

TBR1 – Project Overview

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Response to Transboundary Consultation Representations – [REDACTED] (SRK)

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1603 - Environmental Justice Network Ireland – pg 7	Particular concern related to the use of cyanide in the extraction processes. Cyanide was dropped from Dalradian Gold's application in 2019 due to public outcry. However, cyanide is just one of several heavy metals planned for use in the extraction process (other by-products of the extraction process include lead, mercury, cadmium, chromium, and arsenic).	Yes	This assertion is factually incorrect. Cyanide is not a 'heavy metal' and the process plant does not propose the use of metals in the extraction process. The potential for release of metals as a result of leaching is dealt with in the geochemistry report and the outputs included in the groundwater and surface water impact assessment and discharge consent application documentation.
TBA0360- pg 1	The use of toxic chemicals such as cyanide and mercury in goldmining is well-documented to cause long-term damage to land, air and water. Contamination from the mine could impact ecosystems, farmland, rivers, and drinking water supplies in neighbouring counties	Yes	This comment is not applicable to this project. Neither Cyanide nor Mercury are being used in the process.
TBA0596 – pg 8	The EIA Directive states that Alternatives must be considered. Have alternatives been considered.	Yes	Yes they have. See chapter 5 of the Environmental Statement.

TBA1777 – pg 1	The application which was originally for the mining of gold has been expanded to include silver, copper and tellurium.	No	These metals were always in the rock to be mined. They will follow the gold in the recovery process and will be separated out from the concentrate in subsequent processing off-site. Please refer to SoC - 2. Project Overview - Paras 2.5-2.9. The resource is polymetallic.
TBA177 – pg 1	Dalradian have stated that cyanide will not be used in the extraction process as originally proposed. However, many other harmful chemicals are by products of the extraction process, including lead, mercury, cadmium, chromium and arsenic.	Yes	This issue is well described and the impacts and mitigation, management and monitoring are discussed across numerous documents in the application.