

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

21st June, 2021

Re: Public Consultation of SEA Scoping on the draft Policy Statement on Mineral Exploration and Mining in Ireland.

Dear Sir/Madam,

We welcome the opportunity to engage with the Geoscience Policy Division in the development of the draft Policy Statement as referenced above. We note that this is a non-statutory public consultation at an early stage of the SEA Process and that this is iterative in the development and publication of the Policy Statement.

Irish Water's primary function is to provide clean drinking water to customers and to treat and return wastewater safely to the environment. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public.

We welcome the provision of a Policy Statement to set out a framework for future decision making on mineral exploration and mining within the State. We note that heretofore activities were managed via a strong legislative regime.

We understand the scope of the Policy is limited at present to minerals (as defined) and excludes – agricultural surface of the ground; turf or peat; stone, sand, gravel or clay; uranium (banned), mercury (prohibited) and oil and gas (covered other alternative regulations). In addition we note that, while the schedule includes coal, lignite and oil shale as 'minerals', these will be excluded in line with Circular Economy and Green Deal principles.

We have been supporting the role of Department of Environment Climate and Communications (DECC) as the competent authority for issuing Prospecting Licences for exploration and subsequently, State Mining Facility (SMF) with a lease or licence by engaging with the Geoscience Regulation Office in respect of applications for drillhole licences. Through this process we note that for any intrusive investigations such as exploration drilling or trenching associated with a prospecting licences, that these will be undertaken in-line with DECC guidance as shown below:-

Exploration Drilling – Guidance on Discharge to Surface and Groundwater (Aug 2019) and Guidance for Good Environmental Practice in Mineral Exploration (Aug 2019).

Stiúrthóirí / Directors: Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Yvonne Harris, Brendan Murphy, Maria O'Dwyer

Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86

Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.

Uimhir Chláraithe in Éirinn / Registered in Ireland No.: 530363

In addition, DECC undertake an Environmental Screening Determination, including Screening for Appropriate Assessment for all mineral exploration activities and Environmental Impact Assessment for drilling activities.

IW has a number of plans and programmes which we bring to your attention in relation to the scoping of the Draft Policy.

Water Services Strategic Plan (WSSP)

Irish Water's Water Services Strategic Plan (WSSP) was published in October 2015 and sets out strategic objectives for the delivery of water services over a 25 year timeframe to 2040. One of the strategic objectives for Irish Water outlined in the WSSP is to ensure a safe and reliable water supply. Irish Water activities that contribute to improving the resilience of drinking water supplies include:

- The National Water Resources Plan (which seeks to address issues around the availability of water); and
- Drinking Water Safety Plans (which address issues around the quality of water).

National Water Resource Plan (NWRP)

The National Water Resources Plan (NWRP) is our plan to identify how we will provide a safe, sustainable, secure and reliable water supply to our customers for now and into the future whilst safeguarding the environment. The NWRP will set out how we will balance the supply and demand for drinking water over the short, medium and long term. It is a 25-year strategy to ensure we have a safe, sustainable, secure and reliable drinking water supply for everyone. Phase 1 the NWRP Framework Plan has now been adopted, accompanied by a Strategic Environmental Assessment (SEA) Statement and an Appropriate Assessment (AA) Determination, which are available to download at www.water.ie. Phase 2 NWRP - Regional Water Resources Plans comprises the development of four Regional Water Resources Plans (RWRPs) each of which will be subject to SEA and AA. The regional plans align with the requirement to support balanced regional development and will include for inter-region or inter-catchment water supplies, where required, to ensure adequate water provision into the future. There will be a focus on efficient, environmentally sustainable water use; and on providing for reliability and security of supply (i.e. system resilience). It is proposed that the water resource planning process incorporates all information on significant pressures in relation to abstractions, as it becomes available, in order to ensure alignment with the requirements of the third cycle RBMP.

Drinking Water Safety Plans (DWSPs)

Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The 'source' component of DWSPs is a key component and a priority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of

reducing the cost of water treatment in line with Article 7(3) of the Water Framework Directive. The DWSP source risk assessments undertaken to date indicates that the most common issues in relation to raw water quality in Irish catchments include cryptosporidium, sediment, colour, ammonia and pesticides.

Irish Water is committed to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality are the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is currently involved in pilot drinking water source protection projects, which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies.

In respect of the Scoping Questions posed within the consultation document, please see our responses below:

Scoping Question #1 Based on the plans, policies and programmes outlined, 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 PSMEM?

Include the recast of the Drinking Water Directive (DWD) 2020

Scoping Question #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 PSMEM?

Drinking Water Source Protection

We strongly advocate for ample inclusion of 'Impacts on drinking water quality' as noted with respect of Potential Environmental Issues for Consideration in the ER (page 13). This must include potential impacts to abstractions from groundwater sources and surface water catchments as key sources of public water drinking supplies in Ireland.

Interim drinking water abstraction catchment boundaries should be included in the baseline assessment. The Interim Drinking Water Abstraction Catchment Boundaries can be obtained by sending a request to Datarequests@water.ie.

Material Assets

We suggest that above and below-ground infrastructure operated by Irish Water in the provision of water and wastewater services to communities in Ireland is included in Table 5-1 specifically.

Scoping Question #3 Do you have any comments regarding the draft SEA Objectives presented?

We suggest that Objective 4 is amended to include drinking water sources e.g.

Protect, restore and enhance water quality (surface waters, groundwaters, marine waters and drinking water sources)

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

Not at this time.

We look forward to engaging with the DECC as the proposed draft Policy Statement develops as it goes through the stages of the SEA process.

Yours faithfully,



Sheila Convery

Spatial Planning Team – Asset Strategy – Asset Management