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Dear Geoscience Policy Division,

I have some comments on the Draft Policy Statement for Mineral Exploration and Mining in Ireland. I am a geologist who is working in this sector although no longer directly involved with such work in Ireland. These comments are my own, and not reflective of any companies I have/am working for.

p24, section 3.1

The title " Measures in place to mitigate the environmental impacts of mineral exploration" implies directly that mineral exploration causes environmental damage. I do not believe there is evidence to support this. As mentioned elsewhere in the Statement, there are a number of different types of work which occur before drilling, particularly fieldwork like mapping, prospecting, geophysical surveys and soil sampling. Most of these are entirely without environmental damage compared with many agricultural activities on the same land. Many projects do not even reach the stage of drilling. I suggest that the title of this section is revised.

p24, section 3.1, para4

"The Minister invites submissions on the granting/renewal of each prospecting licence and the consultation period is open for an extra nine days (a total of 30 days' consultation period)." I do not agree this is required particularly when no evidence is provided in the Statement to show a need to extend the consultation period. On the contrary, it is likely that there are very few serious (substantiated) observations made on the renewal/granting of most prospecting licences. An extension of the time period will only cause extra delay in the bureaucratic process without any significant benefit to any party.

p27; section 4.1.2

"Promote and facilitate greater transparency and participation in the decision-making processes which regulate mineral exploration and mining activities, including through making more robust scientific data and evidence used in decision making available to the public." It is entirely accepted that transparency in the regulation process is a general requirement and the use of robust scientific data is always welcomed. However, the Statement does not detail how the public *participation* is to be achieved. This aspect of the Policy is also noted in p30, para.2 ("informing communities how they can participate in the decision-making process around the granting/renewal of prospecting licences"). Participation in decision-making as a democratic process is essential - TDs and Ministers are elected on our behalf to do this. Our civil administration needs to be able to objectively decide through policy, legislation and scientific data that any mineral exploration or mining activity is acceptable. Most members of the public are not trained or experienced in this. Many uninformed views have caused damage - for example the "anti-vax" movement in Donegal. The Policy needs to outline how subjective, uninformed and vexatious objections are to be treated so that a fair, logical and robust process can take place within a reasonable timeframe. As part of this process, an over-arching theme of "Better In My Backyard" should be instilled - where progressive environmental, social and employment policies can be in place within a modern European society which takes ownership of its raw material requirements. It is no longer acceptable to allow external countries to supply our raw materials under the current practices in some countries. Allowing vested interests in local communities to stall exploration and mining projects is also unacceptable if we are to achieve the raw material supply that our green agenda demands.

I hope these comments are of some use to you.

Yours sincerely

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