

Statement of Case: Transboundary Issues on Dalradian Proposed Gold Mine

Dear Sir/Madam

I will not be repeating arguments already submitted to why Dalradian proposed goldmine should not be approved in the Sperrins Area of Outstanding Natural Beauty. My concerns are the negative impact to water, land, air, biodiversity, cultural heritage, health and people's livelihoods in both the North and South of Ireland.

My statement of evidence includes:

[. Transboundary Public Consultation - Dalradian Gold Mine Project, Co. Tyrone | Donegal County Council's Online Consultation Portal](#)

[Submission on the Transboundary Environmental Impact Assessment for the Dalradian Gold Mine Project | An Taisce - The National Trust For Ireland](#)

[Text of the Convention | UNECE](#)

<https://www.newsletter.co.uk/news/politics/century-old-border-dispute-leaves-lough-foyle-unregulated-with-no-controls-on-imported-species-or-oyster-farms-487>

<https://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2021/infrastructure/54212.pdf>

Environmental Impact Assessment (EIA) The proposed Dalradian Gold Mine has raised serious concerns regarding transboundary environmental impacts, particularly to the River Finn, which flows into Co. Donegal. Some of the possible risks include

Water Pollution: The mine's discharge consent applications and abstraction licence applications could potentially contaminate the River Finn with hazardous substances impacting aquatic life and water quality.

Heavy Metal Pollution: Gold mining involves using chemicals, which are toxic to aquatic life and contaminates water sources.

Sediment Pollution: Construction and mining activities lead to increased sediment loads in the river, affecting habitats and species. This can cause problems for many years.

Habitat Destruction. The mine development will harm habitats and species in the Owenkillew and Owenreagh Rivers, which are connected to the River Finn.

Pollution impacts will cross the border from Northern Ireland into the Republic of Ireland affecting the environment and communities.

Planning Regulations: Whose planning regulations will apply, and how will decisions be coordinated between the two jurisdictions, this would need to be decided before any decision would be made on the goldmine. The border between the UK and ROI is in parts undefined, this would need to be addressed first before this planning proposal is even considered.

Water Management: The proposed goldmine will affect shared water sources, like rivers and aquifers, how will this be managed between the two jurisdictions and who will be held

accountable when pollution occurs, will both governments have the power to enforce and act when needed. A plan of action must be put in place before planning is even considered.

Community Engagement: The public inquiry the way Dalradian Gold is approaching it may not be compliant with the three pillars of the Aarhus Convention: Access to Information, the right to participate in decision making processes and access to justice. Transboundary Consultation respondents' risk being treated differently from the people who submitted statements of case to all 8 applications of Dalradian Gold which are being considered by PAC. They also missed out on a lot of information that was discussed the two and a half days the public inquiry was on. It will be impossible for communities to travel long distances to attend the Public Inquiry in person each day, anyone with a job or caring role will be excluded as they will not be able to attend in person. As small mostly rural communities, we do not have the means to pay for legal and expert help which seriously impacts our abilities to participate at the public inquiry on an even footing with Dalradian Gold who has investment companies with behind them. This inequality was noticeable on the couple of days the public inquiry was on by the considerable team of lawyers' and experts Dalradian had on show. I feel communities must be allowed the means to conduct this public inquiry on a more even footing with Dalradian also people unable to attend should be able to listen in from home and experts should be able to speak on zoom or similar technology, reducing the burden on communities to pay travel and accommodation, with no time table it is impossible to know when experts will be needed making planning impossible.

Wildlife Birds, fish and other wildlife do not recognise borders, Dalradian proposed goldmine will have negative effects on their habitats and endangering species already under threat on each side of the border.

This planning application could have serious consequences to the people and wildlife in the North and South of Ireland. Before it is even considered a lot of questions need answered on how the two jurisdictions will work together to ensure the protection of the environment. If at this stage Dalradian gold mine was allowed to go ahead without any proper commitment or plans in motion between the UK and the ROI of working together, it will spell disaster for the future, the first pollution accident would open a can of worms for example which government would pay the massive cost of cleaning up the Rivers if chemicals or heavy metals got in to it. Gold mining world wide is know for its destruction and pollution of land, air and water, many countries are left paying the cost after mining companies poisoned and polluted the land, air and water, this cost can run into billions, who will pay if the pollution was in Donegal but the source of the pollution came from Tyrone, will the UK government accept responsibility or would the Irish government be forced to pay for a goldmine forced on it by Northern Ireland. So, in my opinion this planning application must be refused.

Yours sincerely

