

## DECC – GRSO Consultation on Mineral Exploration and Mining

15 October 2021

[gov.ie](http://www.gov.ie) - Consultation on the Draft Policy Statement on Mineral Exploration and Mining in Ireland and associated SEA Environmental Report and AA Natura Impact Statement ([www.gov.ie](http://www.gov.ie))

### To whom it concerns:

Thank you for the opportunity to comment on the Draft Policy Statement and I welcome its issue as a clear statement of Ireland's commitment to well-regulated mineral exploration and mining as part of our efforts to shift to a circular economy.

### I would make the following comments in a personal capacity.

Chapter	Page	Comment
<b>General:</b> many of the diagrams are bordering on illegible e.g. Figure 7 EU Green Deal / Figure 8 Mining and the SDGs		
<b>2 Policy Context</b>		
2.	p.8	The Fraser Institute's Policy Perception Index always appears anomalous to me in Ireland's context given this is the first time we have had a written policy.
2.1	p.8	Emphasis should move Bullet 4 to place as Bullet 1
2.3.1		Spatial Planning is acknowledged but makes no reference to the lack of spatial zoning for mineral extraction in County Development Plans - we need to set aside lands for minerals as our population grows and rural housing continues to expand
2.5		Welcome reference to Our Rural Future 2021-25 as minerals will be critical to sustainable rural development and balanced spatial strategies/ good job creation.
2.5		Job creation in mining should include multiplier effect e.g. Navan's 600 direct jobs likely supports up to 3,000 indirect jobs in local and regional economy.
2.6		Zero waste – very difficult to achieve in mining. Would be good to see how the State will support this with practical measures for mining industry
2.8		Future Jobs Ireland 2019 - the State could consider investment in vocational training as much as academic/ 3 <sup>rd</sup> level. There is a major gap for advanced mineral technicians (as used to be trained by Athlone IT). Welcome the new drilling apprenticeship in Carlow IT. More please.  Geography, the first and only introduction to Geology (and thus future careers in MinEx and Mining) that students get to Junior Cert level – requires coordination between Dept Education & Skills and DECC prior to removing Geography as a compulsory subject to J.Cert.
	p.20 table	Potential for germanium as by-product of silver (Ag) mining
2.9-2.12		EU Policies – it would be good to see pro-active Irish versions of these policies in terms of concrete measures to support the mineral exploration and mining industry. This Policy Statement is a start but more practical actions are required.

<b>3 Regulatory Framework</b>		
Intro		No mention of the Minerals Development Act 2017 (again) – can this legislation be re-introduced? It encompassed the first attempt to introduce requisite social engagement with local communities and should be re-introduced in legislation. The need for social impact assessment for Mining activities (as per states in Australia, Canada, Greenland and others) should be considered by Ireland – to ensure community is fully considered in all applications.
	p.24	The consultation phase for response to Mineral Exploration licensing/ renewal should be increased to 6 weeks (30 days is insufficient for communities)
<b>4. Minerals Exploration &amp; Mining Policy</b>		
4.2.1	P 30	Welcome the establishment of the Minerals & Mining Advisory Group
		Consideration should be given to having representatives of the Public Participation Networks (PPNs) as part of the Social pillar represented.
4.2.1	p.31 final two bullet points	<b>Supporting Public Understanding &amp; Trust</b> Could we introduce the concept of a Mineral Citizen – as per the Energy Citizen introduced in the Energy White Paper 2016 and subsequently in the Renewable Energy Support Strategy (RESS). Could individual citizens or community groups living in the vicinity of a mining operation could be offered small % shares in the operation as done now for renewable energies under RESS –where financial benefits thus return directly to local communities. And thus generating local buy-in and less opposition potentially. F
4.2.2	p. 31	Welcome the separation of policy and regulatory functions. The bullet in this section pertaining to Non-Issue of coal-lignite-oil shale exploration licences sits oddly here - in the wrong place – move? Should also include ban on uranium exploration in a new section – to make this very clear to potential investors (perhaps in Appx B 6.3 ?)
4.2.5		The Monitoring Review & Reporting should include the M&M Advisory Group to be truly representative and transparent.
<b>Appendices</b>		
6.6		Legacy Mines – seems the State is left to clean up the mess. There should be some expression here of the role of mining companies under modern Mining Leases to rehabilitate through effective mine closure plans.

Thank you

