



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

The Ministry of Science and Environment has reviewed Baffinlands comments to the identified gaps in the first draft ESPOO report regarding Phase 2 Proposal – Mary River Project.

The Ministry emphasizes, that in order to carry out a meaningful public consultation in Greenland regarding the Mary River Project in accordance with the ESPOO convention, the transboundary effects of the project must be thoroughly described in the ESPOO report.

Consequently, the ESPOO report must cover impacts on shared stocks and ecosystems caused by the project in Canadian waters (both inside and outside the RSA) as well as impacts caused by shipping through Greenlandic waters. The ESPOO report must cover all the potential transboundary impacts caused by the project. This includes an evaluation of potential disturbance of marine mammals caused by shipping in areas and seasons with limited or no shipping.

The Ministry stress, that the shipping corridor through the Baffin Bay and Greenlandic waters must be illustrated and described in the report. In case that there is no specific shipping corridor, the ESPOO report should include an evaluation of sensitive habitats, migration corridors and periods of migration for marine mammals in potentially affected sea areas. The assessment should include a comparison between the migration corridors and periods of migration and well as the shipping routes and periods of shipping. The report must evaluate how potential adverse impacts in the identified vulnerable areas are avoided or mitigated.

The Ministry thanks for the attachment regarding Store Hellefiskebanke. The Ministry notes that the environmental effects of using Store Hellefiskebanke as anchoring site is not covered in the attachment and thus still needs to be described.

The Ministry notes that Baffinland refers to section 6 in the draft ESPOO report for information about mitigation measure and emergency response plans in case of any major accidents in Greenlandic waters. The Ministry kindly asks Baffinland to revisit and revise section 6 in the ESPOO report since it is not clear to the Ministry whether the current version covers more than the RSA.

In Section 6 it is mentioned that potential accidents and malfunction include:

- Collision with marine mammals resulting in harm to marine mammals
- Ship grounding resulting in damage to ship or possible harm to aquatic life
- Ice/ship interaction resulting in a delay or possible damage to vessel
- Collision with other vessels resulting in damage to ship, possible harm to aquatic life

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- Major diesel spill along the shipping route resulting in contamination of marine and coastal environment along shipping route

However, an evaluation of any of the abovementioned risks during shipping in Greenlandic waters is absent in the ESPOO report. Likewise, no mitigation measures to reduce the potential adverse effects of shipping through Greenlandic waters are suggested in the ESPOO report. The evaluation should also include a risk assessment regarding spills of heavy fuel oil (HFO), low sulphur oil (LSFO) and marine gas oil (MGO) which is used by the ore carriers throughout the life of the phase 2 proposal.

The Ministry acknowledges that the planned shipping through the Hudson Strait is not the scope of the current EIA process. However, since the proposed shipping through the Hudson Strait potentially has transboundary effects on shared stock of marine mammals, the Ministry requests that the transboundary effects are covered in the ESPOO report.

The Ministry thanks for the attachment 2 regarding Residual Effect Ratings and Significance Determinations for Marine Mammal VECs - Phase 2. The Ministry notes that it is unclear to the Ministry how - and on which scale - the residual effects have been evaluated. For example, the risk for bowhead whales being struck by ships is evaluated to be level 1 in both magnitude and extend meaning that ship strikes of bowhead whales can only occur in the local study area and only at a level that is indistinguishable from natural variations. The Ministry finds that this evaluation is not reflecting the fact that bowhead whales are well known to be prone to ship strikes and that the shipping corridor both within and outside the Local Study Area is crossing through important migration corridors and habitats for bowhead whales. Likewise, the evaluation of residual effects on narwhals seems to neglect the sensitive nature of this species and thus the ministry requests that the attachment is revisited and that the method of evaluating the various VEC's is made more transparent.

The Ministry notes, at that the ESPOO report still lacks a description of the gap of knowledge and how this effects the impact assessment. The Ministry requests that this is being described regardless of whether the impacts are significant or not.

Lastly, Baffinland refers to Section 5.4.2 in the ESPOO report for information about mitigation measures. The Ministry emphasize that Section 5.4.2 in the ESPOO report contains no information about mitigation measures targeted at reducing potential adverse environmental effects caused by the shipping and anchoring in Greenlandic waters.

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Kind regards

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