

Planning Appeals Commission  
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Belfast  
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E: Dalradian.CPI@pacni.gov.uk

Dear Sir/Madam,

I 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. My Statement of Evidence includes:

\* The submission made to the Transboundary Consultation by An Taisce:

- [https://drive.google.com/file/d/1Wha8GazWn59avZ92In2\\_vnmk7CDSCVpK/view?usp=sharing](https://drive.google.com/file/d/1Wha8GazWn59avZ92In2_vnmk7CDSCVpK/view?usp=sharing)

\*The submission by ██████████ Associate Professor of Law at UCD,

- [https://drive.google.com/file/d/1O41hMcMcHkPzCNL\\_dOCdCTOYuHPceQzz/view?usp=sharing](https://drive.google.com/file/d/1O41hMcMcHkPzCNL_dOCdCTOYuHPceQzz/view?usp=sharing)

\*The submission by the ████████ members of UCD Environmental Law and Justice Research Group,

[https://drive.google.com/file/d/1-8P-Kjf\\_TrrkjKv8oQPkREFsnm5yABvf/view?usp=sharing](https://drive.google.com/file/d/1-8P-Kjf_TrrkjKv8oQPkREFsnm5yABvf/view?usp=sharing)

\* The Statement of Case submitted by Save Our Sperrins in Oct 2024.

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

\* 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](https://www.pacni.gov.uk/files/pacni/2025-06/2025-06-17%20Transboundary%20Issues%20Paper%20June%202025_redac.pdf)

My 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 would be part of a fresh application addressing the logistics and the 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.

\* I 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.

\* 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 Dr Steven Emerman, 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>

\* Prof Steven Vick in his book, "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. "Tailing 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!**

\*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).

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