TBR5 - Economics

Curraghinalt, Gortin

December 2025

Response to Transboundary Consultation Representations – [redacted] (Quod)

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 - An Taisce	Dalradian claim that 350 direct jobs will be created by their project, as well as many more indirect jobs. If this is the case, what will the effect of the increase in population on housing, transport, services etc. – the so-called 'gold rush effect'. This has not been assessed.	Yes - RR14, p.34, para 4.19.	
	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. This would allow for an assessment of the proposal with regard to the doughnut economic model, with societal needs being met in a way which does not surpass planetary boundaries, of which chemical pollution,	Yes – the societal value of copper, silver, and tellurium is addressed in TR5, p.25-28, para 4.56 to 4.71. Societal value of gold: Set out in TR2, pages 3-10	The application includes a comprehensive assessment of social, economic and environmental effects. It demonstrates that the economic and social benefits are significant. Doughnut economics has no basis in policy, but the Project will deliver large social benefits without causing significant ecological harm. We have undertaken an assessment of the impacts of the loss of agricultural land as part of a note we sent to DfI in December 2024. <u>That note is included as the Appendix to the Transboundary Consultation Responses</u>

	freshwater impacts, land conversion and biodiversity elements are of most relevance in this case.		Economics Addendum. The DfI advised that in the interests of transparency they would not respond to that note outside of the Inquiry.
	Mining is not only energy intensive but also irreversibly damages ecosystems and puts water quality at high risk of pollution. It is not a sustainable economic activity. Furthermore, typically, little economic benefit stays within the host country. Despite this, both NI and ROI are positioning our island as 'Open for Business' to the global mining industry. In 2019 ROI was ranked by the Fraser Institute as 2nd in the world for the "attractiveness of their mining policies", previously ranking 1st for five years in a row. NI ranked 6th up until 2018 when the reporting stopped. Currently, approximately 25% of both NI and ROI are concessioned to mining companies (this figure fluctuates as concessions expire and new ones bought).	Yes. The point regarding mining being "energy intensive" is addressed in RR14, p.13-14, para 2.96 to 2.103. The point regarding "Economics benefits don't stay in the host country" is addressed in RR14, p.32-33, para 4.8 to 4.12.	
	Then, as now, we recommend that, instead, the Doughnut Economics framework by Kate Raworth be used to guide our planning policies and practices. It requires that development ensures that everyone has the societal essentials (housing, food, energy, education, health, water, employment, justice and equity, etc.) while remaining within our planetary and ecological boundaries (climate, biodiversity, water quality, air quality, etc.). Our assessment concludes that this project does not align with that model of development that we advocate for.	No.	As set out above, Kate Raworth's Doughnut Economics is not government policy, but the Project will deliver large social benefits without causing significant ecological harm. Government policy is, fundamentally, supportive of Foreign Direct Investment (FDI) as a means to generate growth, productivity, and economic prosperity. As stated in the NI Executive's Programme for Government "We will maximise benefits from our unique place in the world to attract global investment, grow exports, and attract Foreign Direct Investment to support higher productivity." Policy compliance is addressed in more detail in Section 2 of the Economics Addendum attached.

TBA1603 - Environmental Justice Network Ireland	There is an uncritical assumption that mining leads to jobs and "growth" but the reality is that gold mining projects are more focused on creating economic value for shareholders than contributing to local economies. Research has shown that large-scale land investments (extractives in particular) increasingly result in the displacement of local communities, violations of economic and social rights, and destruction of the natural environment. This is also reflected in the literature on mining and risk.	Yes (partly) Regarding the point that "gold mining projects are more focused on creating economic value for shareholders than contributing to local economies", this is addressed in RR14, Chapter 2, p.32-33, para 4.8 to 4.12. They cite a paper on the "Resource Curse". This is addressed in RR14, p.5-7, para 2.30 to 2.47.	The other papers they refer to focus on developing nations. They are not applicable to NI.
TBA0008; 0017; 0021; 0040; 0041; 0056; 0060; 0072; 0074; 0077; 0081; 0103; 0113; 0123; 0132; 0138; 0141; 0146; 0159; 0160; 0167; 0179; 0196; 0202; 0208; 0212; 0219; 0220; 0225; 0238; 0250; 0251; 0259; 0264; 0270; 0288; 0302; 0303; 0308; 0314; 0328; 0333; 0337; 0344; 0350; 0358; 0362; 0367; 0378; 0382; 0393; 0418; 0437; 0444; 0455; 0458; 0480; 0485; 0489; 0495; 0501; 0504; 0512; 0517; 0521; 0527; 0531; 0535; 0548; 0552; 0558; 0563; 0577; 0581; 0610; 0611; 0617; 0624; 0638; 0643; 0646; 0650; 0653; 0659; 0661; 0665; 0669; 0674; 0679; 0686; 0702; 0704; 0715; 0719; 0723; 0725; 0732; 0765; 0788; 0797; 0803; 0804; 0808; 0811; 0823; 0836; 0844; 0846; 0880; 0888; 0890; 0897; 0901; 0915; 0920; 0953; 0957; 0964; 0973; 0976;	The history of the North West includes the first settlement of humans on the island and the last flight of the Celtic Chiefs; this could be the basis for a cross-border tourism project in future years. Indeed, many tourists unofficially follow this stream currently, looking for connections with their cultural heritage. The tourism industry in the Sperrins is at a critical stage in its early development. Dalradian Gold's proposals for mining not just at Greencastle but right across the Sperrins risks undermining a key foundation for rural tourism here (the unspoilt natural beauty and green /clean image of this place).	Yes. RR14, "Part Two: Tourism Impacts", p.15-30.	

1000; 1005; 1013; 1026; 1057; 1080; 1084; 1090; 1099; 1100; 1104; 1110; 1123; 1129; 1133; 1148; 1152; 1154; 1163; 1176; 1188; 1192; 1225; 1233; 1242; 1254; 1256; 1273; 1284; 1292; 1314; 1315; 1321; 1325; 1341; 1343; 1372; 1386; 1388; 1397; 1404; 1417; 1442; 1447; 1460; 1469; 1474; 1509; 1510; 1538; 1544; 1560; 1571; 1579; & 1589			
	The heavy-duty powerline that would accompany the mine would result in significant negative visual and landscape impacts from 322 poles being erected 11-20 metres in height and a 10 metre clearance around them, going through the Sperrins Area of Outstanding Natural Beauty. It would damage the attractiveness of the Sperrins as a tourist destination and thus negatively impact tourism as a revenue source for the Sperrins AONB.	Yes. RR14, "Part Two: Tourism Impacts", p.15-30.	
	The multiple vehicles associated with the construction and maintenance of the proposed powerline, as indicated in the RPS Report, would lead to traffic congestion on the roads and increased risks of accidents. It would also deter people from visiting the area, thus affecting tourism.	Yes. RR14, p.27, para 3.54 to 3.56.	
	People may also have concerns for their health from exposure to electromagnetic fields from the high voltage powerline. The World Health Organisation (WHO) classified magnetic fields in 2002 as "possibly carcinogenic to humans," and many research studies support this claim. As a result, a percentage of potential tourists would avoid the area.	See para 8.1.2 of TR19 and paras 1.5.4-1.5.5 and page 8 of RR19.	
	"In addition to the two economies already being closely intertwined, there is a high probability of constitutional change - bringing both jurisdictions into one, within the proposed lifetime of the mine. Once extractive companies are in the door, it is very hard to get them out. So what is permitted in the North now may soon be the	Yes (partly) Regarding their point "One that destroys life or one that sustains life and promotes well-being of people and	Attracting FDI and expanding NI's exports is both NI Executive policy and RoI Government Policy. The NI Executive's Programme for Government specifically states, in the context of 'Prosperity', "We will maximise benefits from our unique place

	responsibility of the entire island. What kind of economy, what kind of society, do we want to create for this new Ireland? One that destroys life or one that sustains life and promotes well-being of people and place.	place", the potential impacts on water resources are addressed in RR14, p.27-28, para 3.57 to 3.62, and benefits for local residents are highlighted in p.32-33, para 4.8 to 4.12.	in the world to attract global investment, grow exports, and attract Foreign Direct Investment to support higher productivity." This is addressed in more detail in the Economics Addendum . Additionally, FDI is the policy of the RoI. The RoI Department of Enterprise, Tourism and Employment specifically states that "The contribution of foreign direct investment (FDI) to the Irish economy is far reaching", further states that Ireland's FDI policy is one of attracting and retaining, and also states that "FDI has been, and will continue to be, hugely important to the Irish economy".[1] The RoI's says that its policy for mineral extraction and mining is to: • ensure a stable, robust and transparent regulatory framework that supports environmentally sustainable mineral exploration and mining • maximise the contribution that sustainable exploration and mining can make to our society, economic development and the transition to net-zero greenhouse gas emissions through the supply of the raw materials necessary for our sustainable development In a Written Answer in Dáil Éireann on 27th June 2023, the Minister for the Environment, Climate and Communications wrote:

[1] https://enterprise.gov.ie/en/what-we-do/trade-investment/foreign-direct-investment-fdi-/

			Mining is economically important to Ireland, particularly in rural areas as it provides direct and indirect employment as well as Exchequer funds. Mineral exploration and mining involve high levels of financial risk. In accordance with the Policy Statement on Mineral Exploration and Mining, Ireland's policy is to attract international investment to these sectors, by providing investors with confidence through a stable regulatory environment, a competitive fiscal framework and high-quality national geoscience data. Policy in the RoI is therefore consistent with NI policy and the Project will deliver against its aims.
	Despite narratives of wealth generation, extractive projects around the world extract wealth from their host countries, are unstable and follow extreme boom and bust cycles (this is also true in the Irish case) and create "enclave economies" (that do not serve the local economy) as seen in both Rosia Montană, Romania and Chalkidiki, Greece. Dalradian's project will extract wealth to the private equity company who ultimately owns them, with the Crown Estate receiving 4% of the royalties (due to the colonial fact precious metals in the North are still owned by the Crown Estate). The extractive and neoliberal economic model in the North and South of Ireland has led to extreme levels of social inequality and degraded ecosystems, inviting in more transnational corporations will only entrench these consequences for people and place. Therefore, this project must be rejected.	Yes. Repatriation of profits is addressed in RR14, p.9-10, para 2.63 to 2.66. The point on social inequality is addressed in TR5, p.32-33, para 5.28.	
	Alternatives are being championed by communities around the island from degrowth, solidarity economy, circular economy, well-being economy, Rights of Nature and Rights of Communities. These are the development	No	The assessments underpinning the economic materials presented are measured against accepted government policy. Whilst the alternatives are not

	pathways that will achieve real and just wealth for the island of Ireland.		explained, the appropriate policy context has been used.
TBA1603 – Pg. 40	A 2016 study by the Institute for Sustainable Development found that post-mining remediation costs often exceed initial project revenues by over 300%. The financial burden of managing pollution disasters in similar projects, such as the Baia Mare cyanide spill in Romania (2000), highlights the significant economic risks involved.	Yes. RR14, p.32, para 4.6.	
TBA0114 - [redacted] (Donegal)	Those who will profit from the gold mine will not be you or I, they are not resident of any part of this island. The wealth generated from the mine would stay in the hands of a few. Any promises of economic benefit for NI will be a drop in the ocean compared with the wealth they will generate from it and keep for themselves.	Yes (partly). TR5, p.29, Table 5.2 highlights the scale of job creation. TR5, p.36, Para 5.42 highlights partnerships with education / training centres. RR14, p.32-33, para 4.8 to 4.12 addresses benefits for local residents.	There will be significant local benefits through direct employment and spending on the project (over £80m pa) and indirect benefits through spending in the supply chain. It will create over 1,000 jobs the overwhelming majority of which are local. The project will also generate significant tax payments that benefit the whole of the UK including Northern Ireland. The proposals would yield a total of £1.2 billion tax payments: TR5, Table 5.3. This estimate was calculated when gold had a market value of $2,300 per oz. This has risen to $4,000, with some reputable financial institutions (such as Goldman Sachs) forecasting a value of $5,000 by the end of 2026. **At a market value of $4,000, the estimated tax impact rises to £2.3 billion, and at $5,000 rises to £2.9 billion.** The updated economic impacts are provided in more detail in Section 3 of the Economics Addendum attached.
TBA0322	This project does not represent economic progress. In fact, it risk dismantling existing livelihoods in sustainable farming, fishing and tourism	Yes. RR14, Part 2, p.15-30	

TBA0596	With the likelihood that the river water and aquatic life, particularly salmon, will be adversely affected by the contamination from this mine, the livelihoods and incomes of fisher people risk significant adverse impacts from toxic contamination on both sides of the border.	Yes. RR14, Part 2, p.27-28, para 3.57 to 3.62.	
	Toxic dust would settle on the grass that is eaten by cattle, sheep and other farm animals. Animals and crops would be affected by the contaminated water and toxic dust from the proposed goldmine so that milk and other farm produce would no longer be fit for human consumption and could not be sold. This would have a significant adverse impact on the livelihood of farmers and farm families not just in counties Tyrone, Derry and Donegal but across other counties in the Republic who rely on their farm produce - such as beef, dairy, chicken, eggs and crops - for their economic viability.	Yes. Releases to air are addressed in RR14, Part 2, p.28, para 3.63 to 3.66. Water resources are addressed in RR14, p.27-28, para 3.57 to 3.62.	
	The tourism industry in the Sperrins is at a critical stage in its early development. Dalradian Golds proposals for mining not just at Greencastle but right across the Sperrins risks undermining a key foundation for rural tourism here.	Yes. RR14, Part 2, p.15-30.	
	Despite narratives of wealth generation, extractive projects around the world extract wealth from their host countries, are unstable and follow extreme boom and bust cycles (this is also true in the Irish case) and create “enclave economies” (that do not serve the local economy) as seen in both Rosia Montană, Romania and Chalkidiki, Greece. Dalradian’s project will extract wealth to the private equity company who ultimately owns them, with the Crown Estate receiving 4% of the royalties (due to the colonial fact precious metals in the North are still owned by the Crown Estate). The extractive and neoliberal economic model in the North and South of Ireland has led to extreme levels of social inequality and degraded ecosystems, inviting in more transnational corporations	Yes. RR14, p.7, para 2.45.	

	will only entrench these consequences for people and place. Therefore, this project must be rejected.	
TBA0741	The development risks undermining local livelihoods.	Yes. Employment impacts are addressed in TR5, p.29, Table 5.2. Salaries are addressed in TR5, p.32, para 5.28. Negative impacts (lack of) on the agriculture and fishing industries are addressed in RR14, p.31, para 4.4.
TBA0750	Given the tourism concentrated in and around the OM Dark Sky and Beaghmore SC the mining project is wholly at odds with the integrity of the landscape and any future tourism in the are. Most of the tourism in the area is linked to outdoor recreation, astronomy, cultural heritage, archaeology, hill walking, fishing, walking and cycling. The sheer scale of the the mine will have a devastating impact on the tourism of this part of the island.	Yes. RR14, Part 2, p.15-30.
	Dalradian's appraisal of negative impacts has failed to address these aspects and there is no information on the economic fallout from the inevitable loss in tourism should the mine go ahead.	Yes. RR14, Part 2, p.15-30.
TBA0751	Economic damage that will be caused to the people already working in the area; the farmers and fishermen as well as the many sustainable tourism projects	Yes. RR14, Part 2, p.15-30.
TBA1019	The livelihoods of people making a living from fishing, farming or sustainable tourism would be jeopardised and our two nations would be tied into an exploitative economy that values profit over healthy communities and healthy ecosystems.	Yes. RR14, Part 2, p.15-30.

TBA1777	I would like to challenge the claims by Dalradian that the project will boost the economy and provide jobs. I live in County Meath, close to the Tailings Facility for the Boliden Tara Mines. Despite assertions that Tara Mines has boosted the economy in my local area I have yet to hear that claim quantified. In fact during a recent year long closure of the mine no local businesses complained of being adversely affected by the closure.	No.	This is anecdotal and about another mine in another location. We have submitted evidence that is specific to Curraghinalt that demonstrates the benefits of the scheme, such as in TR5, p.29, Table 5.2 and RR14, p.32-33, paras 4.8-4.12. There is also evidence to suggest that this comment does not reflect reality. In April 2024, RTE reported that the mine had "a reputation of offering well-paying jobs, supporting local people and the local economy, it was widely seen as being the "backbone" of the area."[2] There was also trade union support for the continued operation of the mine. A separate RTE report states that "unions looked to come up with proposals that would avoid lay-offs and support families and workers financially". The (former) Minister for Enterprise, Trade and Employment [redacted] has been speaking with the Tara Mines for several months prior to its closure and described its closure as "very unwelcome", highlighting that the mine employed 650 people.[3]
TBA1247	Agricultural prospects in the area, including both animal husbandry and crop farming are vital industries for the livelihoods and wellbeing of the communities of the Sperrins AONB and surrounding areas. All of which is presently straining under the conditions of ecological and	Yes. RR14, p.31, para 4.4.	

[2] https://www.rte.ie/news/business/2024/0420/1444534-tara-mines-reopen/
[3] https://www.rte.ie/news/ireland/2023/0614/1389062-tara-mines/

	climate breakdown. This mining project proposes to worsen these conditions directly.	
TBA1494	With the likelihood that the river water and aquatic life, particularly salmon, will be adversely affected by the contamination from this mine, the livelihoods and incomes of fisher people risk significant adverse impacts from toxic contamination on both sides of the border.	Yes. RR14, Part 2, p.27-28, para 3.57 to 3.62.
	Animals and crops will be affected by the toxic dust and contaminated water. This will affect the livelihoods of farmers.	Yes. Releases to air are addressed in RR14, Part 2, p.28, para 3.63 to 3.66. Water resources are addressed in RR14, p.27-28, para 3.57 to 3.62.
	Many people come to the Sperrins from across the island and beyond for walking or hiking, birdwatching, cultural heritage and sightseeing.	Yes. RR14, Part 2, p.15-30.
TBA1496	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, para 3.57 to 3.62.
	impact on agriculture	Yes. RR14, p.31, para 4.4.
	Impact on tourism	Yes. RR14, Part 2, p.15-30.
TBA1537	The economic arguments are robust	Yes. DfE consultation response, May 2018, paragraphs 11 and 15
TBA1539 - Save our Sperrins	Impact on fishing sector	Yes. RR14, Part 2, Paras 3.57 to 3.62
	impact on agriculture	Yes. RR14, paragraph 4.4
	Impact on tourism	Yes. RR14, Part 2.
TBA1548 - Environmental Law & Justice Research Group (UCD)	The economic arguments are not robust	Yes. DfE consultation response, May 2018, paragraphs 11 and 15

TBA1557 - Feminist Communities for Climate Justice	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, paras 3.57 to 3.62
	impact on agriculture	Yes. RR14, p.31, paragraph 4.4
	impact on tourism	Yes. RR14, Part 2
TBA1584	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, Paras 3.57 to 3.62
	impact on agriculture	Yes. RR14, p.31, paragraph 4.4.
	Impact on Tourism	Yes. RR14, Part 2, p.15-30.
TBA1585	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, paras 3.57 to 3.62
	impact on agriculture	Yes. RR14, p.31, paragraph 4.4.
	Impact on tourism	Yes. RR14, Part 2, p.15-30.
TBA1592 - Centre for Global Education	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, Paras 3.57 to 3.62.
	Impact on agriculture	Yes. RR14, p.31, paragraph 4.4.
	Impact on tourism	Yes. RR14, Part 2, p.15-30.
TBA1597 - Ireland's Think-tank for Action on Social Change	Impact on fishing sector	Yes. RR14, Part 2, p.27-28, paras 3.57 to 3.62
	impact on agriculture	Yes. RR14, p.31, paragraph 4.4
	Impact on tourism	Yes. RR14, Part 2, p.15-30.
TBA1575	Economic fallout from the loss of tourism has not been assessed.	Yes. RR14, Part 2, p.15-30.
TBA0005; 0006; 0009; 0014; 0023; 0024; 0030; 0033; 0034; 0036; 0042; 0061; 0062; 0063; 0064; 0087; 0088; 0089; 0090; 0091; 0092; 0093; 0095; 0097; 0098; 0099; 0104; 0105; 0109; 0116; 0117; 0121; 0122; 0124; 0125; 0126; 0127; 0128; 0144; 0145; 0153; 0156;	Due to the contamination of water, land and air and the resulting risk to human health, animals and crops, the livelihoods of people making a living from fishing, farming or sustainable tourism would be jeopardised. In their place, we would be tied into an exploitive, extractive economy.	Yes. Releases to air are addressed in RR14, Part 2, p.28, para 3.63 to 3.66.

0161; 0163; 0168; 0169; 0170; 0171; 0172; 0173; 0174; 0175; 0180; 0181; 0182; 0183; 0186; 0188; 0189; 0190; 0191; 0193; 0194; 0197; 0214; 0215; 0221; 0226; 0227; 0228; 0229; 0230; 0232; 0234; 0241; 0260; 0266; 0267; 0268; 0269; 0274; 0275; 0283; 0284; 0293; 0295; 0310; 0315; 0316; 0317; 0318; 0319; 0320; 0321; 0329; 0335; 0336;0338; 0339; 0340; 0342; 0345; 0352; 0353; 0355; 0359; 0363; 0369; 0371; 0372; 0373; 0385; 0386; 0388; 0394; 0395; 0396; 0398; 0401; 0402; 0403; 0404; 0406; 0408; 0411; 0413; 0413; 0419; 0421; 0424; 0425; 0426; 0427; 0430; 0431; 0432; 0433; 0438; 0446; 0447; 0461; 0462; 0463; 0464; 0465; 0466; 0467; 0468; 0470; 0471; 0473; 0475; 0476; 0496; 0497; 0499; 0500; 0505; 0507; 0508; 0542; 0564; 0565; 0569; 0570; 0582; 0584; 0585; 0586; 0589; 0590; 0591; 0592; 0593; 0595; 0599; 0600; 0601; 0602; 0603; 0604; 0606; 0615; 0620;0621; 0622; 0628; 0629; 0631; 0632; 0633; 0634; 0635; 0637; 0639; 0644; 0645; 0654; 0655; 0660; 0675; 0680; 0683; 0684; 0685; 0689; 0690; 0691; 0693; 0694; 0698; 0708; 0709; 0710; 0726; 0727; 0729; 0733; 0734; 0736; 0739; 0742; 0743; 0745; 0746; 0748; 0749; 0752; 0753; 0757; 0758; 0768; 0771; 0773; 0774; 0776; 0777; 0778; 0780; 0781; 0782; 0784; 0789; 0790; 0794; 0799; 0800; 0809; 0812; 0828; 0832; 0837; 0839; 0840; 0845; 0857; 0858; 0862;		Water resources are addressed in RR14, p.27-28, para 3.57 to 3.62 Tourism is addressed in RR14, Part 2, p.15-30.

0863; 0866; 0869; 0873; 0874; 0884;
0902; 0903; 0906; 0908; 0909; 0921;
0925; 0926; 0927; 0928; 0929; 0930;
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0968; 0981; 0982; 0983; 0985; 0986;
0990; 0994; 0995; 0996; 1001; 1006;
1007; 1008; 1015; 1016; 1017; 1020;
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1114; 1115; 1118; 1119; 1120; 1121;
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