



**Geoscience Policy Division**  
**Department of the Environment, Climate and Communications**  
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**Ireland**

**21<sup>st</sup> June 2021**

Forwarded via e-mail to [GSPD@decc.gov.ie](mailto:GSPD@decc.gov.ie)

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### **Re: SEA Scoping on Minerals Policy**

Dear Sir/Madam,

This submission, which is made on behalf of the Institute of Geologists of Ireland (“IGI”), is in response to your call of May 24<sup>th</sup> 2021 regarding the “*Public consultation on scoping report for the Environmental Assessment of the emerging Draft Policy Statement on Mineral Exploration and Mining in Ireland*”.

The IGI promotes and advances the science of geology and its professional application in Ireland; and ensures that its members uphold, develop and maintain the highest professional standards. The IGI has over 330 members working in a range of specialist and relevant sectors including mineral exploration, environmental geology and hydrogeology. One objective of the IGI is to contribute to the public debate on geoscience related issues<sup>i</sup>. Accordingly, IGI makes the following observations and wishes to note the role of the Geoscientist in ensuring that Ireland’s minerals resource endowment contributes to a successful transition to the carbon-neutral future envisaged in the European Commission’s Green Deal<sup>ii</sup>.

#### **1. Based on the plans, policies and programmes outlined in the SEA Scoping Report, are there any other key relevant international, national or regional plans, policies or programmes that should be considered in the SEA Environmental Report on the Policy Statement on Mineral Exploration and Mining?**

The importance of exploring and developing our indigenous raw material mineral resource endowment has been recognised on a number of occasions including being highlighted by Mr. Eamon Ryan, T.D., Minister for Environment, Climate and Communications in his address to the Dáil among other occasions.

In setting out that policy vision for a Carbon-neutral future it is important to recognise that we are building on the positive achievements of the past and on the spin-off industries that have developed

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from the minerals exploration and mining sectors. These include internationally renowned geochemical laboratories, drilling companies, design, consultancy and contracting service companies operating in the fields of engineering, geology and environment.

It is also important to note that the Irish minerals exploration industry is dominated by SME's, and that it and the mining sector are both seen internationally as best-practice exemplars of sustainable resource development, operating within a well-regulated framework, providing financial returns to the State, long-term employment of the local population and environmentally beneficial post-closure infrastructure<sup>iii</sup>, <sup>iv</sup>.

## **2. Based on the likely significant impacts outlined above, are there any other effects or impacts that should be considered in the SEA Environmental Report on the Policy Statement on Mineral Exploration and Mining?**

As pointed out by European Commissioner Maroš Šefčovič (2019) *“There is a huge risk that we in Europe end up replacing our important dependency on fossil fuels by one on (non-energy) raw materials”*<sup>v</sup>, <sup>vi</sup>, <sup>vii</sup>, <sup>viii</sup>. Thus, Ireland has the opportunity, and responsibility, to demonstrate how, with an appropriately positive minerals policy, the minerals exploration sector and its immediate downstream industry, mining, can play a significant role in the transition to the carbon-neutral future.

## **3. Do you have any comments regarding the draft SEA Objectives presented in the Scoping Report?**

The IGI welcomes the objectives set out in the Scoping Report. Our membership has significant expertise and experience in carrying out the assessments required in many of the SEA objective tasks areas identified.

It is worth noting that due to the high-risks inherent in minerals exploration, sources of funding are specialist, limited, and migrate to those jurisdictions which offer the best potential return. Therefore, in developing a Minerals Policy, elements that diverts funds from their primary objective have the potential to negatively impact on the potential for resource discovery, to the detriment of the Green Action Plan.

## **4. Do you have any suggestions or comments in relation to the overall approach to alternatives?**

The benefits of an appropriately supportive Minerals Policy will have a positive impact on employment opportunities within our Midland's Region as industrial peat production is wound down – a core government objective, but will also ensure the provision of secure supplies of critical and essential minerals raw materials for Europe, and achieve this whilst reducing the carbon footprint inherent in out-sourcing our raw material minerals resource requirements.



In addition, as Europe is one of the biggest consumers of critical raw materials it is of paramount importance that we endeavor to obtain these raw materials locally and in a responsible manner using the established highest European environmental standards with due consideration for human rights and sustainable development.

Yours sincerely,  
*On behalf of Institute of Geologists of Ireland*

**EurGeol. Cian O'Hora PGeo**  
**President**  
**June 21<sup>st</sup> 2021**

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<sup>i</sup> Institute of Geologists of Ireland Mining and Minerals Factsheets, May 2021.

<sup>ii</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: *The European Green Deal*, COM(2019) 640 final (2019).

<sup>iii</sup> An Economic Review of the Irish Geoscience Sector. Indecon International Economic Consultants report to Geological Survey, February 2017.

<sup>iv</sup> A social, environmental and economic assessment of Galmoy and Lisheen Mines. AECOM Final Report to DCCAE, February 2020.

<sup>v</sup> Mapping the Role of Raw Materials in Sustainable Development Goals – JRC Science for Policy Report, 2019.

<sup>vi</sup> Study on the EU's list of Critical Raw Materials, European Commission (2020).

<sup>vii</sup> Minerals for Climate Action: The Mineral Intensity of the Clean Energy Transition, International Bank for Reconstruction and Development/The World Bank (2020).

<sup>viii</sup> The Role of Critical Minerals in Clean Energy Transition, World Energy Outlook Special Report - International Energy Agency (May 2021).