

14 October 2021

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

Re. Consultation on Mineral Exploration and Mining

ZMI appreciate the opportunity to make a submission to the Geoscience Policy Division on this matter.

Zinc of Ireland NL (**ASX: ZMI**) is a Perth-based zinc exploration company dedicated to carrying on the Irish tradition of creating and delivering value from our high grade Irish-Type zinc projects.

The company, and its subsidiaries, focus is on advancing our flagship Kildare Project, located approximately 40km southwest of Dublin, which has the key attributes of the famous high-grade zinc mines in the area.

The Kildare Project is situated within the Rathdowney Trend, within 80km of profitable zinc mines – Lisheen (17 year mine life) and Galmoy (12 year mine life) - both of which are now closed, with the latter seeking to re-open.

In our project pipeline, we also have an extensive portfolio of 100%-owned prospecting licences in the Republic of Ireland, all prospective for zinc and other base metals with PL's strategically located along the Rathdowney Trend.

The Draft Policy appears clearly written and provides a fair and balanced explanation of objectives of the Green Deal and Ireland (and Europe's) ongoing and increasing need for minerals.

ZMI note the separation of exploration and mining activities within the Draft which we consider appropriate.

With respect to the Local Authority Development Plans and the National Planning Framework, we note that often there is emphasis given to certain natural resources (e.g. aggregate) over others. ZMI would like to see this addressed such that local planners are provided with sufficient information to be able to appropriately deal with areas that

may have significant mineral potential. This should contribute to help to optimise the strategic growth and development of the region and encourage ongoing investment in the sector.

We would make the point that the concept of a Circular Economy will require appropriate transition and that any such transition will require greater emphasis on raw (and precious) material extraction, ideally that which can be sourced regionally. Mining's positive contribution towards bridging our society towards a Circular Economy in the medium term should be championed and appropriately messaged by all stakeholders. Further, we note the rise of public participation in mining and related issues in parallel with the increased use of social media. Participation is to be welcomed as all stakeholders will draw benefits from a more transparent outlook and interaction with local communities. Appropriate support and accurate information is however required to counter the potential use of such platforms to disseminate misinformation which may be used simply to stall due process.

ZMI note that Section 4.1.3 has placed emphasis on 'critical raw materials' and their 'inherent circularity'. We find this somewhat concerning as:

- the classification of 'critical' is likely to change over time as may ultimate end uses and users.
- high value resources (precious metals as merely an example) can provide greatly enhanced leverage towards the provision of circular sustainability within an economy.
- long term investment confidence may be eroded by the perception of such selectivity and may be attracted to areas of lower jurisdictional risk.
- any potential loss of investment in one commodity may have a knock-on effect within the sector and act to counteract the benefits of a positive exploration / mining policy. These include security of supply, reduced environmental impacts from the use of locally or regionally sourced materials as well as socio-economic benefits such as increased and upskilled employment.

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Consultant Geologist  
Zinc of Ireland NL  
[www.zincofireland.com](http://www.zincofireland.com)