

email to: [planning@infrastructure-ni.gov.uk](mailto:planning@infrastructure-ni.gov.uk)

Dear Sir/Madam,

I wish to make the following submission to the Transboundary Consultation in respect of Dalradian's proposed goldmine in the Sperrins Area of Outstanding Natural Beauty.

I believe a proper Transboundary Consultation cannot be done when there is no agreement about where the boundary is. Both the Irish government and Crown Estate England claim ownership of Lough Foyle. This has been in dispute for over 100 years, since partition in 1922. This unique situation makes it impossible to submit a complete submission until the matter of ownership is resolved and the boundary is clearly marked.

Additionally, it is unacceptable to expect a submission to be completed without the benefit of a HRA (Habitats Regulations Assessment) - which has not been provided by DfI for the proposed goldmine (only the powerlines received a HRA). This is a fundamentally important document.

There are many reasons to oppose this proposed goldmine but I will focus on how air would be polluted.

### **Toxic Tailings**

Dalradian has applied to build a huge 54 metre high "Dry Stack Facility" to store their waste over the proposed 25 year life of the mine and in perpetuity thereafter. When the thousands of tons of rock are removed from the mine by the use of explosives\* twice daily, Dalradian state that the rock will be crushed into the fine consistency of flour and floated in a "simple chemical solution" to remove the gold ore. The waste would be stacked in the "Dry Stack Facility" which Dalradian states would need to be sprayed with water to prevent the dust, containing heavy metals such as arsenic, mercury, lead, cadmium, chromium, etc, from blowing in the wind. On the other hand, they also state it would have to be kept dry to prevent Acid Mine Drainage from forming. (That is a dilemma for them, how to keep it wet and dry at the same time!) Dalradian's proposed elevated site in the Sperrin mountains experiences strong winds as well as heavy rainfall. When dry, the toxic dust could be blown across the island of Ireland. When wet it could leach into the water table. A study in Finland found the fine dust, 2.5 particulate matter containing arsenic and mercury, had blown on to the leaves of trees 60 kilometres from a goldmine at Kittila. Jari Natunen, a Finnish Biochemist, said that this fine particulate matter was very dangerous as it could enter people's lungs causing respiratory diseases and cancers and that children are particularly vulnerable. (\*Explosives release Ammonium nitrate which is poisonous to humans and the environment)

### **Radon Gas**

The North West of Ireland is high in radon gas - if a person is building a house, he is required to put a barrier in the foundations to prevent radon gas exposure. Dalradian's proposed mine 900+ metres deep would release significantly more radioactive contaminants into the air. The link between radon gas and lung cancer is well established, according to the [World Health Organisation](#).

## **Diesel Emissions and Particulate Matter**

It is [well documented](#) that a high level 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 Environmental Impact Statements.

The construction of a heavy-duty powerline across the Sperrins Area of Outstanding Natural Beauty would contribute directly to climate change through the diesel emissions from the thousands of vehicles involved, as well as the removal of peatland and cutting down of trees to make a 10-metre-wide corridor, as referenced in the RPS report which accompanied the application for a heavy-duty powerline.

Additionally, this level of fossil fuel emissions well into the next decade, and past the legally binding date for net zero targets, has implications for climate breakdown that are far reaching well beyond the island of Ireland.

Dalradian's proposed site is approximately 18 miles/30 km from parts of Donegal so all the poisonous contaminants from the waste dust, explosives, radon gas and diesel emissions can be easily transported by air. People remember the sand from the Sahara desert and the red dust from the Aughinish aluminium mine in Limerick blowing over the whole country.

Air, like water, doesn't stop at borders!

## **Conclusion**

When one considers all of above emissions on the air and the resulting impacts on health, land and wildlife, the precautionary principle must be applied and Dalradian's applications refused in their entirety.

Name:

Address:

Date: