

GSPD

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Sent: Wednesday 16 June 2021 15:54
To: GSPD
Subject: SEA Scoping on Minerals Policy

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Dear DECC / RPS team,

Thank you for the opportunity of providing feedback into the proposed scoping report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland

The feedback I give here is at overall outcome level and is coming from the context of:

1. Being a facilitator for agreements between wind farm developers and local communities in Ireland 2016 to date, and
2. Extensive work for minerals exploration and extraction overseas, especially due diligence, environmental management and social impact assessments to IFC & EU standards.

Combining the experience from both of the above, this feedback focuses in on some ambiguity in paragraph four from the introduction to your SEA Scoping Report, 24th May 2021:

'The objective of SEA is to provide for a high level of protection of the environment and to promote sustainable development. SEA is a process for evaluating, at the earliest appropriate stage, the environmental consequences of the implementing policy initiatives prior to adoption. The SEA process also gives interested parties an opportunity to comment on the environmental impacts of the proposed Policy Statement and to be kept informed during the decision-making process.'

In the first sentence of this, it is clear that the objective of SEA is to 'provide for a high level of protection of the environment and to promote sustainable development.' Here, the wider goal of sustainable development - which includes the local community's sustainable development - is very clearly stated.

Yet from then onwards, the focus is on the environment only rather than the environment together with the vibrancy and social cohesion of communities who call the 'environment' part of their home; and only part of their sustainable development. The section on Population and Human Health (PHH) does address some of this, but certainly does not address many of the other aspects of social and human capital inherent in the foundation of a community's sustainable development as would be required to ensure a community's sustainable development is protected and promoted by any given project.

The reason I raise this larger strategic issues as the main part of this feedback is that policy / strategic disconnect between an 'environmental impact assessment' and 'the impacts on a person's home and wellbeing' was found to be one of the core root causes for the genuine community opposition for the wind projects we studied. As part of an SEAI co-funded project starting January 2020, we had root-cause-analysis conversations with over 150+near neighbours living within one kilometer of existing or proposed wind turbines (and with 7+developers plus government officials and academics working in the field of social license to operate / community agreements / externalities). The results are reported in Section 2 of <https://www.astoneco.com/earning-local-support-energy-projects-ireland>. You will notice a lot of similarities between that sector and minerals.

Should 'wind turbines' or 'wind energy resource' be replaced by 'mines' or 'mineral resources' in this document - and in the subsequent 'Guide to Earning Local Support in Wind Energy Projects in Ireland' in Section 4 - it is our experience (and the experience of quite a few colleagues) from developing and assessing projects, and conducting stakeholder engagement assignments for the minerals sector that the findings would be similar.

As such, to help develop a sustainable minerals sector in Ireland to a level that it optimally meets the objectives set out in paragraph one of the introduction to the SEA Scoping Report, that is: 'Ireland's first Policy Statement for Mineral Exploration and Mining in Ireland which seeks to underline the importance of mineral exploration and mining and the role that the sector can play in:

- Ireland's and the European Union's transition to the circular economy and net-zero greenhouse gas emissions
- supporting primary and secondary economic activity and associated jobs creation and
- progressing many of our national, European, and international policies and commitments'

then the SEA scoping process will need to include a full sustainable development agreement-making partnership between developers and the host community from the outset. In a world where trust in authorities, government and business is more and more precious and harder to come by, trust-building through frank local proactive listening, combined with the addressing of concerns, fears and aspirations as part of and before SEA or EAI processes is critical. For this, the wording needs to be more than an oversize focus on the environment alone. Being responsible vis-a-vis the environment is only part of the solution.

Should a presentation and Q&A on the findings referenced above for the wind energy sector be of use to your team - please don't hesitate to drop me a line and we can easily make ourselves available for a Zoom call.

Yours sincerely,

John.

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