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Submission Re. Draft Policy Statement on Mineral Exploration and Mining 2021

- ❖ The [Climate Action](#) and Low Carbon Development Bill 2021, [Social Partnership](#), SDGs, EU Directives, UN Resolutions, and other relevant policies, laws and realities have implications for Irish mineral policy beyond economic development considerations, requiring new mindsets for new behaviours.
- ❖ The IPCC warnings confirm that maintaining business as usual for the rest of this decade, up to 2030, constitutes catastrophic irreversible risks to future generations.
- ❖ The recently-announced transport element of the NDP includes an innovative climate impact assessment to be carried out on all projects under seven headings: climate mitigation, climate adaptation, water, air, waste, nature and Just Transition, so as to ascertain a favourable impact, no significant impact or a negative impact on the environment. This approach should be adopted for all exploration and mining plans.
- ❖ Inclusion of the ban on new prospecting licences, mining licenses or leases for coal, lignite and oil shale, and support for the Circular Economy Bill 2021, are correct.
- ❖ The role of minerals in 'green transition' is music to lobbyists' ears. DECC need to decide whose side they are on, the public interest, or private/corporate interests. As Friends of the Earth point out, in their report, Green Mining is a Myth, "The mining industry and governments must also stop attempts to greenwash mining, using the fact that certain metals and minerals are key for green technologies to greenwash the metal mining industry in general and promote the nonsensical concept of 'green mining'. Metals like copper, iron and aluminium are overwhelmingly used in construction and other industries, such as the destructive military sector. And war is responsible for more environmental damage and loss of human life than any other undertaking.
- ❖ A strong regulatory framework that governs mineral exploration and mining is an honourable aspiration, but enforcement of restraints on excess is neglected despite some reputable players. Natural resources may well be excavated only to be wasted for little gain and ultimate ruin of land and people.
- ❖ The EIA directive needs to be implemented properly but is not e.g. little wind meant turbines made of many precious minerals lay idle this year, while deep-bore geothermal energy is far less wasteful and extractive but is not even legalised yet.

The geothermal study should be fast-tracked.

- ❖ Taking into account full life-cycles of minerals is, again, an honourable aspiration.

- ❖ Who is to decide if infrastructure required to mine is a positive legacy?

- ❖ Because the past pattern has been about taking as many finite resources as possible from out of the ground, the lack of assurances about regard for nature conservation is retrograde. Absence of life proofing merely blesses ongoing pillaging.

- ❖ Committing verbally to sustainable practices, minimal hazards, and temporary impacts to land or people is easy but unreliable. Standards must be adequately policed for well-regulated carbon-neutral measures. The policy fails to address this aspect.

- ❖ The industry reminds about modernity's dependence on rare elements in so many areas, without considering reduced demand, or developing more available elements for various purposes. The Friends of the Earth report points out that "the root causes of the broader climate and environmental crises [include] an economic system which drives overconsumption and social inequities in all sectors. As an urgent first step, the EU must set a material footprint reduction target of 65%." This is what being serious about protecting the environment would look like.

- ❖ "More environmental defenders are killed for opposing mining than opposing any other industry. 50 of the 212 environmental defenders killed worldwide in 2019 were campaigning to stop mining projects," states that same report. Even in Ireland to date, planning is very weak on social impacts e.g. community workers are smeared as nimby types. Impact assessment is often biased, with conflicts of interest arising and independence hard to discern by the EPA. Regulation of quarrying is long overdue. Bias in assessment erodes public confidence. People are not allowed enough time to wade through huge technical reports. Mining has serious impacts, social and environmental and more but no mining company, even the best of them, go even halfway to meet recommendations of the responsible mining index.

- ❖ A glaring omission is reference to international standards e.g. guiding principles on human rights, sustainable wellbeing and holistic social impacts. International courts are increasingly acknowledging social factors, including those based on objections. As the prospect of jobs diminish with increased remote automation in mines, it will be harder to persuade communities to get on board. Economic benefits are overstated. Low or no royalties are returned to locals for their dispossession. Good neighbour agreements should be put in place. When people are informed and included in decision-making dialogue and listened to, they are more likely to allow projects.

- ❖ Gold mining so negatively affects water, which is also becoming a scarce recourse, and creates such huge risks to limestone aquifers, that its refusal should be considered. There is no shortage of gold in the world. Multi-national companies readily divest from coal and other commodities without hesitation if it suits their narrative and bottom-line. What is stopped can be started again in future if need be.

- ❖ Mine closures have too often been farmed out and done shoddily, despite improved definitions and bonds, which go unfulfilled. The precautionary principle is the wiser choice, for true green outcomes and for this, conscientious management is required.

- ❖ When mines are being closed, plans for long-term stability of workings and rehabilitation of rocks are compulsory but are not checked in practice. Cement and rocks are often used as backfill material. There are reports of much unauthorised material being moved around wholesale, while aggregate to backfill mines is often not what it's supposed to be. This is unacceptable and requires specific attention.

- ❖ The overwhelming trend is for mining companies, if offered an absolute right to

mine, to abuse adjacent communities. Trust is low in institutions. The social impact deserves higher priority. Capacity building at community level is needed so those affected understand and can participate at the earliest possible stages.

- ❖ It is vital and a matter of urgency for the industry to be obliged to work much more closely with recycling companies. The circular economy cannot happen without interventions to curtail consumptive lifestyles and rapidly generate links.

- ❖ The Minerals Development Act 2017, which if enacted would have updated much of the older legislation, should be referenced in the draft Policy.

- ❖ The sector's contribution to the achievement of other national, EU and international policies is complex. The IEA may well talk up critical minerals when disproportionately funded by the mining and fossil fuel industries. Look sharp!

- ❖ Five key principles of robust regulation; increasing awareness and participation; sustainable development; building capacity and access to knowledge; and international co-operation are worthy.

- ❖ The key priorities of building public understanding and trust; enhancing the regulatory framework; research on the role of minerals in the transition to net-zero greenhouse gas emissions by 2050; better data enhancing policy and decision-making; and monitoring, review and reporting are complex.

- ❖ That a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) were been carried out on this Draft Policy Statement is right.

- ❖ Having a draft mineral policy is a step forward though online consultation is insufficient especially for townhall events. Reviews should be factored in. It will take bravery to resist industry's growth demands and do the right thing.