

Your email of 14th of October 2025 refers. Please find below my statement of evidence as mentioned. 10 hard copies will also be sent by post. **REFERENCE:** 2021/C005 - a Public Local Inquiry under Section 26(10) of the Planning Act (Northern Ireland) 2011 for planning application LA10/2017/1249/F on behalf of Dalradian Gold Ltd

Regards,

██████████ Chairperson CFCE, ██████████ ██████████

Statement Of Evidence:

“In the Transboundary Consultation Document for the Dalradian Gold Mine Project, Co. Tyrone, Donegal County Council identifies a potential environmental issue concerning the River Finn.

Source: <https://consult.donegal.ie/en/consultation/transboundary-public-consultation-dalradian-gold-mine-project-co-tyrone>

This reference to the River Finn is the sole reason given by the Irish Government for agreeing to a Transboundary Consultation under the Espoo Convention.

From the Summary section of the document:

“The environmental screening process identified potential transboundary issues for Ireland relating to the River Finn.”

And from Why is this consultation being undertaken?:

“The Dfi, Northern Ireland has determined that the proposed development requires an environmental impact assessment and consequently environmental statements on the above applications have been published. The initial screening exercise determined that the proposed development may have transboundary environmental impacts in Ireland concerning the River Finn which flows into County Donegal.”

The Council document incorrectly claims that the River Finn “flows into County Donegal.” This is factually wrong. In reality, the River Finn rises in Lough Finn at Fintown, Donegal, and flows eastward to meet the River Mourne at Lifford. At this confluence, the two rivers form the River

Foyle, which then flows northwards. Source: <https://www.floodinfo.ie/frs/en/ballybofey-stranorlar/home/>

If this mistaken claim about the River Finn is the only basis for Ireland's agreement to a transboundary consultation, then the process is fundamentally flawed. Was this simply an honest error, or a deliberate attempt to avoid acknowledging the far more significant downstream impacts on the River Foyle and Lough Foyle?

I raised this issue with Donegal County Council in March 2025, yet they chose to ignore it. It is astonishing that such a basic geographical error was made in the first place, and even more troubling that—once informed—they failed to correct or apologise for it.

This avoidance suggests a reluctance to admit that the River Foyle and Lough Foyle would inevitably be affected by any breach of the Dalradian Mine's 59 metre high dry stack tailings facility. These water bodies should unquestionably be included in the Transboundary Consultation process under the Espoo Convention.“