



Ministry of Agriculture, Self-Sufficiency,
Energy and Environment

Send by e-mail eamra@nanoq.gl.

Nuuk, den 4. september 2024
Brev nr. D24-9966
Sagsnr. S18-1074

Greenland Business Associations response on the report "Regional environmental baseline assessment for mining activities".

Referring to your e-mail of August 30, 2024, from Zenica Gosvig Larsen Greenland Business Association hereby forward the response on the above mentioned report on behalf of the industrial community of Raw Materials.

The industry is overall in favor of general databases that raises the basic knowledge level of Greenland concerning exploration and mining activities. Used in favour of as well the environment, the local community AND the industry, such reports will be an excellent foundation for development of a new industry which will be able to create jobs, a new income for the (local) society, educational possibilities and that on a responsible basis.

Similar data-compiling reports would be useful to have, covering other areas in Greenland. These reports and associated data should be upkept in a large database, funded by EAMRA. GBA assumes and recommends that such database – large or small – should be administrated by the Greenland Institute of Natural Resources to have a Greenland anchoring of data and expertise.

If wanted, data from the exploration compagnies can be used in the database but only with the consent concerning the use itself as well as the scope of this use from the company in question.

There should be no restrictions on who can collect samples for data as long as the use of these as mentioned is administrated by GINR.

If reports are to be included in future regulatory initiatives it would be useful to the industry if the reports had a conclusion covering all sections so that the conclusion in the report would be easily identified and understood.

If reports like this were to be created to cover all of Greenland, the industry would find it helpful for exploration companies in assessing the permitting/process risk of a given project at an early stage and before larger investments are made.

That would though assume that the conclusions of the report will appear clearly and applicably in the report.

Please, enlighten us how the framework would work alongside the EIA process.

Please acknowledge the reception of this response

Kind regards



Lars Krogsgaard-Jensen
Legal consultant