

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

Re. Consultation on mineral exploration and mining

I am an exploration geologist who has worked in the industry for 20 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 appears to be 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 deals with exploration and mining separately.

While the Circular Economy is a welcome strategy, there will be a substantial lead in time before this strategy is in place and operating efficiently. It also fundamentally misses the core concept of capitalism, the need for constant growth. Every year will see a constant shortfall, even with 100% efficiencies, as our economies require constant growth. Mining will be required to continue to fulfil society's raw material needs and perhaps some sort of programme should be considered to inform the public and avoid a perception that mining will no longer be needed.

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 a need for 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 be highlighted to the relevant planners.

I am concerned by the subject of Chapter 3.1 – the use of the "mitigate" suggests that there are significant environmental impacts from exploration activity. In fact, any exploration programme I have ever been involved in, exploration companies go to extraordinary lengths to ensure that there is no requirement for mitigation. The GSRO do advise that environmental screening assessments do not include the mitigation of impacts, and 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) currently monitors and records 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. 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, particularly since over the last number of years, a number of regulations have been presented as a fait accompli, with no consultation with the industry.

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 furore, 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.”

This paragraph could be used to cherry pick minerals that are perceived as not essential for the circular sustainability / critical raw material agenda, or even worse, be subjected to the whims and biases of the Ministers and TDs currently in power, without recourse to the best scientific advice. 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. 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 dominates the exploration sphere, and there will undoubtedly be repercussions if there is a move to ban gold exploration / mining. 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. The tightly knit natural

resources industry will take serious note of any perceived governmental anti-mining lobby. A number of exploration managers from various international companies I consult with, have already begun passing comment on the increasing lack of appeal of Ireland.

Section 4.2.1 underlines the requirement to build trust with the public, 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. 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 groups or parties 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. Indeed, the recent pandemic has highlighted the need for the EU to develop its own secure pathways for resources. 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 inherent environmental impacts from less transportation and high-quality regulation of the mineral exploration industry based upon factors within the control of the EU.

Regards

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