland National Museum is informed and confirms that an archaeological survey in the area is unnecessary.

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Page 1/1