

Submission to

Leitrim Co. Council on the Draft Leitrim County Development Plan 2023-2029

For the

Treasure Leitrim Community Group

Regarding mineral prospecting and possible mining for gold and silver in North Leitrim. Treasure Leitrim is a group of residents in North Leitrim who are concerned about the potential of environmental and other harms that may arising out of prospecting and potential extraction of gold, silver and base metals in County Leitrim.

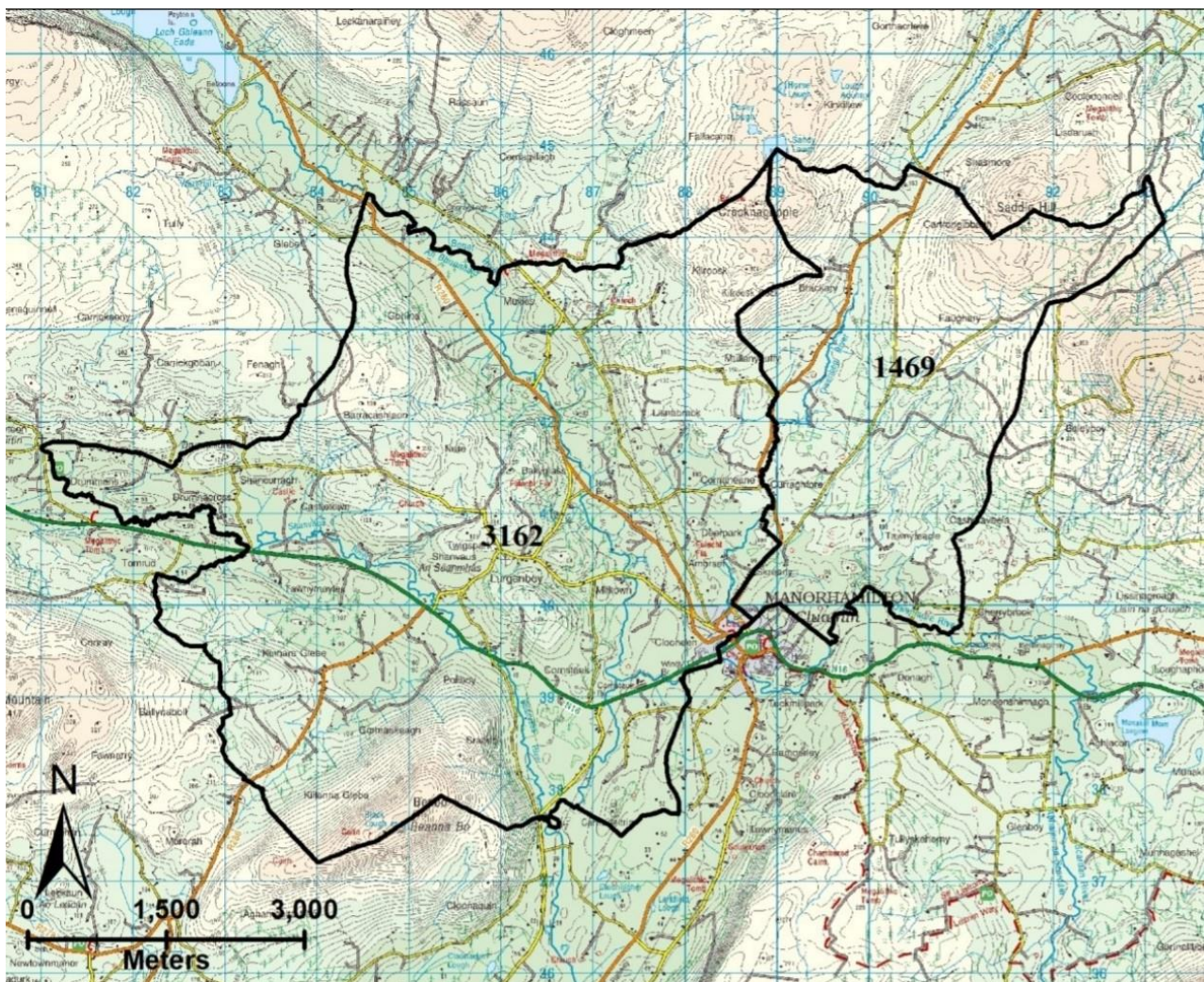


Figure ; Map of mineral prospecting areas granted by Eamon Ryan in 2022 .

North Leitrim is a very special, beautiful, largely unspoilt and historic part of rural Ireland and, for the sake of future generations, it is important that it is kept that way. Manorhamilton has an important built heritage with obvious elements dating back to the 16th Century, including the ruins of Hamilton's Castle. To the West, lies the area of Lurganboy and its quaint village founded by the Wynnes of Hazelwood, with connections to Templehouse, Lisadell, Florencecourt & Kilkenny Castle. Further West, the area of prospecting reaches into Glencar, whose natural beauty is internationally recognised and was infamously recorded by one of Ireland's great poets – W.B. Yeats.

Prospecting licence area(s)	1469 and 3162 – County Leitrim
Application number(s)	291389448 and 291389407
PL Applicant	Flintridge Resources Ltd
Number of submissions received	
By email	2,487
By post	19
By petition	31
Total	2,537
Prepared by	Geoscience Regulation Office
Date Published	19 April 2022

Galantas geologists believe that there is favourable structural setting for gold and base metal in the licenced areas with results so far been very encouraging as can be evidenced here from a report they submitted to the GSRO;

During the reporting period (2016-2018) Galantas geologists accessed additional historical publications via the GSI GOLDMINE website which helped to guide exploration work. In addition, we followed up on the rare opportunity to view and sample drill core that had previously been extracted in the Twigspark area, the results of which were encouraging. Most of the prospecting work centred on the Pollboy region, a favourable structural setting for gold and base metal mineralisation. Elevated pathfinder elements were found across areas of the inlier margins. These margins will be further explored during the next phase of the licence.

There is a growing body of evidence that the mining of gold is an energy intensive and carbon heavy process that has the potential to negatively impact on a wide range of areas including water quality, landscape, agriculture, tourism, and biodiversity amongst others. The carbon heavy, energy intensive nature of the industry is also not compatible with the sustainable future that we are trying to create for this and following generations. The possible development of such an extractive industry would be incompatible with our obligations to urgently tackle climate change and the worst impacts of the climate emergency. This matter has become more urgent with the granting of prospecting licenses for 47 townlands in the county. The Leitrim County Development Plan should reflect the unanimous will of Leitrim County Councillors who have registered their opposition to gold mining.

On the 19th of April 2022 the GSRO wrote to people living in North Leitrim to inform them that the decision had been made to grant mineral prospecting licences. The GSRO wrote;

The Minister is satisfied to grant the two licences to Flintridge Resources for base metals, gold (ores of) and silver (ores of). The decision has been taken following consideration of all the issues raised in submissions received and also an assessment of the application to ensure that the activity is licensed in accordance with relevant national legislation.

The Local Authority's Policy on mineral prospecting and mineral mining has become of the upmost importance now to the residents of Leitrim. Mineral extraction is mentioned in the Draft plan as shown here;

AGG RES POL 7

To ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact in the following areas:

- a) Special Areas of Conservation and/or Special Protection Area
- b) Natural Heritage Areas and Proposed Natural Heritage Areas
- c) other areas of importance for the conservation of flora and fauna
- d) areas of significant archaeological potential
- e) in the vicinity of a recorded National Monument
- f) sensitive landscapes

Treasure Leitrim recommend that the council develop specific policies that can deal directly and effectively with mineral prospecting, gold mining and the like. There are useful local government requirements in place around the world that help protect the local environment against the adverse impacts of mining. Mono, County in California uses a rebuttable presumption as part of their Code of Ordinances¹. Treasure Leitrim recommend that a policy should be added to the County Development Plan that would regulate processing with certain chemicals.

Mineral extraction Policy 1

Processing with certain chemicals—Rebuttable presumption.

It shall be and is hereby rebuttably presumed that any proposed processing operation located above or adjacent to surface or ground waters, or which could potentially impact such waters regardless of their location, that would use one or more of the following chemicals as a processing agent poses an unreasonable risk of environmental harm due to the toxicity of such chemicals and their demonstrated potential to cause damage to the environment: mercury, cyanide or cyanide compounds, breakdown products of cyanide, or sulfuric acid. Use of such chemicals shall not be permitted as part of any processing operation unless the project applicant can demonstrate, by substantial evidence, based on reliable scientific or engineering data, that the proposed use of such chemicals in a given project will not, under any reasonably foreseeable scenario, cause significant adverse environmental impacts. Scenarios considered shall include but not be limited to "best case," "average case," and "worse case" scenarios, taking into account any environmental contamination reasonably foreseeable over time from both natural and artificial causes, including but not limited to spills, leaks, and other releases or discharges resulting from potential design or construction flaws or miscalculations (if any), foreseeable errors or negligence (if any) of processing operators, as well as rainfall, snowfall, snow melt, floods, fires, earthquakes and other potential natural forces and events.

1

https://library.municode.com/ca/mono_county/codes/code_of_ordinances?nodeId=TIT7HEWE_CH7.10MIOP_7.10.03OPERE

We also recommend that an objective be included that identifies why the policy is required.

Mineral extraction Objective 1

to ensure that development of mineral extraction, processing and associated processes does not adversely impact the following;

- a) Special Areas of Conservation and/or Special Protection Area**
 - b) Natural Heritage Areas and Proposed Natural Heritage Areas**
 - c) other areas of importance for the conservation of flora and fauna**
 - d) areas of significant archaeological potential**
 - e) in the vicinity of a recorded National Monument**
 - f) sensitive landscapes**
- by requiring compliance with reasonable regulatory requirements designed to protect the environment.**

Thank you for taking the time to consider our Submission