

Communities against the Injustice of Mining (CAIM)

5th October 2021

Re: Submission on Public Consultation on the draft policy on Mineral exploration and Mining in Ireland and associated SEA Environment Report and AA Natura Impact

Policy Statement

Only one planet Earth

Entire mountains have been gutted with mines that cut and stretch deep scars into the earth, and this pace of extraction shows little sign of ebbing. The assault on our home is causing widespread extinction that has been called a “frightening assault on the foundations of human civilisation” by scientists. However, climate change is not the root problem; it is a civilizational crisis and one attached to an economic model which roots development in destruction.

Continual appropriation

Many in affluent nations and their drivers of production the extractive corporations, have for many years denied they have been responsible for climate change and actually they have spent millions of legal tender to undermine science. The extraction industry now are asking and their requests are promoted by the [Department of the Environment, Climate and Communication](#) (DECC) draft policy that alternative energy (AltE) will replace fossil fuels (FF) with watt for watt and btu for btu.

Using AltE blindly though blocks the small window of opportunity of reassessing how we could examine using less energy, which would be an obvious step to avoid runaway biodiversity and protecting human health. This would entail looking at systemic change on the structure of our economy yet the only narrative promoted is how the present economic structure can continue to grow without FFs. The DECC is desperately projecting the extractive industry goals of using the necessary transition from FFs as an ideology to justify massively increasing extraction on the island of Ireland. It is well recorded that infant capitalism used similar tactics; such as using racism to justify plundering Africa, Asia and the Americas.

A concerted effort by policy makers and corporations are in motion to expand mining which are in effect to plunder for raw materials upon the landscape to continue business as usual. In real terms what it actual means is the continued financialized economy where the process of accumulation is determined only by international markets and shareholders.

Government promotion

In Ireland, the government has adopted a policy already without any debate by declaring enthusiastically that Ireland was “open for business” to increase mining by giving tax breaks and collaborating to overcome hard won regulatory provisions. Therefore, in accommodation there are already 27% of the Republic of Ireland (ROI) currently concessional to mining companies for mineral exploration and 25% in Northern Ireland (NI). There is also the continual collection of Data by

Geological Survey Ireland (GSI) not only on land but also on offshore mineral resources, a further threat to the rich biodiversity of the marine.

Industrial Mining

Industrial scale mining has a long history of colonialism, oppression and ecological devastation including criminal human rights history, the murder of land defenders and environmentalists. There are presently worrying signs of police harassment in Ireland against concerned inhabitants in threatened mining areas. It has to be highlighted that the government has been succumbing to elite corporations with deep financial resources to make further fortunes degrading ecosystems, landscape and its human communities in Ireland.

Renewable energy

Of course, renewables are part of our future in our endeavour to combat temperature rise but unfortunately far from confronting the existential necessity to banish fossil fuels this policy projects a green growth without considering the reality of high production. Insisting that new energy can be inserted in a world created under false finite concepts, geared for FF driven industries and technologies is false. The overproduction it has driven has taken us to the present situation, pursued by rich nations and corporations and cannot be replicated. We cannot solve our problems with the same thinking that caused them.

The first conversation to develop policy has to be around the following questions

1. How much energy do we need?
2. What do we use it for and when do we use it?
3. How do we conserve use and how is it shared
4. Who has ownership, how to strengthen energy democracy and public participation?

It is obviously that a draft policy outline should primarily consider our energy culture, which will fundamentally involve moderating our endless thirst for energy. The draft policy ignores this reality in the pursuit of extraction. There is no better illustration of this than by the policy's repeated claim of the necessity to meet the goal of marketing one million electric cars by 2030 and the obvious necessary associated infrastructure. This vision is rooted in the ideology of capitalism built upon ideas of separatism and individualism, yet in any effort to combat climate change requires the encouragement of communal institutions and cooperative approaches across all spheres of society.

Private or public luxury?

The promoters of electric cars reflects how priority lies in the continuance of the same old story of profit and status before needs for all. Greenwashing in the pursuit of a marketing strategy without accounting for externalities and further environmental costs regarding the many minerals needed to be extracted. The mining activity that such a policy would demand here and elsewhere would neither be sustainable or in any way termed "green".

The alternative in minimising environmental damage is to invest in a proper public transport service. This one issue reflects surely that our planet cannot support private luxury for all but it is just about feasible by diligent behaviour and a circular economy possible to support and to provide a public luxury for all.

Circular economy and mining.

The Policy document, the Strategic Environment Assessment report and the Natura Impact statement for mineral exploration and mining repeats the claim that minerals have a critical role in relation to ambitions in the Climate Action Plan and the transition to a efficient circular economy. The SEA report though mentioning recycling fails to explain the role high quality recycling, reuse, reduce and repair as an alternative activity to mining. It emphasises that extraction is the “Important element”. The policy obviously emphasises that the transition from FFs requires the expansion of mineral extraction in Ireland upon our landscape and our large marine area that will exacerbate fragile ecosystems and their services.

This convenient cloak is actually being used to push for gold mining in the North west yet little gold is used in industry or useful products(as low as 15%). Surely, gold is an appropriate mineral for recycling and reuse as bank vaults are brimming with gold that could meet needs in this existential emergency for the next 100 years. Yet the push for mining gold is happening with disregard to the environment, waste, water and in the pursuit dividing long unified communities. A permanent moratoria on extracting gold should be the call if DECC were serious; this would highlight the need to change course drastically to ensure that this planet remains hospitable for all of humanity now and in the future.

Copper can also be easily reused and recycled; with an estimated 25% of the world’s copper already buried in landfills.

It has to be remembered that half of all resources used and the polluting emissions that are emitted are a result of making people richer beyond their needs and any attempt to do so further are in the interest of stakes. It has to be underlined that the change we face needs widespread public support including recognising the nature-gorging economy and the worship of indiscriminate growth that drives them, ignored in this policy document. Continual growth model is incompatible with the report claims of pursuing sustainability. At best, it is being disingenuous, at worst an attempt to project disinformation.

Initial steps

To put a cap on resource extraction requires a framework similar to the Circular Economy Action Plan but one that accepts that over consumption especially in the global north is unsustainable and indeed unethical. The debate, research and eventual policy in relation to use of resources then has to be about:

1. Planning for cultures of sufficiency, solidarity and simplicity and how they are created, including decentralised energy generation and establishing low carbon urban areas.
2. A revision of how to monitor progress towards a more planetary well-being replacing GDP.
3. How can we exercise restraint in the economy and redistribute wealth for a just transition to avoid planetary ecological collapse?
4. Increase democratic processes in how we can improve quality of life without trashing the planet.

Conclusion

Rich nations and indeed rich individuals therein and not have to address their level of energy use, consumption and reduce it. Since World War 2 increased affluence in a growth driven economic system has ended in the stripping of public services has increased inequality, financial instability and increasing resource consumption with dire environmental pressure on earth ecosystems. We have to

acknowledge that climate violence and massive species extinction requires direct downscaling of present production systems to stay within planetary boundaries while still fulfilling human basic needs. This report we find is not fit for such a purpose.

SEA Statement

SEA report submission

Our red line points.

1. The preferred option in the SEA report which excluded SP2, (which had limited merit) is worrying. Excluded areas for all mining has to include all Natura 2000 areas, heritage sites and sites of community Interest
2. Strict adherence to the goals of the Landscape Convention and the National Landscape Strategy 2015-2015.
3. A strict reverence to the goals of recycling, reuse and reduction to be given total primacy to any mining of minerals in order to prevent the degrading of issues such as biodiversity, population, human health, fauna, flora, soil, water air, climatic factors, material assets, cultural heritage including archaeological heritage, landscape and the interrelationship between the above factors. This should be clearly outlined in any SEA report and its main objective has to be the interconnectivity of climate change and biodiversity.
- 4 Therefore an outline of why such alternatives were decided or not decided has to be stated and how such a decision was assessed and undertaken. This should include any difficulties (including technical difficulties or lack of expertise) encountered in compiling the information in establishing the primacy of a circular economy.
5. There are many areas of inadequate data, which to be fair the report alludes to concerning the marine (30% of which has to be protected by MPAs), but this also is the case onshore. It is estimated that at least 7,000 species of algae and fungi have yet to be discovered and many of our known species have poor overall status. We are far from achieving the Aichi Biodiversity targets and therefore this SEA is not fit for formulating policies. A January 2021 review by the National Biodiversity Forum set up to advise the government on implementing actions to ensure ecosystems are preserved and restored was highly critical. Any progress made lacks any urgency to tackle biodiversity loss or measures to reach conservation objectives. This highlighted by the European Environment Agency audit report 2020 emphasized there is no systematic approach to establishing 'conservation measures linked to Natura sites specific conservation objectives and pressures and threats'. Therefore, any baseline on the environment in this SEA report on mining is not fit for the purpose.

One island

Article 7 of the SEA Directive provides for transboundary consultation and both states must agree on detailed arrangements to ensure the public and local government likely to be affected are informed and given opportunity to make their views known. This is urgent on a small island that shares an interrelated environmental network. The metaphor of a spider web comes to mind, "a pull on one strand will distribute tensions throughout the web as a whole"

AA Natura Impact Statement

Natura Impact Statement submission

The purpose of this report can only be of generic nature as any appropriate assessment of any deterioration or disturbance of protected sites or their proximity geographic context is very important.

The Precautionary Principle is the foundation of the high-level protection needed to protect the environment interrelated with the health of humans physically and mentally. Prevention then is better than a cure; therefore, it is cheaper and more effective to avoid destruction and pollution than to clean it up afterwards. Organisation for Economic Co-operation and Development measures nine factors from the extractive industry that the planet can ill afford to continue. These are acidification, climate change, cumulative energy demand, eutrophication, freshwater aquatic ecotoxicity, terrestrial ecotoxicity, photochemical oxidation.

Therefore, the implications of mining would adversely affect the integrity of a Natura 2000 site, the conservation of natural habitats and of the wild flora and fauna. The burden of proof as to the absence of significant effects and that no reasonable scientific doubt remains falls upon the proponents of mining.

This fact is therefore that the reasoning that the mining industry push to justify mining projects in Ireland cite the extraction of projected critical metals demand and positioning itself as an important actor in the transition to renewable energy. This greenwashing narrative might obscure or attempt to justify their harmful practice it does nothing in real terms for climate change mitigation, due to its link to a model predicated on infinite growth and persistent inequality. A result is the continual assault on the interconnected ecologies that sustain life and wellbeing.

This convenient cloak will be the mode of operandi for mining plans by corporations in support of gaining planning consent; derogation will be sought for Imperative reasons of Overriding Public Interest (IROPI) stated in Article 6(4) of the Habitat Directive .

Article 6(4) of the Habitat Directive outlines where plans or projects likely to effect the integrity of Natura sites may nonetheless be authorised by the prevalence of IROPI. Of course, compensatory measures or offsetting strategies are all part of the corporate playbook with the contemporary appetite for flexible market based solutions to regulation. Using the banner of IROPI that entails a high level of greenwashing undermines a willingness and ambition to genuinely protect the environment now or for future generations.

Compensating factors and the separate factor of mitigation (not mentioned in the Habitat Directive) are not appropriate measures intended to avoid or reduce the harmful effects of a plan or project on a European Site at a stage of screening for an appropriate assessment. Therefore, any use of the term mitigation in policy has no real significance

Article 6(4) does outlines that any reference to IROPI has to have clarification of the concepts of alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence and an opinion from the office of the European Commission .

Without permanent moratoria, a statutory obligation to the many communities affected by proposed mining must outline objective clarity in relation to Article 6(4). That any Opinion of the European Commission be **very transparent and if Ireland asks for such that its content also made fully in the public domain and that alternative solutions are outlined including circularity; alternatives to mining must always be given primacy and discussed in public. Article one of the**

Treaty of Europe states *that* ***“DECISIONS ARE TAKEN AS OPENLY AS POSSIBLE AND AS CLOSELY AS POSSIBLE TO THE CITIZEN”***

