

Timmiaq

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Regarding pre-hearing of scoping of SIA and EIA for the Titanium project at Pituffik.

Department of Industry, Labour, Trade and Energy has in an e-letter of 14 April 2017 send the Terms of Reference for the SIA and EIA for the Titanium project at Pituffik in pre-hearing.

Timmiaq would initially like to comment that our knowledge about the birdlife in the affected area is relatively limited, why Timmiaq finds it important that the projects activities are studied and documented in detail so that any consequences for migrating, breeding and foraging birds are fully documented and described in detail so that any deliberate or un-deliberate impact on birdlife are eliminated.

Based on the presented hearing documents Timmiaq have the following comments:

For at start all international environmental rules for the Antarctica should also apply in Greenland and North Arctic areas, since the ecological and biological conditions in and around Antarctica and in and around the arctic countries are mostly identical. It is a climate that for the individual animal, including birds, requires large amount of food and leads to slow growth, which pose a risk for large accumulation of toxic substances and heavy metals in the animals.

Timmiaq is not convinced that dust pollution or other un-planned pollution as part of the mine activities in the short or long run will not pose an environmental risk to the flora and fauna in the area around the mine and in the adjacent high arctic land- and sea areas, fiords and sounds. From a precautionary principle, Timmiaq would therefore recommend that large environmental demands be set for the mine to prevent any kind of pollution in connection with the operation of the mine.

In order to prevent oil- and other types of pollution Timmiaq wishes that that it is required that all ships in arctic waters are ice-classed and as a minimum has double hull.

In addition, a comprehensive contingency plan including equipment should be available in case of a spill or a large accident.

Timmiaq would like to point out the problems related to the discharge of ballast tanks, as it must be expected that the freight ships that will ship off the processed ore will arrive with ballast water from other ecosystems. This can impose a great risk with non-indigenous invasive species in Greenlandic seas. A permission to discharge ballast water will therefore according to a precautionary principle be irresponsible.

Timmiaq recommends that a ban is imposed against using the polluting heavy fuel in the skip engines of the many cargo and ore (concentrate) transports. Burning of heavy fuel is extremely poisonous and the environmental consequences of this pollution in the arctic is not known.

Since it is technically possible to use lighter and less polluting fuels Naalakkersuisut should – from a precautionary principle – demand that all shipping in arctic seas uses light fuels only. In addition should Naalakkersuisut work for a co-operation with our neighboring countries in order to impose a requirement that shipping in arctic seas should only take place using the least polluting fuels.

Based on the documents made available for the hearing Timmiaq would like to make the following additional remarks of particular relevance for the areas birdlife:

- The temperature of the water discharged from the attritioning circuit should as a starting point have the same temperature as the surrounding water and must not contain heavy metals, poisonous elements or other substances harmful to the flora and fauna that are food resources for birds.
- It must be studies which influence the mining activities has on the flora and fauna during and after the mining activities, including if the removed resources and potential replacement materials will have influence on the arctic birds that live in the area or pass on migration.
- It must be studied to what extent the mining activities including deposited waste material deliberately or un-deliberately can impact plankton-, mussel and fish populations, which form the food for several, bird populations in the sea areas next to the mine and the fiords and sounds in the mines neighborhood. The studies should include if there will be accumulation of for example heavy metals or other poisonous substances in the food chain.
- It must be made certain that the mine company is made responsible and has the finances to cover any environmental damage in Greenland and the Greenlandic seas. This includes any environmental damage by the company, subcontractors and the ships that are engaged in the work.

It must be made certain that the ships are not colliding with seabirds at night or in connection with other activities at night using lanterns.

With kind regards

Hasse Hedemand