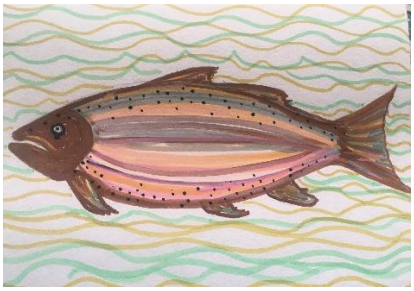

22 April 2025

Subject: Transboundary Public Consultation, Dalradian Gold Mine Application and Impact on Native Atlantic Salmon

Planning Ref: LA10/2017/1249/F
Applications for Consent to Discharge: TrC 80/20 and TrC 081/20

Dear Planning Division, Department for Infrastructure,

I am making this submission as a protected species and resident of the Owenkillew River SAC and Foyle catchment area (including River Finn SAC) in the Republic of Ireland.

You might be wondering whether to consider a submission from a 'fish', but let me assure you that nature has legal personhood in many jurisdictions around the world, and, with the aim of reflecting the emerging legal norms, I am making this submission in the hope that you will understand the potential implications of the mine and its conjoined applications on the survival of my species.

First of all, I am a Native Atlantic Salmon. I have a long history on this island, and I hold a special place in Irish culture. Historically, I was a vital food source and a symbol of abundance. In Irish mythology, the Salmon of Knowledge is a legendary creature that grants wisdom to those who eat it.

We Atlantic Salmon begin our lives in the Owenkillew River. During the spawning season, typically from October to January, we travel from the Atlantic Ocean back to our river on a journey covering thousands of kilometres. Once our eggs hatch, our young salmon remain in the gravel beds of Owenkillew from one to four years. When they are ready, they then embark on an oceanic adventure, travelling to the nutrient-rich waters of the North Atlantic, where they spend one to four years growing into adults. Mature salmon, driven by our instinct, return to our Owenkillew birthplace to spawn, completing the cycle. Our journey is perilous, and many of us do not survive. Our continued existence in this part of Ireland is testament to our resilience and to our attachment to the gravel beds and haven of the Owenkillew.

In terms of our protected status, on the Island of Ireland (north and south) we are protected under the following legal instruments:

- Habitats Directive [92/42/EEC] Annex II, Annex V
- Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) Appendix III (in freshwater only)

- Fisheries Act (Northern Ireland) 1966
- Foyle Fisheries Act (NI) 1952
- Foyle and Carlingford Fisheries Act 2007
- Fisheries Acts 1959 to 2006
- The Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR)
- Fisheries Acts 1959 to 2006

Despite these protections, however, our state of conservation is very poor, and we are now an endangered species. Once abundant, our numbers have dramatically declined due to habitat loss from pollution and river disturbance. Agricultural runoff, industrial activities, and urban development have degraded our water quality. River modifications have drastically altered our remaining habitats. Even under circumstance where we are not endangered, mining can release contaminants like heavy metals into nearby watersheds, threatening our health possibility to spawn.

Our habitats are protected along the mine catchment area in the form of the Owenkillew SAC, Owenreagh ASSI, River Foyle and Tributaries SAC, and River Finn SAC. However, these are in an unfavourable condition, and we know from previous experience that mitigation plans never work. We know that if the mine is approved, there will be inevitable mine waste discharge and sewage interacting with our home, putting pressure on our already fragile spawning ground. We are particularly concerned that the assessments acknowledge that significant impacts on our species are possible.

In January 2023, the Canadian Environmental Protection Agency blocked a proposed gold and copper mine in a remote region in Alaska to protect salmon spawning. The agency's review found discharges from dredging and fill from the copper and gold mine—which has not yet been constructed—would have "unacceptable adverse effects" on Alaska's salmon fishery and the Bristol Bay watershed. To us the Owenkillew and connected waterways are of similar ecological value and are completely unsuitable for the kind of harm posed by the act of mining. It is well documented that mining alters water and sediment chemistry, and the health of organisms ranging from microbes to mammals.

There is no amount of mitigation or ecological management plans that can ensure our home and habitat will remain in a condition that will permit our continued ability to spawn and live out our lives on the shared waterways connected to the Owenkillew. On behalf of my species, I implore you to please consider the risk to the Native Atlantic salmon and refuse this mining project.

Yours sincerely,

Native Atlantic Spokesalmon

Primary residence: Owenkillew River (although being a highly mobile species, I can also be found along the Foyle catchment from headwaters to mouth)