

Representations to AIL 1050 and AIL 1060

Response no	File Ref	Date of received
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Issue Number	Question Detail	Response number
1	The setting should be given central importance-the Sperrins AONB, the Owenkillew SAC, the Owenreagh ASSI, the Foyle River & tributaries system SAC & ASSI, the nearby RAMSAR site of the Black Bog, the SAC features of Mullan Woods & Drumlea Woods. No one in their right mind would consider putting a toxic goldmine & processing plant in such an environmentally sensitive setting	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20,21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,13,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145
2	Why should Dalradian escape the legislation associated with reservoirs? It is unbelievable that they could be allowed to build ponds containing 40,200m ³ ('clean water' pond) & 38,855m ³ (West Pond) & escape the legislation associated with reservoirs containing 10,000 + m ³ just because Dalradian's will be excavated below ground level	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20,21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,13,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145

<p>3 The application states that surface water from north of the proposed infrastructure site will be collected in the North Diversion Berm & directed to the 'Clean Water pond'. This is too vague and requires clarification. What size of area are they talking about in order to abstract 2,250 m³ per day?</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>4 Most of the area from which they are applying to abstract water is covered in peat, supporting blanket bog and wet heath habitats that are recognised as <u>priority habitats</u> in NI & are also listed under Annex 1 of EU Habitats Directive.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>5 These peatlands will be negatively impacted if their water is abstracted. "Peatlands are the largest terrestrial carbon store. They can store twice as much as all of the earth's standing forests, even though they only cover 3% of the world's land surface." (The Guardian 28/7/17)</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>

<p>6 Dalradian use annual average rainfall figures from Lough Fea as 1347mm, whereas MET Office Report on NI Climate (Oct 2016) states that the rainfall in the wettest places in the Sperrins is 1600mm & at Killeter forest in the west of Co Tyrone the annual average is 2000mm. Therefore Dalradian has downplayed the rainfall</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>7 Water quality in the Pollanroe Burn & in the Owenkillew River into which it flows will be negatively impacted as a result of this project. It is significant that Dalradian says 'ground water quality is not considered relevant to the abstraction licence applications!' The quality is of great concern to the public when they know that Dalradian propose to discharge a toxic mix of 24 heavy metals, fuels, acids etc into these "protected" rivers.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>8 Changes to groundwater levels will become more critical over the life of the mine. These changes will impact on groundwater abstractions, surface water and peatland.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>

<p>9 Dewatering of the mine will result in a drawdown of the surrounding groundwater resources.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>10 This 2020 report says that groundwater levels will return to near natural conditions around 15 years post closure of the mine. Dradian's earlier reports stated it would take 100 years post closure. No explanation for the big change has been provided. What is the public to believe?</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
<p>11 Abstracted mine water is calculated to be 1650m3 per day. Adverse impacts from this abstraction would be shortages of supply, increased pollution through reduced dilution and damage to habitats dependent on the water bodies.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>

12	<p>Water Framework Directive (WFD) requires river morphology to be protected to meet the ecological objectives of the Directive and for watercourses to maintain good standard. These abstractions are in contravention of the WFD.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
13	<p>These abstraction applications mention the impacts on the Pollenroe Burn, the unnamed watercourse and to a lesser extent on the Owenreagh River. They do not consider the fact that the Owenreagh joins the Owenkillev a short distance away and that both rivers and the Burns and watercourses that flow into them are in fact the headwaters of the Foyle River System.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>
14	<p>The cumulative impact of all these adverse impacts of these water abstractions has not been considered.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145</p>

15	<p>Furthermore, water is abstracted downstream at Newtownstewart for the Derg Reservoirs to provide a public water supply for 39,000 people. NIEA, in their 2019 report "Drinking Water Quality in NI" stresses the need to protect the catchment from which water is abstracted in order to improve the water quality & reduce potential contamination risks.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20,21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145</p>
16	<p>It is self-evident that the proposed two-year construction phase would disturb the natural ground surface cover of the headwaters of the Pollenroe Burn & will increase run-off rates in the proposed infrastructure site. This cannot be allowed as the sediment etc. would kill the Fresh Water Pearl Mussels (FWPM) in the Owenreagh River. Dalradian seems to think that 2 months or 2 years damage is negligible. They don't even appreciate the exceptional importance of protecting ireland's only globally endangered species, FWPM. Once they are killed, they are gone forever.</p>	<p>1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20,21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70,71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145</p>

17	The resultant increases in all flow conditions (average annual, monthly & low flow) surely must have potential to increase flood risks and result in out of banks flows, bank erosion and deterioration of ecological habitats.	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145
18	Dalradian has NO respect for the unnamed watercourse from which they propose to cut off its head and divert some of its flow, leading to major adverse impacts. Just because it has no named outfall does not mean it has no function in the Rive Foyle System.	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145
19	In view of the above impacts and risks, the precautionary principle must be applied and these abstraction licenses refused.	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,7,18,19,20, 21,22,23,24,25,26,27,29,30,31,32,33,34,35,36,37, 38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53, 54,55,56,57,58,59,60,61,62,63,64,65,67,68,69,70, 71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86, 87,88,89,90,91,92,93,94,95,96,97,98,99,100,101, 102,103,104,105,106,107,108,109,110,111,112,1 13,114,115,116,117,118,119,120,121,122,123,12 4,125,126,127,128,129,130,131,132,133,134,135, 136,137,138,139,140,141,142,143,144,145

20	This proposed abstraction requires a full Environmental Impact Assessment carried out by a recognised professional and a biodiversity survey, again carried out by an Ecology Professional. Without the EIA and the Biodiversity Survey this application and your subsequent decision is in breach of the EU Habitats Directive.	28
21	There has been absolutely no Transboundary consultation or notifications with the Republic of Ireland on possible impacts of the extraction on pathway receptors in the Republic of Ireland either via rivers, lakes and streams or via underground watertable, aquifers. This is contrary to EIA and Arrhaus convention assessment and agreements on transboundary projects, and therefore this application is not in accordance with international law.	66

These applications form an integral part of a much larger planning application for a goldmine, processing plant, LA10/2017/1249/F. The water abstractions & impoundment are intrinsically linked with other major parts of the project including the underground mining, blasting, discharges, exploration works, mine waste facility, an underground cavern for rock crushing and other plant, use of water throughout the entire site. Applications AIL/2020/0105 & AIL/2020/0106 are not self-standing nor can they be adequately assessed without considering the full project. The documentation submitted by Dalradian does not address the cumulative impact of all the essential & relevant aspects of LA10/2017/1249/F nor the in-combination factors impacting negatively downstream on legally protected waterways of the Owenkillev & Foyle River

Peat bogs are not only effective carbon sinks, but also important as natural flood alleviation because of the amounts of water they store. Dewatering them would have serious knock on consequences for flash floods and land erosion/ destabilisation events. The recent Meenbog disaster on borderland with Donegal and its knock-on effects on the Derg will focus minds in Loughs Agency and Daera as well as the public. In light of the new awareness all has changed: no longer must be corporate powers be allowed to lobby or massage away the environmental damage of big mining.

Considering the massive risks & environmental impacts, the interconnected proposals and the Carbon impact, these Applications require consideration at a Public Inquiry.

<http://www.legislation.gov.uk/nisr/2006/482/regulation/17/made> The

documentation submitted fails to acknowledge the scale & range of the risks nor the gravity of the potential negative impacts on the Foyle River Basin, It's as if the Dalradian Applications were marketing the proposal and focused on minimising the scale of all negative impacts & multiplicity of risks at that here. Dalradian presents a one-sided interpretation of the risk factors. It lacks objectivity and professionalism regarding negative impacts on these vulnerable and important waterways, home as they are to 'Ireland's' only globally endangered species, the fresh water pearl mussels.

Another factor not fed into the Abstraction Application details: Dalradian Gold has also submitted a separate application for a new mains water supply that is of scale that needs a new pumping station beside Greencastle Community Centre. The public water resource is at breaking point already, will be unable to cope. As recent as last May, NI water warned the public that: "Northern Ireland's water supply is facing a "network failure" as the hot weather continues. Des Nevin of NI water said: "If demand continues at this level it will lead to failure in our network and customers in certain areas will lose supply or suffer low pressure. Some customers over the past few days are already experiencing this, especially those on high ground. We are asking customers to help us, especially over the next few days where the temperature will continue to be above 20 degrees

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