



**Subject:**



'Consultation on mineral exploration and mining' highlighting - The importance of access to technology to access our mineral wealth.

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Thank you for the opportunity to comment on the draft policy document. This offers exciting opportunities to move the Irish exploration and mining industry forward. I would like to highlight the importance of ready access to the best available technology in achieving such aims.

### **The importance of access to technology to access our mineral wealth.**

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The draft policy statement highlights that access to critical raw materials (many of which are minerals) used in digital and clean technologies was labelled as “a strategic security question” in the European Green Deal. In support of this aim, I agree that a “well-managed and well-regulated mineral exploration and mining sector has the potential to enhance and grow rural communities”. I also welcome the plan that DECC will establish a minerals exploration and mining advisory group comprising the regulatory (including land use planning), environment, academic, economic, industry and social pillars.

The document points out that “amongst global industrial activities, mineral mining is one of a select few that are ‘geo-fixed’”. Hence, it is not possible to cherry-pick an alternative development site elsewhere in a region. This is a key aspect for consideration in land-use planning. It follows that mineral explorers need access to the right “low footprint technologies” to access our mineral wealth which is likely to be, in all probability, in a subsurface location, remotely situated “off-road”. Drilling is highlighted as perhaps one of the most intrusive forms but to date, no evidence of a significant impact on the environment resulting from drilling. Interesting and more crucially, the draft policy document sets out to ensure that Ireland has the necessary mineral exploration and mining personnel, skills, education, knowledge and mineral data to fully realise our mineral potential. However, it falls short in my view, by not committing that these skilled personnel have access to the equipment and technology to deliver on this, on a call off basis. There have been significant advances in seismic technologies in recent years and these have been successfully proven to improve the chance of success in the discovery of economic mineral deposits, in Europe at lower cost. This is what the industry in Ireland is demanding, but to date, the cost of seismic acquisition services, through normal supply chain routes has been excessive. This has been further complicated by Brexit. This situation can and must change, if the strategy set out in this draft policy document is to be successfully delivered. Furthermore, if such capability and technical expertise was available, the stretch objectives of supporting our geoscience data analytics and research capacity could also be delivered in order

to deepen our knowledge of Ireland's geology for geothermal energy, minerals and water and other uses with "pooled resources". I therefore suggest that serious consideration should be given to a national technical services unit, possible aligned to one or more of the existing of the technical research centres, with capability to carry our geophysical acquisition surveys, initially on a small scale and possibly on a speculative basis. Alternatively, this could be through a proprietary licence arrangement but in any event, with the same due regard for all environmental considerations and permits currently required by legislation. In my view, the draft policy document should at least acknowledge that recent low footprint technological advances present new and more environmentally acceptable approaches to mineral exploration. This could include provision for environmentally acceptable screening surveys to ascertain optimal parametrisation and design of geophysically appropriate strategies to explore in off-road environments. To some extent, this could be considered as an "Onshore Observe" program and welcomed as a pro-active step in addressing above ground issues, to secure licence to operate, acceptable to all stake holders.

Best Regards,

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