

GSPD

From: Patrick Lyne <patrick.lyne@iwdg.ie>
Sent: Sunday 30 May 2021 23:12
To: GSPD
Cc: Simon Berrow
Subject: Scoping Report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland

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Re: **Scoping Report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland**

Dear Sir/Madam

It is noted that scoping report explicitly excludes extraction of sand and gravel as regulation of these is the responsibility of local authorities. However in the marine environment this is not covered beyond the 12 mile limit currently and should on the basis of marine habitat destruction and carbon release be generally prohibited.

Additionally the statement "*Future exploration and mining for scheduled minerals in the marine area is not anticipated at this point*" seems shortsighted, given the UK has plans to extract Lithium from offshore Cornwall, with exploration licences already granted. Norway has plans to licence deep sea mining in its' territorial water in 2023. Please read the Reuters article <https://www.reuters.com/article/us-norway-deepseamining-insight-idUSKBN29H1YT>. There are many different methods currently available to mine the deep sea and the ISA (International Seabed Authority) has granted deep sea mining exploration licences for over 1.3 million square km. So the technology is well developed with commercial licences expected to start this year, although these are thankfully delayed.

It is the view of the IWDG that deep sea mining is irreversibly destructive in most forms and that without full and proper consideration it should be prohibited by, if not fully considered, under this process. That therefore a ban on deep sea mining should be in place until at least a full consideration of environmental impacts can be undertaken. This view should also be put forward at the UN and in the ISA, and Ireland should take a more active role in questioning the mining methods currently being explored in the Atlantic by France, Russia and Poland.

Lastly the document does not mention exploitation of geothermal waters in the seabed, with one Irish company having considered exploitation of these already, such a scenario might need to be considered, especially given the approach in the end would probably look very like lithium extraction proposed off Cornwall (see <https://www.northernminer.com/news/cornish-lithium-granted-rights-for-offshore-exploration/1003826764/>), which is also considering using the geothermal waters to power turbines. The department must be aware of several hot springs offshore Ireland, though the waters have never been analysed for lithium content, as far as I know, the question will be how much lithium they contain and not if.

Therefore it would seem prudent given that the scoping report is focused on the terrestrial area of Ireland that it should state this clearly at the beginning and that it should limit the review to this area. It should be also stated clearly that no exploration licences can be issued for deep sea mining without a thorough review of the impact of such activities. In order to consider deep sea mining a fully and thorough investigation of environmental damage would be required.

Yours faithfully

Patrick Lyne IWDG