

DFE MPL Consultation dfe-mpla

From: [REDACTED]
Sent: 05 September 2022 19:06
To: DFE MPL Consultation dfe-mpla
Subject: Fwd: Illegal mining activity

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Dear Sir/Madam,

>

> I wish to object to the granting of Mineral Prospecting Licences OMA1/22, MCTA1/22, KDRA2/22 & KDRA3/22 for the following reasons:

- > 1. These proposed licences cover large geographical areas of Fermanagh Omagh District Council, Derry Strabane District Council & Mid-Ulster District Council. Given that 25% of Northern Ireland is already given out in prospecting licences, the overall cumulative impacts should have been assessed.
- > 2. The outdated culture of pre-determination of these licences is contrary to current recognition of the ecological, environmental & human damage caused by mining and associated activities, as well as their impact on climate change.
- > 3. A Habitats Regulations Assessment has not been carried out.
- > 4. A Strategic Environmental Assessment has not been carried out.
- > 5. The ESPOO Convention requires transboundary consultation and that has not been done.
- > 6. The Aarhus principles of information provision & public participation in environmental decision making have not been adhered to. It is unacceptable for the Department to use a holiday period to slip through a proposal to grant these licences at a time when people are unlikely to notice.
- > 7. Gold & Diamonds are not necessary for health or life whereas clean water & fresh air are basic requirements which will be put at risk if these licences are granted.
- > 8. Due diligence has not been carried out on these mining companies, given all the scandals from similar companies throughout the world. Flintridge Resources Limited is currently going through Court for breaches of Health & Safety dating back to 2018.
- > 9. Derry City & Strabane District Council currently has a Judicial Review against prospecting Licences in their area. Surely it would be advisable to await the outcome of that case before risking / wasting public money because of further legal action.
- > 10. Flintridge Resources' prospecting licence expired on 18th July 2022 & according to the Crown Estate, the Option Lease Agreement is dependent on the MPL being in place. What enforcement action has been taken since 18th July to prevent unlawful work in the area?

- > 11. It is known from the experience of people in the Sperrins AONB that this type of extractive industry creates conflict in the community & violates people's human rights. DfE must address the human rights implications of these proposals including the cumulative impacts.
- > 12. The long outstanding issues of Permitted Development Rights have not been addressed or resolved and Prospecting Licences should not be issued in the interim.

> Yours sincerely

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