



Iascach Intíre Éireann
Inland Fisheries Ireland

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RE: Consultation on the Draft Policy Statement on Mineral Exploration and Mining in Ireland

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Thank you for the opportunity to contribute to the Departmental response on the Consultation for Policy Statement on Mineral Exploration and Mining.

These comments reflect the views of IFI in respect of the above draft policy statement.

Background:

This consultation by The Department of the Environment, Climate and Communications is part of the wider ongoing engagement with stakeholders and advisory groups on the production of the Policy Statement on Mineral Exploration and Mining.

About Inland Fisheries Ireland's Role

Inland Fisheries Ireland is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation, of the inland fisheries resource and recreational sea angling. IFI is mandated to ensure that the fisheries of the State are protected. To protect means to keep safe, defend, to shield from danger, injury or change. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish populations. Ireland has in excess of 70,000 km of rivers and streams and 144,000 ha of lakes, all of which fall under IFI's fisheries management jurisdiction.



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Many of these watercourses discharge directly to the sea and support species which utilise the marine environment for parts of their life cycle (e.g. salmon, sea trout, eel, lamprey species).

Aquatic Biological Diversity

Under section 7(3) of the Inland Fisheries Ireland Act it is stated that IFI shall in the performance of its functions have regard to (g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems), (h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995). It is important to highlight that there are many surface waters, which are not formally designated but which support populations of Annex II species designated under the Habitats Directive.

The National Fisheries Resource – sustainable exploitation and the economy

IFI is the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines. IFI is also mandated to market and promote Irish recreational angling in both the domestic and foreign tourism markets. This brief acknowledges the importance of angling as a contributor to the Irish economy both in terms of revenue generated and the jobs it sustains.

It is important to highlight that (freshwater and marine recreational angling) directly supports over 11,000 existing Irish jobs, many of which are located in the most peripheral and rural parts of the Irish countryside and along our coastline (IFI, 2015). Within the sector participation rates totalled 446,000 people who were involved in recreational angling in Ireland in 2015, with over 170,000 of these travelling from Northern Ireland and overseas. Over a quarter of a million Irish adults (273,000) held a fishing rod in that period, with sea angling along with salmon and brown trout angling, observed as the most popular categories where domestic anglers are concerned. The quality of the Irish angling product, the friendliness and hospitality of the Irish people and the country's outstanding scenery were cited amongst the principal attractions of Ireland as an international destination for recreational angling.

The EU Water Framework Directive

The EU Water Framework Directive (2000/60/EC) is recognised as a critical regulatory legislative provision. The WFD entered into force in December 2000 and requires the protection of the ecological status of surface and ground waters – this encompasses (among other elements) water quality and requires the conservation of habitats for ecological communities.

One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that surface water systems be protected on a catchment basis - a shared objective between all relevant public authorities. Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Article 28(2) of the said regulations states that a



surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.

Policy Statement on Mineral Exploration and Mining

The Policy Statement on Mineral Exploration and Mining should fully consider and make appropriate reference to and provision for aquatic biological diversity, the fisheries resource and relevant stakeholder interests. This document should recognise that protection of the aquatic environment / habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat, hydrological processes and regimes and broader biological diversity. In this context and bearing in mind State obligations to ensure sustainable development, it is advocated that such plans / policies prioritise maintenance and (where possible) restoration of ecological status in surface waters with a particular emphasis on high quality Q5 sites and systems (which have recently been flagged again by the EPA's recent SWMI Report as showing a worrying decline).

Circular Economy Approach and Sustainability in Minerals Exploration and Exploitation

As an Environmental Agency with a particular focus on water quality, IFI fully endorses the progressive and innovative approaches mentioned in the draft policy in respect of the sustainable management of mine waste in Ireland. A 'circular or more sustainable approach' should hold significant potential to address legacy water quality impacts at historical mine sites in Ireland where acid mine drainage (AMD) and other deleterious mineral influences impact on water quality and aquatic / terrestrial ecology today (despite the cessation of mining activity at some locations in the distant past). Given the well characterised significant mineral loads in AMD, IFI advocates exploration of new and innovative technologies and approaches to stripping or 're-mining' these minerals from AMD, thereby removing toxic and harmful metals from the environment and in the process potentially generating significant sustainably sourced mineral resources (that would otherwise have been released into the environment) to feed into a more resource efficient and sustainable circular economy.

IFI agree that a circular approach to mineral waste management can have a part to play in helping Ireland meet several international goals and commitments not least of which are our Water Framework Objective obligations (mentioned above).

Specific Ecological Pressures

The potential negative impacts of any strategic policy framework on aquatic habitats should be addressed. These pressures are further exacerbated by climate disruption impacts reflected in increased likelihood of drought conditions as seen in 2018 and 2020.

Scope of the Draft Policy Statement

IFI endorses the selection of topics as outlined in the *Key Principles - Section 4 - Mineral Exploration and Mining Policy* of the Draft Policy Statement on Mineral Exploration and Mining. IFI also advocates consideration of the following issues in terms of potential environmental impacts with relevance to Ireland's fisheries resource (and in particular in the context of sustainability topics as outlined in the document):

- Biological Diversity
- Climate Disruption



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- Water Quality
- Surface Water Hydrology
- Fish spawning and nursery areas
- Passage of migratory fish / biological connectivity
- Areas of natural heritage importance including geological heritage sites
- Ecosystem structure and functioning
- Sport and commercial fishing and angling
- Amenity and recreational areas
- Sediment transport
- Alien invasive species

Concluding Remarks

The long-term environmental sustainability of any activity that may impact on the status of fish species, their habitats, fisheries and/or the recreational angling or related commercial activities that may utilise these resources is of primary concern to IFI. IFI is among the public bodies that have a role in making policies, plans or programmes relevant to surface waters in Ireland. Critical and sensitive habitats and species (both designated and otherwise) must be protected. A number of fish species and associated habitats are protected under European Directives in Ireland. From an IFI perspective, all fish species and associated habitats within its remit require protection and management for conservation and development. IFI advocates application of the precautionary principle when considering the fisheries resource / aquatic ecology in the current process. In addition, it must be highlighted that all available consideration and support should be afforded to the national 'Blue Dots Catchment Programme' which focuses on the protection or restoration of high ecological status water bodies – a vital component in fisheries ecology, freshwater ecosystems and in Ireland's aquatic biological diversity more generally.

IFI are grateful for the opportunity to have these views considered and incorporated as a component of the Policy Statement on Mineral Exploration and Mining.

Should you require clarification on any of the above or require a consultation meeting please contact Inland Fisheries Ireland.

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