

Submission in relation to the Consultation on the Draft Policy Statement on Mineral Exploration and Mining in Ireland and associated SEA Environmental Report and AA Natura Impact Statement from Aurum Exploration.

To whom it may concern,

Aurum are an Irish based geological services provider, operational within Ireland and globally since 2002. Aurum currently employ over 35 people directly related to the mineral exploration industry. As a successful indigenous SME, Aurum have an interest in Ireland maintaining its position as a favourable exploration destination. This response is aimed at ensuring Ireland's official position on the minerals industry enables the industry to operate and respond to current and future demands, making a valuable, responsible and sustainable contribution to the national and global economy. There is a real need for the minerals industry in Europe to be able to ensure a secure supply of critical minerals (in particular) and a moral requirement for the developed world to share the burden of the production of the raw materials that allow modern day to day life to function.

The publication of a document setting out the Irish Government's position in relation to the minerals industry is welcome. The increase in the demand for metals as we progress towards a zero emission and greener / circular economy is well known and the setting out of the official position is an essential step towards Ireland playing its part in the meeting of national, European and global objectives. As stated in the Draft Policy Document itself, the minerals industry has a vital role to play in meeting objectives related to the transition to net zero emissions & circular economy and rural development as well as to continue the vital contribution already made to almost every sector of modern life. In order for the industry to be able to respond to the demands that will be placed on it (directly or indirectly) by policy makers, the industry must be able to function. A number of aspects of the Draft Policy Statement cause concern and have the potential to limit the viability of Ireland as a mineral exploration and mining jurisdiction.

Section 4 (and the set of documents in general)

The conflation of mineral exploration with mining in the documents is considered as inappropriate, misleading and unhelpful. There are clear and documented differences between the two, in terms of their nature, impact, business model and licence requirements / legislation. The current situation in the country allows the disruption of the exploration licence process (to the point of it being unworkable) through the use of en masse objections, in which the emotive conflation of mineral exploration and mining plays a large part. Disruption to the legal exploration licence process prevents the proper assessment of potential resources of value to the State and disrupts the licencing and planning process, circumventing the proper legally appointed authorities – local councils, planners

and national authorities such as the EPA – from considering the community gain, benefits or downsides of any newly discovered ore deposit.

Section 4.1.3

A suggestion that the schedule of minerals is reviewed regularly and assessed based on the mineral end use, the status as critical and inherent circular sustainability is large point of concern from industry. The security and continuity of mineral exploration licences are an essential tenet of the exploration process and if there is a perceived risk that a review of scheduled minerals will increase the already considerable risk to investment in exploration, explorers will gradually leave and they will not come back. More generally is it 'right' to potentially restrict exploration for materials from which Irish society as a whole derives benefit?

Section 4.2.1 and Section 4.2.2

The issues around the public involvement in the decision making process around the granting / renewal of prospecting licences must be handled appropriately. The need for public understanding and trust (social licence to operate) is acknowledged. However, the level of mandated community engagement and influence must be appropriate to the level of activity. To use an analogy it is important to avoid a situation akin to requiring making and going through a detailed planning permission process to conduct a site investigation for a construction project.

Current disparity between words and actions in the area of communication on minerals policy. It is stated that the "Irish Government will show leadership by engaging with the public on the issue to identify and to address any concerns members of the public may have about the mineral sector in Ireland and how the mineral sector interacts with their local communities". Current attitudes and experience is entirely to the contrary whereby the only voice heard from elected officials are the negative ones, the Civil Service is largely quiet on the matter and the very Department responsible for this document has evolved from the **Department of the Marine and Natural Resources** to the **Department of the Environment, Climate and Communications**, via the **Department of Communications, Energy and Natural Resources**. The impression to industry is the effect of distancing the government from this sector. There is little effort made to combat the use of emotive language and deliberate misrepresentation of facts prevalent in opposition groups and a clear communication plan would be welcomed.

The transparency of the Regulatory Framework must work both ways. Much is made in the Draft Policy Statement of the need for transparency. Whilst transparency is necessary and welcomed transparency, by its nature must work both ways. Current experience is that the exploration licencing process can be circumvented by orchestrated obstruction through objections and access to information requests. There is no transparency here in that the objections and requests are not subject to the same level of scrutiny, there is no right for the licence holder to respond and most importantly of all **there is no clarity on how decisions related to these issues are made, who makes them or in what timeframe.** The result is a number of exploration licence holders, operating to the terms of their licence, in good faith currently hamstrung by the inability of the system to deal with the increased level of public interaction.

The decision making process MUST be clearly documented and the GSRO MUST be appropriately staffed in terms of staff and experience. Following from the above point. If the level of information provided to the public is increased and the level of involvement in the decision making process is increased, the decision making process must be clearly documented and a timeline imposed. Currently it is only industry that is mandated to work to an enforceable timeline. Directly related to this and

presented through direct experience, the staff and experience level within the regulatory authority (GSRO) must be sufficient to deal with the increased demand. This is addressed in the SEA document. Without an efficient and transparent regulatory system, the Irish exploration (and ultimately mining) industry will cease to function.

Section 3.1

There is no reference to the Minerals Development Act 2017. Although this is enacted it is not yet commenced, presumably the plan is for it to be commenced and any material differences should be highlighted.

There is little reference made to the extensive regulatory system that does exist and the requirements that explorers (as Aurum's experience pertains) must adhere to.

General Comment

The heavy focus of the document on input the minerals industry can have in the spheres of green economy, net zero emissions, and the circular economy etc. detracts from the very real contribution the industry makes CURRENTLY and will continue to have to meet. The images and figures related to the requirements necessary to meet these green targets are useful but they fail to address the cumulative impact of the increased resource demand on current demand which is much more effective in highlighting the pressure the industry is about to be placed under and the necessity of all areas lucky enough to be endowed with mineral potential to play their part in allowing a secure, sustainable and responsible supply of necessary raw materials.