

Eco Advocacy

Truth | Justice | Sustainability



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19th June 2021

SEA Scoping on Minerals Policy

Deadline: The consultation will close at 5:00pm on Monday, 21st June 2021

URL: <https://www.gov.ie/en/consultation/ec242-public-consultation-on-scoping-report-for-the-environmental-assessment-of-the-emerging-draft-policy-statement-on-mineral-exploration-and-mining-in-ireland/>

Dear Sir/ Madam

We refer to the above and make the following submissions.

Note that there are 5 pages in total to this submission inclusive of the cover page.

Yours faithfully,

A black rectangular box redacting the signature of Kieran Cummins.

Kieran Cummins,

1. The terms of this consultation are very narrow and appear to only ask 2 questions. It asks about legislative framework; i.e. policies and programmes and also impacts on the environment. It is completely silent on conservation of resources. There needs to be a focus on conservation of Irelands landscape. As we shall see from this submission, mining while underground gives rise to insatiable demand for aggregates from the surface. There should also be bans on mining of certain metals such as uranium. Consideration should also be given to backfilling material.

2. We note that various statements are made in the 'DRAFT POLICY STATEMENT FOR MINERAL EXPLORATION AND MINING IN IRELAND'. In particular we note the following statements are made: -

'Minerals have a critical role to play in realising national ambitions such as the Climate Action Plan and the transition to a circular and resource efficient economy. The circular economy concept advocates a significantly reduced primary resource extraction (i.e. mining of primary metals and minerals) in favour of secondary material (recycled metals and minerals) flowing through internal loops. However, even such a circular system may still need raw material resources to facilitate the green economy. For example to achieve the national target of one million electric vehicles by 2030 will require a significant increase in availability of base metals to allow for the manufacture of batteries and other components. The International Energy Agency estimates that the amount of copper needed to supply electric vehicles will increase by almost two million tonnes by 2030 and there are also projected demand surges for nickel, cobalt, lithium, aluminium, manganese and other minerals.'

3. We are very concerned at the above statement. It fails to consider the finite nature of materials in question. We are but one generation at a given point in time. It is unconscionable that we should keep depleting the earth's resources at the rate, which we have been. We must consider the needs of successive/ future generations.

4. Moreover, the above fails to consider the knock-on issues. Mines generally have to be backfilled with material, which comes from above the ground. This puts pressure on unique landscape features such as eskers and drumlins and has given rise to significant quarrying activities; much of which has been unauthorised. Sadly, a blind eye has been turned to such activities for many years now. Even more worrying is that recent planning decisions by *An Bord Pleanála* appear to place the economic interest above planning and environmental considerations in their efforts to provide for supplies of aggregate going forward.

SEA Screening

5. The document further outlines the SEA issues and does so in some detail, which is to be welcomed. The following is noted in this regard: -

'The SEA process is comprised of the following principle steps:

- Screening: Decision on whether or not an SEA of the Policy Statement on Mineral Exploration and Mining is required;*
- Scoping: Consultation with the defined statutory bodies on the scope and level of detail to be considered in the assessment;*
- Environmental Assessment: An assessment of the likely significant impacts on the environment as a result of the Policy Statement leading to the production of an Environmental Report;*
- Consultation on the draft Policy Statement and associated Environmental Report;*
- Evaluation of the submissions and observations made on the draft Policy Statement and Environmental Report prior to finalising the Policy Statement;*
- Issuance of an SEA Statement identifying how environmental considerations and consultation have been integrated into the final Policy Statement.'*

Environmental Assessment

'In parallel to this assessment, Appropriate Assessment (AA) Screening was also undertaken in April 2021 and it has been concluded that a Stage 2 Natura Impact Statement (NIS) will be

required for the Policy Statement (refer Section 3.2). The development of this NIS will inform the SEA and development of the Policy Statement on Mineral Exploration and Mining.'

'The Policy Statement on Mineral Exploration and Mining is not directly connected with or necessary to the management of a European site for nature conservation. As a national strategic policy, it has the potential for likely significant effects on Special Areas of Conservation (SAC) and Special Protection Areas (SPA).'

6. We are concerned with this statement. We disagree with the sentiments raised. There are massive consequences from mining. Leaving aside the sustainability issues, as previously pointed out, mines have to be backfilled with material from above. This puts enormous pressure on resources such as aggregates and indeed fossil fuels, which are, require in the extraction and transportation of aggregates.

QUESTIONS ARISING

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 Policy Statement on Mineral Exploration and Mining?

7. Yes there are. The document in fact alludes to some potential issues and the following are noted in this regard: -
 - Water (W)
 - Material Assets (MA)
 - Cultural Heritage (CH)
 - Landscape (LandS)

8. We again reiterate the sentiments, which we raise in our point about the consequences of mining, which has significant effects on: -
 - a. Sustainability of materials above the ground such as aggregates, ware and tare items such as tyres, etc
 - b. We need also to be mindful of the landscape above the ground, which will bare the brunt in terms of quarrying to sustaining mining. We have lost many valuable sites such as eskers and so forth. This comprised Irelands natural heritage. We have also seen important sites of archaeological nature being utterly destroyed by some within the extractive industry. Therefore pressures generated by mining need to be considered.
 - c. Mining also puts a significant demand on fossil fuel.
 - d. Mining often renders the ground above vulnerable to collapse.

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 Policy Statement on Mineral Exploration and Mining?

As previously outlined, we make the following submissions in this regard

FINITE RESOURCES

9. Underground Mining is very problematic in that it involves the excavation of large areas beneath the earth, which have to be backfilled with concrete to prevent collapse. One must ask from where does the concrete come and what is concrete made up of?

10. In short, Concrete is made up of three basic components: water, aggregate (rock, sand, or gravel) and Portland cement. Cement, usually in powder form, acts as a binding agent when mixed with water and aggregates. The Rock will be quarried from an open cast quarry somewhere else, thereby necessitating excavating of rock and creating large wounds in the landscape. This is undesirable from an environmental perspective in that it takes agricultural land out of commission forever. It also creates

health issues with dust, particulate matter as a result of diesel engines, etc. Moreover, it also creates significant safety issues. Numerous people (usually children) are drown each year in lakes left as a result of open cast quarrying. There are also of course a host of nuisance issues resulting from such operations.

11. What is even more concerning is the use of finite recourses. Sand and Gravel are products of glaciation where eskers were laid down in the last ice age. We have in the space of a couple of generations removed most of our eskers here in Ireland to facilitate the building boom of recent decades. In the UK, they have now all but exhausted their eskers and have resorted to dredging estuaries in search of sand and gravel. They have also been forced to impose a levy per ton of material extracted from the ground in an effort to curb extraction. Removing our remaining eskers and burying the material in the earth is ridiculous and utterly irresponsible and should not in any way be supported by the state.
12. Tara Mines is backfilling with a mix of concrete on an ongoing basis and lorry loads of finite sand and grave are being delivered to the mines on a regular basis. Burying this finite material in the earth is shameful and wrong. Successive generations will have lots to lament about the way our generation is behaving. Furthermore, experience has shown that much of the quarrying currently taking place is unauthorised.
13. **Fossil fuels:** are required in the extraction and transportation of aggregates. So too on ware and tare items such as tyre's (rubber) and so on. These are significant factors, which are invariably always overlooked.
14. **Collapsing Mines:** There has been issues with collapsing mines over the years; where mines were not backfilled and large underground voids were left rendering the ground above vulnerable to collapse. There have been numerous instances of large sinkholes; one of the most notable being in the Kingscourt area of Cavan where a whole football pitch collapsed. Therefore it is not reasonable to assert that mining does not have significant knock-on affects.
15. **Sustainability:** Finally, we are obliged to also pose the question of future generations. What are they going to do for natural resources' if we keep plundering them on the current scale? One would be well advised to note the comments from the former *Archbishop of Canterbury, Rowan Williams* who in 2007 likened us to janitors on planet Earth, who must stop plundering the '*warehouse of natural resources*' and ensure that we clean up after ourselves. He further stated that the Earth does not exist only for 'humanity's sake'; it also exists 'in its own independence and beauty... not as a warehouse of resources to serve humanity's selfishness'. In 2015, Pope Francis has also issued an encyclical on the environment, which amongst other things states that: "The exploitation of the planet has already exceeded acceptable limits and we still have not solved the problem of poverty."
16. It follows that we STRONGLY OBJECT to further prospecting, as it facilitates activities, which are in themselves totally unsustainable. The current application is therefore inappropriate and without foundation.

BACKFILLING

17. Furthermore, there needs to be analysis of backfilling spend mines. This is problematic in that finite sand and gravel and other aggregates are currently being used. This is very wasteful of finite resources. There have been issues with pyrite and mica, the latter of which has been in the news a lot lately. Could spend mines be used as a repository for such waste? Could mines be used for C and D waste (Construction and Demolition material)?

CONSERVATION

18. **ESKERS:** Most of the sand and gravel requirements in Ireland come from Eskers laid down in the last Ice Age. Sadly in the space of no more than about 2 generations, we have near exhausted all our reserves from these eskers without any thought for future generations. The situation is so bad in the UK and China (to mention but two other countries) that they have now resorted to dredging estuaries in an effort to get sand. Being the principle constituent of concrete, to see so much buried under wind turbines which will without any doubt become white elephants is utterly crazy.

19. Having regard to the foregoing, it is manifestly obvious that investing so much resources in wind energy and data centers that this is in turn driving demand for many of the metals which are the focus of this minerals consultation. Apart from being unable to deliver on dispatchable energy, wind and solar are also being artificially driven by significant grants, which serve only to create a rush for grants by investors and corporate's driven purely by 'returns' piggybacking on the 'Green' label.

DATA CENTERS

20. **Data Centers:** there has been a drive by government over the last decade to pursue data centers. This is frankly daft; they are putting a severe pull on electricity and driving this push for more wind and as outlined in this submission, this is not sustainable. Regional societies throughout the country are entitled to make appropriate regulations. If the government has got policy decisions wrong on data centers and such like, they should not expect or in this case attempt to force local communities to set aside legitimate planning issues and sacrifice their environment and natural finite resources to prop up what is essentially a ponzi scheme for promoters paid for from peoples electricity bills.
21. **Lithium batteries:** moreover the data center issue has also in itself given rise to a need for storage which has is by way of very large lithium ion batteries. There are massive safety risks with lithium batteries in terms of capacity to explode and very specialist fire fighting apparatus and expertise is required. Furthermore, Lithium is a rare earth element, which should be conserved; not squandered!
22. Let us ask the question, what if Ireland only had one data centre to store its share of data and the rest spread around Europe to take their data, giving equal shares to everybody. If this were to happen Eirgrid would not need to upgrade, more quarries would not be needed using up more of our natural resources.
23. Interconnector projects including the North South Interconnector are being built for wind energy. There has been no SEA carried out for on-shore wind energy ever. In the case of the North South Interconnector, this was originally submitted to planning as a project requiring an Environmental Impact Statement, but that was withdrawn and the planning application was re-submitted after the project was made a Project of Common Interest. (PCI).
24. Agriculture is a huge indigenous industry in this country and many farmers are making huge changes in the running of their farms in order to reduce Ireland's CO2 emissions. Meanwhile data centers are being invited in, which will cancel any such savings.
25. In other words an indigenous Irish industry is being replaced by foreign data centers whose construction contributes to landscape destruction giving virtually no employment in comparison to our indigenous agricultural industry, which gives huge employment both directly and indirectly.
26. The destruction of rural Ireland in this manor is frankly disgraceful. Natural resources are finite. THIS MUST NEVER BE FORGOTTEN – ONCE DESTROYED NEVER RECOVERED.
27. It is submitted that THE PRECAUTIONARY PRINCIPLE should be applied to avoid further depletion of finite resources and also to avoid destruction of Irelands landscape.

OTHER FORMS OF ALTERNATIVE ENERGY

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| <ol style="list-style-type: none">28. Finally, please note that there is great potential for harnessing of energy by way of <u>Deep Bore Geothermal Energy</u> with the presence of thermal springs and geophysical activity relatively close to the surface in some parts of Ireland, and yet this is constantly ignored. This is an issue, which needs to be included in this energy matrix. |
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We must not blindly pursue mining of rare earth's to satisfy a seriously flawed energy policy and also unsustainable practices.

ENDS