An Taisce
The National Trust for Ireland

5 July 2019

Exploration and Mining Division

Department of Communications, Climate Action and Environment

29-31 Adelaide Road Dublin D02 X285

EMD.info@DCCAE.gov.ie **Ref: MA258/3**

RE: Submission on notice of intent to grant a prospecting licence to MOAG Copper Gold Resources Inc, 1 Burkebrook Place, Suite 405, Toronto, Ontario M4G 0A2 to explore for minerals in townlands in Ballynahinch Barony including Boolagare, Callow, Dolan, Doohulla, Emlaghmore, Errisbeg West, Murvey and Tullaghlumman Beg, by Richard Bruton TD Minister for Communications, Climate Action and Environment.

We wish to make submission on the above.

The entire process surrounding this application is multiply inadequate in

1. the public consultation process,
2. the information provided as to the nature and extent of the exploration activity which the application would allow ,

3. what minerals are being explored for .

We submit that the preliminary determination of the suitability of the application site area in West Connemara and including the Roundstone Bog Special Area of Conservation (SAC) has not been determined in considering this application.

It is noted that the claim has been made by DCCAE that the area of the adjacent Connenara National Park to the north east of the redlined exploration application area will not be affected. It has been the longstanding concern of An Taisce that the extent of National Park boundary designations in Ireland is inadequate and that the Connemara National Park should be extended to include the full area of the 12 Bens as well as Roundstone Bog. This would cover a significant part of the exploration license area.

The proposed license allows the holder only to explore for mineral deposits, and does not authorize mining of any materials which requires further licensing and planning application consent. However the granting of an Exploration License is a de facto acceptance by the State of the suitability of the area for mining extraction. It clearly confers an expectation by the licensee investing in the exploration work that the Sate supports development in mining in the location identified, and that any mining license application will be treated favorably by the State and subject only to regulatory process.

It is noted that MOAG has previously explored Connemara for minerals, and some information is provided on their website:

http://www.moag.ca/en/projects/mace-molybdenum-copper

This included exploration for copper near Carna, which was the cause of concern to local residents as reported in the Connacht Tribune.

This current exploration plan, if granted, is proposed to take place in protected areas, including Special Areas of Conservation (SAC) and proposed Natural Heritage Areas (pNHA) including Murvey Machair, Connemara Bog Complex, and Dogs Bay.

Parallel to this ecological status, the area is of the highest landscape sensitivity as designated in the Galway County Development Plan

This license application comprises an area forming the heavily indented west Connemara Coast running to the Twelve Bens to the east. It's includes Roundstone Bog one of the most important EU Habitats Directive Special Areas of Conservation SACs in Ireland. This area should be recognized as of International importance and one of the most significant areas both ecologically and in landscapes quality in the North Atlantic

We submit that the information required to establish the claim made by your Department that the activities permitted under this license are "non-invasive" and "of minimal environmental impact, is not available.

There is therefore no basis to explain the determination that:

"*The Minister has assessed the exploration programme proposed by the company and has determined that the activities are not likely to have a significant effect on the environmen*t,"

There are significant legal questions to be raised on the lack of a Strategic Environmental Assessment of the current mineral exploration licencing regime in Ireland in screening mining exploration areas of location suitability, as well as the screening process for this application under the Environmental Impact Assessment and Habitats Directives.

We are accordingly copying this letter to Josepha Madigan TD Minister for Culture Heritage and Gaeltacht and will be seeking information on communications between the Ministers Department and the NPWS on this application.

We request that this license application be rejected

Yours sincerely.

Ian Lumley

Advocacy Officer

CC Josephs Madigan TD Minister for Culture Heritage and Gaeltacht

APPENDIX - NOTICE ON DCCAE WEBSITE

NOTICE OF INTENTION TO GRANT PROSPECTING LICENCE Since it appears to the Minister for Communications, Climate Action and Environment (the Minister) that there are minerals not being worked under the lands in the areas set out below, pursuant to section 7(1) of the Minerals Development Act 1940, as amended, the Minister intends to grant a prospecting licence for Base Metals, Gold (ores of) and Silver (ores of) to MOAG Copper Gold Resources Inc, 1 Burkebrook Place, Suite 405, Toronto, Ontario M4G 0A2, Canada over the following Townlands in County Galway: Townlands in Ballinahinch Barony: Boolagare, Callow, Dolan, Doohulla, Emlaghmore, Errisbeg West, Murvey, Tullaghlumman Beg. Maps showing the areas are available at Clifden and Roundstone Garda Stations; Galway County Council Offices; the Geological Survey of Ireland, Beggar's Bush, Dublin, D04 K7X4 and the address below. Objections to the grant of the licence should be made to the address below within 30 days of the date of this Notice. The Minister reserves the right to make details of the objections available to the applicant in order to fully consider their validity. NB: A Prospecting Licence entitles the holder to explore for mineral deposits and does not authorise mining of any minerals. The activities permissible under a licence are, in general, non-invasive and of minimal environmental impact. The Minister has assessed the exploration programme proposed by the company and has determined that the activities are not likely to have a significant effect on the environment. Further information, statutory notice and Minister's determination at: http://www.dccae.gov.ie/EMD Exploration and Mining Division Department

of Communications, Climate Action and Environment 29-31 Adelaide Road Dublin D02 X285 Ph. (01) 678 2689 Email: EMD.info@DCCAE.gov.ie Ref: MA258/3 Date: 6 th June 2019 Decision on specific prospecting activities The Minister has assessed the exploration project proposed by the company and has determined that the activities are not likely to have a significant effect on the environment. PL Area 930 Company MOAG Copper Gold Resources Inc Activity Mineral exploration involving desk studies, mapping, geochemical sampling and drilling Environmental Considerations Desk studies, mapping and geochemical sampling are temporary, nonintrusive activities, involving minimal disturbance and have a limited zone of influence. These activities are not likely to have a significant effect on the environment. In the event that proposed activity is at or in the vicinity of a Natura 2000 site the activity will be subject to a separate screening assessment. If diamond drilling is proposed, this activity will be subject to its own specific screening assessment European Sites Determination Murvey Machair SAC (Site Code 002129) Connemara Bog Complex SAC (Site Code 002034) Dogs Bay SAC (Site Code 001257) Connemara Bog Complex SPA (Site Code 004181) Slyne Head to Ardmore Point Islands SPA (Site Code 004159) A screening determination has been carried out for the project. Particular attention has been paid to the European Sites listed above. It has been determined that the project does not have the potential for significant effects on any European Site and the activities are not likely to have a significant effect on the proposed Natural Heritage Areas (pNHA) listed below. Connemara Bog Complex pNHA (Site Code 2034) Dogs Bay pNHA (Site Code 001257) Ballyconneely Bay pNHA (Site Code 001231) Bertraghboy Bay pNHA (Site Code 001234) Environmental Information available on DCCAE website. 1. Exploration Drilling Guidance on Discharge to Groundwater 2. Guidelines for Good Environmental Practice in Mineral Exploration 3. Environmental Safeguards- The Irish Way

Authority Department of Communications, Climate Action and Environment Date 6 th June 2019