



Ministry of Science and Environment comments to first draft ESPOO report regarding Phase 2 Proposal – Mary River Project

The Ministry of Science and Environment welcome the first draft ESPOO report regarding the transboundary effects of the Mary River Project.

The Ministry has reviewed the report and have identified some gaps in the report that needs to be covered in more detail, before the report is ready for a public hearing in Greenland.

The Ministry has identified the following key issues that should be covered more thoroughly in the report in order to provide the Greenlandic public with the information necessary to comment on the project.

- The shipping corridor through the Baffin Bay and Greenlandic waters must be illustrated and described in the report. Likewise, affected marine habitat and sensitive fauna in the zone of influence along the shipping corridor must be described. The assessment should include an evaluation of the shipping route and season in relation to migration corridors and periods for marine mammals.
- The effect on using Store Hellefiskebanke as anchoring site is not described in the report. Store Hellefiskebanke is recognized as a particular sensitive sea area, and the effect of the proposed activities must be described in detail in the report.
- Information on the type of fuel used in the ore carriers must be described in the report.
- Mitigation measures and emergency response plans in case of any major accidents in Greenlandic waters must be described in the report.
- The majority of ore is planned to be shipped through the Hudson Strait where the shared stocks of bowhead whale and walrus are present during summer. The effect of the shipping through the southern route on shared stocks must be described in the report.
- The predicted effect on marine mammals (especially narwhals) caused by shipping in Milne Inlet and Eclipse Sound (and adjacent waters) is based

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Act-id: 16092711
P. O. Box 1614
3900 Nuuk
Tel. (+299) 34 50 00
Fax (+299) 34 54 10
E-mail: pan@nanoq.gl
www.naalakkersuisut.gl

on the past experience from shipping with smaller vessels in a shorter period of time. The possible long term effect caused by the current shipping is yet to be determined and the proposed upscaling of the shipping period and size of the vessels will add to the uncertainty of the long term effect on the narwhal stock which is shared with Greenland. This uncertainty must be quantified in the report in order to make it possible to take the uncertainty into account in the biological advice on sustainable harvest from the stock.

- Relevant mitigation measures to the abovementioned key concerns must be addressed in the report.

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Kind regards



Martin Schiøtz
Ministry of Science and Environment
Toqq/direkte 34 67 17
MASC@nanoq.gl