

Geoscience Policy Division
Department of the Environment, Climate and Communications
29-31 Adelaide Road,
Dublin 2, D02 X285

Submission on behalf of The Irish Mining & Quarrying Society (IMQS), June 2021

RE: DRAFT POLICY STATEMENT FOR MINERAL EXPLORATION AND MINING IN IRELAND SEA Scoping Report

The Irish Mining and Quarrying Society (IMQS) welcomes the opportunity to contribute to the consultation on these important topics.

A new National Minerals Policy is overdue, given societal and economic changes since the last one issued c.25 years ago. IMQS supports the five principles of the current Draft Report by RPS outlined below, with further observations by IMQS in italics.

- Ensuring Robust Regulation
IMQS welcomes balanced and transparent regulation.
- Increasing public awareness and participation which are essential to enable projects to proceed in an orderly and secure manner
A vigorous and ongoing educational and publicity programme regarding the importance of minerals to society to enable the realisation of climate change policies is required. Such a programme needs to be delivered by DECC using its line divisions the Geoscience Regulatory Office (GSRO), the Geoscience Policy Division (GSPD) and Geological Survey Ireland (GSI).
- Maintaining and improving the sustainability of mineral exploration and mining, integrating consideration of its employment, social, climate, economic and environmental impacts.

Ensuring that Ireland has the necessary mineral exploration and mining personnel, skills, education, knowledge and data to fully realise the State's mineral potential
Continued state support for the development of the Geo Drilling Apprenticeship delivered by IT Carlow is required to ensure that drilling services procured by state agencies employ competent and properly qualified personnel. Re-instate a minerals based third level course similar to the pre-existing Minerals Engineering course in Athlone IT.

- Promote Irish industry abroad as world class in terms of expertise, sustainable mining practices and skilled workforce to attract inward investment

In addition, to support the development of export of geoscience services and products to international markets, enabling sustainable and responsible minerals development. Consider measures to incentivise minerals exploration in Ireland.

In relation to the Questions posed in the RPS Report, IMQS responds as follows:

Q1; Other Policies to consider - The emerging Minerals Policy should reflect in full recent EU initiatives relating to critical raw materials e.g. the European Critical Raw Materials Alliance and the initiative proposed by the Irish Association for Economic Geology (IAEG) “Supporting Responsible Exploration” which is linked to the European Federation of Geologists programme. Greater participation by Ireland in international projects such as the Inter Governmental Forum on Mining should be encouraged as a means of adhering to best governance and environmental practices.

Q2; Other Impacts for Consideration - The fundamental difference between mineral exploration and mining is not adequately reflected in the Minerals Policy or in the SEA. The former is of limited impact and frequently non intrusive and should be separated from the justifiably more stringent assessments required for mining projects.

Q3; General Comments on Draft SEA Objectives - Consideration should be given to including the importance of social licence in Table 7.1 “C” (Climate). The recent work done by the Minerals Information Working Group and supported by DECC is an excellent example of such of such activity.

Q4; Comments on approach to Alternatives - Table 7-2 is a comprehensive summary. A further reiteration of EU policies in relation to responsible sourcing of raw materials and the responsibilities of individual member states should reflect the alternative outcome i.e. reliance on sources involving unacceptable environmental, health and social impacts.

The Workshop proposed in Section 8 is useful. IMQS recommends that a further Workshop involving a wider stakeholder audience be undertaken, to include national and international trade and professional associations and Environmental NGOs.

On behalf of IMQS

Nicola Nixon
IMQS President
21 June 2021