

ASN Departementet for Mineralske Råstoffer  
Imaneq 1A  
P.O.BOX 930  
3900 Nuuk  
Greenland

July 28, 2021

**Consultation response to the Bill: Greenland Parliament Act no. [X] of [dd mm 2021] to ban uranium prospecting, exploration and exploitation**

With reference to the ASN Department for Mineralske Råstoffer email dated 06-07-2021, I would like to submit the consultation response to the Bill: Greenland Parliament Act no. [X] of [dd mm 2021] to ban uranium prospecting, exploration and exploitation:

1. According to the opinion of experts with whom we have consulted the full text, including the comments, we fully understand the position of the new Greenlandic Government on the sustainability of the natural heritage. However, the text seems to be written under time pressure and seems to be insufficiently elaborated. The signature of the team compiling the text is missing. The text was sent to us without any signature of the responsible employee of the Ministry.
2. The main reservation we have against the proposed provisions of the law is that it seeks to apply the uniform limit values for radioactive elements throughout the whole territory of Greenland in a very simplistic way. Considering the size of the largest island in the world, experts wonder what was the basis for an expert opinion, on which the proposal applies one standard to many different geological structures, which are fundamentally different from each other?
3. The Bill proposal openly states that the government can change the conditions for doing business in Greenland at any time. License removals, banning new raw materials and fining exploration companies could be a clear signal to the international community to suspend all investments and activities in Greenland. In the opinion of our experts, the new law should precisely define the business terms and conditions in the geological exploration and mining industry. The Bill should be sufficiently detailed and professionally designed to give all investors the maximum assurance that the rules set by the government are transparent and permanent. The possibility of constantly changing these rules should be avoided. This can only be achieved by very precise preparation of the text of the Bill in cooperation with highly qualified advisers in the field of geology, economics and international law.
4. Nowhere in the bill can be found a solution on how the government will compensate companies that will have to leave their projects and suffer significant financial losses both from wasted investments and from lost profits due to changes in the law. Should the law be passed in this inadequate form in which it was presented to us, a considerable amount of lawsuits can be expected where high financial compensation reaching hundreds of millions of USD will be enforced against Greenland.

5. We propose that the text of the law be returned for a major re-working with the participation of renowned experts and that all comments of all entities directly concerned are included, which are mainly holders of exploration and mining licenses in Greenland.

Best regards,

A handwritten signature in blue ink, appearing to read 'J. Stransky', with a long horizontal flourish extending to the right.

Jindrich Stransky  
CEO  
Northground s.r.o.