



IRISH ASSOCIATION FOR ECONOMIC GEOLOGY

The Irish Association for Economic Geology (IAEG) welcomes the development of a policy statement for the exploration and mining industries, however there are several aspects of the document that require further consideration, clarification and review in characterising the sector.

The conflation of exploration and mining as one and the same is a common mistake, but there are important and significant differences between the two. In almost all cases, exploration activities consist of short-duration, low-impact, low-risk work involving little or no environmental risk. The granting of Prospecting Licences for mineral exploration confers an implication of the intention to carry out these low impact activities across a relatively wide area in comparison to mining, for which a Mining Licence may be granted under strict and spatially restricted criteria. Exploration activities require an agility beyond that of mining activities, given that by definition exploration is carried out across a wide geographical area, and is transient and short-lived in any given location. Modern mineral exploration has occurred across almost all of the country, and the medium- to long-term impacts are, for all intents and purposes, nil. The nature of mineral deposits means that the exploration and mining sectors are important providers of rural and regional jobs across a range of skill levels.

Prospecting Licence applications in Ireland are already subject to the most stringent Environmental Screening Assessment rules from the Department of the Environment, Climate and Communications. These screening assessments must ensure that exploration activities will have no detrimental impacts on the environment, groundwater, or amenities of the licence area, and will avoid or minimise disturbance of local residents. No hazardous, toxic, or non-biodegradable chemicals are used during mineral exploration activities, and no activities with any lasting negative impacts are permitted. No drill cuttings, drill core, or excess soil samples are left at exploration sites.

Prospecting licences only on the rarest of occasions lead to an application for a mining licence. Application for a mining licence is a long process during which public consultation is an integral, compulsory step. In addition to an application for a mining lease, an Integrated Pollution Prevention Control Licence is required from the Environmental Protection Agency in all cases, as well as planning permission under the Planning and Development Acts.

As stated, mineral exploration is by definition a low impact activity and has been carried out throughout Ireland since before the foundation of the state. Mineral exploration projects have not been known to cause any adverse environmental effects in Ireland. In the mining

sector, there are several Irish precedents for environmentally responsible mining operations today and in the recent past, including the Lisheen and Tara mines, both of which are excellent examples of best environmental practice. In modern times, Europe and the rest of the developed world has increasingly relied on low-income countries for the supply of important raw materials, with many of these countries having exceptionally low environmental standards and poor human rights records.

The Irish mineral exploration sector is currently at the forefront of the move to embrace renewable energy and sustainable resources. Demand for raw materials is increasing as we move away from a fossil fuel reliant society and towards a renewable energy driven one, and mined minerals will be among the key components in the alternative energy technologies that are vital for reducing our carbon emissions and fighting climate change. In keeping with the UN Sustainable Development Goals and the European Union's Critical Raw Materials policies, Ireland has a responsibility to contribute to the sourcing and development of our mineral resources in a sustainable, responsible manner, and the policy statement should acknowledge those commitments under these policies.

Table 5-1 of the draft policy document, "Potential Significant Environmental Impacts", is weighted heavily towards the possible negative effects of exploration and mining. The table, and the document more broadly, fails to consider that the sourcing and extraction of raw materials in Ireland, and Europe in general, is exponentially more advanced and more tightly regulated in terms of both environmental sustainability and community and employee welfare than the current situation where developed nations exploit the global south for the metals and minerals that enable our drive towards a green future and carbon neutrality. It should be stated in the document that the environmental impacts of the industry in Ireland are significantly less than the equivalent activities in less well-regulated nations, from which we source the vast majority of our raw materials, and that a stated reliance on imports is effectively a commitment to the offshoring of carbon intensive industry for the benefit of Ireland and Europe.

Table 7-2 notes that "Sector or mineral based prioritisation" may be a consideration with respect to the policy statement, which may be used to target and outlaw exploration and mining of specific materials that fall outside of the green and critical raw materials specified in EU and UN policy in relation to the sourcing of minerals. Exploration and mining are global industries, reliant on investment from international markets to raise the significant capital required to carry out speculative exploration programmes. A prioritisation approach would effectively label Ireland as a high-risk jurisdiction for all exploration, and render an already challenging fundraising environment impossible to successfully navigate by Irish companies for Irish-based projects. The complex nature of mineral deposits also means that this approach may inadvertently sterilise deposits of critical raw materials - for example where copper commonly occurs with gold, or zinc with silver. In recent years, the Fraser Institute Survey has rated Ireland favourably as a location for exploration and mining, however, the country's rating has seen a consistent fall of late. Continued over-regulation would further

erode our ranking on this important indicator and adversely affect the global industry's perception of Ireland as an investment destination.

Europe has committed to sourcing and developing its own resources for the benefit of its citizens, and the rich mineral wealth we are fortunate to possess in Ireland can be – and is – a net contributor to the continent's sustainable future. Ireland's thriving exploration and mining industries are amongst the most well-regulated, environmentally conscious, and socially responsible in the world, and we are proud to contribute to the green revolution. The scoping report makes the admission that exploration and mining are already heavily regulated, and it is the opinion of the IAEG that the sectors in Ireland are exemplars of environmental and social good practice. Any new policy decisions should reflect the excellent track record of modern Irish exploration and mining in terms of the environment, community relations, and foreign direct investment.

While mining can necessarily only follow successful exploration, and therefore is effectively self-funding when resources are proven, exploration itself is one of the most financially high-risk ventures, and it is vital that the industry is given certainty from government policy. There is strong recognition of the importance of mineral exploration at an EU level, however here in Ireland the future of the entire industry is regularly held up for political debate. The policy statement should have an objective to support, promote, and defend the industry and celebrate Ireland's mineral endowment.

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