	THIRD PARTY COMMENTS		
Objection Ref	**Issue**	**Page No**	**Response**
2024			
	Specific reference to Eagles, Buzzard and Hawks. Also cites a suite of designated sites and interest features, and more general wildlife and landscape / habitat protection points. Risks to the River Finn Incomplete HRA Precautionary approach is needed. Effects on biodiversity and impacts of abstraction and discharge.		Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025). Regarding birds, no detailed point is made in the submission. Mitigation in respect of birds is described at Appendix C9 of the ES. NIEA NED has confirmed (NED Rebuttal to Mine application dated 18th November 2024) that it is content with the proposed mitigation and that a monitoring plan can be conditioned. The application is supported by a suite of detailed surveys in respect of habitat and species and appropriate mitigation is detailed in Appendix C9, to be secured by condition where appropriate.
2025			
Environmental Justice Network Ireland	The Sperrin Mountains are one of the most legally protected landscapes in Europe, recognized as being internationally significant through several national, European and international designations. In addition to being a designated Area of Outstanding Natural Beauty (AONB), the Sperrins include: A Ramsar site of international importance for active raised bog (Black Bog) A Dark Skies Observatory (one of only 200 internationally) Six Areas of Special Scientific Interest (ASSIs) comprising rivers, woodlands and ancient bog An Area of Significant Archaeological Interest (ASAI) including Beaghmore stone circles Owenkillew River Special Area of Conservation (SAC), a site of European significance for several species, including the rare freshwater pearl mussel, the Native Atlantic salmon and otter. In addition, the Owenkillew River SAC and the Owenreagh River ASSI are hydrologically linked to Lough Foyle Ramsar site, the River Foyle and Tributaries SAC (including the River Finn SAC in Donegal) which together with smaller tributaries, form an ecological continuum linking the north and south of Ireland. There are few landscapes on the island with this level of significance recognised in multiple overlapping designations.	pg 6	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)

	Protection of designated habitats and species: The proposed development and associated activities involve interactions with the Owenkillew River SAC and the Owenreagh River ASSI. All treated wastewater and sewage from the mine will ultimately discharge into both rivers. Given the presence of EU protected habitats and species in the ecological catchment area of the River Foyle and Tributaries SAC (including River Finn SAC) and Lough Foyle (NI & Ireland), Ireland is under a legal obligation to ensure that the integrity of these EU protected sites and species is not adversely affected and are known to have an extensive range through the connected river system from headwaters to mouth. The freshwater pearl mussel, a critically endangered species, is dependent on the Atlantic salmon, so the effects are cumulative and interconnected. The Owenkillew River, the Owenreagh River and the River Foyle and Tributaries SAC are not only hydrologically linked but ecologically integrated with smaller tributaries within the catchment of the SAC which are also very important ecological resources for Atlantic Salmon in particular. All three designated rivers are currently in unfavourable condition.	pg 11	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	disturbance to breeding or migratory birds	pg 12-13	Mitigation in respect of birds is described at Appendix C9 of the ES. NIEA NED has confirmed (NED Rebuttal to Mine application dated 18th November 2024) that: "Provided the proposed mitigation and compensation measures are implemented as described in 2017 ES Volume 3: Appendix C9: EcMMP Section 7.0 Birds, and the conditions detailed in Section 11 of this document are included in any planning approval, NED have no concerns regarding adverse impacts to bird species"
	In terms of required legal procedures, and given the special nature of the sites in question, it is concerning that no independent Habitats Regulations Assessments have yet been completed.	pg 15-17	That assessment will be undertaken by the Competent Authorities in view of all of the relevant evidence, including that submitted to, and questioned at, the Inquiry.
Objection Sample Letter 1	If the two Discharge Consents are granted, they would result in killing aquatic life in the Owenkillew and Owenreagh Rivers and over time they would seriously impact on the water quality and aquatic life throughout the Foyle River Basin, due to the cumulative build up of heavy metals in the river system. There would also be significant risks to Lough Foyle's expansive shellfish aquaculture industry, various types of fishing and recreational activities along the Donegal coastline. The Foyle is a tidal river so there is an increased risk of pollution from the mine waste discharges being washed into the River Finn.	pg 3	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)

	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 Stack, and both would pervade the entire Foyle river system, putting all aquatic life in grave danger.	pg 3	Water discharging from the adit at closure will be groundwater as the local groundwater table will intersect with the adit. Water quality predictions (see Surface Water Impact Assessment, Section 10.3) does not predict acid mine drainage. Calculations of the impact on the Owenreagh River and Owenkillew River are provided in the SWIA and these show no significant effects on these rivers.
Cllr [redacted]	The River Foyle and its tributaries are critical habitats for salmon, protected under the EU Habitats Directive. Scientific studies confirm that heavy metals and sedimentation disrupt salmon spawning, reduce oxygen levels, and impairs survival rates.	pg 1	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	Freshwater pearl mussels, an endangered species present in Owenkillew River, are acutely sensitive to sedimentation. According to the IUCN Red List, increased sediment load can suffocate juvenile mussels and impair water filtration capacity.	pg 1	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	Hydrological pathways connect the development site to the River Foyle and other sites. Data from the European Commission's Water Framework Directive (WFD) shows that over 60% of water bodies in the North West are at less than "Good" status, further emphasising their fragility.	pg 2	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025). Matters concerning WFD implications are discussed in the main body of this RS.
1501 - Friends of the Earth	Bioregional flora and fauna are under climate stress, yet the impacts of the mine are not considered cumulatively with these changes to habitats and the population dynamics of fish, birds, molluscs, invertebrates etc.	pg 2	Such cumulative impacts are not considered to be significant from an ecological perspective. Climate stress would include greater extremes - hotter / drier periods and wetter (more severe rain events). The proposals do not alter the hydrological regime associated with the peatlands / bog habitat. The proposals do not have a significant adverse effect on flow regime associated with watercourses. Indeed, for Pollanroe there is a direct benefit in view of climate change issues - greater control, minimising risks associated with high flow / storm events and increasing (slightly) low and average flows, so slightly more water for more of the time. See Update sHRA.

	Failure to assess transboundary impacts such as an Article 6 HRA	pg 3	T*here is no requirement for Competent Authority to produce the HRA / AA now. That assessment to be undertaken in view of all relevant evidence, including that discussed during the Inquiry.* *The Update Shadow Habitats Regulations Assessment (2020) specifically considered implications for relevant downstream designated sites (potential transboundary effects). see paragraph 3.9 of the sHRA (2020)* *The sHRA 2019 considered potential downstream / Transboundary effects. See section 4.1* *Further, an Update sHRA is submitted as part of this transboundary response in order to consolidate the evidence.*
1502 RABHARTA	Draw attention to the report of [redacted] BSc MSc FCIEEM CEcol CEnv written for Fermanagh and Omagh District Council outlining the biodiversity concerns attached to this project.	pg 3	No new issues raised. Matters addressed specifically in RR6 and Water Discharges RS.
	It is incumbent that the DfI apply the precautionary principle in its decision making around this project.	pg 4	Agreed that the HRA / AA must be undertaken on a precautionary basis. But - Precautionary Principle is not without limits. Any required measures required to address risks must be proportionate (not aim at zero risk) and must be non-discriminatory / consistent.
TBA0143 [redacted]	The mine's waste will contain toxic heavy metals like arsenic, mercury, and lead. These could leak into rivers that flow into Donegal and Lough Foyle, threatening fish, wildlife and drinking water.	pg 1	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	There is no completed HRA	pg 1	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025).

TBA0309	We object to the proposal because of the destruction and long-term damage it will cause to rivers, special areas of conservation, wildlife habitats, peatlands and the whole ecology of the surrounding area.	pg 1	No specific points raised and no evidence of 'harm' brought forward. Appropriate mitigation is proposed in respect of habitats inc peatland and watercourses, and also for relevant species. These will be no adverse impacts in respect of river habitat (inc flows) or supported species, with appropriate protection (and enhancement) delivered through the consenting processes and through the Betterment Plan proposals. Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
TBA0322	The mine places already endangered species such as the Freshwater Pearl Mussel and the Atlantic Salmon at unacceptable risk. These species rely on pristine river systems to survive - systems that Dalradian's operations would compromise.	pg 1	Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	Concerned about the impact on migratory birds such as Whooper Swan, Chough and Peregrine Falcon, which will be affected by both airborne and waterborne pollutants.	pg 1	No specific points raised and no evidence of likely 'harm' brought forward. Appropriate mitigation is proposed and quality / water quality impacts have been assessed. NIEA NED are satisfied that appropriate mitigation can be delivered, including long term monitoring with an Ornithological Monitoring plan to be conditioned.
TBA0360	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	pg 1	Impacts in relation to air and water quality have been fully assessed. Assertions that drinking water supplies could be affected are entirely unfounded, with discharged water treated to standards far more restrictive than those applied for drinking water. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus.
TBA0360	Goldmining is one of the most environmentally destructive industries in the world. It generates vast amounts of waste, disrupts biodiversity and contributes to climate change.	pg 1	No specific points raised and no evidence of 'harm' brought forward. Appropriate and proportionate mitigation is proposed.
TBA0412	The mines waste includes arsenic lead and mercury all of which will contaminate water bodies killing fish and poisoning drinking water for years to come.	pg 1	Not a new or different point. Impacts in relation to air and water quality have been fully assessed. Assertions that drinking water supplies could be affected are entirely unfounded, with discharged water treated to standards far more

			restrictive than those applied for drinking water.
TBA0506 Wild Ireland Defence	Contamination water from the mine would flow into the Owenkillew River. The Owenkillew and Owenreagh River are SAC and ASSI because of the presence of FWPM, spawning salmon, otters and brown trout. The Fine and Mourne Rivers join to become the River Foyle which flows into Lough Foyle and the Atlantic. From Lifford to the sea is tidal so this also puts the River Finn at risk of contamination due to tidal back flow.	pg 1-2	Hydrological connectivity not disputed. Wrong to assert "contaminated water" discharged. Appropriate mitigation and discharge limit values are proposed. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus. There is in fact no risk to the Foyal River Basin or the Finn. Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	The application to discharge in to the Owenreagh also included treated sewage. If the consents are granted it would result in killing aquatic life in the Owenkillew and Owenreagh Rivers and would impact on the water quality throughout the Foyle River Basin, due to the cumulative build up of heavy metals.	pg 2	The concerns are unfounded. Treated sewage is already discharged into these rivers at multiple locations, however none of these plants can operate at the efficiency of the proposed RO plant. Strict limit values are proposed in relation to the discharge, guided by the Conservation Objectives of the SAC, JNCC CSM Guidance, and EQS. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus. Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	Significant risk to Lough Foyles shellfish aquaculture industry, fishing and recreational activities.	pg 2	Not a new or different point. Impacts in relation to air and water quality have been fully assessed, with strict limit values to be applied to the discharges.
	Dalradian SoC added new information, wherein they state that there would be discharge of 20,000 litres per day from their plant into the Owenkillew River, via the Curraghinalt Burn for 7 years post closure and that this discharge would join the contaminated waste flowing from the Filtered Tailing Stack and both would pervade the entire Foyle River system putting aquatic life in grave danger.		Water discharging from the adit at closure will be groundwater as the local groundwater table will intersect with the adit. Water quality predictions (see Surface Water Impact Assessment, Section 10.3) does not predict acid mine drainage. Calculations of the impact on the Owenreagh River and Owenkillew River are provided in

			the SWIA and these show no significant effects on these rivers.
	One of the Water Abstraction applications is to abstract 2.23million litres of water per day for 25 years from the peatland north of Dalradian's proposed site. This is a preposterous suggestion as peatland is a carbon sink and such water abstraction would affect local aquifers, streams and rivers, including the headwaters of the River Foyle, which would lead to long term negative impacts on the whole River Basin.	pg 2	Abstraction will not alter the hydrology of the peatland. The mine project re-circulates water with no adverse change in flows associated with watercourses.
	The second water abstraction application is to abstract 1.7 million litres of wastewater from the proposed mine and discharge it following 'treatment' to the Owenreagh River via Pollanroe Burn. This would pose huge risk to water flowing to the Foyle River basin.	pg 2	No specific point made and no evidence for harm brought forward. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus. Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	The precautionary principle should be applied	pg 2	Agreed that the HRA / AA must be undertaken on a precautionary basis. But - Precautionary Principle is not without limits. Any required measures required to address risks must be proportionate (not aim at zero risk) and must be non-discriminatory / consistent.
TBA0536	This objection is grounded in the ecological significance of the Black Bog, its protected status under multiple conservation designations and the potential adverse impacts the proposed development may have on this sensitive environment.	pg 1-2	No specific point made and no evidence for harm brought forward. No hydrological connectivity. Applicant sHRAs and NIEA HRA (TOLS Assessment - see NIEA SoC Water Discharges Annex C) screen out LSE on this site. No Air Quality implications. Such matters have been specifically considered in the Applicant's Air Quality modelling, now updated with reference to AONA 2025 report considering NIEA Revised Operational Protocol. NIEA has already confirmed it is content in relation to potential effects from air emissions (see NIEA Rebuttal evidence).

TBA0545	Contaminated water flowing from the Mine would flow into the Owenkillew River, which joins the Strule and Derg Rivers at Newtownstewart to become the Mourne River, which the River Finn joins at Lifford/Strabane - which is also where the jurisdiction of NI meets RoI. The Finn and Mourne Rivers join to become the River Foyle, which flows into Lough Foyle and on into the Atlantic Ocean. From Liffod the sea is tidal waters, and so this puts the River Finn at risk of contamination due to back flow.	pg 1	Hydrological connectivity not disputed. Wrong to assert "contaminated water" discharged. Appropriate mitigation and strict discharge limit values are proposed. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus. There is no risk to the Foyle River Basin or the Finn.
	If the two discharge consents are granted they would result in killing aquatic life in teh Owenkillew and Owenreagh Rivers, and overtime they would seriously impact on the water quality and aquatic life throughout the Foyle River Basis, due to cumulative build up of heavy metal in the river system.	pg 3	Strict limit values are proposed in relation to the discharge, guided by the Conservation Objectives of the SAC, JNCC CSM Guidance, and EQS. The RO plant is BAT. There would be no build up of heavey metals, with discharges being in accordance with relevant standards (e.g. EQS which is designed to protect the aquatic environment from potential harmful effects in relation to discharges). Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
	In Dalradian SoC they added that for 7 years post closure, there would a discharge of 4,400 gallons per day from the Adit to the Owenkillew River, via the Curraghinalt Burn. After 7 years the 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 from from the DSF and both would pervade the entire Foyle River System putting all aquatic life in grave danger.	pg 3	Water discharging from the adit at closure will be groundwater as the local groundwater table will intersect with the adit. Water quality predictions (see Surface Water Impact Assessment, Section 10.3) does not predict acid mine drainage. Calculations of the impact on the Owenreagh River and Owenkillew River are provided in the SWIA and these show no significant effects on these rivers. Matters concerning the implications for the designated sites and associated interest features are discussed within the Update sHRA (2025)
TBA0596	It is well documented that high levels of fumes from diesel emissions are poisonous - leading to increased rates of lung cancer, other heart and lung diseases and premature death. Dalradian has applied to use 3.5 million litres of diesel onsite every year for 25 years - the implications of this on human, animal and plant life has not been measured in their EIA.	pg 2	Human health matters are addressed elsewhere. In ecological terms, no significant adverse effects have been identified. Emissions have been properly assessed. Such matters have been specifically considered in the Applicant's Air Quality modelling, now updated with reference to AONA 2025 report considering NIEA Revised Operational Protocol. NIEA has already confirmed it is content in relation to potential effects from air

			emissions (see NIEA Rebuttal evidence).
TBA0741	The proposed development raised serious concerns about the impact on water systems across Tyrone, Derry, Donegal and Monaghan. There is significant risk of pollution from toxic tailings, acid mine drainage and the discharge of 24 heavy metals and treated sewage into the headwaters of the River Foyle.	pg 1	Not a new or different point. See Update sHRA (2025)
	The impact on protected species must be acknowledged. The mine endangers the habitat of critically important species, including FWPM and Atlantic salmon.	pg 1	Not a new or different point. See Update sHRA (2025)
	Other vulnerable migratory and resident species such as Whooper Swans, Peregrine Falcons, Chough, Greylag Geese and Snipe are also at risk due to pollution affecting both water and air.	pg 1	No specific point made and no evidence for harm brought forward. Water quality and air quality pathways for effects have been fully assessed. See Update sHRA (2025)
TBA0750	The Sperrins are protected under various environmental agreements and the river that will bear the brunt of the mine wastewater and sewage is a SAN. This river is connected to protected rivers in RoI and is an important spawning ground for an all-island species (native Atlantic salmon). It appears from the documents online that the mining project will result in harm to this habitat but that the company will manage this harm through various management plan. This does not strike me as possible due to the very fact that many of the assessments conducted to date seem to downplay the significance of the natural and cultural heritage of the area.	pg 2	The respondents views, are misplaced. First, there is no downplaying of the significance of 'natural heritage' - The application is supported by a significant volume of ecological survey and assessment work which has been kept up to date wherever necessary, over the course of the application. Importantly, where new evidence has come to light, for example in respect of salmonid presence in burns, or changes to the formal Conservation Objectives for the Owenkillew SAC - the applicant has responded positively, with any necessary revisions to the mitigation proposed (e.g. discharge limit values). Secondly, whilst Management plans are important for effective delivery, monitoring and control in relation to mitigation, it is wrong to state that 'harm' to salmon habitat will be managed through management plans. See Update sHRA (2025) There will be no (adverse) change the habitat of Atlantic salmon. In terms of water quality - Appropriate mitigation and discharge limit values are proposed. The RO plant is BAT and combined with Nitrogen off-set delivered through Betterment Plan the project

			delivers better than baseline WQ in respect of e.g. Nitrogen and Phosphorus. The proposed limit / enforcement values associated with the discharge consents are fully reflective of the Conservation Objectives (2024) and supporting JNCC guidance, along with EQS which is adopted for the very reason that its purpose is to protect the aquatic environment.
TBA0751	the threat to protected species, both the indigenous Atlantic Salmon as well as the migrating bird species that overwinter here.		This is not a new or different point.
TBA0775; TBA0987; TBA1465; TBA0630	There is no completed Health Impact Assessment of full HRA for the mine. The law requires these before decisions are made	pg 1	This is not a new or different point.
TBA0872	We only have one planet and the daily use of chemicals in mining operations will have detrimental effects on the land, waterways and air quality in the surrounding area. It will poison our wildlife, water supplies and the communities living nearby.	pg 1	No specific point raised, with these broad allegations already addressed.
TBA1019	A similar application in Co. Mayo where permission was sought to mine for gold under Croagh Patrick. The overwhelming sentiment of the population of Ireland, north and south of the border, was that this would be selling our minerals to the detriment of our natural and cultural heritage.	pg 1	No specific point made. Impacts have been fully assessed and appropriate mitigation proposed.
	The waters of Tyrone, Derry and Donegal would be seriously affected by the proposed goldmine, including spill of toxic tailings, Acid Mine Drainage, water abstraction, discharge of heavy metals and treated sewage into the headwaters of the Foyle Catchment area which includes an SAC, SPA and Ramsar Site.	pg 1	Not a new or different point. Impacts in relation to air and water quality have been fully assessed, with strict limit values to be applied to the discharges.
TBA1177	It is absolutely out of the question that mining should be permitted in an AONB, RAMSAR site, Dark Sky Observatory, ASSI, ASAI and SPA.	pg 1	No specific point made. Impacts have been fully assessed and appropriate mitigation proposed.

	The Owenkillew SAC and Owenreagh ASSI are hydrologically linked to the Lough Foyle Ramsar site, the river Foyle and Tributaries SAC which together with small tributaries form an ecological continuum linking the north and south of Ireland.	pg 1	No specific point made. Hydrological connectivity is not disputed. See Update sHRA (2025).
TBA1206	The Owenkillew and Owenreagh rivers are designated Special Area of Conservation and ASSI because of the presence of FWPM, as well as salmon spawning, otters and brown trout... If the 2 discharge consents are granted, they would result in killing aquatic life in the Rivers and over time they would seriously impact on the water quality and aquatic life throughout the Foyle River Basin, due to cumulative build up of heavy metals in the river system.	pg 2	Not a new or different point. No specific point made. Hydrological connectivity is not disputed. See Update sHRA (2025).
	In Dalradian SoC they state that for the 7 years post closure, there would be a discharge of 4,400 gallons per day from their adit into the Owenkillew Rivers, via the Curraghinalt Burn. After 7 years this would increase to 176,000 gallons per days forever! This is hugely worrying as this would most likely be acid mine drainage, which would join the contaminated waste flowing from the DSF and both would pervade the entire Foyle River Statement, putting aquatic life in grave danger.	pg 2	Water discharging from the adit at closure will be groundwater as the local groundwater table will intersect with the adit. Water quality predictions (see Surface Water Impact Assessment, Section 10.3) does not predict acid mine drainage. Calculations of the impact on the Owenreagh River and Owenkillew River are provided in the SWIA and these show no significant effects on these rivers. See Update sHRA (2025).
	Abstraction of water would detrimentally affect the aquifers, streams and rivers in the area, including the headwaters of the River Foyle, which would lead in the long term to negative impacts on the whole River Basin. The second Water Abstraction application is to abstract 375,000 gallons of wastewater daily from the proposed mine and discharge if, into the Owenreagh River, via the Pollanroe Burn. This also would pose huge risks to the quality and quantity of water.	pg 2	Not a new or different point. Impacts in relation to air and water quality have been fully assessed, with strict limit values to be applied to the discharges. See Update sHRA (2025).
TBA1247 Progressive Politics NI	The Black Bog RAMSAR site is internationally significant peatland ecosystem, protected under the RAMSAR convention for the unique biodiversity and ecological value... In accordance with the precautionary principle, regulators have a duty to prevent harm to sensitive habitats where scientific uncertainty exists. The potential for windborne arsenic pollution arising from the proposed mining activities poses a credible risk to the integrity of this site.	pg 2	Not a new or different point. Impacts in relation to air and water quality have been fully assessed, with strict limit values to be applied to the discharges. See Update sHRA (2025).
TBA1429	Protected Species are also at risk due to Dalradian's proposed gold mine, such as the endangered FWPM and the Atlantic Salmon, who breed in the Owenkillew and Owenreagh Rivers (headwaters of the Foyle river system) and swim, via the water route the contaminated water would also take, out in to the Irish Sea. Other Migrating and resident species at risk are Whooper Swans, Peregrine Falcons, Chough, Greylag Geese and Snipe, via both water and air pollution.	pg 1	Not a new or different point.
TBA1487	In the beautiful area of the Sperrins any development requires the protection of its AONB status, this requirement particularly so because of its archaeological heritage, it ecological value, its cultural identity, its beauty, its unspoiled nature, fresh air and its tourist potential.	pg 1	No specific point made. Ecological impacts have been fully assessed and appropriate mitigation proposed.
	The requirement for screening for EIA and full HRA assessment is mandatory, The E in DAERA must fully protect this area from ecological damage.	pg 1	Screening for EIA, then EIA was undertaken. HRA will be undertaken by the competenet Authority in view of all relevant evidence.

TBA1494	Protected Species are also at risk due to Dalradian's proposed gold mine, such as the endangered FWPM and the Atlantic Salmon, who breed in the Owenkillew and Owenreagh Rivers (headwaters of the Foyle river system) and swim, via the water route the contaminated water would also take, out in to the Irish Sea. Other Migrating and resident species at risk are Whooper Swans, Peregrine Falcons, Chough, Greylag Geese and Snipe.	pg 9	Not a new or different point.
TBA1495 - FoE	The regionals flora and fauna is under climate stress yet the impacts of the mine are not considered cumulatively with these changes to habitats and the population dynamics of fish etc.	pg 3	Not a new or different point.
	Implications of the use of diesel on the site on human, animal and plant life has not been measured in the ES.	pg 3	Air Quality impacts have been fully assessed and NIEA has confirmed it is content in relation to ecological receptors. oCEPM described measures which will be employed to control and mitigate impacts from fules and oils on site.
	The Owenkillew and Owenreagh rivers are designated Special Area of Conservation and ASSI because of the presence of FWPM, as well as salmon spawning, otters and brown trout... If the 2 discharge consents are granted, they would result in killing aquatic life in the Rivers and over time they would seriously impact on the water quality and aquatic life throughout the Foyle River Basin, due to cumulative build up of heavy metals in the river system.	pg 4	Not a new or different point.
TBA1533 - Irish Peatland Conservation Council	Black Bog RAMSAR site - one of the best examples of low land raised bog in the UK. The importance of this conservations ite is highlighted by the number of under-threat species. The site is also knowns as having a good lagg zone, an increasingly rare feature in the Republic. The development of a mine to facilitate the extraction of minerals would risk the pollution of habitats which are water dependent.	pg 2	Not a new or different point. See Update sHRA (2025).
	The Sperrins contains rare and endangered FWPM and IPCC are not satisfied that there will be no impact on this species.	pg 2	Not a new or different point. See Update sHRA (2025).
	It is totally inappropriate to allow developers to decide where conservation happens. To destroy blanket bog and healthy peatland habitat which is already providing high quality conditions to support range species and purport that you can create supporting habitat elsewhere is on of the reasons there is a grave biodiversity decline across the island.	pg 3	Appropriate mitigation / compensatory habitat is proposed. The measures have been agreed with NIEA.
TBA1537 - Dr [redacted]	Screening out of the Owenreagh and Pollanroe Burn from the sHRA despite the presence of Atlantic Salmon.	pg 3	The applicant has acted positively towards the recording of Salmon in the Burns and has revised its approach to water discharges accordingly. See Update sHRA (2025).
	failure to consider effects on migratory species in RoI	pg 3	Not a new or different point.
	Wholly unrealist mitigation plans which do not conform with Article 6(3) of the Habitats Directive	pg 3	Not a new or different point.

	Flawed methodology in sHRA and Missing HRAs	pg 8-10	Not a new or different point. See Update sHRA (2025).
TBA1539 - Save our Sperrins	Several protect species are at risk. FWPM, brown trout, spawning salmon and otters.	pg 9	Not a new or different point. See Update sHRA (2025).
	protected habitats at risk - ASSI, Lough Foyle Magilligan ASSI,	pg 9-10	Not a new or different point.
TBA1548 - Environmental Law & Justice Researc Group (UCD)			
	Screening out of the Owenreagh and Pollanroe Burn from the sHRA despite the presence of Atlantic Salmon.	pg 2 - 5	Not a new or different point. See Update sHRA (2025).
	failure to consider the effects of migratory species in the Republic	pg 3 , 6-7	
	No HRA for water applications	pg 3 - 5	Not a new or different point.
	Wholly unrealist mitigation plans which do not conform with Article 6(3) of the Habitats Directive	pg 3	Not a new or different point.
TBA1557 - Feminist Communities for Climate Justice	One of the most protected landscapes in Europe. - The proposal will involve interactions with the SAC, ASSIs which would have negative impacts on habitats and species in the Owenkillew and Owenreagh Rivers.	pg 6-8	Not a new or different point. See Update sHRA (2025).
	Concerning that no independent HRA has been undertaken	pg 8	Not a new or different point.
TBA1564 - Ecojustice Ireland	Waters of Donegal could be affected via the failure of the DSF, acid mine drainage, water discharges and water abstraction.	pg 3	Not a new or different point. See Update sHRA (2025).
	risk of toxic tailings which could ruin the integrity of lough Foyle	pg 3	Not a new or different point. See Update sHRA (2025).
	the discharge consent applications would result in the killing of aquatic life in the Owenkillew and Owenreagh Rivers and impact on the water quality and aquatic life of the Foyle River Basin due to build up on heavy metals in the river system.	pg 3	Not a new or different point. See Update sHRA (2025).
	FWPM are at risk.	pg 4	Not a new or different point. See Update sHRA (2025).
	Atlantic salmon many be killed	pg 4	Not a new or different point. See Update sHRA (2025).
	other protected species are at risk - whooper Swan, Peregrine Falcon, Chough, Snipe and Greylag	pg 4	Not a new or different point. NIEA NED has agreed the mitigation strategy in rspect of birds, including monitoring which is to be conditioned.
	Tree cutting would disturb wildlife and habitats	pg 4	Appropriate mitigation is poposed including ECoW.
TBA1583 - Donegal Rights of Nature	Given that we are in the middle of joint existential crisis of climate and biodiversity, wide scale destruction of peat in order to facilitate the process that is in itself a major contributor to both the climate and biodiversity emergencies, make absolutely no sense.	pg 4	Impacts have been fully assessed. Peatland mitigation and associated compensatory habitat provisions have been agreed with NIEA.

TBA1592 - Centre for Global Education	If the two Discharge Consents are granted, they would inevitably result in killing aquatic life in the Owenkillew and Owenreagh rivers and over time they would seriously impact on the water quality and aquatic life throughout the Foyle River Basin, due to the cumulative build-up of heavy metals in the river system. There would also be significant risks to Lough Foyle's expansive shellfish aquaculture industry, various types of fishing and recreational activities along the Donegal coastline. The Foyle is a tidal river so there is an increased risk of pollution from the mine waste discharges being washed into the River Finn.	pg 4	Not a new or different point. See Update sHRA (2025).
	Dalradian has applied to use 3.5 million litres of diesel onsite every year for 25 years. The implications of this on human, animal and plant life has not been measured in their Environmental Impact Statements.	pg 5	Not a new or different point.
	Protected species are at risk due to Dalradian's proposed gold mine such as the endangered Freshwater Pearl Mussels. Other protected species that traverse our man-made borders are, for example, the Atlantic Salmon, who breed in the Owenkillew river and swim, via the water route that toxic waste would also take out into the Irish Sea. The River Foyle and Lough Foyle are known globally for rich salmon fishing. This would disappear if the salmon were killed by pollution. Other species at risk include Whooper Swans, Peregrine Falcons and Chough, as well as migrating birds such as the Greylag geese and Snipe	pg 5	Not a new or different point.
TBA1597 - Ireland's Think-tank for Action on Social Change	Protected species are at risk, such as FWPM, Atlantic salmon, Whooper Swans, Peregrine Falcons, Chough, Greylag and Snipe	pg 7	Not a new or different point.
TBA0594	The mines waste involves toxic heavy metals. These could leak into rivers that flow into Donegal and Lough Foyle, threatening fish, wildlife, and drinking water.	pg 1	Not a new or different point.
TBA1576 - Save inis Eoghain	Given that we are in the middle of joint existential crisis of climate and biodiversity, wide scale destruction of treat in order to facilitate the process that is in itself a major contributor to both the climate and biodiversity emergencies, make absolutely no sense.	pg 8	Not a new or different point.
TBA-195 & TBA0341	It appears from the documents online that the catchment of the Rivers will be impacts	pg 2	Not a new or different point.