



Nuuk 19 May 2017

To Råstofstyrelsen

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Pre-hearing of scoping for SIA and EIA for the Titaniumproject af Pituffik

Transparency International Greenland (TIG) is an organization that works for preventing corruption in Greenland in cooperation with the international umbrella organization Transparency International.

TIG welcomes the pre-hearing as this gives a more transparent and clear hearings material. In addition, we are satisfied to note that TIG together with a number of other stakeholders will be invited to a workshop after the pre-hearing.

The published material are draft *Terms of Reference for the Social Impact Assessment for Pituffik Project* and *Scoping and Terms of Reference for the Environmental Impact Assessment for the Pituffik Titanium Project*

TIG assumes that the *Scoping and Terms of Reference for the Environmental Impact Assessment for the Pituffik Titanium Project* is the Terms of Reference for the EIA.

General remarks:

At the hearings portal it is stated that the owner of the exploration license 2015/08 is Bluejay Mining Ltd. In the (hearings) material it is stated that the company FinnAust Plc is behind the project proposal. An overview of who is behind the project is requested.

TIG is worried that it is not made clear which authority will be working on the case. Department of Industry, Labour, Trade and Energy is listed as the responsible department but hearings responses should be send to the Environment Agency for Mineral Resources Activities (Miljøstyrelsen). It is not clear if the regulatory procedures of the EIA will be by the Environment Agency for Mineral Resources Activities.

TIG is satisfied to note that FinnAust will comply international conventions even if they have not been ratified by Greenland. In this context specifically UN's Convention against Corruption.

Comments to Terms of Reference for the Social Impact Assessment for the Pituffik Titanium Project:

It is mentioned several places, including in Table 7-1 1:1 that “the level of skills does not meet the need of the labor market”. It is not clear which skills are asked for, but in the material it is stressed many times that it (the work at the mine) are simple processes. TIG would like to draw attention to a publication from Greenland Perspective “Sitting on gold. A report on the use of informally acquired skills in Greenland”, in this inspiration can be found ahead of meetings with stakeholders in Qaanaaq and North Greenland, where the labor must be expected to be recruited from.

TIG is available with further information if required.

With kind regards

Anita Hoffer