GSPD

From: Dave Blaney [redacted]
Sent: Sunday 20 June 2021 14:50
To: GSPD
Subject: SEA Scoping on Minerals Policy

Follow Up Flag: Follow up
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Re. SEA Scoping for Minerals Policy

The development of a policy document for the sector is a welcome development. However, I would question the inclusion of both exploration and mining in the same document. While these are related, and if successful then exploration will lead on to mining, they are very different in terms of project scale, duration and potential environmental impact or risk.

It could be suggested that “exploration” can consist of basic fieldwork by foot or other such activities (ground geophysics survey) which are entirely environmentally sound. It would not be appropriate to obstruct this kind of work. It would be akin to preventing farmers walking over their own land to check livestock. The granting of a PL to a company, in itself, implies a reasonable opportunity to carry out exploration works on the area and this should not be eroded. The time-related requirements for exploration are also very different from mining – mining requires a static, long-lived site-based approach; exploration is time-limited (e.g. the PL), transient, and the focus moves across different areas within a PL. The exploration industry is required to be agile, and an exploration company can often enter and leave a location in a short number of years, compared with a mine which can be there for decades. It would provide an undue hindrance to the exploration industry to be tied-into a regulation scheme which is more suitable for factories.

The policy objective to develop the skills, education, knowledge and mineral data to fully realise the country’s mineral potential is to be welcomed. Mining will follow exploration success and accordingly it will be self funding and a contributor to the national exchequer. However, exploration is extremely high risk, and Junior companies in particular need certainty with respect to Government policy. They need encouragement and some level of certainty to develop the new skills and expertise along with the exposure to even higher risk to explore in new areas for the new minerals required for the Green Transition.

"Building Capacity" (p.5) does not explicitly state that there will be *promotion* of exploration within the State. With "International Cooperation" it is incongruous to promote the industry's professionals abroad yet not at home. Clearly there is a need to increase domestic supply and recycling would be entirely inadequate. In terms of the EU, there is a clear recognition of self-reliance and maximising sources within the EU. It is often not understood that the endowment of minerals is irregular and that Ireland has a unique position within the EU with respect to zinc and lead resources. Other EU states have their own specific endowments, and we would encourage them to maximise those for the benefit of the EU in turn. Scoping Question 4 (p19-20) suggests that an alternative is "reliance on imports only" i.e. not allow any mineral extraction in the State. This is unacceptable on a number of grounds – our responsibility to contribute to the EU critical raw materials effort; our responsibility to ensure safe and responsible exploration and mining within our own State and not allow developing nations and their citizens to be exploited; the State has a responsibility to promote progress and economic advancement for its citizens; it is imperative that the State and the EU have security of supply of critical raw materials in order to allow economic development.

Table 5-1 Highlights the "Potential Significant Environmental Impacts" both Positive and Negative. In my opinion this table is weighted towards the negative, this is perhaps the place to highlight the enormous, critical and to a large extent unrecognised role that mining plays in modern society. It is difficult to envisage any component of modern life and in society as a whole that does not rely on products derived from the mining industry. Scoping Question 2: it should be clearly stated within Table 5-1 that both positive and negative impacts for each item should be considered. The recent reviews of the economic benefits of Galmoy and Lisheen should be borne in mind.

Table 7-2 suggests consideration could be given to a "do nothing scenario / business as usual approach" while improvement is desirable, change for change's sake is not a good idea. The impact of exploration activities should be evaluated. Given that it is such a low impact activity, that is already "heavily regulated" (page 3 para 4) is additional oversight and regulation warranted or beneficial? "Robust Regulation" is noted as the first of five key aspects. Within this regulation, there should be an addition of "simplify and streamline". Robust regulation need not be cumbersome. For example, a regional exploration survey need not have a number of individual procedures (for each PL say) when a grouping of them could be made at no risk to the quality of the assessment. On two occasions there is reference to "significant" impact of exploration and mining: p.7 "likely to have a significant impact on the environment" and p.9 "likely significant effect". It is self-evident that mineral exploration, consisting of many stages prior to even drilling, can objectively be stated to have *less than significant* impact on the environment. As noted elsewhere, farming and other much more widespread activities have a far greater impact and yet continue without similar regulation**. It is difficult to think of any exploration activity, including drilling for a short duration, which has caused any *significant* impact that would warrant the imposition of SEA and AA processes.**

Table 7-2 also notes that sectoral controls or mineral based prioritisations are to be considered with respect to the Policy Statement. I am very concerned that this will mean a repeat of the 2007 banning of Uranium exploration and target specific commodities that may fall outside the Green Critical Raw Material sphere. I would caution against using such a blunt instrument and issuing bans on the exploration for specific minerals / metals. The exploration sector is a global industry and Ireland competes in a very challenging global marketplace for scarce exploration funding. Given that exploration is already a high-risk activity, investors prioritise areas with low geopolitical risk, the banning of exploration for specific minerals / metals will send the wrong message and make an already challenging fund raising environment almost impossible. The selection of specific elements (commodities) is also difficult based on the fact that several elements may occur within the same mineral species or type of mineral deposit. For example, a copper deposit may also contain gold; a zinc deposit may also contain silver. The ban on a given element (commodity) may have unintended consequences in denying the opportunity to extract materials important for carbon-reducing technologies. Substitution and research mean that many new elements may become important. The Fraser Institute survey is often used to highlight Ireland as a favourable location for exploration and mining – such over-regulation would severely impact Ireland's ranking on this important indicator.

From a national perspective, Ireland is totally reliant on mineral / metal imports for many of its needs, however, from a European perspective Ireland is a net contributor of metals such as zinc and lead, reducing the requirement to import from sources from outside of the EU. The benefits are many, both in terms of security of supply and inherent environmental impacts from less transportation and high-quality regulation of the mineral exploration industry based upon factors within the control of the EU.

Regards

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