

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

Re. Consultation on mineral exploration and mining

I am an exploration geologist who has worked in the industry for almost 34 years, both in Ireland and overseas.

Firstly, I would like to commend the Geoscience Policy Division on the quality of this policy document, in my opinion it is quite fair and balanced. It clearly explains society's need for minerals and the requirement for an increased supply of minerals to meet demands arising from the objectives of the Green Deal. It highlights the benefits accruing from the mining industry in terms of jobs, raw materials supply, and investment into local / rural communities. It also recognises the significant difference between mineral exploration and mining, in terms of scale, duration of activity and environmental impact.

The Circular Economy is a welcome strategy, and it is essential for the benefit of society and future of the planet. However, there will be a substantial lead in time before this strategy is in place and operating efficiently. Mining will be required to continue to fulfil society's raw material needs and perhaps a estimate of the timeframe should be included to inform the public and avoid a perception that mining is no longer necessary.

The National Planning Framework outlines the strategic plans and objectives for growth and development. The planning process defaults to the Local Authority Development Plans, and within these documents natural resources are often restricted to aggregate production / quarrying. There is need the Department to educate and inform Local Authority planners on the mineral potential. In particular, areas where exploration activity has discovered significant and / or potentially economic mineralisation should highlighted to the relevant planners.

I would question the title of Chapter 3.1 – the use of the “mitigate” suggests that there are significant environmental impacts from exploration activity. In fact, exploration companies go to extraordinary lengths to ensure that there is no requirement for mitigation. The GSRO advises that environmental screening assessments do not include the mitigation of impacts. In fact mitigation must not form part of the procedures and processes for carrying out exploration activities.

In paragraph 2 of section 3.1 the document states that “Mineral exploration should be compliant...” I think that there is no room for ambiguity here – mineral exploration **is**

compliant, the regulator (GSRO, formerly EMD) does an excellent job of monitoring and recording the activities of exploration companies.

The point in paragraph 3 section 3.1 is well made, in the almost 75 years history of exploration drilling I know of no significant impact on the environment attributable to drilling. Yet the industry in Ireland has been subjected to continually increasing levels of regulation, supervision and screening. Perhaps it is now time to say that we have reached the point where further / increased regulation of exploration drilling is not warranted. It could be construed that potential over-regulation is in fact having a detrimental effect on Ireland's standing within the exploration sector and the ability of exploration companies (in particular Junior Companies) to raise funds to explore in Ireland.

Public participation is to be welcomed and the industry will draw benefits from a more transparent outlook and interaction with local communities. In my experience working in Ireland, I have found that the vast majority of people are welcoming and readily accept exploration companies and the associated activities if they are kept informed and know what is happening. Mistrust and poor relations develop when there is a perception that a company is hiding something. However, with the rise of social media, and the ability to rally a few likeminded individuals to make an online furor, there is the perception of an increased antithesis towards mining and exploration. This has manifested in the exploration sector as a significant increase in objections to the awarding or renewal of licences. Many of these submissions are without foundation and are simply malicious and vexatious, designed to delay the process and put an intolerable workload on the public servants working in the GSRO. A mechanism needs to be developed to weed out clearly spurious objections.

I would be very concerned about paragraph 8 of section 4.1.3, which states:

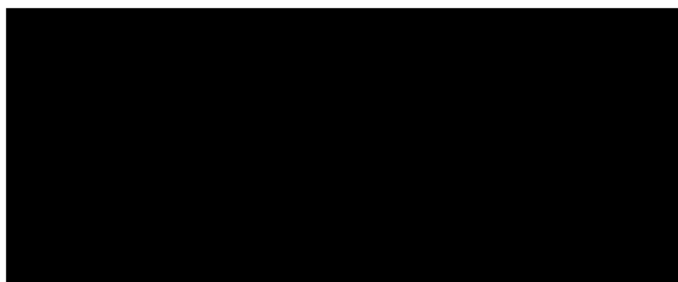
“Regularly review the schedule of minerals for which prospecting is permitted, against several criteria including,
o their potential end uses,
o their inherent circular sustainability (circularity) and,
o their status as critical raw materials.”

It strikes me that this paragraph could be used to cherry pick minerals that are perceived as not essential for the circular sustainability / critical raw material agenda. I would have particular concern that this will be used to target gold exploration / mining. I would point out that the mineral exploration sector is a global market, and it is a very challenging and extremely competitive space to raise the funds for projects. It would be impossible to restrict any negative fallout to a specific mineral such as gold. The attitude of investors will rightly be, if they do this to gold explorers what is to stop them adding other minerals on a whim. The banning of uranium exploration in the 2000's passed under the radar screen as Ireland was not a destination for uranium exploration funding. However, gold is an entirely different beast, for good or ill, it dominates the exploration sphere, and there will undoubtedly be repercussions if there is a move to ban gold exploration / mining. Gold does have quickly growing uses in medical, IT and other high tech industries. The rapid destruction of Ireland's

hydrocarbon exploration sector, with the ill-advised banning of oil (but not gas!) exploration should provide an example of what will happen if cherry picking occurs within the minerals sector. Rest assured that the tight knit natural resources industry will take serious note of any perceived governmental anti-mining lobby.

Section 4.2.1 underlines the requirement to build trust with the public. You will find that exploration companies are well aware of the requirement to build trust and engage with local people, as access to any land is always with the permission of the landowners and trust must be established at an early stage, otherwise there will be no project. However, the rise of misinformation and the propagation of mistruths in the online environment, often by people with nefarious agendas must be addressed. Public participation in the process is to be welcomed but mechanisms must be in place to quickly and efficiently weed out spurious objections from anti-mining lobby's or groups with other political agendas. These mechanisms must be quick and cost effective so as not to overwhelm the regulator or place unacceptable burdens on the exploration sector.

From a national perspective, Ireland is almost totally reliant on mineral / metal imports for many of its needs, however, from a European perspective Ireland is a net contributor of metals such as zinc and lead, reducing the requirement to import from sources from outside of the EU. Mining has a critically important and growing role in the world's economic development, it is an essential industry. However, mining cannot exist without continued exploration and explorers need to know that they can explore. The benefits of a positive exploration / mining policy are many, both in terms of security of supply and the inherent environmental impacts from less transportation and high-quality regulation of the mineral exploration industry based upon factors within the control of the EU.



Best Regards

