

Planning Appeals Commission

92, Ann Street

Belfast.



4th December 2025

Dear Sir /Madam

We will not repeat the arguments already submitted as to why a toxic goldmining application should not be approved in the Sperrins Area of Outstanding Natural Beauty. Our Statement of Evidence includes:

* The submission made to the Transboundary Consultation

by An Taisce: - https://drive.google.com/file/d/1Wha8GazWn59avZ92ln2_vnmk7CDS CVpK/view?usp=sharing

*The submission by [REDACTED], Associate Professor of Law at

UCD, - https://drive.google.com/file/d/1O41hMcMcHkPzCNL_dOCdCTOYuHPceQzz/view?usp=sharing

*The submission by [REDACTED] members of UCD Environmental Law and Justice

Research Group: https://drive.google.com/file/d/1-8P-Kjf_TrkjKv8oQPkREFsnm5yABvf/view?usp=sharing

* The Statement of Case submitted by Save Our Sperrins (SOS) in Oct

2024. <https://www.infrastructure-ni.gov.uk/sites/default/files/2025-02/Save%20Our%20Sperrins%20Mine%20Rebuttal.pdf>

*We wish to add that Save Our Sperrins (SOS) has put wildlife cameras on the Unnamed Burn, the Glenealy Burn & the Attagh Burn during 2025 and found rich ecological life in them, in contradiction to what Dalradian states about these Burns. Otters, pine martens, foxes, stoats and badgers have been recorded in the Glenealy Burn. Otters, foxes, stoats, ducks & numerous ducklings have been recorded in the Unnamed Burn. Heron and stoats have been recorded in the Attagh Burn as well as a variety of birds which are awaiting identification. Furthermore, a long-eared owl and a suspected Mistle Thrush (awaiting identification) have been recorded on the Pollanroe Burn on the proposed mine site as well as a suspected Jack Snipe and ducks and ducklings further downstream on the Pollanroe Burn. Videos and photos of wildlife can be provided on request.

* The issues collated by DfI in their 8 page summary of issues raised in the 1600 submissions to the Transboundary

Consultation. https://www.pacni.gov.uk/files/pacni/2025-06/2025-06-17%20Transboundary%20Issues%20Paper%20June%202025_redac.pdf

Our concerns include the negative impacts on cultural heritage, biodiversity, water, landscape, air, health, traffic, farming, fishing & tourism, economic & social effects, climate change, mine waste, peatland as well as the cumulative impacts not being considered or the precautionary principle applied. Furthermore, Dalradian's Statement of Case included new information not consulted on, as well as changing their application for a gold and silver mine to add "critical minerals." If Dalradian Gold are now seriously proposing to include the mining, extraction or processing

of specific critical minerals alongside gold and silver, surely this should be part of a fresh application addressing the logistics and associated environmental impact assessment?

* The absence of a defined jurisdictional border between ROI & UK impacts negatively on responsible and sustainable regulation and enforcement along the border region and this is something which should be addressed by the 2 governments before any decision is made about a proposed goldmine.

* We believe that the way the Public Inquiry is being approached by Dalradian Gold may not be compliant with the 3 pillars of the Aarhus Convention: access to information, the right to participate in decision making processes that may significantly affect the environment and access to justice. Respondents to the Transboundary Consultation risk being treated differently from the people who submitted Statements of Case and Rebuttals to all 8 applications of Dalradian Gold which are being considered by the PAC. The respondents to the Transboundary Consultation have been asked to provide Statements of Evidence for the Curraghinalt Mine Project and the 33kv heavy duty powerline, but not the 2 Discharge Consents, 2 Water Abstraction application and the Road abandonment application. Why? In light of the significant issues raised in Transboundary Consultation responses, this omission appears impossible to justify. There is a risk that people who responded to the Transboundary Consultation may be further disadvantaged in that they have no way of knowing what was already discussed on the first 3 days of the Public Inquiry 13th-15th January 2025, as there was no recording or Minutes provided. How will this be addressed going forward? In light of this and the introduction of new information, the points discussed in January 2025 would need to be revisited in April 2026.

* A huge number of people are opposed to the proposed goldmine and all it entails (50,000+ submissions of objection). Yet there is such inequality of arms in this Public Inquiry. People cannot listen in or join online - they have to be there in person. Carers and mothers of young children were discouraged from attending. 22 days have been timetabled for the re-convened Public Inquiry in 2026, but the majority of ordinary people who are in employment cannot take 22 days off work. It's fine for Dalradian Gold's legal teams and many consultants, as they're being paid to attend. Experts representing the people who are opposed to the goldmining application are not allowed to join online and as the timetable of Topics will not be available till March 2026, it leaves very little time to make travel and accommodation arrangements.

* It is important that the PAC fully appreciates the size of Dalradian's proposed Dry Stack Facility and bears in mind its proposed siting on top of Crockanboy Hill, above the village of Greencastle in the Sperrins Area of Outstanding Beauty. Save Our Sperrins has included a PDF drawing from 2017 to illustrate the scale of the proposed above ground mining compound overlaid on Belfast City Centre.

https://drive.google.com/file/d/1qCCB14D3CKMB_kqKBIIIuLNFmC8R8-PI/view?usp=sharing

As can be seen, the Dalradian Waste Dump/ "Dry Stack Facility" stretches from

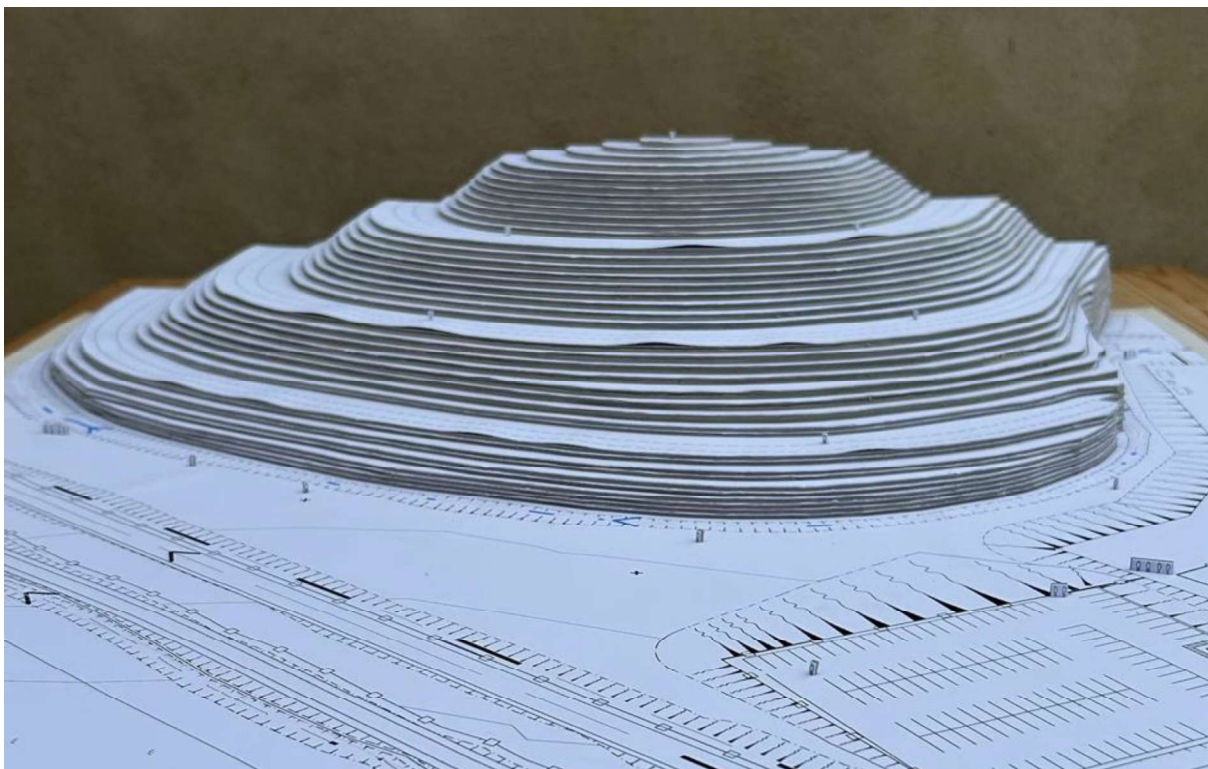
Great Victoria Street (Europa Hotel) to Oxford Street (Waterfront Hall). The footprint of this waste dump is 35 times the size of the footprint of Belfast City Hall Building or 15 times the size of the City Hall & its Grounds (i.e. the land footprint between Donegall Square North, East, South & West). This waste dump/ “Dry Stack Facility” is predicted to hold over 8.2 million metric tons of mine waste.

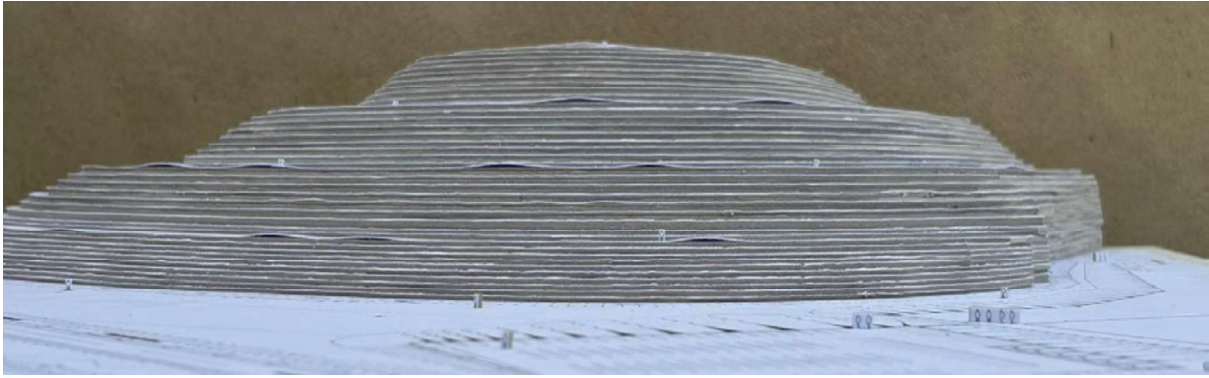
Save Our Sperrins also includes a map (from 2017) of Dalradian’s proposed site overlaid on a map of Omagh.

<https://drive.google.com/file/d/1NafJuxywn7-W8x9g3F0wWLjR3q6z8/view?usp=sharing>

The footprint of the “Dry Stack Facility”/waste dump is more than 150 times the size of the Strule Arts Centre, where the Public Inquiry is being held; more than 40 times bigger than the South West College building (across the river from the Strule Arts Centre); more than 250 times the size of Omagh Court House (High Street).

Save Our Sperrins has produced a 1: 500 scale model of a portion of the proposed Dry Stack Facility, which will be delivered to the PAC on 4th December 2025. The portion modelled relates to the eastern end (adjacent to processing plant and car park). Here are some photographs of it.





* [REDACTED] in "Planning, Design, and Analysis of Tailings Dams" says regardless of intentions, **failure / collapse is inevitable** for the "Dry Stack Facility" (a PR term, not standard terminology). Filtered Tailings Stack or Mine Waste Storage Facility are the correct terms. This is stated in official mining industry documents, eg. "Tailings Management Handbook" by Society for Mining, Metallurgy and Exploration. This handbook also states that these structures "**require maintenance in perpetuity.**" There have been multiple failures of similarly designed "Dry Stack Facilities"/ Filtered Tailings Stacks (eg. In Brazil Jan 2022, Mexico Sept 2024, Brazil Dec 2024, two in Indonesia in March 2025). Dalradian Gold has no plans to monitor, inspect, maintain and review in perpetuity and even if they had, no-one would believe them!. Basically, risk is about consequences and if failure is not acceptable at a particular location, then it should not be built there. Dalradian Gold do not provide **an analysis of the consequences of failure.** This is necessary and should be included in their environmental Impact Statement. Furthermore, a tailings dam/"Dry Stack Facility" never has insurance for failure as **failure is an uninsurable risk!**

* The April 2025 report, "Potential Impacts of a Failure of the Dry Stack Facility at the Proposed Dalradian Gold Curraghinalt Mine in Northern Ireland on the Rivers of the Republic of Ireland." by [REDACTED], eminent hydrologist and geophysicist, outlines the potential detrimental impacts of the failure of Dalradian's proposed tailings stack on the River Foyle, Lough Foyle and River Finn.
<https://drive.google.com/file/d/1FcC1U75V2ttxyizz2cydZK4UAVO4zclm/view>

* According to the mining industry, an "**Emergency Preparedness and Response Plan**" is necessary. This is missing from Dalradian Gold's plans. Such a plan should have been co-ordinated between the two governments of Northern Ireland and Republic of Ireland.

* The Global Industry Standard on Tailings Management (GISTM), which was largely written by the International Council on Mining and Metals (ICMM), is very widely accepted within the mining industry. It balances the interests of mining companies with the protection of people and the environment. It emphasises safety and transparency. "The Global Industry Standard on Tailings Management (herein "the Standard") strives to achieve the ultimate goal of zero harm to people and the environment with zero tolerance for human fatality. It requires Operators to take

responsibility and prioritise the safety of tailings facilities, through all phases of a facility's lifecycle, including closure and post-closure. It also requires the disclosure of relevant information to support public accountability." Dalradian has not taken this advice.

*"Safety First. Guidelines for Responsible Mine Tailings Management," (2022),(endorsed by 158 NGOs, political parties and tribal governments) emphasises the protection of people and the environment. The consent of the impacted community is most important and in the Sperrins AONB, the vast majority of people say no to toxic mining. They have the right to consent or to withhold consent. The voice of the impacted people must be heard. The PAC should ask "Who is gaining the benefits of a goldmine and who is bearing the risks?" There is huge disparity in power between these two groups. This raises serious ethical problems which must be taken into account by the PAC.

* Dalradian's proposed site is only a kilometre from the primary school and playgroup in Greencastle and half a kilometre from the local church, football club, playing fields and community centre. To build a goldmine in such close proximity to people, including young children, would not even be allowed in China, often regarded as a country with weak environmental standards. Furthermore, in China, tailings facilities are strictly forbidden within three kilometres from the banks of main streams and one kilometre from the banks of tributaries. It is ironic that the Owenkillew and Owenreagh Rivers and Curraghinalt and Pollanroe Burns and the precious freshwater pearl mussels would be better protected in China! Other jurisdictions have even stricter standards for minimum separation between tailings facilities and communities (eg.Brazil).

* The risk of radiological Cs137 from peat disturbance has not been considered at all by Dalradian Gold. The Sperrin Mountains received airborne fallout during the rainfall events of early May 1986, following the Chernobyl disaster. Northern Ireland received higher initial doses of radiation compared to other parts of the UK due to meteorological conditions at the time, specifically patchy rainfall that washed the radioactivity from the passing plume. Global fallout from atmospheric nuclear weapons tests also contributed a smaller baseline amount. The Sperrin Mountains, with their extensive peat bogs, are an area where this contamination is concentrated and persists. Disturbing peat in an area with historical Cs137 deposition can mobilise contamination into the environment. Dalradian Gold has not provided any confirmation, supported by proper evidence, that peat disturbance will not mobilise Cs137.

* In view of all the inherent risks associated with Dalradian's proposals, it is obvious that the Sperrins AONB is not a suitable place for a goldmine and all parts of their applications should be refused.

Yours Sincerely

██████████ Secretary Save Our Sperrins (SOS)
email: ██████████