

From: Futureproof Clare - [redacted]
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Contact details for submission.odt



Futureproof Clare
Building Resilience in County Clare

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Co.Clare



My name is Emma Karran and I am submitting this on behalf of FutureProof Clare, the community organisation that I'm part of.

My address is





FutureProof Clare is a grassroots community organisation. We are about bringing people together and sharing new social and environmental ideas. We aim to help build local resilience during these changing times. We also work on local energy, food security, sustainable communities and economies.

Proposed amendments to the Draft Clare County Development Plan 2023-2029

Chapter 1: Introduction and Vision

Concerning Goal XX:

It is laudable that the council is committing itself in the Plan to playing a role in the transition from a linear to a circular economy, but there is in our opinion no substance to the wording of Goal XX beyond paying lip service to this aim. It is concerning that the phrase “sustainable growth” is still being used (eg in Goal II) when it is increasingly clear that we cannot grow our way out of poverty and environmental degradation. Sustainable economic growth is impossible, since the economy is an open subsystem of the Earth’s ecosystem, which is finite, non-growing, and materially closed. As the economic subsystem grows, it engulfs more and more of the ecosystem in which it exists and is bound to reach a limit when

it 'incorporates' 100 percent of the ecosystem, if not before. Thus, the economy's infinite growth is by Nature not sustainable.

"Economic growth and environmental quality" (used in Goal XX) is therefore an unacceptable phrase as it contains an outdated assumption, as explained above. The council needs to commit itself to a serious engagement with these issues and reflect this seriousness in the wording of its documents, such as this Plan.

We want to see a commitment from the council to push for stronger and more binding circular economy policies at national and EU level. Can we have a commitment that the phrase "fostering the linkages to transition from linear to a circular model" includes proactive measures such as this? Ireland is committed to the EU circular economy action plan. However, it is widely documented that this action plan is not adequate for the task ahead. A circular economy should first and foremost have the overall aim of ensuring that resource consumption remains within planetary limits. However, the EU's action plan contains no such overarching goal. It does mention that the EU needs to "advance towards keeping its resource consumption within planetary boundaries" but there are no details of how this will be achieved." This will be discussed below in more detail below with relevance to mineral extraction. And on this topic of mineral extraction, we wish for "and seeks to minimise extraction of all non-renewable resources." to be added to the last sentence in Goal XX.

SECTION 6.28 Data Centres

Futureproof Clare notes the current wording of the draft development plan in section 6.28 and the suggested *Addendum to Environmental Assessments (AEA)* of the draft county development plan 2023-2029 page 23.

"Data centres are an integral part of the enterprise and business support infrastructure" is the current wording of the draft development plan. Despite the fact that planning was granted to a data centre in Ennis, there are no data centres currently in Clare and the permission awarded by Clare County Council has been appealed by several members of the public as well as various groups concerned with the environment in Clare. Therefore, the statement in the draft CDP that data centres are already an integral part of the enterprise and business support structure has no veracity in the county of Clare, and therefore, as suggested, this wording and indeed this section needs to be removed and replaced with.

"Given the current situation where household energy use is not considered to be secure, coupled with the extensive energy use of data centres, a moratorium on new data centres is currently enforced until further assessment suggests that there is a net greenhouse gas emissions reduction by facilitating data centre development."

The reason for this wording is that any data centre connected to the grid would not rely on renewable energy. There are no facilities currently for renewable energy powered data centres in Clare. Therefore any data centre proposed would be a huge net emitter of greenhouse gases. This is relevant to a potential negative effect on human quality of life in the area - given that any new data centres may potentially put pressure on energy supply. This outweighs the proposed positive effects outlined in the draft CDP, including gaming - given there is scientific evidence gaming may lead to addiction and other detrimental health effects (e.g. Ayenigbara, 2018 <https://doi.org/10.17352/2455-3484.000025>).

We also suggest striking the current wording of section 6.28 of the draft development plan because any data centre would contravene the following Strategic Environmental Objectives as outlined in table 1.1 of AEA (pg 6-7, AEA):

CC2 Decrease the usage of fossil fuels and increase both renewable resource usage and protection together with a move towards more low carbon energy sources.

As outlined above, a data centre will increase the use of fossil fuels.

CC7 Avoid situations that limit adaptation to climate change such as zoning lands in close proximity to a known flood risk area.

Data centres will limit adaptation to climate change by usurping water and energy use competing with local energy and water needs which may be needed for adaptation.

CC8 In preparing the spatial plan for our county, it is crucial that we develop ecologically resilient and varied landscapes. This can be done through the establishment and preservation of ecological networks and stepping-stones as part of our settlement zonings and objectives, and fostering adaptive management practices in the face of uncertainty, favouring flexible adaptation options and allowing for alterations of the Plan as monitoring and evaluation data become available during its implementation.

Data centres have a negative impact on biodiversity.

P2 - To protect human health.

Human health may be adversely affected by increased use of fossil fuels due to data centres. For example, an increase in air pollution - where air quality is already a significant issue in Clare.

B1 Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species, wildlife corridors, ecosystems and geological features

Loss of diversity because data centres. For example, the data centre which was granted permission in Ennis will mean that several acres of hedgerows will be eradicated

L1 Conserve, protect and enhance valued natural, cultural and built landscapes, views of local value and features including those of geological and aesthetic value.

The proposed data centre in Ennis has planning permission for 84 chimney stacks. Data centres do not preserve or enhance natural or build landscapes.

Section 8.3

Natural Resources:

CDP8.8 It is an objective of Clare County Council:

To facilitate, encourage and appropriately manage the development of the natural resources of the County and to ensure that this is done in a sensitive way, eliminating any significant adverse effects on the natural and built environment, negative impacts on archaeological heritage and in compliance with all relevant legislation and planning requirements.

FutureProof Clare are concerned that the above amendment does not adequately protect human and ecological health from the potential negative impacts of developments.

Minerals, Mining and Quarrying

CDP 8.14

It is an objective of Clare County Council:

- a) To promote the extraction of minerals and aggregates and their associated processes where such activities do not have a significant negative impact on the environment, landscape, public health, archaeology, County Geological sites and/or sites of geological importance or residential amenities of the receiving environment and where such operations are in compliance with all national regulations and guidelines applicable to quarrying and mining activities.
- b) To support the satisfactory and sensitive re-instatement and / or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed

by an assessment of the specific site/lands in accordance with the restoration plan under the facility's EPA licence.

We are especially concerned about the present wording in section a): "to promote the extraction of minerals .." This implies the benefit is being given to the developer / extractive industry over the environment and the health of the local community.

Of particular concern is the vulnerability of ground water sources in the county. These were spelt out (and overwhelmingly supported by councillors and the Chief Executive) by Cllr Johnny Flynn at the full council meeting on December 12th of last year. Also of great concern is the absence of a ban on the potential use of mercury, cyanide, cyanide compounds and sulfuric acid in the processing of gold and silver ore. These toxic chemicals are known to pose a significant threat to health and environment. There is a real possibility that gold and (further) silver prospecting (and therefore potentially mining) will start in Clare in the near future. We are suggesting the wording of Leitrim County Council in their amended draft CDP be seriously considered. This wording includes a ban on the use of these toxic chemicals in the county.

This proposed wording is provided below:

A) To ensure that the extraction of minerals and aggregates protects to the maximum practicable extent the visual quality of the receiving landscape and do not adversely affect the environment or adjoining existing land uses

B) The planning authority will not facilitate the development of the extractive industry and permit such workings unless it has been shown that the following criteria can be met; having taken into account the reduced demand for aggregates that will come about through improved recycling of construction and demolition waste:

- 1. The environment and the landscape will be safeguarded to the greatest possible extent during all life-cycle stages of the process,*
- 2. Such operations have good access to, or are within reasonable distance of, the national or regional road network and do not adversely affect the residential or tourism amenity of the area,*
- 3. Satisfactory provision will be made for a beneficial after use of the land that does not conflict with other planning objectives for the area,*

4. *The working, landscaping, restoration and after-care of the site will be carried out to the highest standards in accordance with the approved scheme.*

C) Where proposals for the working out of minerals and aggregates are submitted in the Area of Outstanding Natural Beauty AONB or an Area of High Visual Amenity (AHVA), existing landscape quality shall remain the overriding priority and such proposals must illustrate that the benefits of the development will outweigh any adverse environmental consequences. The planning authority shall evaluate the need to conserve the environment, character and natural beauty of AONBs and AHVAs and the extent to which the proposed development would materially damage these qualities. It shall also examine the national need for that specific mineral or aggregate substance to be worked and the availability of the resource in less sensitive locations.

The use of the following chemicals as a processing agent shall not be permitted as part of any proposed processing operation located above or adjacent to surface or groundwaters, or which could potentially impact such Waters regardless of their location - mercury, cyanide or cyanide compounds, breakdown products of cyanide, or sulphuric acid. These present an unreasonable risk of environmental harm due to the toxicity of such chemicals and their demonstrated potential to cause damage to the environment.

FutureProof Clare were shocked to learn that an application made in late 2021 to the Department of the Environment, Climate and Communications by Minco Ireland Ltd for a prospecting licence (1543/ PLA 3788 – for Base Metals, Barytes, Gold and Silver in the Tulla area of Co Clare) covered an area that included three Special Areas of Conservation (SACs), a Special Protection Area (SPA) and three Natural Heritage Areas (NHAs).

Further, due to reasons which will be spelled out below, Futureproof Clare are calling on Clare County Council to issue a **moratorium** on the granting of Prospecting Licences in the county. And we ask for this moratorium to be included in the new County Development Plan.

Presently 27% of the Republic is covered by mining concessions. Large areas of Clare are included in this. As a comparison, an estimated 7.7% of Scotland, 6.4% of Wales and 0.2% of England is covered by concessions – based on approximate calculations of data held by the Coal Authority and the crown estate.”

<https://amp.theguardian.com/environment/2022/jul/25/fears-island-ireland-faces-new-carve-up-mining-companies>)

It is our view that the potential impact of such large scale mining has not been sufficiently considered, at a country or county level. There is a growing body of evidence that mining can and often does impact negatively on a wide range of areas including

water quality, landscape, agriculture, tourism, and biodiversity. The carbon heavy, energy intensive nature of the industry is also not compatible with the sustainable future that we are trying to create for this and following generations. The possible development of such an extractive industry would be incompatible with our obligations to urgently tackle climate change, critical biodiversity loss and the worst impacts of the climate emergency. The new Government Policy on Mineral Exploration and Mining is being called out by environmental groups in the country as being in place solely to facilitate the arrival of large scale extractive mining in the country. This will be discussed in more detail later in the submission.

Other counties are recognising the dangers of pursuing this dangerous road of opening the country to mining companies without sufficient regard to their potential negative impacts. For example, Cork County Council recently voted to request Minister Ryan to stop issuing PLs to mining companies

<https://www.buzz.ie/news/irish-news/leitrim-mining-cyanide-mercury-sulfuric-28163288>)

We are calling for a moratorium for the following reasons:

1) There are significant environmental and human / animal health concerns about the impact of both prospecting and mining in the county.

(i) As mentioned above, there is a very real possibility of a negative impact on groundwater sources. These ground water sources are particularly vulnerable in Clare. Water contaminated by mining processes is referred to as acid mine drainage (AMD): a toxic cocktail uniquely destructive to aquatic life. According to one study of work

(<https://link.springer.com/article/10.1007/s002540050133>) carried out at Avoca in south east Ireland: “The effects of AMD are so multifarious that community structure collapses rapidly and totally, even though very often no single pollutant on its own would have caused such a severe ecological impact.” These same “multifarious impacts” also make recovery from such wastes much more difficult. This environmental damage ultimately affects us — in addition to drinking water contamination, AMD’s byproducts such as mercury and heavy metals work their way into the food chain and_sicken both humans and animals for decades.

(<https://earthworks.org/issues/environmental-impacts-of-gold-mining/>)

(ii) The Government is yet to come to a decision about the banning of toxic chemicals (including cyanide and mercury) by mining companies here in Ireland. Until this decision has been made, given the well-documented harmful effects of these chemicals, it is irresponsible to grant prospecting licences to mining companies that intend to prospect and potentially mine for gold.

(iii) Hannan Metals have already secured PLs covering an area of 35,444 hectares in the county, the western edge of which is 1.5 km east of the town of Ennis. (<https://hannanmetals.com/projects/clare-project/>) (<https://clarechampion.ie/theres-zinc-in-the-hills/>) They are prospecting primarily for zinc and lead.

There are real concerns about the negative impact on human / animal health and on the rest of the natural world of zinc and lead mining (see below). Although the DECC are at pains to make the point that prospecting and mining have different impact assessment processes, there is a clear intention by Hannan Metals to open new zinc / lead mines in the county. Their website refers to much preliminary work that has been done by the company, leading them to the confident conclusion that it is both viable and profitable for them to mine in the county. Because of this, the undertaking of a full assessment of the potential impact of mining as well as prospecting in the county BEFORE prospecting is commenced is both necessary and crucial.

Potential impact on env and health of zinc / lead mining:

- *The Hydrometallurgical Process produces high levels of liquid waste and is more energy intensive. ('An environmental assessment of lead and zinc production processes' T E Norgate and W J Rankin)*
- *The production for sulfidic zinc ores produces large amounts of sulphur dioxide (can form acid rain) and cadmium vapour.*
- *Unwanted by-products from zinc production include sodium oxide (corrosive and violent when exposed to water) and carbon monoxide (toxic to humans and animals as well as ozone-forming) and carbon dioxide.*
- *The production of zinc produces around 3 tonnes of CO₂ per tonne of zinc.*
- *Zinc occurs naturally throughout the environment, but concentrations are rising unnaturally.*
- *Smelter slag and other residues of process also contain significant amounts of heavy metals. Water is polluted by these heavy metals. This results in some fish accumulating zinc in their bodies, when they live in zinc-contaminated waterways. When zinc enters the bodies of these fish, it bio magnifies up the food chain.*
- *About 1.1 million tonnes of metallic zinc and 130 thousand tonnes of lead were mined and smelted in the Belgian towns of La Calamine and Plombières between 1806 and 1882.[92] The dumps of the past mining operations leach significant amounts of zinc and cadmium, and, as a result, the sediments of the Geul River contain significant amounts of heavy metals. (Wikipedia)*

• Zinc can be a danger to unborn and newborn children. When their mothers have absorbed large concentrations of zinc the children may be exposed to it through blood or milk of their mothers.

(From

<https://www.greenspec.co.uk/building-design/zinc-production-environmental-impact/>)

2) There are economic impact concerns for the county:

The arguments for the positive economic benefits of mining don't always hold up upon further investigation. Critics question whether mining actually favours the local communities due to the fact that costs and profits are not equally shared. Investors in mining are mostly foreign private companies. The *extractive* model secures the export of raw materials, which means that the further processing of the materials does not take place in the country where the products have been extracted from. Moreover, the current mining sector is mostly a capital-intensive sector and not necessarily labour intensive. The increased opportunities for employment of the local population are therefore limited, at best. At the same time, farmers – who depend on agriculture – see their income decrease when their grounds are occupied by mining companies or heavily polluted as a consequence of their activities.

(<https://catapa.be/en/research/all-about-mining/>)

Hannan Metals and Minco Ltd are private companies coming from outside of Ireland.

Only a small percentage of profits made will stay in Clare. Has an analysis been done of the potential employment figures for the county from mining?

Increasing Clare's / Ireland's dependence on global demand for these resources will lead to insecurities (eg

<https://www.irishtimes.com/business/2022/08/15/tara-mines-records-pre-tax-profits-of-1975m/>)

There are alternatives to this model which look at re-imagining the present model which favours foreign companies at the expense of local communities. Such models include community ownership of the land areas desired by mining companies, meaning decisions are not taken out of the hands of those who live in the area. The following documents explore such ideas:

'A Material Transition' (a report by War on Want)

https://waronwant.org/sites/default/files/2021-03/A%20Material%20Transition_report_War%20on%20Want.pdf

'Green Mining is a Myth: The Case for Cutting EU Resource Consumption' (a report by FoEEurope and EEB)

<https://friendsoftheearth.eu/wp-content/uploads/2021/10/Green-mining-myth-report.pdf>

There is a further disruption of the local economies which is caused by something called the 'dutch disease effect'. This term refers to a phenomenon that occurred during the 1960s in The Netherlands, when natural gas reserves were discovered. The discovery of natural resources led to an increase in the value of the local currency. This had a negative impact on the competitive position of the country, leading to increased unemployment and a decrease of its economic productivity. The effect is a macro-economic phenomenon that comes into play when foreign currency suddenly flows into the country because of the extraction of natural resources. The contribution of mining to the micro-economic situation of individual citizens is therefore, in the end, generally negative instead of positive.

Furthermore, the taxes paid at the national level are often only a fraction of the total profits made by investors. Private companies make large profits, with little return for the country itself and its inhabitants. The passive costs of environmental pollution and social unrest remain to be paid by the country itself. When a country focuses too much on the export of natural resources, it also becomes strongly dependent on the demand for these resources in the worldwide economy.

Countries that rely on income from mining and gas extraction are likely to end up in trouble by the decline in oil and metal prices. The global price of copper has declined recently by almost a third.

<https://www.bloomberg.com/news/articles/2022-09-21/copper-prices-fall-despite-signs-of-looming-crucial-metal-shortage?leadSource=verify%20wall>)

And concerning zinc prices:

According to the **World Bank's** zinc price forecast, the average price in 2022 was expected at \$3,500, falling to \$2,800 in 2023 and \$2,771 in 2024. (<https://capital.com/zinc-price-forecast#:~:text=According%20to%20the%20World%20Bank's,in%20the%20next%2012%20months>).

3) Communities' Right To Say No

Communities directly affected by the potential negative impact of prospecting and mining must be allowed the right to say no. The Right to Say No has become a global campaign because of the general disregard throughout the world by large scale industry of this basic human right.

<https://catapa.be/en/right-to-say-no-webinar/>)

Worryingly, this is also the case here in Ireland. Within the Minerals Development Act 2017, it states that an injunction can be taken out by the State against a person if they refuse to allow a prospector onto their land. This does not represent a "right to say no" nor local residents having the final say on mining in their region.

"Injunctions 197.

(2) The High Court may on the application of—

(a) the Minister when the Minister is being prevented from acting under this Act, or

(b) the licensee referred to paragraph (i) to (iii) when the licensee is being prevented from so acting, grant an injunction directing a person—

(i) in the case of the Minister or a licensee under a prospecting licence or retention licence being prevented from entering land to prospect for minerals, to allow the entry and prospecting to take place,"

From <https://www.irishstatutebook.ie/eli/2017/act/23/enacted/en/print.html>)

The recently published Policy Statement on Mineral Exploration and Mining raises concerns for us over whether information to be shared with the public is balanced.

Within Section B. Theme of Increasing Awareness and Participation, under the principle “The public should have access to easily understood information on mineral exploration and mining” the following is written:

“DECC will develop a communications strategy, with reference to all the principles outlined in this policy statement, and using simple language, to:

- a. Explain the activities that differentiate mineral exploration and mining and the safeguards in place to ensure that local communities and the environment are protected
- b. Describe the potential benefits, particularly to rural economies and SMEs, of mineral exploration and mining to local communities
- c. Explain the importance of minerals, including their role in developing green energy solutions as part of the Climate Action Plan and
- d. Promote the development of geoheritage.”

(<https://www.gov.ie/en/publication/3a2bb-policy-statement-on-mineral-exploration-and-mining/>)

None of those address the need to alert communities about the potential negative impacts of mining and even prospecting. It is clearly an attempt to convince people that mining in their area is a good idea.

To quote from p24 of the Friends of the Earth document ‘Green mining is a myth: the case for cutting EU resource consumption’: “It is interesting to note that, for the second consecutive year, public acceptance is the number one business risk on Ernst and Young’s risk radar for mining and metals”

(https://eeb.org/wp-content/uploads/2021/10/Green-mining-report_EEB-FoEE-2021.pdf p24)

4) Weak EU and National circular economy policies mean we are not exploring sufficiently the alternatives to opening new mines.

To quote further from the FoE report mentioned above: “Industrial mining companies and their subsidiaries or contractors are granted an enormous amount of power in the global economic system, with their corporate interests dominating political discourse, resulting in action that favours the profits of mining corporations over the interests of people and planet.”

(https://eeb.org/wp-content/uploads/2021/10/Green-mining-report_EEB-FoEE-2021.pdf p17)

Because of the biodiversity loss crisis and climate emergency, we need to shift urgently from an extractive to a regenerative approach to the accessing of minerals. The recent Citizens' Assembly on Biodiversity Loss saw an 83% vote in favour of a constitutional referendum on recognising and protecting the rights of the natural world - and the human right to a healthy environment. This points to the high possibility of a large scale shift from an exploitative mindset in relationship to the environment happening amongst the public. This could lead to a change in policy if a referendum is held. Clare CoCo could be ahead of the curve if it recognises this mindset shift and reflects this in its documents including the County Development Plan.

Ireland is committed to the EU circular economy action plan. However, it is widely documented that this action plan is not adequate for the task ahead. A circular economy should first and foremost have the overall aim of ensuring that resource consumption remains within planetary limits. However, the EU's action plan contains no such overarching goal. It does mention that the EU needs to "advance towards keeping its resource consumption within planetary boundaries" but there are no details of how this will be achieved."

(https://eeb.org/wp-content/uploads/2021/10/Green-mining-report_EEB-FoEE-2021.pdf)

"War on Want's report, 'A Just(ice) Transition is a Post-extractive Transition', illustrated how the push to produce electric vehicle batteries, solar panels, clean energy storage, and wind turbine components, is unleashing unprecedented levels of 'transition' metal and mineral extraction. The report argues that switching from an economy powered by fossil fuels to one powered by renewable energy, while

increasing energy consumption in the Global North, is simply not an option. (https://waronwant.org/sites/default/files/2021-03/A%20Material%20Transition_report_War%20on%20Want.pdf)

Throughout Ireland and specifically here in Clare, as well as throughout the EU and globally, we need to take urban mining much more seriously in order to reduce the need to extract more minerals from the earth. An investment shift is required in order to keep investing in the re-introduction of the already mined metals, through recycling and ecodesign.

5) Problems and protests at other European mines:

There is a widespread belief that the human rights and environmental issues related to mining happen in other parts of the world only - and not in the EU (or the UK). This is used by the Irish Government as an argument for mining in a country like Ireland instead of countries with weaker health and environmental protections. There are two arguments against this position. Firstly, there is no evidence that mining here would reduce mining in other parts of the world. There is a huge and growing global demand for minerals and every indication that no stone will be (quite literally) left unturned by mining companies seeking to profit from this situation.

Secondly, the Green Mining Report cited throughout this submission contains case histories of widespread protests against the activities of European mining companies both here in Europe and elsewhere. Despite all the companies cited having Environmental, Social, and Corporate Governance (ESG) obligations, either through their own commitments or indirectly through national obligations, the case histories illustrate that these corporate responsibility commitments via ESG standards do not suffice to guarantee proper due diligence as these are 'soft law' instruments, meaning they are

often not enforceable. The case studies clearly point to the failure of voluntary or non-binding ESG standards to safeguard social and environmental systems (https://eeb.org/wp-content/uploads/2021/10/Green-mining-report_EEB-FoEE-2021.pdf p24)

The advent of a large number of Prospecting Licences being granted in Clare and many other counties in Ireland is unprecedented. The Republic is said to be Number 1 in terms of attractiveness to mining companies. The opinion of FutureProof Clare is that opening new mines is the last resort. Other avenues need to be examined first: such as much stronger and binding circular economies, urban mining, looking critically at ways we can reduce our consumption and perhaps alternatives to a model of an ever-growing economy which is now clearly not sustainable. The European Environment Agency recently stated that an “absolute reduction of environmental pressures and impacts would require fundamental transformations to a different type of economy and society — instead of incremental efficiency gains within established production and consumption systems.”

CDP Objective 11.46 includes facilitating the “expansion of the Natural Gas infrastructure throughout the County”.

This objective runs counter to reducing fossil-fuel burning and to the objectives set out elsewhere in the Draft CDP 2023-2029, including: “To facilitate measures which will accelerate the transition to a low carbon economy” (CDP Objective 2.14); and to “facilitate a low carbon future...” and “enable the decarbonisation of our lifestyles and economy...” (Goal I, on page 11).

FutureProof Clare request:

- the removal of CDP Objective 11.46;
- the inclusion in the CDP 2023-2029 of a commitment to ban all new investment in fossil fuels or in fossil fuel infrastructure.

Rights of Nature

Members of FutureProof Clare have addressed a number of council committees on the topic of Rights Of Nature (RoN). The RoN approach proposes a way to rethink our relationship with nature, in which humans are connected to and dependent on the natural environment and in which both humans and nature have equal and intrinsic rights to exist, regenerate, evolve and thrive. The RoN approach aims to provide guarantees for the protection of life on earth through our current legal and political system. In 2021 local authorities in Donegal, Derry, Fermanagh and Tyrone adopted pioneering motions recognising the Rights of Nature.

FutureProof Clare recommend that Clare County Council also adopts a Rights of Nature approach and that this be enshrined in the Clare CDP 2023-2029. Many of Clare County Council's rural and economic development strategies would benefit from this approach being taken, in particular in relation to tourism, well-being and recreation.

Addressing the climate and biodiversity emergencies and achieving sustainable rural development are key goals for Clare County Council. Taking a RoN approach will futureproof the Clare CDP 2023-2029 and will help Clare County Council to be at the forefront of sustainable development, climate action and climate adaptation. This approach will also help to shift from the Council's current extractive approach to our environment to more of a custodianship approach that can create a circular, sustainable, regenerative economy and society.

Thank you for considering our submission.