TBR2 - Need

Curraghinalt, Gortin

December 2025

Response to Transbounday Consultation Representations – [redacted]

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 - An Taisce – Pg. 25-26	"We would not consider gold end-uses for jewellery in emerging markets in the developing world, which appears to constitute the purpose of the bulk of the gold to be extracted, as necessitating the scale of environmental degradation proposed. The framing of the applicant's arguments in this respect appear to focus narrowly on economic considerations, at the expense of local human and non-human communities and the environment. A clear articulation of how the gold from the proposal is warranted due to essential societal need rather than wants is lacking. ' 'Furthermore, given the prevalence of obsolescence within modern electronic consumer goods, the stated application of gold from the proposed mine within digital society uses raises e-waste and circular economy concerns. We would also have serious concerns about gold's potential utilisation in manufacturing AI	Yes	For further information on gold supply and demand see Mine SoC TR2 pages 4 - 13 There have been very significant developments in international metals markets over the last year which are relevant to some of the points raised by An Taisce. In summary, there has been increasing international and UK Government concern about security of supply of critical and strategic minerals. For example, with the gold price having increased by more than 50% year on year to the end of Q3 2025, this has meant that gold jewellery, which traditionally accounted for over half of gold demand fell to 43% in 2024 and to 31% Year to Date in 2025. The objector's criticism of the utility of gold jewellery is misguided. Such jewellery is not of negligible societal value or to be dismissed. Rather, such gold has for centuries been a significant expression of cultural identity and of artistic design and expression across diverse geographies. Moreover, as previously noted, in many Asian markets jewellery represents a store of value and a source of stability and security for individual families concerned either about the capricious behaviour of authoritarian regimes

	hardware, a sector whose demand is projected to increase significantly. We note an assertion from the applicant's consultant within the statement on 'Dalradian's Curraghinalt Project: The Societal Value of its Metals', which states the following: "Curraghinalt is one of the highest-grade undeveloped gold deposits in the world; and its underground configuration and commitments to carbon neutrality and net positive impact on biodiversity, translate into the mine having limited environmental impacts." (p. 5)		or distrust of the banking system. It does not behove the objector to belittle such considerations. A combination of cultural identity and the desire for financial security is significant proof of human 'need' rather than just 'wants'. In any event, as set out below and previously in TR2 and RR2, the societal value of gold is far broader than jewellery. This representation wrongly assumes that the economic benefits of gold mining must be separated from its societal value. It is worth noting, in relation to 'circular economy' concerns that the presence of gold in many consumer devices makes it more likely that they will be recycled on a commercially viable basis because of the value of the gold to be recovered. An Taisce is correct in noting that the growth in AI hardware represents a significant additional source of gold demand in the technology sector – thereby enabling the realisation of significant economic and productivity growth. AI-related data centres will also be a significant source of demand for copper of which the Curraghinalt Project is a worthwhile source of supply in the context of significant concerns about the ability of society to meet the requirement to approximately double copper production by 2035. The availability of copper is fundamental to the transition to a low carbon economy and for widespread electrification. Curraghinalt is a significant source of silver which is fundamental to the growth of solar energy.
Pg. 26	Need for the development not adequately assessed.	Yes	See Mine SoC TR2
TBA1537 – Pg. 10-13 Dr [redacted] Sutherland School of Law, UCD	Unsubstantiated necessity for the project 'It is not disputed that minerals are necessary for certain industries but there are several problems with Dalradian's justification for this project... In relation to gold, the applicant notes in 4.11 that 'Gold demand comes from diverse sources, principally: jewellery, individual and institutional investors; central banks and from technology-based users'. This acknowledges the order of relevance for the use of gold with jewellery (a luxury) coming before investors (wealth-	Yes	See Mine SoC TR2 (Silver, pages 14-17 and Copper pages 18 – 20) We note Dr [redacted] reservations, but we consider them to be ill-founded. She seeks to make a debating point about the order in which various uses of gold are referenced in Dalradian's documentation. These are not intended to attribute relative value to these uses, all of which represent legitimate societal value, but were listed according to the volume of gold that each consumed at that time. As noted above, the relative importance of jewellery demand has declined significantly because of high prices, whereas various forms of investment, including by central banks, has

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<td>creation); central banks and lastly ‘technology-based users’ The report prepared on behalf of the applicants supports this by stating that jewellery accounts for over half of gold use.’ The last mentioned in this order of demand for gold - technology-use – is touted by the Applicant as the primary purpose in the rationale for the project, when in fact it is listed last... Dalradian continues to introduce the presence of new minerals in an attempt to legitimise the mining application and link it to strategic and critical minerals. Tellurium is now mentioned, whereas it was not featured in Dalradian’s business reports for 2022 and 2023.... First, there is growing recognition that the green transition ought to be just and, in any case, many of the processes involved in the production of new technologies are these same processes that further exacerbate the climate, biodiversity and pollution crises. Second, the underlying defence applications of critical minerals are not in the public good or in the societal interest when they further destabilise peace and security....

The demand and supply rationale provided by the applicant’s expert to support the economic arguments is not relevant to the present case because it deals with the global market for minerals and the profits of the company itself..’</td>
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<td>surged. Technology use has declined slightly because of ‘thrifting’ under the influence of the high gold price.
However, the surge in central bank purchases and for investment, shows gold’s growing significance in underpinning the stability of the world economy. Gold has been purchased as a hedge against inflation; as a reflection of concerns about the sustainability of government debt; in response to the instability caused by armed conflicts; and as insurance against the economic volatility associated with the unpredictable policies of the current US Administration, especially in relation to tariffs. Central banks now hold more gold as a reserve asset than they do US Treasuries for the first time since 1996. These economic developments, show a growing societal ‘need’ for gold as a source of insurance and security.

We have not introduced discussion of the other metals associated with the Curraghinalt deposit to ‘legitimise’ the project. Rather it provides a more rounded account of the overall value of the project and the needs which it can help to meet. For example, demand for both silver and copper has been strong over the last twelve months reflecting demand, inter alia, from the electronics, renewables and medical sectors. In terms of demonstrating ‘need’ for the project’s minerals it is notable that the US has recently added silver and copper to its list of ‘critical’ minerals and restored tellurium to its list. Similarly, the UK Government’s recently published ‘Vision 2035’ (November 2025) added copper to a new category of ‘growth minerals’ - i.e. minerals for which reliable access is needed to underpin economic growth. Copper and silver are both present at Curraghinalt and are key to the technologies that address climate change.</td>
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<td>‘In addition, there are contradictory statements in the Applicant’s statement of case concerning the use of and destination of the minerals....Dalradian states that the ‘Curraghinalt deposit has the potential to increase the accessibility of these minerals for the United Kingdom and other parts of Western Europe’. But in other places, it says that the minerals will be transported all over the world in a global market. And how does this benefit the local economy of Northern</td>
<td>See Mine SoC TR2 pages 20 - 22</td>
<td>In relation to tellurium, this continues to be designated a UK ‘critical mineral’ and the Vision 2035 Report specifically identifies West Tyrone as the UK’s best potential source of supply for tellurium and antimony.

We strongly disagree with Dr [redacted] suggestion that access to minerals that are fundamental to the UK and Europe’s security and defence needs are not in the public or societal interest at a time when Russian aggression in Ukraine has brought our nation and region’s assumptions about collective security into doubt.</td>
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Ireland and local communities in particular? These are inconsistent statements. The Applicant relies on the assumed correlation between the mining project and direct benefits for the local economy and 'the need for the economic benefits generated by the extraction and sale of minerals to the local and Northern Ireland economies'. This statement might be partially true if it was a publicly-owned mine, but it is not true because the profits accrued from the sale of the minerals extracted will belong to Dalradian Gold and the parent company (and 4% to the Crown Estate which is not of direct benefit to the NI economy). There will be a tax windfall from the project but this ought to be weighed against the cost of the long-term negative impacts.

We also disagree with Dr [redacted] assumption that the value of the minerals at Curraghinalt can only be brought to account if the operation were in State ownership. On the contrary, economic value will be delivered to the communities around Curraghinalt, to Northern Ireland and to the United Kingdom through private investment, the purchase of goods and services and the payment of royalties and taxes. Moreover, the wider societal value of the mining activity will be delivered through the use of the metals liberated from the ore body at the mine. Some of that benefit will be generated locally and some nationally or internationally dependent upon sources of need and demand.