

TBR4 - Closure

Curraghinalt, Gortin

December 2025

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

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 An Taisce – pg 3	Dalradian proposes a mere 15 year closure plan in their Statement of Case to the Public Inquiry (up from the five years in their planning application), however this plan concentrates solely on monitoring the water flooding the mine, and not the Dry Stack Facility.	Yes	Post closure monitoring covers similar locations to operations and includes but is not limited to the site associated with the Dry Stack (see SGEMAP at ES, Appendix D2, sections 3.2.4 and 3.2.5). The fifteen-year commitment is in line with the modelled rebound of the ground water in the mine workings and will be kept under review.
Pg 22	We would have concerns over the ability of the subject site to be visually remediated in the decommissioning phase of the proposal. For example, we would query the extent to which mining tailing and other waste can be effectively covered over with vegetation given the acidity and toxicity of the material. We note a study from Hassan et al (2024) which finds that physical treatment of mine tailings i.e. dumping, covering and solidifying, experiences reduced efficacy when the soil is highly contaminated. This introduces prohibitive costs for the mine operator and may reduce the quality of remediation.	Yes	The rehabilitation of the DSF will be carried out progressively. The question of tailings toxicity is addressed in the geochemistry assessment and the revegetation is described in the ecology and landscape and visual reports (summarised in Mine SoC TRs 4, 6 and 13 – specifically paragraphs 123 – 141 of TR13) The Hassan <i>et al</i> paper covers phytoremediation of exposed tailings. This is not relevant to the Curraghinalt Project as the tailings will be compacted and progressively rehabilitated using an engineered cap (see ES, Appendix B3, Appendix G3 section 4.8). The reference to the Hassan paper

		has no direct relevance to the tailings management on this project.
TBA0001; 0002; 0003; 0004; 0011; 0013; 0018; 0027; 0028; 0029; 0032; 0035; 0038; 0043; 0045; 0051; 0054; 0058; 0066; 0070; 0073; 0075; 0078; 0080; 0083; 0101; 0106; 0107; 0108; 0119; 0120; 0140; 0142; 0148; 0152; 0154; 0158; 0165; 0184; 0199; 0201; 0206; 0210; 0217; 0223; 0231; 0236; 0239; 0240; 0242; 0248; 0254; 0255; 0257; 0262; 0272; 0276; 0279; 0281; 0289; 0290; 0300; 0304; 0306; 0312; 0326; 0330; 0346; 0351; 0354; 0361; 0364; 0366; 0374; 0379; 0383; 0387; 0389; 0391; 0307; 0313; 0327; 0332; 0343; 0347; 0349; 0357; 0368; 0381; 0392; 0397; 0323; 0405; 0414; 0420; 0435; 0440; 0441; 0445; 0451; 0452; 0457; 0460; 0474; 0478; 0482; 0487; 0490; 0493; 0498; 0469; 0502; 0510; 0515; 0519; 0522; 0525; 0529; 0533; 0539; 0541; 0549; 0553; 0554; 0555; 0559; 0561; 0571; 0572; 0573; 0575; 0579; 0583; 0587; 0597; 0598; 0608; 0613; 0616; 0623; 0626; 0636; 0641; 0648; 0652; 0657; 0663; 0667; 0672; 0677; 0682; 0688; 0696; 0700; 0703; 0707; 0711; 0713; 0716; 0722; 0724; 0744; 0747; 0755; 0759; 0760; 0761; 0763; 0767; 0772; 0779; 0786; 0792; 0802; 0806; 0814; 0815; 0818; 0821; 0824; 0848; 0849; 0851; 0853; 0854; 0855; 0859; 0870; 0871; 0876; 0878; 0882; 0886; 0889; 0892; 0895; 0899;	Dalradian’s mine closure plan falls catastrophically short. Yes They initially proposed just five years, however in their Statement of Case in October 2024, they state they will monitor 15 years post closure. They also state that a figure of £20 million would be the ‘proposed subject of a financial guarantee with Dfl’ - this is very ambiguous and does not seem at all like any kind of ‘guarantee’. Jan Morrill, Earthworks, states that \$50 billion is the cost to clean up a mine in USA. Moreover, the Society for Mining, Metallurgy, and Exploration Tailings Management Handbook states: “The mining industry has a significant challenge in that these TSFs [Tailings Storage Facilities] will last for perpetuity. Unfortunately, humans have no experience in designing facilities to last forever, so responsible tailings management is required for as long as the TSF exists” (Morrison and Lammers, 2022). Dalradian falls very short of forever, leaving a ticking time bomb for environmental destruction and loss of life.	The proposed process for providing the financial provision for closure is described in the draft Heads of Terms appended to the Mine SoC - Appendix 12 Draft Heads of Terms - a Bond to be in place for the Bond amount. The design of the DSF is covered in the various documents that comprise the Mine Waste Management Plan in the ES, Appendix B3. This includes an assessment of the design against European Best Practice guidance. It is not obvious where Jan Morrill states that <u>a mine</u> in the US would cost \$50 billion to ‘clean up’. There are various estimates in the public domain for the remediation and restoration of legacy sites in the US with similar order of magnitude costs. The comment is not relevant to Curraghinalt.

0904; 0912; 0916; 0918; 0923; 0936;
0949; 0951; 0955; 0959; 0962; 0971;
0977; 0980; 0988; 0989; 0992; 0998;
1003; 1011; 1014; 1022; 1024; 1029;
1030; 1032; 1033; 1043; 1047; 1048;
1055; 1062; 1071; 1074; 1076; 1078;
1083; 1088; 1095; 1097; 1102; 1108;
1111; 1113; 1116; 1125; 1127; 1131;
1134; 1137; 1139; 1146; 1150; 1156;
1159; 1162; 1166; 1174; 1186; 1190;
1196; 1200; 1201; 1208; 1209; 1223;
1231; 1241; 1244; 1250; 1251; 1257;
1260; 1265; 1268; 1274; 1275; 1282;
1286; 1288; 1290; 1294; 1296; 1299;
1301; 1303; 1309; 1311; 1313; 1319;
1323; 1333; 1336; 1339; 1346; 1355;
1357; 1360; 1370; 1377; 1379; 1385;
1387; 1389; 1395; 1398; 1399; 1402;
1408; 1414; 1422; 1423; 1424; 1427;
1428; 1433; 1439; 1453; 1458; 1471;
1476; 1479; 1484; 1486; 1489; 1504;
1506; 1513; 1521; 1522; 1523; 1524;
1542; 1543; 1545; 1547; 1549; 1550;
1552; 1553; 1555; 1562; 1567; 1568;
1572; 1578; 1579; 1580; 1582; 1586;
1588; 1593; 1594; 1596; & 1604– pg2

Pg 3

In Dalradian’s Statement of Case in October 2024, they added in “new information,” where they state that for 7 years post closure, there would be a discharge of 4,400 gallons per day from their adit into the Owenkillew River, via the Curraghinalt Burn. After 7 years, this discharge would increase to 176,000 gallons per day, forever! This is hugely worrying as this would most likely be acid mine drainage, which would join the contaminated waste flowing from the Filtered Tailings

Yes

Test work and modelling has demonstrated that the groundwater will not be acidic. The potential impacts, mitigation, management and monitoring are explained in the technical reports submitted as part of the Mine Statement of Case (Closure TR4, Geochemistry TR21, Surface Water TR9, and Groundwater TR10). Flows of 0.23 l/s are predicted from the adit for an initial period post closure rising to 9 l/s once the residual voids in the mine have filled with groundwater post closure. This will help mitigate low flow periods in the Curraghinalt Burn. The

	Stack, and both would pervade the entire Foyle river system, putting all aquatic life in grave danger.		contribution to the flow in the Owenkilwey is negligible as set out in section 10.2.2 and Tables 10-1 to 10-6 and Figure 10-1 of the SWIA. (ES Appendix C4)
TBA0143 – pg 2	Mines like this often fail. Dalradian has not shown it will provide a proper financial bond.	Yes	See response to Sample letter 1 above.
TBA0412 – pg 1	Dalradian has not demonstrated how it will cover the cost of cleaning up	Yes	See response to Sample letter 1 above.
TBA0545 – pg 2	Dalradian's mine closure plan falls catastrophically short. They initially proposed just five years, however in their SoC they state they will monitor 15 years post closure. They also state that a figure of £20million would be the proposed subject of a financial guarantee with DfI. This is very ambiguous and does not seem at all like any kind of guarantee .	Yes	See response to Sample letter 1 above.
TBA0775; TBA0987; TBA1465; TBA0630 – pg 1	Mines like this often fail. Dalradian has not shown it will provide a proper financial bond.	Yes	The proposed process for providing the financial provision for closure is described.
TBA0945 – pg 1-2	There are multiple pathways by which the proposed goldmine would pose serious risks to the waters of County Donegal , including Potential failure of the DSF; Acid Mine Drainage; Discharge of contaminated water; Large-scale Water Abstraction; Inadequate Closure Plan	Yes	The Closure Plan is noted as conceptual until planning is granted and commitments have been made to periodically update the Plan (see para 1.19 of TR4 in the SoC and sections 1.2, 2.2.3 and 7 of the Conceptual Rehabilitation and Closure Plan – Appendix B5 to the ES). This is standard practice for this stage of a mining project. Ongoing monitoring, particularly water quality and progressive rehabilitation processes, carried out during the life of the mine will inform the updates to the Closure Plan.
			The ARDML and water abstraction are responded to under the relevant technical reports and geochemistry and groundwater TB response tables.
TBA0991 – pg 2	Closure plan is dangerously inadequate.	Yes	The Closure Plan is noted as conceptual and will be conditioned to be updated at least every three years. This is standard practice for this stage of a mining project.
TBA1206 – pg 2	Dalradian have pledged to monitor the mine site for 15 years after formal closure. They estimate that even a decade after the closure of the mine, 176000 gallons on polluted water will be discharged into just the	Yes	The closure cost estimate has been developed based on first principles by the project engineers. The cost will be periodically reviewed as described in the Mine SoC Closure TR4. The closure costs could rise due to inflation, and may

	Owenkillev River. So worried is Dalradian about the costs this pollution will inflict, they have already made vague mention of a £20 million financial guarantee with NI's Departments for Infrastructure. One can infer the actual costs of remedying the harms caused by their pollution to be much higher.		subsequently reduce towards the end of the mine life as progressive rehabilitation reduces the financial requirements.
TBA1564 - Ecojustice Ireland – pf 3	Closure plan is insufficiently cautious and detailed with an inadequate monitoring plan post closure	Yes	The Closure Plan is noted as conceptual and will be conditioned to be updated at least every three years. This is standard practice for this stage of a mining project. Monitoring requirements are set out in the SGEMAP at ES, Appendix D2, sections 3.2.4 and 3.2.5
TBA1581 - Jesuit Centre for Faith & Justice – pg 4	Dalradian's closure plan falls catastrophically short.	Yes	The Closure Plan is noted as conceptual and will be conditioned to be updated at least every three years as noted above. This is standard practice for this stage of a mining project.
TBA0594 – pg 1	Mines like this often fail. Dalradian has not shown it will provide a proper financial bond.	Yes	The proposed process for providing the financial provision for closure is described in the draft Heads of Terms appended to the Mine SoC - Appendix 12 Draft Heads of Terms - a Bond to be in place for the Bond amount.
TBA1566 – pg 9	Mines like this often fail. Dalradian has not shown it will provide a proper financial bond.	Yes	The proposed process for providing the financial provision for closure is described in the draft Heads of Terms appended to the Mine SoC - Appendix 12 Draft Heads of Terms - a Bond to be in place for the Bond amount.