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IW_FP_53

8th October 2021

Re: Public Consultation on the Draft Policy Statement on Mineral Exploration and Mining


www.water.ie

Dear Sir/Madam,

We welcome the opportunity to participate in the public consultation of the Draft Policy Statement as referenced above. This follows our submission during the consultation on the SEA Scoping of the Draft Policy Statement on Mineral Exploration and Mining in Ireland, which included details of Irish Water's plans and programmes which are relevant to the policy statement. These include the Water Services Strategic Plan, the National Water Resources Plan and the commitment to a Drinking Water Safety Plans approach.

We have been supporting the role of Department of Environment Climate and Communications (DECC) as the competent authority for issuing Prospecting Licences for exploration by engaging with the Geoscience Regulation Office in respect of applications for drillhole licences. Through this process we note that for any intrusive investigations such as exploration drilling or trenching associated with prospecting licences, that these will be undertaken in-line with DECC guidance as referenced in the Draft Policy statement.

Irish Water has the following comments in respect of the Draft PSMEM, and associated SEA Environmental Report as published.

Relevant Legislation (Appendix A page 1)

Notwithstanding that the list of legislation is not said to be an exhaustive inventory, and that it supplements Chapter 4 of the Environmental Report, the reference to the Drinking Water Directive (page 8 Appendix A) should be updated to include:

Directive (EU) 2020/2184 of the European Parliament and of the Council of 16 December 2020 on the quality of water intended for human consumption (recast)

Spatial Alternative 2 (SP2): Prescribe spatial restrictions and/or siting guidelines for future development (Section 7.6 Environmental Report, page 127)

Irish Water supports the catchment-based approach which should be used in order to protect drinking water quality in addition to the use of buffer distances within the EIA criteria. This would better align with associated environmental legislation which promotes a

catchment-based approach (e.g. DHPLG Water Framework Directive Draft Guidelines for Planning Authorities) and a risk-based approach to source protection as advocated by the recast Drinking Water Directive).

We look forward to continuing our engagement with the DECC as the Draft Policy Statement develops.

Yours faithfully,

[Redacted signature]

[Redacted contact information]