

From: [REDACTED]
To: [GSPD](#)
Cc: [REDACTED]
Subject: Re: Consultation on Draft Policy Statement on Mineral Exploration and Mining, SEA Environmental Report and AA Natura Impact Statement
Date: Sunday 1 August 2021 14:45:56
Attachments: [image001.png](#)

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Re: marked Consultation on mineral exploration and mining

[REDACTED]

We broadly welcome the extra clarity around marine mining in the documents. While we agree the Observe program will add valuable environmental information (Draft Policy Statement on Mineral Exploration and Mining) in the offshore arena, a lot more environmental baseline data would be required before any mining could be adequately assessed and regulated. Acoustics data would be more important than aerial surveys by giving a thorough understanding of noise, but also a review of habitat destruction, sediment dispersal, and blue carbon removal would be necessary, before proper consideration can be made. It is impossible to evaluate properly also without consideration of the exact mining activity proposed, with crawlers and seabed removal, cutting and removal of seafloor chimneys, and drilling and extraction of hydrothermal waters, being some of the variety of works falling under the label of deep sea mining. However we broadly support statements in the Policy Statement and Strategic Environmental Assessment with regard to mining in the marine environment.

We do feel that the failure to consider sand and gravel extraction in the policy an omission and error. All extractive industries need to follow the same regulations and environmental considerations based on what they are doing and where, and not what title is given to the activity. There is little difference as regards environmental impact between gravel extraction from the seabed and deep sea mining using dredging techniques. Both remove the seabed, the only difference is what they do with this material. Currently marine aggregate extraction outside the 12 mile limit lacks regulation and it is not clear how or if this will be resolved or when. Therefore if the document is not going to concern itself with marine aggregate extraction it should identify who the responsible regulator is or will be, as has been done for quarries on land.

Yours sincerely

[REDACTED]

On 30/07/2021 17:36, GSPD wrote:

[REDACTED]

Thank you for making a submission on the SEA Scoping report for the Draft Policy Statement on Mineral Exploration and Mining.

I wish to advise you that the Draft Policy Statement on Mineral Exploration and

Mining, Along with the SEA Environmental Report and AA Natura Impact Statement have been published today for consultation. The consultation can be found at the link below.

[gov.ie](http://www.gov.ie) - [Consultation on the Draft Policy Statement on Mineral Exploration and Mining in Ireland and associated SEA Environmental Report and AA Natura Impact Statement \(www.gov.ie\)](#)

The deadline for the consultation is 5.30pm 15 October 2021. The Department will be organising informational events and we will keep you informed of any developments.

[Redacted]

An Rannán um Pholasáí Geo-eolaíochta

Geoscience Policy Division

An Roinn Comhshaoil, Aeráide agus Cumarsáide

Department of the Environment, Climate and Communications

29-31 Bóthar Adelaide, Baile Átha Cliath, D02 X285

29-31 Adelaide Road, Dublin 2, D02 X285

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**An Roinn Comhshaoil,
Aeráide agus Cumarsáide**
Department of the Environment,
Climate and Communications

If you do not wish to receive any further communication from the Department of the Environment, Climate and Communications in relation to the draft Policy Statement on Mineral Exploration and Mining in Ireland process, please let us know by return email to gspd@decc.gov.ie.

From: GSPD

Sent: Monday 31 May 2021 13:10

[Redacted]

Subject: RE: Scoping Report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland

[Redacted]

Thank you for your submission on the SEA Scoping report for the Minerals Policy Statement, which has been received.

Your submission will inform the preparation of the documents below, which will be

published for public consultation on gov.ie within the next few months.

- an Environmental Report (ER) for the SEA process
- a Natura Impact Statement (NIS) for the AA process
- DECC will integrate the SEA/AA findings into a draft Policy Statement on Mineral Exploration and Mining in Ireland

[Redacted]

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**An Roinn Comhshaoil,
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Climate and Communications

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[Redacted]

Sent: Sunday 30 May 2021 23:12

To: GSPD <GSPD@decc.gov.ie>

[Redacted]

Subject: Scoping Report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland

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Re: Scoping Report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland

Dear Sir/Madam

It is noted that scoping report explicitly excludes extraction of sand and gravel as regulation of these is the responsibility of local authorities. However in the marine environment this is not covered beyond the 12 mile limit currently and should on the basis of marine habitat destruction and carbon release be generally prohibited.

Additionally the statement "*Future exploration and mining for scheduled minerals in the marine area is not anticipated at this point*" seems shortsighted, given the UK has plans to extract Lithium from offshore Cornwall, with exploration licences already granted. Norway has plans to licence deep sea mining in its' territorial water in 2023. Please read the Reuters article <https://www.reuters.com/article/us-norway-deepseamining-insight-idUSKBN29H1YT> . There are many different methods currently available to mine the deep sea and the ISA (International Seabed Authority) has granted deep sea mining exploration licences for over 1.3 million square km. So the technology is well developed with commercial licences expected to start this year, although these are thankfully delayed.

It is the view of the IWDG that deep sea mining is irreversibly destructive in most forms and that without full and proper consideration it should be prohibited by, if not fully considered, under this process. That therefore a ban on deep sea mining should be in place until at least a full consideration of environmental impacts can be undertaken. This view should also be put forward at the UN and in the ISA, and Ireland should take a more active role in questioning the mining methods currently being explored in the Atlantic by France, Russia and Poland.

Lastly the document does not mention exploitation of geothermal waters in the seabed, with one Irish company having considered exploitation of these already, such a scenario might need to be considered, especially given the approach in the end would probably look very like lithium extraction proposed off Cornwall (see <https://www.northernminer.com/news/cornish-lithium-granted-rights-for-offshore-exploration/1003826764/>), which is also considering using the geothermal waters to power turbines. The department must be aware of several hot springs offshore Ireland, though the waters have never been analysed for lithium content, as far as I know, the question will be how much lithium they contain and not if.

Therefore it would seem prudent given that the scoping report is focused on the terrestrial area of Ireland that it should state this clearly at the beginning and that it should limit the review to this area. It should be also stated clearly that no exploration licences can be issued for deep sea mining without a thorough review of the impact of such activities. In order to consider deep sea mining a fully and thorough investigation of environmental damage would be required.

Yours faithfully



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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.