Social Impact Assessment (SIA)

Guidelines on the process and preparation of the SIA report for mineral projects

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Social Impact Assessment (SIA)
(Guidelines on the process and preparation of the SIA report for mineral projects)

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Government of Greenland
Ministry of Industry, Labour and Trade
Tel +299 34 50 00
www.govmin.gl
www.naalakkersuisut.gl
Postbox 1601
3900 Nuuk
Kalaallit Nunaat
Greenland

Layout and production:
ProGrafisk ApS
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Greenland wants to develop the mineral resources area into one of the country's primary and principal business sectors. This is to be done in close collaboration and dialogue with the Greenlandic population. Understanding the interaction between mineral projects and Greenlandic society is therefore essential in order to create sustainable relations between mineral resources companies, municipalities, affected individuals, other stakeholders as well as Greenlandic society in general.

Pursuant to Inatsisartut Act no. 7 of 7 December 2009 on mineral resources and activities of significance for these (the Mineral Resources Act), and later amendments, mineral resources companies must prepare a Social Impact Assessment (SIA) in connection with developing mineral projects. Social Impact Assessments for mineral projects in Greenland must be prepared in accordance with good international practice.

In 2009, version 1 of the SIA guidelines was issued. More than five years of experience in working with assessments of companies’ SIA reports and stakeholder involvement in general have created a natural need to update these guidelines. These guidelines (version 2 – 2016) include this experience and use the best international practice in this area, including experience from other comparable mining countries, as well as recognised standards from e.g. International Association for Impact Assessment (see reference list).

As new specific initiatives, these guidelines include a section on pre-consultation and a White Paper, and the structure of the guidelines has been changed. Where the previous SIA guidelines from 2009 had focus on the content of the SIA report (dark blue circle in figure 1), these guidelines focus on the process and the preconditions for a good SIA process in addition to requirements to the SIA report. The reason for this is the increased focus in recent years from individuals and stakeholders on the consultation process and the preconditions that form the basis for this.

The guidelines are to support assessment of the social aspects in a project. Moreover, they are to ensure that focus is aimed at strengthening constructive solutions in order to promote the positive opportunities in society caused by the project and also reduce negative impacts.

These guidelines are more than just instructions on how to prepare an SIA report. They are to support a transparent process about openness and participation from relevant stakeholders in order to ensure the best possible sustainable development in Greenlandic society.

Figure 1. Focus areas of the SIA guidelines.
1.1 Objective
All mineral projects must be socially sustainable and meet high international standards with regard to financial planning, health, safety, the environment as well as social and cultural initiatives. This means that planning, implementation, execution and monitoring of the project must be in close dialogue with Greenlandic society, including individuals, organisations, enterprises and other relevant stakeholders.

It is important to see the SIA and the process of involving stakeholders in context with the other initiatives in the project, including in particular Environmental Impact Assessments (EIA).

The main objectives of the SIA process for a mineral project in Greenland

- to provide a satisfactory and impartial description for Greenlandic society in general about what Greenland, the local communities affected and individuals will gain from the project
- to inform and involve relevant and affected individuals and stakeholders early on in the process via ongoing dialogue and specific procedures, for example through information and consultation meetings as well as through relevant media
- to provide a detailed description of the social pre-project baseline situation, which, on the basis of the most recent available data, is to form the basis for planning, mitigation initiatives and future monitoring
- to provide an assessment based on collected baseline data to identify both positive and negative social impacts at local and national levels
- to optimise positive impacts and mitigate negative impacts throughout the project lifetime and through this ensure sustainable development
- to involve in a meaningful manner affected towns, settlements and communities (individuals) that may be directly or indirectly impacted throughout the project by utilising and respecting local knowledge, experience, culture and values
- to develop a Benefit and Impact Plan
1.2 Legislative framework

These SIA guidelines concern aspects of mineral resources activities in Greenland in relation to the general legislation below. Moreover, the Greenlandic legislation is supplemented by Greenland’s international obligations.

The Mineral Resources Act

- Greenland Parliament Act no. 7 of December 7, 2009, on mineral resources and mineral resource activities (the Mineral Resources Act) and rules laid down pursuant to this Act, including later amendments to the Act.

The Large Scale Act

- Greenland Parliament Act no. 25 of December 18, 2012 on building and construction in connection with large-scale projects (the Large Scale Act) and rules laid down pursuant to this Act, including later amendments to the Act.


These guidelines build on part 16 of the Mineral Resources Act on social sustainability assessment (SSA) and agreements on social sustainability, including activities likely to have significant effects on social conditions. In practice this will generally be exploitation projects (mining projects). Significant impacts on social conditions may also occur in connection with prospecting projects and exploration projects, but this will depend on a specific assessment of the project’s impact on social conditions.

The guidelines do not apply to environmental impact
assessments (EIA) and to licences for small-scale projects. In addition, independent updated guidelines will be prepared for the hydrocarbon area. The Ministry reserves the right to make and issue supplements to these guidelines at any time. The supplements will be available on www.naalakkersuisut.gl and www.govmin.gl.

1.3 Mineral resources authorities

The Ministry of Industry, Labour and Trade, the Ministry of Mineral Resources and the Ministry of Nature, Environment and Justice, inclusive underlaying authorities are responsible for the mineral resources administration in Greenland. The Ministry of Industry, Labour and Trade is the responsible authority in areas related to industry and labour market, including the responsible authority within the areas of SIA and IBA. The Ministry of Mineral Resources is responsible for among others approval of licences and permits. The Ministry of Industry, Labour and Trade is responsible for licences and approvals related to socio economic matters, including the area of processing in and outside of Greenland, infrastructure related to local workforce and local enterprises and SIA and IBA matters etc. Figure 2 shows the local and national parties taking part in the IBA process. The municipality and the Government of Greenland are involved as the Greenlandic parties in Impact Benefit Agreement (IBA) negotiations.

Socio-economic aspects related to these SIA guidelines, including cases related to Social Impact Assessment (SIA) and Impact Benefit Agreements (IBA), come under the Ministry of Industry, Labour and Trade. Besides the Ministry of Industry, Labour and Trade other departments will be involved in the IBA negotiations, including the Ministry of Finance, the Ministry of Mineral Resources, the Ministry of Education and eventual other ministries.

In order to ensure local support, the local authority, such as municipalities and relevant village councils, must be involved early on in the process. Together with the company and the Government of Greenland, municipalities play a vital role in the negotiations on Impact Benefit Agreements – which are to be concluded following the public consultations. Moreover, the municipalities help create the best possible framework conditions for existing

![Figure 2. Participants in the IBA negotiations (three-party negotiations).](image-url)
and future business activities locally, including upgrading the local labour force.

1.4 Payment of costs
The company (licensee) has to pay all costs for preparing the SIA report, annexes and associated studies/surveys.

In connection with authority processing and guidance by the authorities, including work on licences, approvals and IBA agreements, etc., costs pursuant to relevant legislation and the Reimbursement Order shall be covered by the company.

Reasonable costs in connection with public consultation meetings must also be covered by the company. When a final application has been received, the mineral resources authority can submit a preliminary budget for these costs.
2. The process

2.1 The formal process

The process concerning Social Impact Assessment is more than just preparing a SIA report, as this is only one element in the process. The figure below provides an overview of the process concerning the preliminary studies, preparation of the SIA report and the statutory consultations as well as other processes.

Parallel with the different scenarios is an ongoing processing by the authorities. From when an application for exploitation is received until a project is approved, a mineral exploitation licence (a section 16 licence), a development and closure plan (sections 19-43 approval) and subsequently more specific approvals of operations (section 86 approvals) will be prepared in parallel with the consultation, the White Paper and the IBA.

The processing time for an application is therefore expected to take 4 to 12 months. Larger and more technical applications can take longer. The case-processing time begins when a specific application has been submitted (see large orange circle below). Incorrect applications will be returned, and in these cases the overall processing time will be extended.

Some processes, such as collection of baseline data (large blue circle), are not only limited to take place in the

Figure 3. The formal SIA process.
beginning, but can overlap the other processes in the figure. Other processes, such as the eight-week public hearing which can be extended (big green circle), cannot begin before an application for exploitation as well as a draft SIA have been submitted.

As shown in the simplified SIA process described in figure 3, there is a process before and after the preparation of the draft SIA and application for a mineral exploitation licence (large orange circle). The Government of Greenland considers it important to involve stakeholders early in the planning of the project, i.e. so the stakeholders have a real opportunity to influence the process and make their voice heard before the draft SIA is made available for the eight week consultation period. For the very same reason, in 2014 a requirement was written into the Mineral Resources Act for a 35-day pre-consultation (small green circle). Moreover, the eight-week public hearing was also written into statute in the Mineral Resources Act in order to create a more transparent process.

Following the public consultation, all consultation statements will be gathered in a White Paper and made available to the public. In parallel with this, the statutory IBA negotiations will begin between the company, the municipality(ies) and the Government of Greenland. The purpose of the IBA is to involve as many local enterprises and as much local labour as possible in the project, and to optimize supplies from local sources as well as education and competence development etc.

The White Paper and the updated SIA report must generally be completed before the IBA negotiations can begin. The completion of the White Paper and the SIA report as well as the start-up of the IBA process may overlap.

The updated SIA report and the White Paper will form the basis for signing of an IBA agreement and a political decision on possible approval of the exploitation licence. The IBA agreement must shall be signed before the project is approved. The IBA agreement is further described in section 2.9.

Political approval of the exploitation licence does not automatically allow the company to begin the construction phase of a project. Before this can take place, a number of technical and administrative approvals must be granted, cf. sections 19, 43 and 86 of the Mineral Resources Act.

The central phases in the formal SIA process in Figure 3 are described in more detail below in sections 2.2-2.10.

2.2 Scoping study

Mining projects can be very different also in terms of potential social and economic impacts during a project. A scoping study is the initial step of the SIA process where key issues to be assessed in the SIA are identified and delimited.

In parallel with this, and up to the submission of the SIA report, the company and the consultants of the company will make comprehensive plans and collect numerous baseline data for the SIA report. Baseline data is described in more detail in section 3.3.

The scoping study is the first specific project document containing assessment of timetable and project budget, typically with a number of reservations and uncertainties. The report may contain alternative proposals for project design such as different design and layout of roads and similar.

Public participation must be part of the scoping phase in order to identify the most relevant social issues to ensure that groups concerned will be able to influence the issues to be studied in the SIA in good time. Local communities, organisations and stakeholders, including municipalities and local representatives that hold particular knowl-
edge about the social aspects of the project area, should therefore be identified and involved already in the scoping phase.

It is recommended that the scoping study describes involvement of individuals and stakeholders in the process, and introductory information about expected training and employment of local labour should be included. Already at this stage, it is important to match expectations with relevant stakeholders and authorities.

Based on the scoping study, the company should prepare and publish a non-technical document explaining in layman’s terms the most relevant aspects of the project. The document/proposal can form the basis for meaningful discussions involving the public. As a minimum, the proposal and relevant information should therefore be available in Greenlandic and in Danish in this phase.

The scoping study is considered the first step towards the preparation of a final SIA report and will hold a number of uncertainties with regard to time perspectives and project budget etc. The study may contain different scenarios which are to be clarified, and identify possible issues and concerns to be investigated.

The final scoping study must be submitted to the authorities in order to be approved before work on the Terms of Reference can begin. It is important that the authorities are given the opportunity to assess the project already in this scoping phase, as any doubts and shortcomings could be addressed at this early stage to the benefit of all parties.

2.3 Pre-consultation and announcement of the project

A consultation has several purposes, but is mainly to ensure meaningful involvement early on in the process. Conducting a pre-consultation prior to the public eight-week
consultation ensures that companies make contact with the relevant stakeholders and authorities early in the project, including relevant municipalities.

The pre-consultation is the official announcement of a project, and can therefore be considered as a formal declaration that the company wants an SIA process/consultation to be carried out. The announcement is made by the company submitting a letter stating that the company wants to announce the project concerned. The announcement must be accompanied by a project description and a non-technical summary in both Greenlandic, Danish and English. The project description is to be based on, and include the scoping studies and can be considered a sort of draft Terms of Reference.

The project description is to be sent for public pre-consultation on the Government of Greenland’s hearing portal for 35 days. The content of the Terms of Reference and the SIA report will be determined on the basis of input from the public pre-consultation. Incoming consultation statements will be sent to the company. The company is obliged to include input from consultation statements in its further work on the SIA report. Consultation statements must be included in the White Paper on equal footing with consultation statements in the eight-week public consultation process.

Subsequently, the company will submit the Terms of Reference to the authority, which, on the basis of input during the pre-consultation, will then approve the Terms of Reference before a draft SIA can be prepared and submitted.

This process ensures that alternative project proposals, ideas and clarifying questions are addressed early in the process, so that considerations and specific proposals can be incorporated at an early stage, and thereby be included as real alternatives to the original project proposal.

2.4 Fund (consultation fund)
When a project description has been sent for public pre-consultation, affected individuals, the local community and relevant organisations in Greenland can seek funding to initiate studies and advice to identify special issues related to specific mineral projects in Greenland.

The fund is a new initiative stipulated in the Mineral Resources Act. The purpose of the fund is to ensure that the local community and individuals affected by a specific mineral project can seek funding to carry out studies or to collect information and receive advisory services on unclarified issues or concerns. Similarly, relevant registered Greenlandic organisations can seek funding to carry out studies or collect information about a specific mineral project.
Applicants can apply for funding from the fund early in the idea phase, as funding from the fund is intended for affected individuals and relevant organisations to gain knowledge and information to contribute constructively to development of the mineral project.

The company must consider the resulting studies as a submission in line with general consultation statements. Reports and other information collected from this process must therefore be included in the development of the mineral project as background material prior to a final decision on approval.

The Government of Greenland may lay down provisions on the level of resources in the fund, requirements for the application, who can apply for funding, how the funding is to be distributed and who is to administer the fund. More detailed provisions about the fund, including financing, deadlines etc. will be available on the Government of Greenland website www.naalakkersuisut.gl.

2.5 Terms of Reference
On the basis of the approved scoping study and the public pre-consultation, the company must prepare a Terms of Reference which must also be submitted to the authorities for approval.

The Terms of Reference must contain a more detailed description of the result of the pre-consultation, including the initiatives and changes to the project that have occurred as a consequence of the pre-consultation.

The Terms of Reference are considered a more specific and detailed document than the scoping study, which describes the timetable and project budget etc. in more detail. Therefore, the Terms of Reference describe more specifically when the different phases in the project are expected to be implemented and what the phases and the project in general will contain. Furthermore, the parties involved, including relevant stakeholders such as municipalities, individuals etc., will also be involved in the Terms of Reference, for instance through the pre-consultation. Possible issues will therefore be defined in more detail, as will possible limitations and possibilities.

2.6 SIA report (draft and final version)
The SIA report is the company’s estimate of the socio-economic impacts that will arise in connection with starting up a mining project and how the company will deal with such impacts. The company is obliged to involve relevant stakeholders and apply local knowledge in connection with preparing this report.

The SIA report will be used as a basis for the eight-week public consultation and associated public consultation meetings which will be held following an application for exploitation.

The SIA report cannot be submitted for hearing before requirements and formalities have been met (see section 4.1 on formalities). The SIA report sent for public consultation will still be considered as a draft, as submissions and consultation comments etc. arising during the public consultation phase have not yet been incorporated in the SIA.

As a general rule, the public consultation must be commenced no later than four weeks from submission of a correct draft SIA report.

Recommended content of the SIA report is described in more detail in section 4.2.
2.7 Public meetings

Unlike stakeholder meetings, information meetings and other citizen-related meetings typically held by the companies, the authorities hold public consultation meetings after consultation material has been published and submitted for public consultation on the Government of Greenland website www.naalakkersuisut.gl. It will be possible to supplement these meetings with other types of meetings and methods, including social media.

Public consultation meetings are chaired by a chairperson and minutes are taken during the meetings. Presentations, questions and answers will subsequently be published on the Government of Greenland website in Greenlandic and Danish.

Consultation meetings will typically take their point of departure in the published draft SIA report. Types of meetings, topics and number of meetings etc. depend on a continuing professional assessment and will therefore be decided from project to project with regard to needs and relevance.

Meetings focusing on either providing information, gaining input or in some other way involving the public in social aspects, and special mining-related issues. These meetings may have different forms and contents, for example large public meetings in village halls and similar, and are typically held by public authorities.

Meetings primarily focusing on providing information on the status of the project, including project plans and timetables, future initiatives, matching of expectations, expected work and supply needs etc.

Meetings focusing on providing information, gaining input, or in some other way involving relevant stakeholders in the project. These meetings may have different forms and contents, for example focus-group meetings or one-to-one meetings, and are typically held by the companies. Stakeholder meetings can therefore be held with specifically selected groups, persons etc.

Type of meeting arranged by the authorities as stipulated in the Mineral Resources Act. The meetings (often several meetings in different towns/settlements) have a keeper of the minutes and a chairperson, and are held in connection with the eight-week public consultation period. The companies and their consultants will typically present the results of their studies (including the SIA report). The authorities will also be present to inform about the process and answer questions.
2.8 The White Paper

The White Paper is a document with the purpose of addressing relevant consultation statements and comments on the project which have emerged during the consultation phases. Questions from the pre-consultation and the eight-week public consultation meetings must therefore also be included. The structure of the White Paper is to help ensure transparency and that all remarks and questions are noted down, answered and assessed.

Remarks and questions will be answered in the White Paper by the company and any authorities depending on to whom the questions are addressed. Consultation statements, replies to these statements as well as references to where in the SIA report the replies will be dealt with, will then be published on www.naalakkersuisut.gl.

The White Paper is part of the decision-making basis for when the Government of Greenland makes its final decision on the exploitation licence.

The company is responsible for translating the White Paper into Greenlandic and Danish. Moreover, the company is responsible for preparing the White Paper and for ensuring that all hearing statements have been included and answered. The authorities will provide guidance and assistance when necessary.

A White Paper is a public document which has a clear structure and is designed to answer relevant consultation statements and comments on the project which have emerged during the consultation phase. The structure of the White Paper ensures listing of questions, replies to these questions and references to how and where the outcome of the replies will be adjusted in the SIA report.
2.9 Impact Benefit Agreement

Negotiations concerning the content of the Impact Benefit Agreement (IBA) can begin as soon as the eight-week public consultation phase is over. The Impact Benefit Agreement is an agreement between the licensee, the municipality(ies) and the Government of Greenland. The purpose of the agreement is to safeguard Greenlandic interests and social commitment from the parties involved throughout the mining project.

The agreement can be considered as a tool for companies to convert the initiatives described in the SIA report into more specific and measurable initiatives, and is thereby a tool to ensure local support for the projects. The SIA report therefore forms the basis for negotiation of the Impact Benefit Agreement.

The content of the IBA agreement will be negotiated between the parties, and relevant Greenlandic stakeholders will be involved in the process as far as possible. Following conclusion, the IBA will be published on www.naalakkersuisut.gl.

![Figure 5. Areas with high priority in the Impact Benefit Agreement.](image-url)
The content and structure of an IBA may vary from project to project. However, there will be components in the agreement which will generally be repeated from agreement to agreement. As a main principle, the agreement will use a structure in which there is a main document with legal sections and general provisions. This is the part of the agreement that is repeated from year to year. Among other things, the content will include provisions on entry into force, termination of the agreement, legal basis, conflict resolution etc. This will be based on an IBA model prepared by the Ministry of Industry, Labour and Trade.

Moreover, a number of annexes will be added containing specific measurable sub-targets to be updated year by year on the basis of regular monitoring and evaluation. The IBA will therefore become a dynamic document which is continuously adjusted as the project evolves. Different IBA model drafts can be used depending on the scope of the project and whether the project is a large scale project or not.

### 2.10 The approval

When the public consultation has been completed and the SIA has been updated on the basis of the White Paper, the final mineral exploitation licence and any other relevant documents will be presented to the Government of Greenland with a view to deciding whether to approve the project.

The IBA agreement must as a main rule be signed before the final exploitation and development and closure plans can be approved. The final IBA must therefore be signed by all parties before the construction work can commence.

Depending on the size of the project, processing by the authorities of an SIA report can be expected to take six months, including the public hearing period. This presupposes that all required documents have been submitted according to the correct formalities and in the correct languages. However, project-specific issues may cause a longer processing time.
3. Preconditions for a good SIA process

3.1 Involvement of stakeholders

The process of preparing a Social Impact Assessment is characterised by having a high degree of public participation before, during and after the launch of a project. The aim is that all relevant stakeholders must be informed about the project and heard in the process, be given the opportunity to contribute with knowledge about e.g. local conditions, and be active in the work and the decision-making process in proposals for location of installations etc.

In connection with preparing an SIA report, knowledge and experience from people familiar with Greenlandic conditions must be included as far as possible. It is therefore recommended that local individuals, local consultants and enterprises be involved in this process as far as possible.

Participation must be initiated in a timely manner to ensure that project benefits and challenges are addressed proactively. Individuals and stakeholders must therefore be given a real opportunity to be heard and thereby influence the process before important decisions are made. Furthermore, an important principle for public participation is to provide information and material comprehensible for non-experts, for example by preparing non-technical summaries in layman’s terms. Workshops, information meetings and similar public events must generally be held in both Greenlandic and Danish.

Stakeholder analysis

It is required that the involvement of stakeholders in the SIA process is documented. The SIA process must there-
fore include identification of the stakeholders involved and affected by the project both directly and indirectly. It is recommended to prepare a strategic stakeholder analysis for this purpose. This analysis will identify and prioritise the group of stakeholders with regard to important and less important stakeholders. The analysis should include a clear strategy for how the stakeholders will be involved before, during and after the project and how input from stakeholders will be dealt with. Matching of expectations is key in this connection.

The analysis or key parts of the analysis must be included in the SIA report, and the report must describe how the stakeholder process has taken place and the constructive contributions that have arisen. Summaries of the comments from stakeholders should be incorporated in the SIA report, and the entire stakeholder analysis can be enclosed as annex to the SIA report.

Early in the process, the authorities will assist in finding relevant stakeholders which may be affected by the project. Relevant stakeholders can be divided into the following areas (see figure 6):

**Relevant stakeholders can be divided into the following (not exhaustive) areas**

- **PUBLIC SECTOR**: Local and national authorities, settlement representatives, education sector etc.
- **NON-GOVERNMENTAL ORGANISATIONS**: Employers’ and employees’ organisations, farmers associations, hunting and fishing organisations, NGOs focusing on the rights of indigenous peoples, NGOs focusing on fighting corruption, tourist organisations, environmental organisations etc.
- **OTHERS**: Affected communities and individuals, relevant external associations and organisations, relevant mineral resources activity companies as well as other enterprises affected directly or indirectly by a mining project or similar stakeholders.

3.2 Applying local knowledge

When preparing the SIA report, the company must use traditional and local knowledge as far as possible by collecting information through qualitative interviews. It is important to incorporate local knowledge from individuals, commercial hunters and fishermen etc. This knowledge may have been passed on from generation to generation and has not necessarily been described and analysed in publications and public literature. It is recommended that the licensee describes, analyses and uses the traditional knowledge existing in the area in the SIA report. This knowledge may also include municipal planning documents and similar descriptions.

It is also important to study how and by whom the area and the surrounding project area is being used. Very often fiords and local areas in the project area are being used by anglers and commercial fishermen as well as individuals from towns and settlements nearby. Moreover, these areas may have a cultural value for local residents. Furthermore, the land areas may be used for other different purposes, often for sheep-farming, or for recreational and commer-
Social hunting. There may be tourist activities, use of nature and other initiatives related to mineral resources. In addition, areas may be protected and under conservation orders. A further description of how the area is being used should therefore be prepared and incorporated in the SIA report. Longer descriptions can be included in the annex to the SIA report.

### 3.3 Baseline data

One of the purposes of the SIA report is to describe possible negative and positive impacts on society in establishing a mining project. In order to do this, and to measure the effect of this, it is important to start with a baseline level, i.e. a level for different factors in society before an actual impact from the mining project is added. On this basis, it is possible to measure actual changes later in the project phase in relation to the baseline data level described.

In order to make the SIA report easy to read and relevant, the primary baseline data should be included in an annex to the SIA report. Central and summarising parts of the baseline data can then be included in the actual SIA report where relevant. It is recommended to make a critical assessment of whether the baseline data collected is relevant to the specific project. Irrelevant baseline data should therefore not be included in the SIA report. Rather than only listing baseline data, the SIA report should concretise its significance for the areas suggested in figure 7.

Baseline data must be collected on the basis of best international practice and through credible and reliable sources in a transparent manner, and in a manner that involves traditional and local knowledge.

Descriptions related to use of the project area and the local area (a Land-Use Study) must be included as part of the baseline data in the SIA report.

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**Baseline data includes the following areas (non-exhaustive list):**

- Population and general demographics
- Cost of living and housing situation
- Nature and land use
- Social problems, crime, illness and drug/alcohol abuse
- Income and taxes
- Industry and business structure
- Public, private and semi-private sectors
- Labour market structure and education structure
- Infrastructure
- Health
- Values, heritage, knowledge and social/cultural well-being as well as language aspects
- Listed/conservation areas
- Relevant socio-economic and project-specific areas

Figure 8. Baseline data.
3.4 Active communication of information
The licensee must be active in communicating relevant and readily accessible material about the project to the public and other stakeholders throughout the project period. It is important that relevant and comprehensible information about the project reaches the public and other stakeholders in a timely manner before a political decision on the exploitation licence is made.

Website
Early in the exploration phase of the project, the licensee should create a website in Greenlandic and Danish as a
minimum. This website can be used to communicate relevant knowledge about the project and serve as a platform for stakeholder involvement and discussion. Later in the project phase, information about tendering procedures, procurement, job ads and other relevant information can be communicated through this media.

It is important to direct the website to the individuals who will be affected by the project in the languages spoken in Greenland. Therefore, the website should not only be an international showcase aimed at foreign investors. It is a good idea to create a questions and answers section (Q&A) in which individuals can ask the company questions and get a quick reply in Greenlandic/Danish.

The licensee should therefore create, and use actively, a website in Greenlandic and Danish in a timely manner before the public consultations.

**Dialogue with individuals and stakeholders**

In order to communicate information about the project to as many individuals as possible, it is important to prepare an information strategy. In addition to participation in public consultation meetings, it is important that the licensee holds a number of different stakeholder, information and community meetings throughout the project. See section 2.7 for more details on types of meeting.

Therefore, the company must hold a number of stakeholder meetings early in the process in order to collect important information for the SIA report. Depending on the stakeholders involved, the licensee is encouraged to adjust the form and content of the meetings to the recipients.

In parallel with this, the licensee must hold information meetings focusing on providing information on the plans for the project, including infrastructure, expected jobs, time perspective and economy etc. As the majority of the people at such meetings will be speaking Greenlandic and Danish, it is important to adjust the meetings to this.

When the public consultation has commenced and the public consultation meetings have been initiated, the licensee is recommended not to arrange public meetings in the same period, as this can cause confusion.

**Active participation in communicating information including socio-economic events**

The Licensee is encouraged to be creative with regard to communicating information about the project to the public. In addition to the different types of meetings and communication through websites, it is recommended that relevant information is communicated through video clips, social media, newspapers and journals, local offices, trade fairs etc.

It is a good idea to have a Greenlandic-speaking contact and information employee, who is acquainted with the local area to act as a liaison officer between the company and the public.

Seminars, meetings and sessions organised to communicate information about the company’s plans to involve local labour, or to create contact between the licensee and local sub-suppliers etc. must be attended by the licensee as far as possible. Participation is considered a matter of course and can be viewed as part of the company’s social licence to operate when planning mining activities in Greenland.

Events and meetings concerning educational institutions, job centres etc. should also be given priority with participation by the company.

Moreover, companies are encouraged to communicate, support and in other ways promote social responsibility as an integrated part of executing mineral resources activities in Greenland.

In order to prepare for and deal with complaints and concerns from individuals and stakeholders, a transparent grievance mechanism should be established by the company.
4. The SIA report

4.1 Formalities

The SIA report is the company’s suggestions for how to deal with positive and negative socio-economic issues. When preparing a Social Impact Assessment report (the SIA report), a number of criteria and formalities must be complied with before the report can be approved and submitted for public consultation.

Although the SIA report may have been prepared by an independent third party, the authorities will consider the SIA report as the licensee’s report. Therefore, the name and logo of the licensee must be stated clearly on the front page of the report as a minimum.

Versions and languages

The SIA report should be submitted in an electronic version together with a non-technical summary and annexes in each of the languages stated in figure Figure 8. The SIA report can only be sent for public consultation when all versions in all languages have been submitted, and the authorities have confirmed that the formalities have been met, the text is correct, and the report meets the criteria stated in guidelines and related legislation.

The final SIA report and the non-technical summary as well as all annexes must be submitted to the mineral resources authority in Greenlandic, Danish and English. The summaries must be included as part of the SIA report and as separate documents. The consultation period can therefore only commence if the material has been submitted and approved in the languages stated.

Other relevant background materials to the SIA report must be made available on the company’s website from the date the consultation is initiated, so that all the consultation material is available to the public.

- If the material is not translated into Greenlandic and Danish, the SIA report may not refer to this as annexes. Instead a reference should be made to the material as background material.
- When submitting the SIA report, it must be explained why the specific material is not included in the annexes. Moreover, it should be explained why the material is not relevant to include in the SIA report. The authority will then assess the reasonableness of this explanation.
4.2 Contents of the SIA report

The suggestions below for a table of contents serve as a guide. As every project has its own specific characteristics, it will be necessary to adjust the content accordingly.

It is important for the authorities that the SIA report is easy to read and informative. Although sections in the SIA report may be very technical and text-heavy, the material should be communicated to the reader in a simple and easy-to-read manner by inserting relevant and informative maps, figures, photographs, graphs and fact boxes etc.

It is recommended that sufficient time is allocated for proofreading the SIA report and any annexes, both for language mistakes as well as factual mistakes. This is particularly relevant if there is a long time gap between collecting and preparing data and the date of submitting the report. The most recent data should therefore be included at all times.

Accumulated effects

The accumulated effects must be described in the SIA re-

Table of contents:
(the final SIA report should include the following components)

- **FRONT PAGE** (project title, name and logo of licensee and any consultant, licence number and other relevant information)
- **NON-TECHNICAL SUMMARY**
- **INTRODUCTION/BACKGROUND/OBJECTIVE**
- **PROJECT DESCRIPTION** including relevant key figures
- **POSITIVE AND NEGATIVE IMPACTS**
- **BENEFIT AND IMPACT PLAN**
- **STAKEHOLDER INVOLVEMENT**
- **ANALYSIS OF ALTERNATIVE PROJECT PROPOSALS** including status quo
- **CUMULATIVE EFFECTS**
- **BASELINE DATA SUMMARY**
- **APPENDICES**
  - Definitions and abbreviations
  - Methodology
  - Legal and administrative framework
  - Baseline data and baseline description
  - Possible stakeholder analysis
  - Possible summary of Scoping Study and ToR
- **REFERENCES**

*Figure 10. Suggestions for table of contents.*
The effects can be positive and negative. It can be relevant to include projects already in operation, under construction or in the process of considering initiating construction by the company.

**Positive and negative impacts**

A key element in the SIA report is a description of the positive and negative impacts as well as suggestions for how to deal with such impacts. It is important to divide the expected impacts and their effects into positive and negative social consequences. A Social Impact Assessment should aim at maximising the sustainable initiatives and development opportunities to be localised, and it should minimise the possible negative effects that may occur. This will contribute to a sustainable development in Greenland at local, regional and national level.

In order to identify clearly the positive and negative effects of establishing a mine in Greenland, it is a good idea to list advantages, disadvantages and initiatives in a clear and simple manner. The purpose of this is to elucidate in the best possible way how Greenland will benefit from permitting exploitation of a deposit, and describe the possible negative impacts that may arise. Therefore, it should be clear what advantages and disadvantages Greenlandic society can expect from this project.

**Processing in Greenland**

The SIA report must include expected reprocessing scenarios in Greenland/outside Greenland, expected jobs in Greenland/outside Greenland as well as expected job categories. Moreover, the report must state the expected tax revenues and royalties in Greenland/outside Greenland.

According to the Mineral Resources Act section 18 (3) a licence under section 16 may lay down the extent to which the licensee must process exploited mineral resources in Greenland. However, minerals may be processed outside Greenland if processing in Greenland would result in significantly higher costs or greater inconvenience. Processing in Greenland is therefore the main scenario and therefore processing outside Greenland will require an exemption from the provision.

It must therefore be described in the SIA report, where appropriate in scenarios, what processes are planned in Greenland and outside Greenland. Scenarios of the processing placed outside Greenland because of higher costs or greater inconvenience must be satisfactorily documented in a way that it clearly emphasizes why these scenarios are not possible in Greenland. It must also be documented what tax revenues, jobs and other positive impacts generated by the processing abroad Greenland in this regard will not benefit from.

The positive social benefits can be described as (list not exhaustive):

- processing of minerals in Greenland
- increased tax revenues
- reduction of unemployment / creation of jobs
- expected work-experience positions/placements
- supplies from local sources
- knowledge transfer to society
- start-up of courses
- description of the company’s planned collaboration and supplier models
- public events targeted at the business community
- upgrading of the local business community
- expected employee competences necessary for being employed in the mine and/or for sub-suppliers as far as such information is available
- and similar conditions

The SIA report must also include a clear overview, describing:

- important key figures (capital investment and operating expenses etc.)
- expected profit for society as well as for the mining company
The negative impacts can be described so that they give individuals and other stakeholders, including public institutions and local communities, a clear picture of the negative impacts of establishing a mine. It is important that the SIA report illustrates the social impact the company is expecting, for example in relation to increased case-processing in public institutions, load on infrastructure, pressure on public institutions etc. Negative impacts on nature and the environment will also be included in the EIA report.

**Health (an example):** When, for example, the health area is to be described in relation to positive and negative impacts, it is important to involve the right stakeholders (e.g. the Ministry of Health and the healthcare sector in general) early in the process. This is partly to procure the most correct and updated figures and information for the SIA report, but also to initiate early dialogue with the affected stakeholders and match expectations.

Positive and negative impacts on health will have to be described satisfactorily. Furthermore, how best to ensure proposals for mitigating negative impacts and promoting positive impacts must be described.

In this context, it would be relevant to study whether the project will change the current health status in the project area and perhaps in the public generally, as well as how this will take place? What initiatives aimed at ensuring positive impacts on sectors financed by Greenlandic society must be considered and initiated in this connection?

For example, there may be studies of whether it will be necessary to enter into an agreement with authorities in the health area with regard to commitments and expectations, and what health services the company can expect in this regard.

Moreover, the necessity of a Health Impact Assessment (HIA) must be considered, if the health aspects of the project are significant.

It is also important to describe if there are aspects of the project that the public or employees in the mine must be particularly aware of in a health perspective?

**Benefit and Impact Plan**

It is important the SIA report identifies and discusses possible initiatives managing both positive and negative impacts as well as derived and cumulative effects. It may be necessary to identify impacts not possible to manage immediately. Furthermore, the need for additional mitigat-
tion initiatives may arise, for example as proposals for limiting negative impacts and promoting positive initiatives as well as development initiatives as a consequence of new and unexpected developments during the project. These aspects must be secured via the licensee’s monitoring and evaluation programme.

The proposed mitigation and development initiatives as well as measures to promote positive impacts and avoid negative impacts in the SIA report must be analysed, assessed and prioritised and act as a foundation for a specific Benefit and Impact Plan.

It is important to address how the negative impacts can be limited as far as possible while promoting the positive impacts.

A Benefit and Impact Plan must be included as part of the SIA report and contain specific initiatives. The Benefit and Impact Plan must address specific and relevant areas expected to be affected and it must identify the parties to be involved in order to limit or promote proposed effects.

The Benefit and Impact Plan must indicate expected duration/timetable for each activity and clearly state what effect the proposed measure will have on the specific areas.

The Benefit and Impact Plan is a dynamic document which within the frames of the IBA is adapted and adjusted regularly in accordance with the progress of the project.

**Monitoring and Evaluation Plan**

Monitoring and evaluation requirements for the Benefit and Impact Plan will be included as an element in the subsequent IBA agreement.

The aim of monitoring is to observe changes over time and through this adjust the project. Monitoring must be done regularly and with well defined and relevant indicators based on the impacts and mitigation measures identified in the SIA.

The purpose of an evaluation plan is to assess if any major adjustments in the monitoring plan and in the Benefit and Impact Plan are needed.

The monitoring and evaluation frequency can be adjusted regularly throughout the project if necessary. It is important that the company demonstrates a clear organisation and structure to deal with such plans.

*Figure 12. Process and plan for managing, monitoring and evaluation of possible impacts.*
5. List of references


- Inatsisartut Act no. 7 of 7 December 2009 on mineral resources and activities of significance for these (the Mineral Resources Act), and any later amendments to this Act and rules laid down pursuant to this Act.

- Inatsisartut Act no. 25 of 18 December 2012 on building and construction in connection with large-scale projects (the Large-Scale Projects Act), and any later amendments to this Act and rules laid down pursuant to this Act.

- Greenland Home Rule Statutory Order no. 24 of 30 December 2003 on reimbursement of expenses in connection with processing by authorities in relation to mining activities (the Reimbursement Order).

- International Association for Impact Assessment (IAIA) www.iaia.org
