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June 11th 2021

**Geoscience Policy Division
Department of the Environment, Climate and Communications
29-31 Adelaide Road
Dublin
D02 X285
Ireland**

Forwarded via e-mail to GSPD@decc.gov.ie

Re: SEA Scoping on Minerals Policy.

Dear Sir/Madam,

Further to your call of May 24th 2021 for submissions in respect of the “*Public consultation on scoping report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland*” I wish to make the following observations in response to the specific questions on the Scoping Report:

1. Based on the plans, policies and programmes outlined in the SEA Scoping Report, are there any other key relevant international, national or regional plans, policies or programmes that should be considered in the SEA Environmental Report on the Policy Statement on Mineral Exploration and Mining?

The formulation of a national policy on mineral exploration and mining is of the utmost importance as Ireland has a key role to play in ensuring the successful transition to the carbon-neutral future envisaged in the European Commission’s Green Deal¹. In developing that policy it is critical that cognizance is taken of the conclusions presented in the Commission’s 2019 analysis² of the linkages with the United Nations Sustainable Development Goals.

2. Based on the likely significant impacts outlined above, are there any other effects or impacts that should be considered in the SEA Environmental Report on the Policy Statement on Mineral Exploration and Mining?

Ireland’s strategic contribution to the achievement of the Vision espoused in the Green Deal results from its globally recognized mineral endowment, particularly zinc, but also including copper, lithium and the other elements required for the infrastructure^{3,4,5} necessary to attain the Vision’s objectives^{3,4,5}.

¹ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: *The European Green Deal*, COM(2019) 640 final (2019).

² Mapping the Role of Raw Materials in Sustainable Development Goals – JRC Science for Policy Report, 2019.

³ Study on the EU’s list of Critical Raw Materials, European Commission (2020).

⁴ Minerals for Climate Action: The Mineral Intensity of the Clean Energy Transition, International Bank for Reconstruction and Development/The World Bank (2020).

⁵ The Role of Critical Minerals in Clean Energy Transition, World Energy Outlook Special Report - International Energy Agency (May 2021).

Europe's future security of raw material supply requires the effective implementation of the European Commission's tripartite policy of trade diplomacy, recycling and development of our indigenous raw material resources⁶. No single strand of that policy will succeed in isolation.

3. Do you have any comments regarding the draft SEA Objectives presented in the Scoping Report?

In the context of Ireland's role, the importance of a coherent, supportive, national policy for minerals exploration, is an essential pre-requisite for an economically viable, environmentally sustainable, mining sector.

4. Do you have any suggestions or comments in relation to the overall approach to alternatives?

Ireland has a world-class best practice regulatory framework supporting an exploration and mining sector which has a global reputation for excellence⁷. This is evidenced by decades of successful exploration conducted in concert with society and the environment, and by the positive economic and social contribution of the mineral discoveries resulting from those programs^{8,9}.

It is considered that Ireland has a societal, moral and ethical responsibility to contribute to the vision enunciated in the Green Deal, and to help ensure a sustainable future for all, through the exploration and development of our minerals raw material endowment.



EurGeol John A Clifford PGeo



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⁶ Communication from the Commission to the European Parliament and the Council: The raw materials initiative – meeting our critical needs for jobs and growth, COM(2008) 699 final (2008).

⁷ Institute of Geologists of Ireland Mining and Minerals Factsheets, May 2021.

⁸ An Economic Review of the Irish Geoscience Sector. Indecon International Economic Consultants report to Geological Survey, February 2017.

⁹ A social, environmental and economic assessment of Galmoy and Lisheen Mines. AECOM Final Report to DCCAE, February 2020. Rd