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October 15th 2021

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

Re: Consultation on Mineral Exploration and Mining

The Draft Policy Statement on Mineral Exploration and Mining setting out the Government strategy to support and regulate the mineral exploration and mining industries is a welcome initiative - in particular, the recognition of the importance of the role that mineral exploration and mining can play in Europe's transition to the circular economy and net-zero greenhouse gas emissions; in supporting primary and secondary economic activity and associated job creation; and in progressing many of our national, European and international policies and commitments.

The Statement recognizes that, over the past decades, mineral exploration and mining in Ireland has effectively operated within an agricultural and semi-urban environment, supported by an evolving, comprehensive, wide-ranging and well-regulated policy framework. The value of this approach is clearly evidenced by the co-operation between the agricultural community and the mineral exploration companies; by operating history and outcomes from the recent, and on-going, mining operations, and; by the high regard that Ireland holds within the international mineral resource investment community. However, given that social licence can be transitory, that exploration funding is a risk investment, that funds are mobile and will always seek out the most attractive jurisdictions, we cannot rest on our laurels and must ensure that the Policy, and its implementation reflects this fact.

The public's awareness of the importance of minerals, mineral exploration and mining is a major issue at national and international level. Addressing the issue is the responsibility of all stakeholders. The development of voluntary codes of practice is noted and your attention is drawn to the fact that a code for "responsible exploration" is currently being drafted by the Irish Association for Economic Geology.

The vision for greater transparency and participation in the decision-making processes regulating mineral exploration and mining activities is important. However, it is suggested that, in the case of exploration licencing / permitting, commentary by members of the public local to the exploration area(s) should be given primacy, and that all submissions should only be considered within the framework of the policy.

The suggestion that the schedule of minerals for which exploration is permitted be subject to regular review provides opportunity for on-going populist pressure, and introduces an unwelcome degree of uncertainty into the regulations. Minerals do not occur in nature as singular elements, but typically occur in association. Therefore, exploration should be not confined to specific elements, or commodities. Instead of suggesting the possibility of limitations / restrictions, synergies between

different geoscience sectors should be encouraged. For example, the contribution that deep exploration drilling can provide to the emerging geothermal sector.

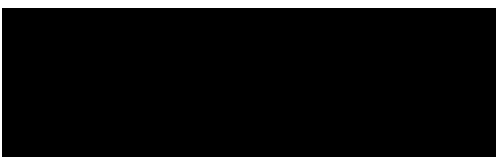
Free access to data is of increasing importance in assessing the attractiveness of a jurisdiction for mineral exploration investment. If Ireland is to maintain its ranking relative to other jurisdictions then we need to continue to evolve and improve our archiving of the historic exploration data, including drill cores, taking into consideration on-going software development. In particular it is suggested that all of the historic exploration data should be made available in a format that can be interrogated by modern GIS systems.

At the international level, the commitment to actively participate in European and international fora promoting best practice in, and the sustainability of, mineral exploration and mining is welcome - in particular, your positive participation in developing the EU Taxonomy Regulation system to ensure that the contribution of the minerals sector to the vision of a climate-neutral Europe by 2050 is recognized. In parallel with this, it is of equal importance to ensure that policies and systems are put in place, nationally and at EU level, to support investment in mineral exploration, particularly by the SME sector. As you will be aware, all of the mineral discoveries in Ireland in the past 7 decades are the result of exploration programs initiated, or conducted, by “junior” exploration companies. In order to ensure the future viability of this sector, a study of financing incentives operating in other jurisdictions should be a priority action.

The importance of people cannot be overstated. To-day, Irish geoscientists are globally recognized by the resource sector for their expertise. This is well illustrated by the success of the Geoscience Ireland, an initiative that warrants continuing governmental support.

The proposal to establish a minerals exploration and mining advisory group is also to be welcomed. Given the conflation of the two industries in the public mind, and the distinctly different business models, it is recommended that two advisory group be established, one for each industry.

Yours,

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