



## Fermanagh & Omagh Draft Plan Strategy - Counter Representations Form

Hard Copies of the Draft Plan Strategy, all Representations received and our 'Guidance note for Making Counter Representations' are available for inspection during normal opening hours at the Council's offices at: 7 Shore Road, Enniskillen, BT74 7EF; Strule House, 16 High Street, Omagh BT78 1BQ; The Grange, Mountjoy Road, Lisnamallard, Omagh, Co Tyrone, BT79 7BL and; Townhall, 2 Townhall Street, Enniskillen, Co Fermanagh, BT74 7BA or may be viewed at <https://www.fermanaghomagh.com>

### How to make Counter Representations

You can make counter representations by completing this form, by email to [developmentplan@fermanaghomagh.com](mailto:developmentplan@fermanaghomagh.com) or by post to: Local Development Plan Team, Strule House, 16 High Street, Omagh BT78 1BQ.

For further assistance contact: [developmentplan@fermanaghomagh.com](mailto:developmentplan@fermanaghomagh.com) or Tel: 0300 303 1777.

### SECTION 1. Contact Details

Agent or Personal Submission - Are you submitting on behalf of someone or in an individual capacity?

Individual     Organisation     Agent (complete with your client's contact details first)

**First Name**

**Last Name**

**Job Title** (Where relevant)

Click or tap here to enter text.

**Organisation** (Where relevant)

Click or tap here to enter text.

**Address**

**Postcode**

**Telephone Number**

**Email Address**

**If you are an Agent, acting on behalf of an Individual or Organisation, please provide your contact details below.** (Please note you will be the main contact for future correspondence).

**First Name** Click or tap here to enter text.

**Last Name** Click or tap here to enter text.

**Job Title** (Where relevant) Click or tap here to enter text.

**Organisation** (Where relevant) Click or tap here to enter text.

**Address** Click or tap here to enter text.

**Postcode** Click or tap here to enter text.

**Telephone Number** Click or tap here to enter text.

**Email Address** Click or tap here to enter text.

## **SECTION 2. Counter Representation**

Have you submitted a representation to the council regarding the Draft Plan Strategy?

**Yes**                       **No**

If yes, please provide the Reference Number of your representation and a summary of the issue raised in your representation below.

See attached

### **Details of Your Counter Representation**

Please provide the reference number of the site-specific representation to which your counter representation relates to:

See attached submission

Please give reasons for your counter representation having particular regard to the soundness test(s) identified in the above referenced site-specific representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

Please see attached submission

*(Continue on a separate sheet if necessary)*

### **SECTION 3. Data Protection and Consent**

#### **Data Protection**

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any counter representation available for inspection. The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at [www.fermanaghomagh.com/your-council/privacy-statement/](http://www.fermanaghomagh.com/your-council/privacy-statement/)

**By proceeding and submitting this representation you confirm that you have read and understand the privacy notice above and give your consent for Fermanagh and Omagh Council to hold your personal data for the purposes outlined.**

#### **Consent to Publish Response**


The Council is required by law to publish your representation and make it available for inspection. Unless otherwise stated by yourself, this will include your name and postal address. Your personal telephone number, personal email address and signature will not be published.

If you do not wish for your name and postal address to be published please tick the box below.

**Please do not publish my name and postal address**

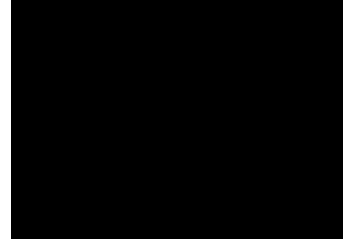
Please note: Even if you opt for your details to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner/Authority they appoint to oversee the examination in public into the soundness of the plan. This will be done in accordance with the privacy statement above.

**Signature**



**Date**

27/06/2019



27<sup>th</sup> June 2019

Development Plan Team  
Planning Department  
Strule House  
16 High St  
Omagh  
BT78 1BQ

### **Response to Draft Local Development Plan (LDP)2030**

Dear Sir/madam.

Please find attached a copy of my Counter Representation I would like to state at the outset that I wish to make a representation, with the possibility of an agent attending, to be heard orally at the independent Examination as per paragraph 15 of the PAC document procedures.

#### **Structure**

I strongly object to the predetermined structure, format and design of the draft local development plan. The authors of this draft plan have essentially predetermined a strict framework essentially making sufficient provisions to ensure that mining of precious metals and minerals plus the installation of wind turbines in site specific The Sperrins AONB is guaranteed, against the will of the people as per related LDP policies. This draft LDP has at no point allowed our people the opportunity to choose what we wanted or did not want in our area. Indeed many people, who endured the original online survey which had to be completed at one sitting, opposing the mine were totally ignored and these opinion were seemingly not carried through in the draft LDP. Did the same government departments/personnel input into developing the The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 and the Draft Local Development Plan?

The vast majority of FODC inhabitants do not want precious metal & minerals extraction or processing and the installation of more wind turbines, instead they want The Sperrins to be left intact and indeed, developed sympathetically as a core tourism destination. The FODC has essentially abandoned The Sperrins as an integral element of the tourism strategy, which has the potential to secure our economic livelihoods while safeguarding our environment for generations to come.

The travesty of this draft LDP is that by allowing or facilitating the industrialisation of The Sperrins, the Fermanagh and Omagh District Council (FODC) are putting at risk the health of our people, aiding the devastation of our environment and fundamentally destroying tourism, agriculture and fishing in this region. The focus on tourism and developing a truly sustainable tourism product, lasting generations is being abandoned for the financial gain to foreign corporations, with little direct benefit to our economy, to facilitate a short termism strategy to rape and pillage our lands of our natural resources. FODC, by pursuing this agenda and advocating this draft local development plan in its current form is complicit in facilitating the associated detrimental health, environmental and economic consequences of the industrialisation of the Sperrins.

FODC is now making itself financially liable for future health and environmental claims based on its role in designing, facilitating, advocating and implementing these toxic and destructive proposals. The Local Development Plan (LDP) is evidence of same. Local councillors should be made aware that based on Surcharge they are potentially liable for any claims for damages, in terms of water, air pollution, cancers, infra and ultra sound for wind turbines and brain and heart tumours, neurological disorders, Alzheimer's, DNA mutation, infertility etc for facilitating the implementation of 5G (shared telecoms).

A further instance, mentioned below, is at this stage of the consultation it is seemingly a condition, to be site specific - this is the local development plan for 2030 – who knows precisely what site will be used by then. This process has been designed to stifle opposition to the current draft local development plan proposal. It is certainly not transparent and accessible.

In terms of the The Planning (Local Development Plan) Regulations (Northern Ireland) 2015;

“site specific policy” means a policy in a development plan document which identifies a site

for a particular use or development;

“site specific policy representation” means any representation which seeks to change a

development plan document by—

(a) adding a site specific policy to the development plan document; or

(b) altering or deleting any site specific policy in the development plan document;

In terms of the Planning Act (Northern Ireland) 2011 and The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 there is absolutely no reference to a Soundness test hence this criteria should not be used in this process.

The Soundness test has been cynically utilised to confuse and put off the general public from actively participating in this process. This is clearly evident when at the Public meeting in Gortin, The Head of Planning for FODC publicly stated that she was unaware of the precise requirements of the soundness test, the criteria for assessment and indeed she concluded by stating that as this was the first time this soundness test was used that the Department might not be too strict in its application.

As per the Planning Act (Northern Ireland) 2011 it clearly details certain areas should be excluded from a simplified planning zone or development;

### **Exclusion of certain descriptions of land or development**

**38—(1)** The following descriptions of land may not be included in a simplified planning zone—

(a) land in a conservation area;

(b) land in an area which is—

(i) designated as a National Park under Article 12 of the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985 (NI 1);

(ii) designated as an area of outstanding natural beauty under Article 14 of that Order;

(iii) declared to be an area of special scientific interest under Article 28 of the Environment (Northern Ireland) Order 2002 (NI 7);

(c) land declared to be a national nature reserve under Article 18 of the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985;

(d) land of such other description as may be prescribed

This fails soundness tests C1, C3, C4, CE1, CE2 CE3 CE4

This draft local development plan has totally ignored this clause 38 (and its ethos) with a view to creating designations (Areas of Constraint on Mineral Development – ACMD, underlying capacity for wind turbines etc) linked to specific policies (L01-L03, RE01, TR01, PU01-PU02, WM01-WM04, NE01-NE03, MIN01-MIN04, HE01-HE08, TOU01-TOU04, DE01-DE05, HOU01, 03, 09-18, IB01-IB06, FLD02-FLD06 including all the Proposals Maps including those showing wind energy, conservation areas and environmental designations) seemingly with a view for the industrialisation of the Sperrins (ACMD/AONB) by the stealth use of exclusions/exceptions, mining of precious metals and minerals, allowance for permitting wind turbines and high structures (potentially linked to 5G) and unconventional hydrocarbon extraction.

The site specific policy representation action is as stated in the previous submission, to remove all elements of the above policies, including the exclusions, that allow these areas as detailed above in Clause 38 to be exploited or for mineral development in any manner e.g. DPS052, DPS047, DSP271

In terms of site specific counter representations, there seems to be a major conflict of interest with the key governmental departments submissions (e.g. DPS248, DPS250 and very apparently in Dalradian's Gold submission, given the long term and close relationship with a Canadian company (DPS271) intent on imposing the largest cyanide gold processing plant and mine network, in or around



the site specific “protected” designations as detailed in clause 38 above, given their roles in the aforementioned Planning Act 2011 and The Planning (Local Development Plan) Regulations (Northern Ireland) 2015. The elements of their submissions relating to this planning application, must be disregarded given this clear conflict of interest.

These governmental departments, all have included statements, to benefit this company and exploit the natural resources of FODC, by making arguments or provisions to essentially aid planning approval, ease planning and operational restrictions e.g. remove 15 years limitation (MIN01), or provide support for a controversial plan that the vast majority of the people of our district do not want as demonstrated from the 15,000 objection letters.

The submissions from these governmental departments, having essentially a vested interest, were working with this company (DPS271) since 2009 and are members of a Special Working Group regularly meeting to progress the planning application. These departments, given their current pro mining stance, are not working in the Public Interest of the vast majority of people in the FODC, take no account of the Precautionary Principle, and by their intervention failing to take into account the Aarhus convention, Climate change laws, EU environmental law & ECHR.

These governmental departments are essentially supporting this company’s planning application in a site specific development in the Sperrins AONB (ACMD), which will also have a negatively impact on ASSIs, SACs, Nature Reserve and a Ramsar Site, on a 997 hectare site, with plans for many more mines in its 122,000 hectare licenced land portfolio. The same governmental departments, having worked with local councils, should be fully aware of the full extent of this company’s plans (DPS271) regarding locations of other mines and as such should voice concerns to the true scale and scope of this precious metals and minerals strategy, with licences spanning most of the FODC land area. These failed the soundness tests C1, C3, C4, CE1, CE2, CE3

The key site specifics that this local development plan must do is to prevent in the future are: Precious metals and minerals extraction and processing in the Sperrins (including ACMD) including Uranium mining in Fintona area, Geological Disposal Facility in The Sperrins to store higher activity radioactive waste including Naturally Occurring Radioactive Materials (NORM) – DPS052, wind turbines in the Sperrins and the consequential health effects (Appendix 1), the roll out of 5G (appendix 2), an experimental technology that is medically and expertly proven to cause harm to humans and environment, in each town and then larger masts in the rural areas. These should be prohibited in the LDP, until it is proved that there are no detrimental health and environmental consequences.

Further to thoroughly reading the remit it is worrying to discover that the Counter representation should be limited to site specific issues based on Soundness. This is entirely wrong to limit and curtail the counter representation process. At no point was this constraint mentioned in the literature at the outset and from your attached email there is effectively no sound reasoning for this stipulation. This in my opinion has been designed to counter the large number of representations received during

the initial consultation period focused on opposing the proposed cyanide gold processing plant and the industrialisation of the Sperrins.

I demand, without prejudice, that in the interests of transparency, accountability and fairness that this counter policy representation period is extended for a further 8 weeks with this "site specific" restriction removed. The local development policy is indeed for the entire district council area and should not be curtailed to site specific instances. The overall Omagh Local Development Plan Draft Strategy was indeed very wide ranging and deliberately steered away from site specific policies in general.

Given that the various government departments made non site specific representations e.g. to remove the 15 years time limit, means that this counter representation is effectively meaningless. Given your constraint of being site specific means people are unable to challenge or counter these departments as their statements were effectively non site specific.

In my mind, this counter representation consultation being restricted to site specific policies is purely designed to allow Dalradian Gold (referred to as reference as DPS271), other exploration and mining companies plus commercial wind farm companies to justify their toxic projects.

To me this was a deliberate ploy particularly given that in the FODC area, DPS271, intends to build the largest cyanide based gold processing plant in Western Europe, to be located in Greencastle Co. Tyrone. The local development draft plan has been effectively designed around permitting valuable minerals development in our Council area, with carefully worded exclusions and exemptions to pursue the precious metals and minerals agenda, in the future.

Indeed DPS271 has only officially identified one mining site (997 hectares) in its planning application however DPS271 intends to develop a "mine camp" (Patrick Anderson, MD of Dalradian) on its 122,000 hectare exploration and prospecting licenced area. This counter representation does not allow us to address our concerns regarding the cumulative health and environmental impacts on same.

In the draft local development plan it is clear that specific policies and re-designations were designed to effectively decimate our AONB in pursuit of this industrialisation agenda. This seems to be clearly at the expense of our peoples' health, our environment and without any thought for our existing tourism product or our expanding tourism economy and its future potential.

The actual local development draft plan effectively airbrushed core issues such as the internationally designated RAMSAR site, the archaeological sites within The Sperrins/Creggan area including the Green Road, and demoting other Special Areas (SACs, ASSIs and Nature Parks) to permit the industrialisation of The Sperrins. This is without even having an opportunity to discussing the imminent plans to impose 5G (See Appendix 2), a proven unsafe experimental technology that is intended to be rolled out across the entire district, once again non site specific. For the purpose of this consultation I will quote Omagh town centre, but all towns, villages and rural areas apply.

To reiterate I demand, without prejudice, that in the interests of transparency, accountability and fairness that this counter policy representation period is extended for a further 8 weeks with this "site specific" restriction removed

## Soundness

To recap from the initial consultation and this counter representation consultation were based upon the principles of soundness. To gain information about this soundness test I attended a public meeting at Gortin, the presenter Deirdre McSorley (Head of FODC Planning) was asked about the soundness test, and to provide a worked example, she admitted that herself and her department were not familiar with the application of this principle and was unable to discuss it. When challenged how does she expect the public to provide constructive comments on the basis of soundness she stated that given that this was the first time that this was used, she hoped the evaluators would not be too stringent. When asked did all the criteria have to be addressed or merely one of the three, she nor her assistants knew this answer.

This information was evidently not available to all of the public hence to enforce the soundness principle is clearly wrong and must not be used in the evaluation process to judge comments. Unbelievably this principle is still central to this stage of the counter representation consultation process.

Given the size, scale and complexity of this this exercise, the lack direction based on the aforementioned points, the limited timeframe, this letter will detail the key issues in relation to the draft strategy which will be elaborated upon at the oral hearing. Based on the Soundness criteria I will initially show that FODC has not applied this test.

It seems that FODC has unilaterally adopted a precious metal and minerals strategy, and indeed the industrialisation of the Sperrins areas (AONB – site specific) with total disregard to the local communities, while ignoring the main focus of the Strategic Environment Assessment (SEA) and consequently the related European Legislation, Regional Development Strategy (RDS), 2035, Habitats Regulation Assessment (HRA), and Strategic Planning Policy Statement (SPPS). The entire draft LDP has failed to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fail to comply with the Aarhus Convention and the Climate change legislation.

## Site Specific

In terms of the Site Specific location I will be using The Sperrins AONB in the ACMD with particularly significance placed on the 997 hectares related to DSP271's planning application, that they continually refer to in their submission.

The proposed cyanidation gold processing plant and mine network including mercury smelting plant, currently seeking planning permission, is a Site Specific reference. This is the catalyst for the rollout of the precious metals and minerals agenda that

will detrimentally affect the health of the people, environment and economy (tourism, agriculture and fishing) of FODC prior to be the forerunner to the storage of radioactive nuclear waste, based on the current policies, strategies and infrastructural works undertaken and planned.

The proposed toxic project is situated in an Area of Outstanding Natural Beauty, less than a kilometre from the local 160 pupil primary school and pre-school, community centre, playing fields & church. It is on an elevated hillside (approx 300m above sea level) exposed to wind, snow, rain with numerous underground water channels, ideal to spread pollution, and certainly not suitable for a proposed dry stack tailings storage facility.

The majority of local people are completely opposed to this toxic proposal and the associated health and environmental risks. The toxic discharge into the local rivers includes acid water (sulphuric acid), Mercury, lead, cadmium, chromium, Zinc, copper, arsenic, lead, nickel, etc. The area has one of the highest radon levels in the UK with an increased risk of radioactivity damaging people's health.

Dalradian proposes to use 2 tonnes of cyanide per day, 365 days a year, where one gram of cyanide is enough to kill an adult human.

The huge toxic waste storage facility will be 895m by 365m by 53m high – 17 storeys high – when exposed to the air will release toxic chemicals such as lead, arsenic mercury, zinc and cadmium. The chances of skin, kidney, respiratory illnesses or cancers are high. This toxic tailings dust, given the elevated site and high wind levels, will spread widely to agricultural land, be ingested by native wildlife/agricultural animals and enter our food chain.

All of the mine related figures come from DPS271's own application, which is dealing with only ONE mine on a 997 hectare site. DPS271 has licences for 122,000 hectares. The requirements for this ONE mine is: Settlement ponds is 145million litres is toxic waste, 4.3m litres of diesel to run plant annually, electrical power equivalent to run 15,000 homes annually, 750,000 litres of water per day with the company claiming that it will come from rain water and recycling, this is fantasyland as they intend to use underground aquifers hence destroying our rivers and water table – this will be necessary when it is scaled up for the other mines. All government departments, like DPS271, has focused on this single application, despite DPS271 announced the Mine camp scale of this enterprise. All departments have been working with DPS271 for several years hence by not addressing these issues in this LDP they too are negligent.

On 28 April 2017 the European Parliament voted with an unprecedented and overwhelming vote of 566 in favour and 8 against for the European Commission to ban the use of cyanide-based mining in the European Union as soon as possible. Our Civil Servants, political parties and FODC are actively working to impose this toxic enterprise in this beautiful part of the world, sure to be detrimental to our health and environment. Our local development plan must NOT facilitate this destruction.

This particular application will inevitably directly impact on our major waterway flowing into the Strule, Mourne and then Foyle Basin. Even without pollution incidents DPS271 and the NIEA are in court as part of a judicial review to get the judge to rule that NIEA's original increased consent levels, be upheld. This I believe increased the consent discharge levels of 9 elements with, I think zinc, up to 10 times the current permitted levels. This is apparently a kill licence for aquatic life, given that there are protected pearl mussels and salmon in that stream, they effectively have no chance – cumulative build up.

This coupled with the fact that NI Water only monitors and treats a select number of elements in its water treatment plants, the toxic sediment released from the cyanide processing will go directly into our drinking water, particularly heavy metals which are not even tested. NI Water must be held accountable based on health and environmental impacts. The LDP must be written so as to ensure that no precious metal and mineral mining should occur unless all potential contaminants are identified, EU consent parameters established, monitoring plan in place and most importantly a commitment that all water treatment plants are capable of providing clean drinking water, free from contaminants & heavy metals including lead, which it doesn't do at present. This has been completely ignored in DPS251

DPS271 intends to blast 1700 tonnes of material a day, grind to a the consistency of a fine sand, increasing volume and surface area, resulting in dust, PM10 and PM2.5. This ground material, will be placed on a tailings dump to be 895m long, by 375m wide and up to 17 storeys high (53m). The dust, when processed, will also contain things such as arsenic, lead, zinc chromium plus whatever inherent radioactive properties they possessed.

The PM10 dust will spread for many miles just look at the Sahara dust. However the PM2.5 can spread hundreds of miles.

With PM2.5 when you breathe this dust, given its fineness, it stays in your lungs.

This tailings dump will be situated 300m above sea level, on top of a mountain, having extremely inclement weather (wind, rainfall and lower temperatures - not suitable for a dry stack tailings dump) being only over 1 km from schools with 160 pre school and primary school pupils and Greencastle village a little further. Pregnant women, elderly and young children are the most susceptible to this.

To dislodge the 1700 tonnes, for this single mine (going to be many more throughout the country) there intends to be 2 blasting times, with two blasts with each blast having up to 25 explosive charges. This will happen 365 days per year.

To put things into further perspective, given the amount of explosives, the storage of up to 20 tonnes of cyanide on site, the mercury smelting facility, the cocktail of other dangerous chemicals, the smelted gold onsite, Greencastle will become the largest militarised facility we have seen. Is this what we want in our LDP – what will be the impact on tourism then.

### Security

Incidentally, if DPS271 gets its way all policing costs will be picked up by the taxpayer, possible with contributions from FODC as they permitted this development as part of the LDP.

DPS271, when mining its tiny exploration adit (small tunnel), had to have PSNI security for the delivery of explosives. After 8 months the PSNI sent DPS271 an invoice for £440,000.

Dalradian is disputing this in court. If they win the PSNI will be forced to police not only this mine, but all of Dalradian's other mines plus the mines of other mining companies. This will potentially cost us the tax payer tens of millions of pounds per annum.

Bear in mind, gold and silver is tax exempt, the only party after Dalradian's shareholders to benefit is the Crown Estates, receiving 4% of revenue. FODC or indeed NI assembly will not benefit from this precious metals and minerals strategy. Our health service, education service or welfare services will not benefit. Instead our health services will be burdened with the resultant additional health issues(respiratory, cancers, neurological, dermatological, mental health, etc)

Bear in mind tourism in this area has grown substantially particularly in the past 25 years. You would have witnessed a marked improvement in the tourism project since 1987, all this to be put in jeopardy for what, a mine which will be operational for at best 20 years. The loss of sustainable jobs in our tourism and agricultural industries will grossly outweigh the few local job offered by mining in the short term.

Ammonia, a by product of DPS271's proposed toxic cyanide gold processing plant, largest in Western Europe, to be situated in Greencastle Tyrone. NIEA is not too concerned with this, at all. This fails to be considered in Climate Change Legislation and AARHUS convention, EU legislation, hence breaching soundness test P3 C1, C3, C4, CE1, CE2

Just 5km from largest raised bog in Europe, The Black Bog, an internationally designated RAMSAR site, also ASSI and Natura 2000 site, which DPS271 has effectively ignored in their 10,000 page planning proposal.

Bear in mind this planning proposal essentially ignores or downplays the detrimental impact on the Black Bog. DPS271 plans 256 daily trips (365 days per year), vast majority by lorries, with associated diesel pollutants and CO2 emissions, these are the journeys that DPS271 has admitted for this application.

Bear in mind DPS271's proposed plan is based on 997 hectares, however DPS271 will have many more mines given it has exploration licences for 122,000 hectares.

Several hundreds of daily journeys will be on these roads that NIEA, DfI or any other civil service department have not taken into account of. DPS271 continues to insist in public correspondence that as it is not on their application nothing else can be considered. There seems little hope for The Black Bog!

DPS271 has been working with the civil service departments for many years hence they have obviously been following their advice! How to successful gain planning approval!

The real issue is 25% of the land area of the north has been sold to these prospecting companies. How much additional pollution will this bring then?

The irony is our main political parties and civil servants are actively pursuing this toxic precious metals and minerals agenda by stealth, hidden from our people, yet at no point have they considered to undertake regional environmental, health or economic assessments and the cumulative effects.

Fermanagh and Omagh District Council (FODC), has attempted to downplay the significance of The Black Bog, explicitly creating simple exclusions in the draft Local Development Plan to allow them to essentially destroy it.

The council should be using the Local Development Plan to safeguard this unique living wetlands having already taken several thousands of years to grow. Indeed FODC should use the Local Development Plan to protect our Ramsar sites, ASSIs, SACs, nature parks and AONB, instead of deliberately creating loopholes to allow mining and the saturation of wind turbines, as part of it's industrialisation of the Sperrins plan .

The reality is our people are the only protectors of our land and environment, we have been totally betrayed by the civil service departments and politicians.

### **Jobs – dependent on the site specific implementation of this cyanide gold processing plant and mine network**

Currently FODC is essentially in full employment. Civil engineering companies are unable to fill vacancies across the board, from professionals to skilled/unskilled staff so when an organisation comes into an area, claiming to offer 25%-30% more in wages this can only make the existing companies less competitive.

Now lets just take displacement of tourism jobs as a start. It is projected that Northern Ireland will employ 55,000 people in tourism related jobs by 2020, generating £1bn annually. This will all be thrown into turmoil is a precious metal and minerals policy is pursued. TOU01-04, fail soundness tests PE3, C1-4, CE1,CE2

Currently Omagh & Fermanagh district employs 3500 in tourism, with a tourism revenue of £54m per annum – 2016 (NISRA.gov.uk). Lets take a modest growth of 3% per annum over 20 years (NI Exec using 6% growth) – this equates to 2821 new



sustainable local jobs, generating additional tourism revenue of £43.5m after year 20, if tourism continues on its current path.

Contrast that to the scenario where this toxic cyanide processing plant was operational then lets assume a very modest 3% decrease in jobs equating to an overall reduction of 1163 jobs by year 20, reducing tourism revenue by £18m.

The difference in both scenarios would mean the economy would be less well of by approximately 4000 jobs/job opportunities and by £61m. The 350 “local” jobs don’t even register when being realistic.

The NI Executive departments have not undertaken a regional environmental, health or economic review based on the precious metals and minerals agenda hence cannot meaningfully make an input in this process. They are in full knowledge of the potential hazards and impacts however they have failed initiate these reports.

Now, fundamentally, bear in mind that according to DPS271’s annual report March 23 2018 the Life of the Mine is now 10.5 years. Are we going to jeopardise our health, environment, tourism and agriculture including displacement of thousands of jobs in tourism/agriculture/food processing for this unwanted Canadian opportunist?

In terms of site specific As identified in the draft Tourism Strategy 2010 it was stated RG 4: *Promote a sustainable approach to the provision of tourism infrastructure* by improving facilities for tourists in support of the Tourist Signature Destinations, including Fermanagh Lakelands and Tyrone & Sperrins. Instead of the promotion of tourism our in the Site specific Sperrins region the civil service aided by our local council denied tourism investment in the Sperrins. Sperrins Tourism a grass roots tourism body was specific funding for tourism in The Sperrins with drawn including

2.6:

- Promoting a balanced approach that safeguards tourism infrastructure while benefitting society and the economy;
- as identified in the draft Tourism Strategy 2010;
- Encouraging environmentally sustainable tourism development.

This site specific project is the catalyst for the rollout of the precious metals and minerals agenda.

25% of our land area is licenced for precious metals and minerals exploration, which foreign companies are actively pursuing, many having been financially incentivised to be here.

Our civil service departments fully supported by all our main political parties are intent on pushing this agenda through hence all their opinions are biased and should be disregarded in this process.

Their aim is to have gold, silver, cobalt, lithium, potentially copper, zinc and definitely uranium mines located throughout this region, with the intention later for fracking and lignite extraction.



The catalyst of this plan is to have the largest cyanide gold processing plant in Western Europe to be situated in Greencastle Tyrone. The NIEA and Dalradian are currently taking legal action to ensure the current water standards are very relaxed to essentially pollute our water. Water which we drink.

Our water treatment plants do not test for or treat heavy metals, a definite by product of precious metal mining & processing, hence we will be consuming these chemicals essentially oblivious to our regulatory bodies.

There are no plans for modernisation of water treatment plants, given the vast expense, so our people will effectively be slowly poisoned, all in the knowledge and authorisation of our civil servant departments, supported by the political parties.

This will be permitted as we do not have an Independent Environment Protection Agency (EPA) and the NIEA's role is to primarily support the developer, in the pursuit of economic growth, regardless of risk, providing the developer can get their consultant to produce a report stating same.

The health of our people, by the direct impact of this precious metals and minerals policy, specifically in terms of water and air pollution, will inevitably be put at risk.

The civil servant departments, supported by our political parties, have clearly placed economic growth, to be more important than our health in terms of what is best for the public interest.

Incidentally there has been no regional health, environmental or economic impact studies on the implementation of this precious metals and minerals strategy. The cost benefits in terms of health, tourism, agriculture and environment would greatly outweigh any financial gains.

The only winners would be these foreign mining companies and their shareholders.

The Sperrins despite it being an Area of Outstanding Natural Beauty, has been designated an industrialised zone with a plan for several commercial wind farms prior to it being used for the storage of higher activity radioactive nuclear waste.

The underground higher activity radioactive waste geological storage facility was sanctioned by the SF/DUP NI Executive, supported by all main political parties, and is in legislation in The White Paper - Implementing Geological Disposal July 2014. This decision will be imposed on us by Westminster government who have given themselves power to do so in July 2015, by declaring this of national significance.

Our MLAs are intentionally not back at Stormont until these decisions are directly taken by Direct Rule, SoS or a sacrificial Head of Civil Service. For any future credibility our political leaderships cannot be seen to be directly involved being implicated with these toxic poisonous plans.

The above activities will make us an industrialised mining and wind energy region, with industrialised intensive farms, being the dumping ground for the UK and

Europe's nuclear waste, however if Brexit occurs, we will be the global nuclear waste receptacle, namely USA, Japan, Australia and Canada.

This will all detrimental damage our water and air supplies.

## DPS271 – Counter representation

Please find attached a counter representation against DPS271. This organisation is intent on dictating the contents of our Local Development Strategy to pave the way for a precious metal and minerals strategy, that if allowed to proceed will destroy health, our air, our water and decimate our tourism, agricultural and fishing industries and forever more destroy our environment. This site specific area relates The Sperrins AONB, ACMD essentially the area where this representation is seeking planning permission 300m above sea level, 1200m from two pre-primary schools with 160 pupils.

A 400 page submission was lodged by DSP271 and they have failed to be transparent. This organisation having totally insisted on the deletion of all the policies, even those relating to tourism (TOU01) as it may affect their mining operations.

This organisation has shown total disregard to our people, refused to engage with the local groups (having been invited to information evening on many occasions by CAMIO) and to our council with their total disregard to our LDP.

Likewise this company has the audacity to insist that no buildings should be build in this area yet DSP271 is prepared to build an absolute monstrosity of building 300m up a hill, some ranging 28m in height and over 100m long, a tailings dump 895 long, 375m wide and 53m high (17 storeys). Strangely but as eluded to in the opening section of this report DPS271 keeps referring to C3. C3 does not refer to any governmental policy but instead to what DPS271 has agreed with the Department in this “cosy” relationship where there is a vested interest to seek approval of this planning application.

*C3 Did the Council take account of policy and guidance issued by the Department?*

The references to C3 which DPS271 deems to have failed the Soundness test is all cloak and daggers. It seems to totally contradict the current planning Act, the Regional Development Strategy, the previous local development plan, the SEA and SSPS. I find it incredulous that C3 is used so often in an attempt to delete policy clauses not to the liking of DPS271. This policy and guidance referred does not seem to be in the public knowledge, certainly not in the public interest, it is not transparent while going against existing policies and strategies that the local communities were forced to abide by for years. Special treatment?

DSP271 objects, in red, to the following policies in its entirety despite it being a foreign company, having no experience of running a functioning gold mine let alone operating the largest cyanide processing plant in Western Europe in this Site specific AONB as in the ACMD.

### *MIN01*

*The Council is proposing that the full extent of the Sperrins AONB, which falls within the Council area, is designated as an Area of Constraint on Minerals Development (ACMD). The draft policy conflicts with and is inconsistent with the approach set out*

*in prevailing regional policy. The draft policy would result in the unjustified sterilisation of large areas of mineral resource. Dalradian opposes the introduction of a 15 year restriction on the extraction of minerals within an ACMD as this has no basis in regional policy. It does not reflect the operational practices of the minerals sector and is not justified. The draft policy is unsound as it fails tests CE2, C3 and CE4.*

Firstly this is deflection as the exclusions and exemptions allow this company to mine wherever they want this test just need to get an exemption. These exemptions must be removed from MIN01 to secure the safety of this AONB. If this project 997 hectare site located in the site specific AONB/ACMD is granted planning permission then will be the catalyst for many more mines in the DSP271 122,000 hectare exploration and prospecting landbank area. Given that the nearest processing plant for low grade gold is in the USA many other companies will be destined to trundle along the beautiful Tyrone roads, causing pollution and congestion. The Sperrins and our way of life is not worth that sacrifice. Fundamentally DSP271 objects to the 15 years for extraction of minerals given that we are talking of two entirely different processes. Minerals development (aggregates – sand and gravel) has occurred here for generations and as detailed in The Planning Act 2011, adhering to the Regional Development Policy and fully reflected in the operational practices of the minerals sector which was fully justified, with no fundamental issues to date. This relates to the core issue that these departments, like DPS271, have conflated the term minerals development to include value minerals such as gold, silver, copper and zinc (site Specific ACMD/AONB). In the Regional Development Policy, Strategic Environment Assessment (SEA) and Strategic Planning Policy Statement (SPPS) references to minerals development solely relate to aggregates (sand and gravel). Precious metals and minerals is an entirely different scenario requiring toxic chemicals for processing, much more stringent environmental legislation, greater controls and monitoring, tighter control mechanisms, bond and warranties, greater ancillary services, more stringent water and air testing, substantial bonds and warranties in place, detailed closure, remediation and monitoring plans in place for at least one hundred years – this is not like an ordinary gravel pit.

This fails on P3, P4, C1-C4, CE1-CE4

#### *MIN02*

*We object to this draft policy in its entirety.*

*The Council is proposing to introduce a policy on the restoration and aftercare of mineral sites. This draft policy is more onerous than the existing policy position set out in prevailing regional policy as it proposes that materials for the infill and restoration of sites should be sourced from within the site. This draft policy not in conformity with the SPPS and therefore fails soundness test C3.*

However according to DPS271 MIN02 – restoration and aftercare should be deleted. This shows how responsible this company really is. These failed the soundness tests C1, C3, C4, CE1, CE2, CE3. This AONB has to be protected. As stated previously the cost of restoration is totally different for precious metals and minerals as it is for minerals (aggregates). Acid Rock having the ability to pollute rivers for thousands of years, tunnels down to depths of 900m, in the highest radon areas in the UK, with

the potential of uranium and radiation from Chernobyl, with the DPS271 stating that water will be only be back to near its quality after 100 years (no guarantees of any of this as one does not know the devastation caused by tunnelling through underground aquifers. Typical remediation of a gold mine is \$200m - \$350m. This is only one mine, 997 hectares of a potential 122,000 hectares that DSP271 has acquired licences for. Strangely DPS 271 is vary happy to use the Planning Act 2011 Part 3 Clause 53 limited to only 5 years when the aggregates(sand and gravel) legislation suits the company. If this was allowed the taxpayer will be paying potentially billions for all the planned mining allowed in the region. This is really frightening. A financing bond and warranty, covering total closure, remediation and monitoring(1000 years) should be established at the outset of works to safeguard the taxpayer. This has to be established at the outset and checked periodically for validity to ensure that the company does not go into administration overnight. This failed soundness test P1, C1, C4, CE1, CE2 and CE3.

### **MIN03**

*We object to this draft policy in its entirety.*

*The Council's approach is flawed. As, properly understood, Section 4 (Paragraphii the failure to detail Mineral Safeguarding Areas (MSAs) is inconsistent with the decision to identify ACMDs. Without properly understanding the extent of reserves, it is not possible to robustly define areas of ACMDs, as existing operations and known mineral resources will and do exist within these areas and should be safeguarded. The draft policy fails soundness tests CE1 and CE2*

*Once again this statement is clearly coming from DSP271 whereby the only motivation this company has is greed and maximising profits. The entire AONB should be a MSA, without exception. The planned location which DPS271 keeps referring to in its 400 page submission is totally unsuitable. It is 300m above sea level, in an area known to have highly inclement weather, highest radon levels in the UK, 1200m from 2 schools with over 160 pupils and overlooking watercourses that flow into the Strule to provide drinking water to 15,000 people. This entire region should be destined a MSA – no exceptions. If this is deleted it would fail soundness tests P3, C1, C4, CE1, CE2, CE3.*

### **TOU01**

*We object to this draft policy in its entirety.*

*The Council is seeking to introduce a policy which seeks to protect tourism assets from inappropriate development. The draft policy is, however, in conflict with and inconsistent with the approach set out in prevailing regional policy. The draft policy is unjustified.*

*The draft policy fails to meet soundness tests C3, CE2 and CE3.*

The aim of the FODC should be to create a local development plan that specifically safeguards our Special designation areas, prohibits the extraction of precious metals and mining as the cost of our tourism industry(DPS271). They claim not to be able to identify the tourism assets which is fundamentally the case in point, why this company should never be allowed to extract anything from our . This company does

not appreciate the sheer beauty of this location, has taken time to identify and review the magnificent tourism assets all it. Than AONB by its designation is the tourist asset, the sloping hills, flora, fauna, magnificent skyline, the meandering paths, clear and pristine flowing river securely housing the fresh water pearl mussels, the precious Green Road, the various archaeology located in the magnificent mountain scenario with various accommodation (B&B) units, An Creagan, An Clachan, to name but a few. The long term sustainable jobs from tourism vastly outweigh any short term mining jobs fulfilled by external labour while cherishing our tourism product for future generations. *If this is deleted it would fail soundness on P3, P4, C1-C4 and CE1-CE3.*

*We object to this draft policy in its entirety.*

*The Council is proposing an extension to the Beaghmore ASAI on the basis of a proposal from DfC HED to extend the ASAI. The proposed extension is not justified. The draft policy fails soundness test CE3.*

*Once again the AONB should not be violated, the ACMD should have no exceptions and DPS271 is now dictating planning policy by stating the proposed extension is not justified. What gives this foreign company the right to determine the size of our ASAI's and over rule the DfC HED? If this is deleted it would fail soundness test P3, C1, C3, C4, CE1 & CE2*

**L01**

*We object to this draft policy in its entirety. Draft Policy L01 is unsound. The draft Policy is based on flawed evidence. The draft policy is contrary to and inconsistent with the provisions of the prevailing regional policy. It fails soundness tests CE2 and CE3.*

*The draft policy reads;*

*“Development proposals that would impact negatively or work to erode the distinctiveness of the Sperrin AONB or its setting, when considered individually or cumulatively alongside existing or approved development, will not be permitted.”*

*This is a very reasonable policy for the Sperrins AONB. Only companies that would plan to be building a total monstrosity would object to this clause – DPS271. There should never have been a consideration regarding this policy. If this is deleted it would fail soundness tests P3, C1, C3, C4, CE1 & CE2*

**PU02**

*We object to this draft policy in its entirety.*

*This draft policy does not provide sufficient flexibility to assess proposals for overhead powerlines associated with minerals developments which are often time limited and subject to restoration requirements. The draft policy fails soundness test CE3 and CE4.*

*Once again DPS271 is seeking special consideration for overhead powerlines that traverse an ANOB. All powerlines should be forced to go either around the AONB or underground. This fails soundness tests P3, C1, C3, C4, CE1 & CE2*



Also the The Council is proposing that powerlines will only be permitted where:

- “They avoid Sensitive Locations and Features;
- They have no unacceptable impacts on residential amenity or other sensitive receptors;
- Within urban areas, they cannot be provided underground or along external surfaces of buildings; and
- They comply with the with the 1991 International Commission on Nonionising Radiation Protection (ICNIRP) guidelines.”

*The ICNIRP guidelines are totally out of date and are very dangerous to both humans and flora and fauna in relation to shared overhead apparatus using 5G. According to Professor Martin Pall these guidelines are out by a factor of 7.2million. By agreeing to this we are effectively causing genocide and ecocide. Given that this is now mentioned here all departments must consider it. The policy of Surcharge make individual councillors liable for future costs arising out of damages, compensation or arising out of negligence, for instance.*

#### **TR06**

*We object to this draft policy in its entirety.*

*The Council is proposing a policy that would prohibit development where it would prejudice the reuse of disused routes as a transport route or a recreational, nature conservation or tourism-related use. The draft policy is unsupported by evidence. The draft policy fails against soundness test CE2.*

*This policy is sound and should be retained. The Green Road, dating from 10<sup>th</sup> Century was an arterial route and was used by O’Neills to go from Tullyhogue fort to Donegal. This road and surrounding area should be designated on Map 1 given the potential for archaeological features. It also come under HE02 – Archaeology*

#### **HOU9**

*We object to this draft policy in its entirety.*

*The Council asserts that development of replacement dwellings is an opportunity to upgrade housing stock whilst minimising landscape and visual impact, however no evidence or assessment has been provided to support this statement. Section 7 (Paragraph 7.1 to 7.7)*

#### **iii**

*Furthermore, applicants seeking permission for this type of development will not be required to submit a visual assessment of their development. The draft policy therefore fails against soundness tests CE2 and CE3.*

*Once again DPS271 is seeking special consideration over and above the general population who lived there for generations. It is nigh impossible to get planning for new house hence this is a good and positive policy bringing people back into the countryside, allowing families to be reunited (son/daughter not forced to move elsewhere) while enhancing the countryside. By not doing this policy this will fail soundness test P3 CE1, CE2, CE3 C1, C2 C3,C4*

*Draft Policy HOU11*

*We object to this policy in its entirety.*

*There is insufficient evidence to support this draft policy. The draft policy is inconsistent with current regional policy. Relaxation of existing policy would increase development in the countryside but there has been no assessment of the capacity of the landscape to accommodate such change.*

*The policy fails against soundness tests C3 and CE2.*

*Once again DPS271 is seeking special consideration over and above the general population who lived there for generations. This is actually in keeping with the Regional Policy and indeed regards SSPS. It seems rich from DPS271 that there has been no assessment of capacity when DPS271 has only declared what it will do with 997hectares of its 122,000 hectare licenced portfolio.*

*It is nigh impossible to get planning for new house hence this is a good and positive policy bringing people back into the countryside, allowing families to be reunited (son/daughter not forced to move elsewhere) while enhancing the countryside. By not doing this policy this will fail soundness test P3 CE1, CE2, CE3 C1, C2 C3,C4*

*Section 7(Paragraph 7.8 to 7.13) Draft Policy HOU13*

*We object to this policy in its entirety.*

*This draft policy is inconsistent with prevailing regional policy. Regional policy does not include such a policy requirement or identify that LDPs should include policies for such purposes. The policy fails against soundness test C3.*

*Section 7 (Paragraph 7.14 to 7.16) Draft Policy HOU15*

*We object to this policy in its entirety.*

*This draft policy is inconsistent with the prevailing regional policy. Regional policy does not include such a policy requirement, nor does it identify that LDPs should include policies for such purposes.*

*The policy fails against soundness test C3.*

Once again DPS271 is intent on creating a desolate barren wilderness, which seems to the end game for this foreign company given the number of housing related policies they are attempting to have deleted. Soundness test CE3 is used again in this instance. These polices should remain intact or indeed should category state that regional policy by creating sustainable development in the rural area.



Below is a some examples of where the Draft LDP failed to meet the soundness test however I am really only touching the surface of issues. The site specific element is the The Sperrins AONB/ACMD (DPS271)

#### Procedural tests

##### *P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*

Community involvement specifically from the people of Greencastle, has been ignored at the expense of mineral development (precious metal and minerals specifically), designation of areas, furtherance of the installation of wind turbines at the expense of community health, environment or objections. DPS317

##### *P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?*

They have essentially ignored the outcry regarding the goldmining and use of cyanide but worse still they have actually developed mitigating measures based on Dalradian's planning application. The outcry regarding wind turbines has been essentially ignored, even areas which are saturated with wind turbines is deemed to still have capacity while The Sperrin AONB is now a targeted area for Wind turbines. The protection of the environment has been ignored in the pursuit of industrialisation hence the re-designations and opening up the region for industrialised processes. The recent motions taken by the council and expanded on by the local councillors to ban goldmining and stop Permittable Development Rights must be included in the LDP. DPS317

##### *P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*

No the key elements of the SEA was for sustainable development this has not been specifically considered in relation to the overall plans for the industrialisation of The Sperrins AONB. The Sperrins AONB must remain intact hence the entire LDP must be re-written to accommodate same. DPS317, DPS248, DPS021

#### Consistency tests

##### *C1 Did the council take account of the Regional Development Strategy?*

No

RG11 text states that areas of landscape quality should be protected and that the countryside should be protected from inappropriate development. The Council has facilitated Dalradian through the designations developed, the Draft Policy Min01 explicitly through the policy clarifications. This policy clarification should be used to protect The Sperrins environment, the health of the people and the tourism infrastructure. As detailed in RDA key concerns are the air quality and water quality of Northern Ireland. These have been sacrificed in the policy clarifications.

The RDS states to Protect and extend the ecosystems and habitats that can reduce or buffer the effects of climate change. Many ecosystems and habitats (such as peat bogs) act as sinks or stores for carbon if undisturbed. The FODC propose to destroy these areas by the adoption of this minerals development policy (FODC use this to mean precious metal and minerals) DPS317, DPS248, DPS021 DPS271 DPS052

The RDS 2035 does not mention mineral development at any point let alone linking it to precious metals and minerals which FODC has done. Instead please find below the RDS 2035 index showing the key Strategic Guidance – Economy, Society and Environment with all areas focusing on sustainable development. In terms of the economy the actual focus is on tourism. The environment is fully focused on sustainability, particularly protection of our air, water and natural environments while minimising waste (something which precious metals & minerals cannot achieve by the very nature of this dirty industry)

## Strategic Guidance

### 1. ECONOMY

RG1	Ensure adequate supply of land to facilitate sustainable economic growth	31
RG2	Deliver a balanced approach to transport infrastructure	33
RG3	Implement a balanced approach to telecommunications infrastructure that will give a competitive advantage	34
RG4	Promote a sustainable approach to the provision of tourism infrastructure	35
RG5	Deliver a sustainable and secure energy supply	36

### 2. SOCIETY

RG6	Strengthen community cohesion	38
RG7	Support urban and rural renaissance	38
RG8	Manage housing growth to achieve sustainable patterns of residential development	40

### 3. ENVIRONMENT

RG9	Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality	43
RG10	Manage our waste sustainably	47
RG11	Conserve, protect and, where possible, enhance our built heritage and our natural environment	47
RG12	Promote a more sustainable approach to the provision of water and sewerage services and flood risk management	51

Prior to that the Regional Development Strategy Volume 1 Environmental Report 2010, does indeed refer to mineral development, however this mineral development purely focuses on aggregates with no mention of precious metals at any point.

The Strategic Environmental Assessment refer to minerals on many occasions however not once is it implied that the minerals are precious metals or minerals.

FODC in 4.72 defines Minerals as “includes all minerals and substances in or under land of a kind ordinarily worked for the removal by underground or surface working except that it does not include turf (peat) cut for purposes other than sale” Where did the FODC get this definition as it was not derived from the previous related publications.

More alarming is that “aggregates such as sand, gravel, and limestone are widespread within the council area and can be found within the council area and can be found in areas of high scenic value and environmental sensitivity.” What is the basis of this – how many quarries are in AONB or high scenic value areas – this is paving the way for the next killer sentence!

“Valuable minerals such as gold, silver, lead and copper are also present but are more limited in occurrence.”

This is the only reference to minerals that makes them classified as precious metals and minerals. This does not reflect the SEA nor any of the RDS's. How can FODC change regional policy and change district policy by now defining minerals as essentially precious metals and minerals.

This new definition will have to be approved by a Stormont Minister and a specific policy established. None of the regional documents refers to this definition so therefore all references and inferences to "precious metals and minerals" should be fully removed from this draft strategy. This will be open to a Judicial Review challenge.

The fundamental difference between minerals as aggregates as opposed to precious metals and minerals extraction is the latter will require processing with toxic chemicals and by default will generate considerable waste, unlike conventional aggregate extraction.

Furthermore precious metal and mineral extraction will cause acid rock drainage for perpetuity, hence resulting in potentially hundreds of millions of pounds for remediation. Min02 does not address this sufficiently. There is no consideration of a bond for accidental chemical spillages during operational life which has the potential to cost hundreds of millions of pounds if an accident occurred – usually the company quickly goes into administration.

Furthermore in terms of Draft Policy Min01 – Minerals Development the word unacceptable in the first line should be removed as this is subjective and open to abuse by planners who are pro-precious metal and minerals mining. Any adverse impact based on the listed 6 criteria should not be supported by the local Council. DPS021, DPS248 & DPS271 insist, among others that the 15 years is extended as it is based on no evidence. Fundamentally they object to the 15 years for extraction of minerals given that we are talking of two entirely different processes. Minerals development (aggregates – sand and gravel) has occurred here for generations and as detailed in The Planning Act 2011, adhering to the Regional Development Policy and fully reflected in the operational practices of the minerals sector which was fully justified, with no fundamental issues to date. 15 years on the whole is adequate.

This relates to the core issue that these government departments, like DPS271, have conflated the term minerals development to include value minerals such as gold, silver, copper and zinc (site Specific ACMD/AONB). In the Regional Development Policy, Strategic Environment Assessment (SEA) and Strategic Planning Policy Statement (SPPS) references to minerals development solely relate to aggregates (sand and gravel). Precious metals and minerals is an entirely different scenario requiring toxic chemicals for processing, much more stringent environmental legislation, greater controls and monitoring, tighter control mechanisms, bond and warranties, greater ancillary services, more stringent water and air testing, substantial bonds and warranties in place, detailed closure, remediation and monitoring plans in place for at least one hundred years – this is not like an ordinary gravel pit.

The second part for (vii) to (xi) should be removed as they are explicitly related to precious metals and minerals as re-defined by FODC.

In terms of Policy Clarifications 4.75 – 4.80 these should be deleted as they are providing the planner with methods to circumvent the restrictions of points (i) to (vi).

It is evident that the last sentence in each paragraph, excepting 4.79, is designed to permit mineral extraction irrespective of the first 6 points.

If a new precious metals and minerals policy was included, by order of a Minister, then one would envisage a SEA/EIA based on the impact of this policy would be required.

One now has to question the legitimacy of the issuance of exploration licences considering there was no provision for precious metals or minerals agenda granted by a MLA. On whose authority or following which policy did the Civil Service departments actively go over to Canada and promote Northern Ireland as being open for businesses and then grant exploration and prospecting licences for 25% of Northern Ireland.

Indeed when undertaking this strategic environmental assessment and environmental Impact assessment the overall cumulative impact of numerous precious metal and mineral mines, extraction of various other minerals and substances (cobalt, uranium, lithium, zinc, silver etc) and their associated chemical processes have to be considered on the environment, tourism, health and agriculture. Consideration must be given to the well documented and immensely negative impact on air, water - ground/surface, plus existence of radon, radiation from Chernobyl and potential uranium radiation). This has in effect been ignored to date, by both RDS, SEA and specifically totally ignored by FODC draft strategy. An independent body should assess this appointed by FODC to establish a baseline.

Bear in mind Dalradian to date is only seeking planning in for one underground mine, given the geological structure there will be several others including open cast mines. The impact of all precious metals and minerals mining and processing, and installation of wind turbines and 5G (See Appendix 2) must be considered holistically with the cumulative impact on health, environment and economy assessed. Failing to undertake these assessments clearly makes FODC liable for any future claims. Once The Sperrins AONB is industrialised for mining and wind turbines, it can never be restored to its former beauty.

As a by-note at the public meeting in Gortin, The head of Planning when advised of the dangers of gold mining explicitly stated that if we want to own and wear jewellery we must be responsible and mine the gold in our own country. When pointed out to her at what cost to the health of our children and to the environment, she retorted that it has to be mined somewhere and if we wanted the jewellery then we had to be responsible for it rather than mine it in a less prosperous country. This was obviously an extremely stupid and silly statement, not least in the fact that gold is not essential, like jewellery and that there is sufficient gold in vaults to satisfy our needs for over one hundred years. However what it did show was that the Head of FODC

was fully supportive of the goldmining project. Does this explain as to why the draft plan is so precious metals and minerals orientated?

**The entire draft LDP, particularly relating to this site specific reference, has failed to take into account any Health legislation and indeed Human Rights(Under the Charter for Fundamental Rights) Legislation. The entire LDP will fails to comply with the Aarhus Convention and Climate Change legislation failed soundness tests - PE3, C1,C4 CE1 CE2.**

**The entire draft Local Development Plan has to be re-written with these fully integrated in the policies.**

*C2 Did the council take account of its Community Plan?*

“Community planning is a process whereby councils, statutory bodies and communities themselves work together to develop and implement a shared vision for their area. It involves service and function delivery to produce a community plan that sets out the direction of a council area which promotes community cohesion and improves the quality of life for all its citizens.”

The plans for the mineral development(precious metal and minerals) is totally rejected in the community particularly in the AONB, specifically in the areas surrounding Greencastle. FODC has indeed completely ignored the community instead FODC under MIN01, has split the community and will unquestionably affect the quality of life of its citizens. This community sees sustainable development through tourism and agricultural as the key drivers in this area however FODC is promoting mineral development, industrialisation of the existing AONB through redesignation while allowing wind turbines to be introduced to one of the most scenic areas of Tyrone, plus the destruction of the Ramsar Black Bog Site (see later).DPS 052, DPS248

*C3 Did the council take account of policy and guidance issued by the Department?*

The draft plan seems to have significant input from Dalradian and issued by the Departments particularly in the re designation of AONB, MIN01 etc.,

The provision of Appendix 8 is extremely worrying particularly the mention of Section 76 of the Planning Act – why is this mentioned here in the Local Development Strategy quickly followed by developer contributions, community benefits and financial guarantees, all from Dalradian’s application and seen as a sop to enforcement. Dalradian has use C3 as the soundness test criteria to request a policy is deleted – see Counter Representation DPS271. What about community planning here?

See paragraph above where governmental departments worked hand in hand with Dalradian for several years, formed a joint working group last year and continue to engage with Dalradian during planning application however there is little or no meaningful engagement with the community.

*C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council’s district or to any adjoining council’s district?*

The plan has failed to take into account the cumulative impact of precious metal mineral mining on other areas and the impact on its peoples health, environment and economies, particularly relating to this site specific reference. Trans boundary arrangements has been ignored in terms of water and air pollution.

Fundamentally Fermanagh and Omagh District Council passed a motion on 5<sup>th</sup> February 2019 claiming to oppose the goldmining and precious metals and minerals mining in FODC. This council motion MUST take precedence over all other policies as the motion was passed 27 votes to 0. The Sinn Fein led motion, was annexed by long statements from Sinn Fein members where they purported stated that mining for precious metals should not proceed in FODC. This motion specifically referred to Dalradian's goldmine and cyanide gold processing plant in Greencastle Co. Tyrone. Please refer to the recording of the minutes of the meeting to confirm same. Given the strong opposition to this goldmining plan, with essentially a unanimous vote this toxic cyanide processing plant and goldmining network must not be imposed in Greencastle, Co. Tyrone. This is a decision undertaken by the council members which clearly states that any form of precious metals and minerals mining is not welcome in FODC.

Furthermore the FODC councillors opposed the granting of Permittable Development Rights to Dalradian on the proposed Greencastle site, WHEN, therefore in the spirit and ethos of this motion Dalradian should not be allowed to continue with exploratory drilling. Given this is now a FODC motion this should be included in the Local Area Development Plan and applied across the board preventing future precious metals and mineral development companies from exploration works without full planning permission.

Additionally The FODC, on the 2<sup>nd</sup> April 2019 also passed a motion not to allow a Geological Disposal Facility in FODC – for the storage of radioactive material including NORM material derived from mining activities. This motion must be included in the Draft Local Development Plan. Currently RWM Limited is currently monitoring the works, therefore this should not be prohibited given that FODC has agreed Permittable Development should not be granted to Dalradian on the proposed Greencastle Site.

DPS047, DPS049 have some links however both councils showed surprise at the blanket ACMD entailed the entirety of The Sperrins AONB. Given that the ACMD is in theory easy to get an exemption from this will suit DPS271. All exemptions must be removed and The Sperrins AONB should be a MIN03 – MARS, including prohibiting overhead electricity and telecoms apparatus

*CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*

Minerals development particularly precious metals and minerals has devastating impact on cross border issues. The council are not highlighting the fact that the largest cyanide gold processing plant planning application is intended to be situated in Greencastle, relating to this site specific reference. Yet the consequences of this cross boundary in terms of water and air pollution is immense, while the negative

impact of having this toxic monstrosity will have a negative impact on tourism and agriculture. This is before we mention the cumulative impact of various other mines operating across the region.

Indeed there is a seam of uranium running from Donegal to Fintona direction which is surely destined to be mined in the near future. Gold mining is the most damaging to health and the environment only beaten by uranium mining. The impact of allowing these forms of mining in FODC will be devastating. CE01 and C4 failed soundness test needs to be addressed re transboundary/transborder.

Given that FODC is effectively proposing to extract and process valuable minerals which will have addition elements including heavy metals enter our water course and travel by air, they seems to have been no transborder facilitation. DPS248, DPS049. Needs to be addressed

*CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*

Cyanidation method, relating to this site specific reference, like fracking should be prohibited. Firstly as it is not the Best Available Techniques as deemed necessary by PPC application as there are many more methods of extracting gold that does not require cyanide or mercury, which will be addressed later on. Ironically Galantas won an environmental award in 2017 as the process employed there is both cyanide free and mercury free.

One of the most important alternatives is that of developing the FODC purely for tourism as opposed to adopting a precious metals and minerals strategy. To date nobody has produced a report showing the benefits of adopting a minerals development strategy, yet FODC has embraced Minerals Development fully. Before FODC adopts this policy it is essential to demonstrate why this council is prepared to risk our wonderful environment and the health of our people by producing evidence to prove same?

A full regional report, followed by a localised FODC report, must be completed, showing the economic, social, environmental impact of such a minerals development policy, taking into account impact on health, increased security, impact and cost to water and air, impact on tourism, agriculture and fishing. PE 3

One of the largest negative impacts which we will cover later in all forms of precious metals and minerals extraction is that of acid drainage. This occurs for hundreds of years and costs hundreds of millions of pounds to remedy. Should our local rate payer foot the bill for this? Dalradian won't be here when we are left with the health effects and environmental damage.

*CE3 There are clear mechanisms for implementation and monitoring; and*  
There is evidence of implementation and monitoring but the focus are on the wrong areas, where protection of peoples health and the environment should be paramount. More focus should be placed on improving our tourism offering as per

the SEA. e.g. Monitoring point 21-extent of mineral reserves and extracted mineral assets – The Relevant SA Objectives, based on SEA/RDS should be 10, 11, 12, 13, 15 & 17. These all need to be revised with this in mind. Fundamentally the health of our people should be foremost with the environment next as our tourism economy hinges on it – Tourism is reported to generate £1bn per annum by 2020.

*CE4 It is reasonably flexible to enable it to deal with changing circumstances.*

The only manner that this is flexible is in the favour of mineral development, particularly relating to this site specific reference. This entire report has been designed to facilitate the precious metal and mineral plus industrialisation agenda at the expense of the environment, tourism and health based upon the prevalence of various exclusion clauses & mitigating measures. This has to be totally reviewed.

It is clear from reading this draft report that it does not incorporate an assessment of environmental effects, it fails to comply with the requirements of the European Directive 2001/42/EC and on the assessment of effects of certain plans and programmes on the environment (SEA Directive) and the Environmental Assessment of Plans and Programmes, Regulations (Northern Ireland) 2004, in relation to Minerals development particularly the provision of mitigating measures and exclusions to allow mineral development (more specifically precious metals and minerals), proposed designations in maps including the areas identified for wind energy, the essential downgrading of the internationally designated Ramsar sites specifically the Black Bog (effectively airbrushed from the report), the merging of native quarrying processes to seamlessly incorporate the development of precious metals and minerals governed by the same rules, regulations and guidelines, ignoring the dangerous, toxic chemicals used in the processing of same. This has to be addressed

Having read the SA and SEA it is apparent that FODC has not taken in consideration these reports nor indeed that of the Regional Development Strategy. According to 5.3.11 of Practice Notes 6 (soundness) A council must be able to demonstrate that has met all the legislative requirements regarding SA and SEA. Looking at table 2.2 SEA Objectives (Final Environmental Report Sept 2015), all eleven of them support sustainable development with even no. 8 - Material Assets (referring to point a) safeguard natural resources including minerals and peatland) and minimise unsustainable use.

There were apparently over 900 responses to the initial consultation, from my knowledge a vast number opposed gold mining and the use of cyanide. The current draft report fails to address these concerns. These letters of objection should now be made public to provide full disclosure. Community involvement seems to be sacrificed to allow a minerals development friendly strategy, ignoring the key principles of the SEA. Please provide a copy of these responses via email/hardcopy to review.

The Draft Plan Strategy is so totally conflicted that it does not make sense. On one hand tourism is quite rightly being promoted as a sustainable strategy and then



mineral extraction is being promoted in an AONB that will potentially effect ASSIs, SAC and even the Ramsar site(Black bog).

Draft Policy TOU01 – Protection of Tourism Asset and Tourism Development refers to the Council will not permit any form of development that would, to paraphrase, have an adverse impact. How can FODC have a sustainable tourism industry, as per SEA, but yet fully embrace a toxic mineral extraction industry and wind turbine installation programme essentially causing the industrialisation of the Sperrins, an AONB? The precious metal agenda has to be removed from this draft strategy to ensure sustainable development.

An Creagan, which according to Department figures attracts 35,000 per year is hardly mentioned in this report and this facility will be decimated with the imposition of the largest cyanide processing plant in Western Europe, similarly the Black bog neglected by the Departmental response

DPS047 states clearly that the countryside will be scope for major tourism development and welcome the Upland Sperrins AONB is protected for tourism Development. The entire Sperrins AONB and associated areas close to RAMSAR sites (with 7km as per scail model) etc must be fully protected and allowed to be developed as a Tourism Destination. TOU01 must be rewritten to accommodate same as it fails this soundness test.

Draft Policy Min02 – restoration and aftercare is woefully inadequate particularly relating to this site specific reference – As shown above given there is not a policy for a precious metal and mineral strategy hence MIN02 should be obsolete.

If still in existence and given the potential to harm environment and consequently people - The council should insist on realistic public liability insurance cover must be paid in advance for life of mining operation” by the applicant plus before planning is granted to cover worst case scenario a bond covering “accidents” during operation(e.g. £300m for cyanide). This figure has to be determines prior ro planning permission is granted.

At the outset a realistic Warranty and financial bond must be in place for closure and remediation so the public purse in not liable (local council). This must take cognisance of similar projects and environmental circumstances e.g. typical closure costs of gold mining in the US including monitoring and remediation of sulphurification/acid rock is \$200m to \$350m. This has to be paid for in advance and must be paid for for at least 100 years - Dalradian has allowed only \$16m throughout life of mine and \$16m on closure, woefully inadequate. Tax payer will have to foot this bill and Dalradian will be long gone.

Draft Policy L01 – Firstly this undermines the AONB designation which should be of the highest protection and conservation. The Proposal Map 1 – North East has only a small area of The Sperrins AONB designated which is mystifying. The recommendation is to extend the entire Sperrins AONB to the highest level as per SEA 1.3 4.

### Draft Policy HE02 – Archaeology

Proposed Area of Significant archaeological interest is too small. First the Green Road, dating from 10<sup>th</sup> Century was an arterial route and was used by O’Neills to go from Tullyhogue fort to Donegal. This road and surrounding area should be designated on Map 1 given the potential for archaeological features.

An Creagan (Site specific) and surrounding area should be designated on map 1 – North East given there are 44 archaeological monuments surrounding the centre. Policy clarification 5.12 should be removed as once again this draft report has pandered to the whims of the industrialisation of the Sperrins. This AONB and its archaeology must be protected rather than sacrificed for unsustainable industries, once again deviating from the SEA and HRA.

### Draft Policy Min04 – Unconventional Hydrocarbon Extraction – should include cyanide and mercury - particularly relating to the aforementioned site specific reference – ref DPS006 – DPS052/DPS103

This proposal, one assumed had been afforded some form of protection from fracking “until it is proved that there is no adverse effects on the environment or public health”. Unfortunately this was not the case despite it being essentially in moratorium as per the Regional Development Policy.SSPS. Prospecting and exploration licences were issued by the Department.

This makes a mockery of the Regional Development Policy when a governmental department just railroaded through these licences without any explanation of basis of new evidence to show it is now safe. This action obviously breached the entire soundness tests in two. See Appendix 2.

In terms of the policy, the same protection should be afforded to the use of cyanide and mercury as is for Draft Policy

Use of Cyanide and mercury should be prohibited until it is proved that there is no adverse effects on the environment or public health.

MEPs essentially voted to ban mercury in 2017 however our governmental departments seem to be allowing it on this application.

Dalradian proposes to be a member of the International Cyanide Management Code – This is a voluntary code developed by the mining industry in response to various mining disasters. It is not regulatory does not have any powers.

Germany, the Czech Republic, Hungary, Turkey, several Argentine provinces and the U.S. state of Montana have banned the use of cyanide to extract gold from low-grade ore, given the adverse effects on health and the environment.

On 28 April 2017 the European Parliament voted with an unprecedented strong vote of 566 in favour and 8 against for the European Commission to ban the use of cyanide-based mining in the European Union as soon as possible. Given this overwhelming vote to ban this toxic process are our Civil servants even considering gold processing using cyanide, in a region of that does not have a mining industry let alone monitoring or control mechanisms in place.

The European Parliament cited that *over the past 25 years more than 30 major accidents involving cyanide spills have occurred worldwide*, and that *"there is no real guarantee that such accidents will not occur again, especially taking into account the increasing incidence of extreme weather conditions, inter alia heavy and frequent precipitation events"*.

In view of the recent storm of 22nd August 2017 when large parts of the Sperrins slid down the mountainside, and indeed the devastating flash floods (1<sup>st</sup> & 8<sup>th</sup> June 2018) in parts of Tyrone, disastrous environmental consequences would have resulted had this toxic waste dump, tailings and settlement ponds been on site.

Given this overwhelming vote to ban this toxic process, I recommend that FODC should not permit the use of cyanide in this gold processing in Draft Min05. This is particularly pertinent given that the proposed cyanide gold processing plant in this Area of Outstanding Beauty, approximately ½ mile from 120 pupil primary school, in an inclement weather area, 300m above sea level, above tributaries that flow into watercourses that is used for drinking water.

In the same vein, as Draft Policy Min04 and as part of HRA, SEA and indeed the RDS given that FODC is a member of Nuclear Free Local Authorities it is vitally important that the council specifically rejects higher activity radioactive nuclear waste being stored in a Geological Disposal Facility situated our District Council. This must be included in the Draft Policy to avoid future issues.

RAMSAR SITE – Black Bog – site specific reference – DPS052, DPS047 – fails soundness test P3, C1, C3, C4, CE1 CE2

Draft PolicyNe01 – Nature Conservation states that the council will not support any development that will adversely affect the integrity of an SAC, cSAC, SPA, pSPA site or proposed Ramsar Site unless it is demonstrated that: It then goes on to list 3 ways to overrule these decisions with the final being “it meets a social, environmental or economic benefit of national or regional importance and compensatory measures are provided.

This is the polar opposite effect of the SEA - 1.3.4 Aims and Objectives particularly in relation to “Furthering Sustainable Development” and Core Planning Principles particularly “Natural Heritage” to assist in meeting international, national and local responsibilities and obligations, reinforced by SEA objectives 2.2.3. Indeed this also goes against HRA. Where in the SEA does it provide the council with guidance to develop this exemption clauses?

What Draft Policy NE01 does is to downgrade The Black Bog, an internationally recognised Ramsar Site to the equivalent as an SAC, cSAC, SPA, pSPA site. This has to be changed to prevent any degrading, even through mitigation

According to Ramsar “A Ramsar site is recognised as being of significant value not only for the country or the countries in which they are located, but for humanity as a whole.” The Black Bog took thousands of years to grow and under no circumstances

must it be put in danger. The Black Bog in its own right is a major tourist attraction to this area. It is a natural habitat to various rare flora and fauna.

Draft Policy NE01 takes no consideration of international law, and indeed essentially allows its destruction based on a benefit of regional or national importance.

This is an internationally recognised Ramsar site with the following designations (AONB, ASSI and EU Natura 2000). It is protected under the international (Ramsar) convention whereby adverse changes to the ecological character of a site is prohibited as per Article 3.2 of the Convention and Recommendation 4.8 (1990), which established the Montreux Record.

According to Article 3.2 of the Convention, "Each Contracting Party shall arrange to be informed at the earliest possible time if the ecological character of any wetland in its territory and included in the List has changed, is changing or is likely to change as the result of technological developments, pollution or other human interference."

Contracting Parties commit to inform the Secretariat of such changes.

Has FODC informed the Secretariat of such changes - likely to change as the result of technological developments, pollution or other human interference? Have they informed the secretariat that they have made provisions in the Local Development Plan to allow such changes?

I fundamentally recommend that Ramsar site is removed from point (a) of Draft Policy NE01 – Nature conservation and a separate paragraph is provided stating; "any development that has the potential to have an adverse effect on an internationally designated RAMSAR site will not be permitted."

One can clearly see that the "Black Bog" is protected by AONB, ASSI and EU Natura 2000 status and a gold processing plant and gold extraction will destroy this delicate ecological system.

The status of the Black Bog, despite being an internationally designated RAMSAR site, is being eroded by our local council's draft strategy, who are in effect are trying to downgrade this importance of this highly sought after accolade.

One major concern is that these Toxins will affect the Black Bog, located close to this processing site. Dust will affect the ecology of this precious site, however dust with toxic contaminants will unquestionably damage this delicate eco-system. The toxic emissions from the transportation of materials alone would be enough to detrimentally affect this precious ecological site. The ASSI management guidelines clearly show that Bogs depend on rainwater and maintaining a high water table is vital to the "health" of the bog. In addition, the peat soils and many of the species that grow there are very sensitive to physical disturbance.

Diversion and disturbance of underground water sources will undoubtedly affect this site, with deadly toxins both in air and water form destroy the ecology of this site which took thousands of years to grow

At Formil, the geological formation means that the underground water system will be disrupted to negatively affect, lower the water table, of the black bog. Based on the Ramsar management plan it is fundamental that air quality and the water table (hydrology) is protected. How can this be allowed to happen?

According to the Department of the Environment for Northern Ireland declaration of Area of Special Scientific Interest (ASSI) at Black Bog Co. Tyrone, Article 24 of the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985 clearly

states the following activities will damage the flora, fauna and physiographical features of the area: The alteration of water levels or water tables or utilisation of water (including storage or abstraction). •Extraction of minerals including peat, sand, gravel, topsoil or sub-soil

According to The Environment (Northern Ireland) Order 2002 Article 28(2) the Environmental and Heritage Management Plan states:

Bogs depend on rainwater and maintaining a high water table is vital to the "health" of the bog. In addition, the peat soils and many of the species that grow there are very sensitive to physical disturbance

One of the by products of the cyanide processing is ammonia, very damaging to flora, particularly heathers and indeed those aforementioned rare species.

Additionally ammonia will also be present in the tailings and may become airborne. Fundamentally in accordance with Habitats Regulation Assessment legal precedence states

*Waddenzee (C-127/02)* - landmark ruling on art. 6 of the Habitats Directive, mere probability of significant effect would be sufficient risk, precautionary principle, AA, created the procedure, any doubt/uncertainty about the effects of the project, authorisation must be refused. Also touched on plans/project, EIA, Art6(2).

*Sweetman (C-258/11)* - Expands on and clarifies the findings of Waddenzee. art. 6 should be read as a whole to prevent death by a thousand cuts, competent authorities can not authorise plans or projects which risk causing lasting harm to sites hosting priority natural habitat types. Where AA or competent authority decides the project will cause lasting or irreparable loss of even a part of the natural habitat whose presence was the reason for the site's designation should inevitably lead to the conclusion the plan or project will adversely affect the integrity of the site.

#### Draft Policy RE01 - renewable and Low Carbon Energy Generation - Wind Turbines - fails soundness test P3, C1, C3, C4, CE1 CE2

Sperrin AONB - site specific reference - Based on SEA and HRA FODC should be/ trying to preserve the entire Sperrin AONB. Instead the FODC are attempting carve it up by allowing wind turbines into this area by designating a large swath of it (ironically Dalradian's main mining areas) as an area of limited underlying capacity. Why is the entire Sperrin AONB not an "Area of No Underlying Capacity" as is Bessy Bell and Gortin and South Sperrins? This is one of the most scenic natural valleys in our district yet. I recommend making the Sperrins AONB an "Area of No Underlying Capacity" to preserve its natural habitat.

What criteria was used to determine these areas capacity? who determined it? based on what evidence?.

By undertaking this local area plan and by putting in place this development plan to allow more wind turbines in certain areas this means that FODC must now be fully responsible and liable for any health issues arising from these wind turbines. FODC should specifically take cognisance of the health implications of Infrasound and low-

frequency noise, as by creating this plan, and indeed by allowing other wind turbines in areas of Significant cumulative development FODC is liable. See Appendix 1

Likewise by defining certain areas as in an Area of constraint on Mineral Development and then allowing a developer ways to mine these areas through mitigating measures, FODC is complicit in allowing whatever future health and environmental consequences that results from the developers negligence. The health and environment should in effect be the primary responsibility of a governmental body, at no point should economic gain, particularly by a private entity, be given preferential treatment.

This is particular true when mining for precious metals and minerals when toxic chemicals processes are being utilised, which are well documented to cause health and environmental issues. For example cyanide is banned in several European countries, a number of US states and various countries throughout the world. FODC, by developing a policy document which essentially will facilitate developers, is unquestionably complicit and in my opinion joint and severely liable for any consequences.

In terms of telecommunications (PU01 and PU02) 5G, in every site specific location, in particular each town, village and rural area should be explicitly prohibited in the LDP given its clear dangers to our health and environment. The ICNIRP guidelines are totally out of date and are very dangerous to both humans and flora and fauna in relation to shared overhead apparatus using 5G. According to Professor Martin Pall these guidelines are out by a factor of 7.2million. By agreeing to this we are effectively causing genocide and ecocide. Given that this is now mentioned here all departments must consider it. I believe the policy of Surcharge makes individual councillors liable for future costs arising out of damages, compensation, arising out of negligence, for instance.

Yours Sincerely

A solid black rectangular box used to redact the signature of the author.

## Appendix 1

### Home Wreckers: Finnish Study Finds Wind Turbine Infrasound Unsafe For Residents Living Within 15 Km

February 1, 2019 by [stopthesethings](#) [10 Comments](#)



The Finns are renowned for their stoicism, but grinding, pulsing wind turbine noise is too much for any sentient being, even the Finnish.

The evidence proving the unnecessary damage done to wind farm neighbours by the noise generated by giant industrial wind turbines is mounting by the day: Germany's Max Planck Institute has identified sub-audible infrasound as the cause of stress, sleep disruption and more (see [our post here](#)); and a Swedish group have shown that it's the pulsing nature of low-frequency wind turbine noise ('amplitude modulation') that is responsible for sleep problems in those forced to live with it (see [our post here](#)).

Making a mockery of planning rules that permit giant industrial wind turbines to be speared within a thousand metres or so of residential dwellings, a Finnish study reckons that the safe setback distance is more like 15,000m.

#### **Pilot study shows no significant reduction in damage caused by infrasound until residents more than 15 kilometers from wind farms**

Finnish Environmental Health – SYTe ry  
Suomen ympäristöterveys  
10 January 2019

The pilot study carried out in Satakunta and Northern Ostrobothnia in Finland shows that the damage caused by infrasound from wind power plants will only decrease

significantly more than 15 kilometers away from wind turbines. The study was carried out by the Finnish Association for Environmental Health (SYTe) in the spring 2016.

– It has been noticed from experience that after the construction of wind power plants, usually within a few months, people in the surrounding area have begun to get a wide range of symptoms, says Markku Mehtätalo, Chairman of the Finnish Association for Environmental Health.

– It is possible to study the matter quite easily and the Finnish authority responsible for the public health, the Department of Health and Welfare (THL), has tried to do this, for example, Mehtätalo continues. However, in THL's study in 2016, it was assumed that the symptoms would decrease significantly in the first 10 kilometers, with more symptoms near the wind turbines. The study did not take into account the impact of wind farms elsewhere in the environment.

– But it is known from experience that the symptoms of people do not usually decrease at this distance, says Mehtätalo. Measurements have also shown that the infrasound pulses from the wind turbines that are currently being built will not be significantly reduced at this distance. Other risk factors very close to the wind power plants are audible sound and electromagnetic fields.

The research material was collected from Satakunta and Northern Ostrobothnia

The sample of the pilot study meets the requirements of a statistical analysis. The data was collected from Satakunta and Northern Ostrobothnia, mainly from areas where wind turbines were built 0.5– 1.5 years before the interview (see Figure 1 from Northern Ostrobothnia). The subject of the study was about 50 families, with symptoms of each family member found out. A total of about 200 people were involved in the study.

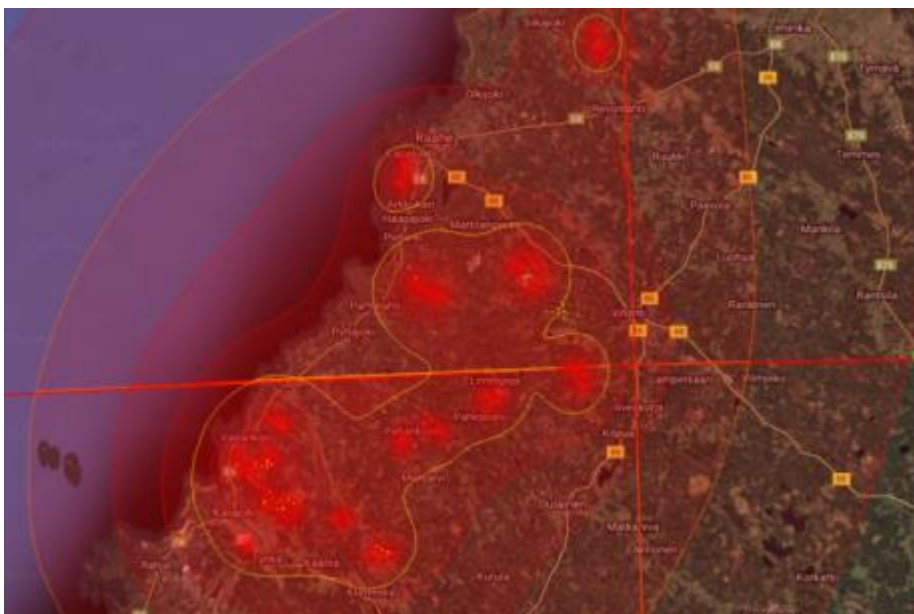


Figure 1. In the yellow-bounded area, the infrasound from wind turbines is almost continuous. The area is located in the south of Oulu Province in Finland.



– In addition, the pilot study took into account the location of all wind power plants in Finland and did not exclude beforehand the possibility that the effect of the wind farms could be greater and reach longer than the impact of a single, clearly separated area, says Mehtätalo.

### Nocturnal disturbance is a typical symptom caused by infrasound

The basic research question was whether the family had noticed changes in health status in the last six months or a year within. The wording of the question regarding the time was dependent on when the impact of the nearest wind turbines could have started. The interviewees were not told in advance about the possible connection with wind turbines.

– The majority of respondents were unable to name a change in their overall health status. However, they gave many responses to separate symptomatic questions, says Mehtätalo.

– The most typical was sleep disturbance or change in the need for night’s sleep, fatigue and various pains. Only very few, some respondents, considered wind power plants as a possible cause.

### Harmful or severe symptoms three times more common near wind turbines

The responses were categorized according to the severity of the symptoms and subjected to a statistical analysis. There were about three times more harmful or more serious symptoms near wind turbines (less or about 15 km from wind power plants) than further away (see Figure 2).

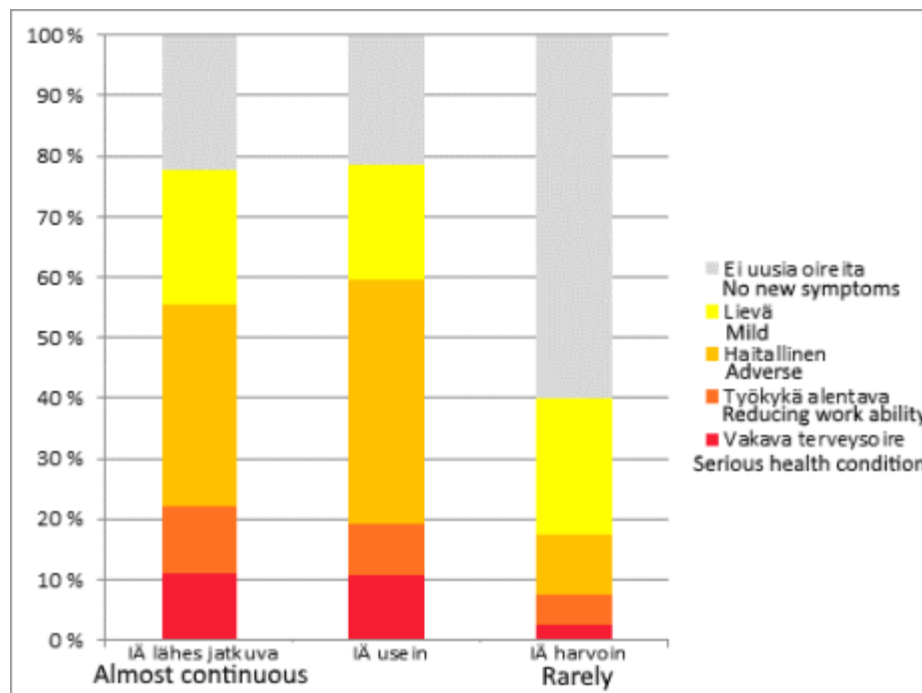


Figure 2. Symptoms of almost continuous or often persistent infrasound exposure (less or about 15 km from wind turbines) and further (over 15 km) from wind power plants.

– Based on the analysis, it seems strongly that, after the construction of wind power plants, the majority of people in the surroundings of wind turbines are having concomitant symptoms. Most of the symptoms are typical stress symptoms, says Mehtätalo.

Although some people have suspected that the symptoms are caused by wind turbines, especially if the wind power plants are visible or if they have heard beforehand about their potential harmful health effects, people have symptoms regardless of attitude. – The pilot study shows that the symptoms are not caused by attitudes, says Mehtätalo.

The occurrence of symptoms decreased significantly only over 15–20 km from the wind power plants (see Figure 2). If there are wind turbines in different directions and a person stays a lot in the area, the risk of symptoms increases.

### **The assumed harmful area caused by infrasound is too small**

– Later in 2017, based on infrasound measurements made in different parts of Finland, it has been found out that 15–20 km is a typical distance where the infrasound pulses of wind turbines can be detected by measurements to travel in almost all circumstances, says Mehtätalo [1–4]. According to an American study, infrasound travels under favorable conditions to a distance of 90 km from wind farms [5].

If the sample of the pilot study is representative, about 400,000 of the Finns suffer from symptoms due to wind turbines and only about 10,000 of them combine the symptoms with wind power plants. Because of the small amount of research data, strong conclusions must be taken with caution.

– However, the study clearly shows that in all previous studies, the harmful area has already beforehand been presumed to be too small, says Markku Mehtätalo. – Among other things, the extensive, in-depth material of another American study, used in several publications, has been gathered within a radius of 11.7 km from wind turbines. For this reason, the harmful health effects cannot be found in the studies, because the symptoms do not vary at this distance, he concludes. – syte

Completed translation of the original text: SYTe (2019). “Pilottitutkimus osoittaa infraäänihaitan vähenevän merkittävästi vasta yli 15 kilometrin päässä tuulivoimaloista.” 2016. Available: <https://syte.fi/2019/01/10/pilottitutkimus-osoittaa-infraaanihaitan-vahenevan-merkittavasti-vasta-yli-15-kilometrin-paassa-tuulivoimaloista/>

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**Finnish Environmental Health**

## Appendix 2

### Article 1

#### 5G

According to the main stream media there might be 12 years left for this planet re climate change but the reality is there is only two years to stop 5G being implemented across UK and Ireland.

Extinction Rebellion are predicting many species will be extinct in the next 12 years but what they are not telling us is that 5G will be the cause - trying to place the blame on climate change before it happens!

5G is the most imminent and dangerous threat to humans and our environment.

5G produces radiofrequency electromagnetic radiation damaging to humans, flora and fauna. It will destroy all insects including bees, birds, animals, tree and plants - this is also ecocide. Essentially 5G creates an Electromagnetic Field (EMF) with millimetre microwave frequencies up to 300GHz (Microwaves are 2.4GHz). Currently this technology has been used by the US military as crowd control and actually has been weaponised for military purposes, capable of bringing soldiers down on their knees. These are the same frequencies that 5G will use on our streets.

<https://www.facebook.com/1356985514444027/posts/1432334796909098/>

[https://www.captain-planet.net/hundreds-of-birds-dead-during-5g-experiment-in-netherlands/?fbclid=IwAR3djplbnqx54VyCFQ6lMQkZhWh0k4VzALssXS\\_n4ko8TjfmUG\\_zv0HJmLw](https://www.captain-planet.net/hundreds-of-birds-dead-during-5g-experiment-in-netherlands/?fbclid=IwAR3djplbnqx54VyCFQ6lMQkZhWh0k4VzALssXS_n4ko8TjfmUG_zv0HJmLw)

We are being brainwashed into thinking 5G is designed merely to provide us with the "Internet of Things" with faster movie downloads.

There have been over 250 medical and technical experts stating that 5G is not safe, linking it to cancer, heart and brain tumours, neurological disorders, Alzheimer's, infertility, DNA degeneration, sleep deprivation etc. There has been no reputable report that proves 5G is safe. Children are the most susceptible to 5G. The Lancet has produced a comprehensive study showing how dangerous this wireless radiation really is.

[https://m.facebook.com/story.php?story\\_fbid=1425853400890571&id=1356985514444027](https://m.facebook.com/story.php?story_fbid=1425853400890571&id=1356985514444027)

The government itself calls it an "experimental" technology yet insists on implementing it in our cities without any proof or reassurance that it is safe. Lloyds and all insurance companies have refused to offer any cover against effects of 5G.

The difference between 5G, to conventional 3G or 4G (G refers to generation) is the heightened radiation frequencies plus unlike a 3g/4g mobile phone or even a router we have a choice to use or to turn off, 5G is always on and surrounding us 24/7. The plan is to have 20,000+ satellites creating an EMF so every corner of this earth is covered in deadly 5G radiation (first satellites are to be launched this Summer). Currently given it is millimetre wave radiation technology trees are being felled across Europe to facilitate 5G to provide line of sight – needs a mast/antenna every 100m-150m – currently using led light poles/side of buildings/billboards etc. Trees/plants die if in close proximity to radiation.

Given the complete censorship of the dangers of 5G from the main stream media and greater political powers I sincerely hope you take time to read and research the detrimental and dangerous impact of 5G. This is potentially genocide and ecocide combined. A few countries, states and cities have called a moratorium on this 5G rollout. Ignore this smokescreen news between Huawei and Vodafone of there being a security threat, the real issue this distraction is hiding is the danger to our people's health and our environment. Unbelievably in the US masts have been set up in or near schools with devastating effects – school children are the most vulnerable.

<https://www.5gspaceappeal.org/the-appeal>

- excellent article based on expert reports

## **Article 2**

### **Energy and Climate Change Committee Written evidence submitted by Yvonne Tinckler (SMR26)**

There has been a decade of warnings from researchers, doctors, professors and governments, that WiFi is potentially harmful especially to children and pregnant women and should be reduced or avoided.

Experience of Smart Meter installation in the US and Australia has shown that a significant number of people are made extremely sick by them, so much so that Australia has WiFi free zones in several hospitals & those affected by WiFi are obliged to use these when needing hospital treatment.

Smart Meters will not be removable once they are installed. It will be extremely difficult if not impossible to avoid the effects of them in a neighbourhood even if they can be removed from an individual house (those individuals also having to reorganize heating/cooking/washing to cope without grid meters). Studies show 4–5% of the nation may have EMF hypersensitivity.

There is no doubt the lack of freedom to avoid the devastating effects of Smart Meters on a significant minority of individuals and consequently their families will contravene several Articles on the EU Charter of Fundamental Rights.

The Bioinitiative report has just been updated, and covers Smart Meters:  
<http://www.bioinitiative.org/>

The Sage Report on Smart Meters, including letters from experts:  
<http://sagereports.com/smart-meter-rf/>

May, 2011—World Health Organization (WHO) reclassifies microwave radiation from wireless communication devices and mobile phones as classification Class 2B “possible carcinogen.” This is the same class as lead, DDT and car exhaust. [Click here for CNN article](#) [Click here for Press Release](#) [Click here for Journal of Nature article](#)

May, 2011—The Council of Europe recommends WiFi be banned from schools. The Council of Europe has 47 member states and is highly influential in policy-making. [Click here for article.](#)

February, 2011—Scientists at the National Institutes of Health in the U.S. find that microwaves emitted by cell phones cause changes in the brain. These biological changes are well below the “thermal level”. Click full study: [Effect of Cell Phone Radiofrequency Signal Exposure on Brain Glucose Metabolism](#). Click The Globe and Mail: [Radiation from long cellphone calls stimulates brain](#).

February, 2011—Scientific Panel concludes that standards for WiFi and other wireless devices are “entirely inadequate” and “strongly recommends that schools do not install wireless internet connections that create pervasive and prolonged EMF exposures for children.”

November, 2010—National Research Council Press reports that many Canadians are being exposed to dangerous levels of radiation in its journal Environmental Review. It concludes that a new biologically based guideline is needed, instead of the dangerous, outdated thermal guideline. Click study: [Biological effects from exposure to electromagnetic radiation emitted by cell tower base stations and other antenna arrays](#).

September, 2010—Study finds that sitting at a laptop computer with the WiFi enabled for just four hours can damage sperm. No research has been done on possible DNA damage to female eggs because of the technical and ethical difficulties studying female eggs. [Journal of Fertility and Sterility September, 2010](#)

April 27–29, 2010—Canadian Government’s Parliamentary Standing Committee on Health heard two days of testimony including international scientists calling for people to stop exposing children to microwaves from systems such as cell phones, cell towers and unnecessary WiFi transmitters in schools.

October 2009—The U.S. government releases classified military documents on the biological effects of Microwave Radiation from 1971. The detailed report by the

Naval Medical Research Institute lists hundreds of papers from around the world showing that microwave radiation causes biological changes. The report was declassified in 2009. Note the index which lists every symptom that has been experienced in Simcoe County Schools. Here is a PDF of declassified [U.S. Navy Report on the Biological Effects of Microwave Radiation](#). Many of the individual documents can be viewed at <http://www.magdahavas.com/>. The entire collection was donated to Dr. Havas by the author, Dr. Zory Glasser.

October 2009—U.S. Government, National Institutes of Health, released a stem cell study linking microwave from carrier frequencies like cell phones and WiFi, to [Leukemia and Cancer, especially among children](#).

July 2009—Dr. Magda Havas PhD., professor at Trent University issues a [public warning to all School Boards](#) saying “It is irresponsible to introduce Wi-Fi microwave radiation into a school environment where young children and school employees spend hours each day.”

January 2009—French National Government announces it will tighten safety regulations for cell phones and children.

November 2008—The European Parliament votes almost unanimously (522 to 16) to urge Cabinet Ministers across Europe to introduce stricter regulations for microwave exposure. Russian Ministry of Health have issued guidelines stating that youth under 18 should not use cell phones.

July 2008—The [French Public Library System gutted its WiFi](#) after only a year because the labour unions complained about a growing number of symptoms suddenly being reported by workers. These are same type of symptoms now being reported in Simcoe County Schools along with several other [Paris libraries](#) are WiFi-free

November 2007—Toronto’s Chief Medical Officer of Health recommends Health Canada’s Safety [levels for microwave exposure be lowered by a factor 100X](#).

September 2007—Germany’s Federal Government issues a national warning to citizens: “Avoid exposure to radiation emanating from WiFi and Amex ports in cafés, schools, public “hot spots”, and private homes.”

August 2007—The BioInitiative Group, of 20 Scientists, doctors and professors release their [610 page report](#) warning that the effects of prolonged exposure of radio frequencies (ie. WiFi) on children is unknown and there cannot be declared safe. The report concludes that, “This could have serious implications to adult health and functioning in society if years of exposure of the young to Radio Frequencies result in diminished capacity for thinking, judgement, memory, learning, and control over behaviour.”

September 2006—A group of thirty Physicists, Doctors, Professors, Union Reps and Politicians meeting in Italy released the [Benvenuto Resolution](#) that confidently stated: “We take exception to the claim of the wireless communication industry that there is no credible scientific evidence to conclude there a is risk. New standards



should be developed to take various physiological conditions into consideration, eg, pregnancy, newborns, children, and elderly people.”

February 2006—[Lakehead University banned WiFi](#) to protect students staff and visitors from unnecessary microwave exposure. Lakehead’s sitting president was a trained Biologist who understood the dangers moreso than most. This now includes the new [Orillia Campus](#).

2005—Irish Doctor’s Environmental Association. A group of [Irish physicians declared](#) that, “The current safe levels for exposure to microwave radiation were determined based solely on the thermal effects of this radiation. There is now a large body of evidence that clearly shows that this is not appropriate, as many of the effects of this type of radiation are not related to these thermal effects.”

June 7, 2000—Twenty Doctors, Physicists and Professors meet in Salzburg Austria to discuss the growing concern with microwave radiation from the erection of Cell Phone Towers in Europe. They declare in the [Salzburg Resolution](#) that current “safe limits” for microwave exposure, such as Health Canada’s, are 100 to 1,000 times too lenient to be declared safe for humans.

## International Warnings

### WiFi

Wingspread Conference on the Precautionary principle:  
<http://www.sehn.org/wing.html>

German Government advises against WiFi:

<http://www.independent.co.uk/environment/green-living/germany-warns-citizens-to-avoid-using-wifi-401845.html>

[http://www.icems.eu/docs/deutscher\\_bundestag.pdf](http://www.icems.eu/docs/deutscher_bundestag.pdf)

In 2010 the Hesse minister of education and cultural affairs (Germany) replies to a request regarding Wi-Fi in schools with the recommendation to prefer wired network solutions whenever possible.

[http://download.bildung.hessen.de/medien/einrichtungen\\_medien/support/Drucksache\\_18\\_1924\\_Laptop\\_WLAN\\_Gesundheitsgefaehrdung\\_an\\_Schulen.pdf](http://download.bildung.hessen.de/medien/einrichtungen_medien/support/Drucksache_18_1924_Laptop_WLAN_Gesundheitsgefaehrdung_an_Schulen.pdf) (in German but can be translated)

In 2007 the Bavarian parliament (Germany) recommended the use of wired networks in all Bavarian schools due to health concerns and had each single school informed about this recommendation by the state secretary himself.

[http://download.bildung.hessen.de/medien/einrichtungen\\_medien/support/Bayer-StaMi-Empfehlung-20070823.pdf](http://download.bildung.hessen.de/medien/einrichtungen_medien/support/Bayer-StaMi-Empfehlung-20070823.pdf) The parliament of the Canton Thurgau clearly

recommends since 2006 that schools use wired networks.

[http://www.qrgeko.tg.ch/docs/00000064\\_00000E85\\_WEB.pdf](http://www.qrgeko.tg.ch/docs/00000064_00000E85_WEB.pdf) (in German but can be translated with GOOGLE) European Environmental Agency advises the



precautionary principle for WiFi: <http://www.eea.europa.eu/highlights/radiation-risk-from-everyday-devices-assessed> <http://www.independent.co.uk/environment/green-living/eu-watchdog-calls-for-urgent-action-on-wifiradiation-402539.html> Austria medical association pressing for a ban on WiFi in schools: <http://www.telegraph.co.uk/news/uknews/1549944/Warning-on-wi-fi-health-risk-to-children.html>

Herouville St Claire Normandy removes WiFi from schools: <http://freepage.twoday.net/stories/5670096/>

(USA) Progressive Librarians Guild urges the precautionary principle for WiFi in libraries June 2008: <http://libr.org/plg/wifiresolution.php> France: Paris City Council launched a study on WiFi June 2008 (in french): [http://www.lemonde.fr/technologies/article/2008/06/16/wi-fi-le-conseil-de-paris-lance-une-etude-surles-risques-sanitaires\\_1058950\\_651865.html#ens\\_id=1053227](http://www.lemonde.fr/technologies/article/2008/06/16/wi-fi-le-conseil-de-paris-lance-une-etude-surles-risques-sanitaires_1058950_651865.html#ens_id=1053227) UK: The Association of Teachers and Lecturers (ATL) with 160,000 members has called for a government investigation into the biological and thermal effects of "WiFi" networks: <http://news.scotsman.com/education/39Wifi-in-schools-may-give.5156371.jp> Penang Malaysia to study health effects of WiFi. October 2008: <http://freepage.twoday.net/stories/5250937/> England: Health Protection Agency launches study on health effects of WiFi Oct 2007: <http://www.guardian.co.uk/technology/2007/oct/13/internet.internetphonesbroadband>

USA: Sebastopol CA. City Council chooses the precautionary principle and terminates contract for free city wide WiFi:

<http://www1.pressdemocrat.com/article/20080324/NEWS/803240314/1033/NEWS>

Sebastopol Area WiFi petition: <http://www.petitiononline.com/mufifree/petition.html> European Parliament Sept 2008 voted 522 to 16 to adopt text: "is greatly concerned at the Bio-Initiative international report concerning EMFs, which summarizes over 1500 studies on that topic and which points in its conclusions to the health risks posed by emissions from mobile-telephony devices such as mobile telephones, UMTS, WiFi, WiMax and Bluetooth, and also DECT landline ". "The limits on exposure to electromagnetic fields [EMFs] which have been set for the general public are obsolete." <http://new.marketwire.com/2.0/release.do?id=901580> England schools dismantle wireless networks:

[http://www.timesonline.co.uk/tol/life\\_and\\_style/education/article642575.ece](http://www.timesonline.co.uk/tol/life_and_style/education/article642575.ece)

England: Teachers union call to suspend WiFi in schools:

<http://www.dailymail.co.uk/news/article-1039235/Suspend-wi-fi-schools-says-union-chief-followingreports-causes-ill-health.html> Bavarian state parliament advises

schools against WiFi: (in German): [http://www.buergerwelle-schweiz.org/fileadmin/user\\_upload/buergerwelle-schweiz/Mobilfunk/MF\\_03.07\\_Kein\\_WLAN\\_in\\_bayer\\_Schulen.pdf](http://www.buergerwelle-schweiz.org/fileadmin/user_upload/buergerwelle-schweiz/Mobilfunk/MF_03.07_Kein_WLAN_in_bayer_Schulen.pdf)

Glastonbury residents "Why WiFi" Campaign: <http://www.glastonburynaturalhealth.co.uk/WhyWi-Fi.html> Ireland: Jan 2008 The City of Dublin Ireland did not install WiFi due to a EU law: <http://www.rte.ie/news/2008/0109/wifi.html> WiFi code for Welch Schools:

<http://www.independent.co.uk/environment/green-living/child-safetyfears-prompt-wifi-code-for-welsh-schools-403255.html> Frankfurt, Germany: Bans WiFi in public

schools (in German): <http://www.buergerwelle->

[schweiz.org/fileadmin/user\\_upload/buergerwelle-schweiz/Mobilfunk/Frankf\\_Rund\\_keinWLAN.pdf](http://schweiz.org/fileadmin/user_upload/buergerwelle-schweiz/Mobilfunk/Frankf_Rund_keinWLAN.pdf) Hospital Techies urge limits on “white space” WiFi: [http://news.cnet.com/8301-10784\\_3-9930441-7.html](http://news.cnet.com/8301-10784_3-9930441-7.html)

Spain: Ecologists in Action statement on WiFi:

<http://www.ecologistasenaccion.org/spip.php?article11598> [http://www.es-uk.info/news/20080319\\_belmonte\\_en.pdf](http://www.es-uk.info/news/20080319_belmonte_en.pdf) GreenWarriors of Norway oppose WiFi in

schools:

<http://www.miljovernforbundet.no/render.asp?rticleno=1471&segment=1&session=>

Dr. Magda Havas open letter to schools and teachers on WiFi health risks:

[http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/09\\_Havas\\_WiFi\\_schools.pdf](http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/09_Havas_WiFi_schools.pdf)

Austrian health director Dr. Gerd Oberfeld advising against WiFi: <http://www.antennafreeunion.org/salzburg.pdf>

Sweden Prof. Olle Johansson scientist WiFi letter:

[http://www.powerwatch.org.uk/pdfs/20070723\\_wifi\\_olle.pdf](http://www.powerwatch.org.uk/pdfs/20070723_wifi_olle.pdf)

Dr. George Carlo WiFi video: [http://www.mcs-international.org/red\\_alert\\_1\\_wifi\\_schoolchildren.html](http://www.mcs-international.org/red_alert_1_wifi_schoolchildren.html)

Green party MEP/concern with WiFi in schools:

<http://www.carolinelucasmep.org.uk/2007/10/12/green-meps-demand-investigation-into-wifi-inschools-after-study-links-electro-magnetic-fields-and-cancers/> (USA) Dr.

Mercola wireless warning:

<http://articles.mercola.com/sites/articles/archive/2008/06/21/are-you-allergic-to-wirelessinternet.aspx?source=nl> (Canada) Dr. Magda Havas Report opposing

WiFi in San Francisco: [http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/07\\_Havas\\_WiFi-SNAFU.pdf](http://www.magdahavas.com/wordpress/wp-content/uploads/2009/10/07_Havas_WiFi-SNAFU.pdf)

The Gathering Brainstorm:

[http://www.theecologist.org/pages/archive\\_detail.asp?content\\_id=1179](http://www.theecologist.org/pages/archive_detail.asp?content_id=1179)

Dr. Jeff Fawcett: WiFi Blues: <http://ezinearticles.com/?The-WiFi-Blues&id=169261>

WiFi in Schools UK: <http://wifiinschools.org.uk/index.html> Santa Fe Librarians letter supporting WiFi free Public libraries:

<http://www.santafenewmexican.com/Opinion/Their-View-Librarians--Keep-public-library-Wi-Fi-free>

“Wireless Networks (WiFi) Consumer Health and Safety Advice” EMFacts handout:

<http://www.emfacts.com/wifi/> Porto Alegre Resolution 2009:

[http://www.icems.eu/docs/resolutions/Porto\\_Alegre\\_Resolution.pdf](http://www.icems.eu/docs/resolutions/Porto_Alegre_Resolution.pdf) Venice Italy

Resolution 2008: <http://www.icems.eu/resolution.htm> London Resolution 2007:

[http://www.icems.eu/docs/resolutions/London\\_res.pdf](http://www.icems.eu/docs/resolutions/London_res.pdf) Benevento Italy Resolution

2006: [http://www.icems.eu/benevento\\_resolution.htm](http://www.icems.eu/benevento_resolution.htm) Catania Italy 2002:

<http://www.emrpolicy.org/faq/catania.pdf> Salzburg Austria Resolution 2000:

[http://www.salzburg.gv.at/salzburg\\_resolution\\_e.pdf](http://www.salzburg.gv.at/salzburg_resolution_e.pdf) Vienna resolution 1998:

[http://www.icems.eu/docs/resolutions/Vienna\\_Resolution\\_1998.pdf](http://www.icems.eu/docs/resolutions/Vienna_Resolution_1998.pdf) Other Concerns Bioinitiative Report: <http://www.bioinitiative.org/>

Bioinitiative Report video with co-author Cindy Sage: <http://www.youtube.com/v/7tZDor-co0>

Brussels determines new EMR safety standard of 3 volts per meter: <http://www.next-up.org/NewsOfTheWorld/Belgique.php#2>

2009: The European Parliament passed the EMF Resolution calling for caution on the use and expansion of electromagnetic fields, particularly radio frequency exposure from wireless technologies. The resolution was endorsed by an overwhelming margin of 559 members in favor, 22 opposed, and 8 abstaining. The EP calls on member states to follow the example of Sweden to recognize ES as a disability and grant adequate protection as well as equal opportunities. <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2009-0216+0+DOC+XML+V0//EN>

French Health and Security Agency (Afsset) recommend reducing exposure to mobile phones and other portable wireless devices. OCT 2009 [http://www.breitbart.com/article.php?id=CNG.9264422c2946d8bf1cb62cde139e996e.c21&show\\_article=1](http://www.breitbart.com/article.php?id=CNG.9264422c2946d8bf1cb62cde139e996e.c21&show_article=1)

(USA) NIEHS and NIOSH classifies EMF's as a hazardous substance. NIEHS advocates prudent avoidance of EMF's. <http://www.niehs.nih.gov/research/resources/library/consumer/hazardous.cfm>

Prudent avoidance has been adopted in Australia, Sweden, and several U.S. states, including California, Colorado, Hawaii, New York, Ohio, Texas, and Wisconsin: [http://www.who.int/peh-emf/meetings/southkorea/en/Leeka\\_Kheifets\\_principle\\_.pdf](http://www.who.int/peh-emf/meetings/southkorea/en/Leeka_Kheifets_principle_.pdf)

Collaborative on Health and the Environment CHE EMF statement: [http://www.healthandenvironment.org/wg\\_emf\\_news/772](http://www.healthandenvironment.org/wg_emf_news/772)

California EMF program 7 million dollar gov't mandated study. up to 95% certainty leukemia caused by EMF's. Up to 80% certainty brain cancer related to EMF's. Advocate prudent avoidance of EMF's. <http://www.dhs.ca.gov/ehib/emf/> 2009 Counties of LA (CA), Pima (AZ) City of Portland Oregon, Cities of Sebastopol, Albany and Glendale CA pass resolutions requesting the federal government repeal section 704 of the Telecommunications Act of 1996.and/or requesting the FCC to update RF studies: <http://www.cloutnow.org/localres/>

Chinese breakthrough study how EMFs promote childhood leukemia: <http://www.microwavenews.com/XRCC1.html>

European Union adopts ALDE report advising the precautionary principle for EMF's: [http://www.alde.eu/index.php?id=42&L=2&tx\\_ttnews\[tt\\_news\]=9559&cHash=2fec11e0cc](http://www.alde.eu/index.php?id=42&L=2&tx_ttnews[tt_news]=9559&cHash=2fec11e0cc)

USA, NJ. Sussex County school to close due to unsafe power lines near playground:  
[http://www.nj.com/news/index.ssf/2009/09/sussex\\_county\\_school\\_to\\_close.html](http://www.nj.com/news/index.ssf/2009/09/sussex_county_school_to_close.html)  
(NZ) Dr. Neil Cherry: <http://www.neilcherry.com/>

(USA) Dr. Louis Slesin: <http://www.microwavenews.com/>

(Canada) Dr. Magda Havas: <http://www.magdahavas.com/>  
<http://www.magdahavas.org/>

Electrical Sensitivity Germany 2002: Freiburger Appeal signed by 30,000 doctors:  
<http://www.starweave.com/freiburger/>

2005 Ireland IDEA Irish doctors concern over EMR health effects:  
<http://www.ideaireland.org/emrIrishresearch.htm> Switzerland: Dr. Rau Paracelsus  
Health Clinic : treats 10,000 people annually. They assess health in light of EMF  
exposure. Although health issues are multi factorial, his assessment is EMFs are a  
hidden factor in many illnesses: <http://www.paracelsus.ch/welcome>

US Access Board: Report on Indoor Environmental Quality Released: <http://access-board.gov/news/ieq.htm> Dr. Christine Aschermann: Observations from a  
Psychotherapy Practice on Mobile Telecommunications and DECT Telephones:  
<http://emfsafetynetwork.org/wp-content/uploads/2009/10/Aschermann2009.pdf>

France Eco village white zone for EHS recovery: <http://www.zoneblanche.fr/index-eng.html>

2008: Electromagnetic Hypersensitivity Wikipedia:  
[http://en.wikipedia.org/wiki/Electrical\\_sensitivity](http://en.wikipedia.org/wiki/Electrical_sensitivity)

*February 2013*

## Appendix 3

### Total Ban on Fracking Urged by Health Experts: 1,500 Studies Showed 'Damning' Evidence of Threats to Public Health, Climate

#### [Common Dreams](#)

Jun. 20, 2019 09:32AM EST

By Jake Johnson

A comprehensive analysis of nearly 1,500 scientific studies, government reports, and media stories on the consequences of [fracking](#) released Wednesday found that the evidence overwhelmingly shows the drilling method poses a profound threat to public health and the climate.

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The sixth edition of the [Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking](#) (the Compendium), published by Physicians for Social Responsibility and Concerned Health Professionals of New York, found that "90.3 percent of all original research studies published from 2016-2018 on the health impacts of fracking found a positive association with harm or potential harm."

The [analysis](#) also found that:

- 69 percent of original research studies on water quality found potential for, or actual evidence of, fracking-associated water contamination;
- 87 percent of original research studies on air quality found significant [air pollutant](#) emissions; and
- 84 percent of original research studies on human health risks found signs of harm or indication of potential harm.

"There is no evidence that fracking can operate without threatening public health directly and without imperiling climate stability upon which public health depends," the Compendium states.

Sandra Steingraber, Ph.D., co-founder of Concerned Health Professionals of New York, said in a [statement](#) that "the case against fracking becomes more damning" with the publication of each edition of the Compendium.

"As the science continues to come in, early inklings of harm have converged into a wide river of corroborating evidence," said Steingraber. "All together, the data show that fracking impairs the health of people who live nearby, especially pregnant

women, and swings a wrecking ball at the climate. We urgently call on political leaders to act on the knowledge we've compiled."

According to the Compendium, the first edition of which was published in 2014, the "feverish pace" of U.S. [fossil fuel](#) extraction — which has [accelerated](#) under President Donald [Trump](#) — "has spurred a massive build-out of fracking infrastructure," putting air quality and water sources at risk in communities across the United States.

In addition to the harmful effects of fracking on those who live near oil and gas development projects, the Compendium found, the drilling practice is "also at odds with the emerging scientific consensus on the scale and tempo of necessary [climate change](#) mitigation and with rising public alarm about the impending climate crisis that this consensus has amplified."

"Despite efforts by the gas industry to suppress all health data on fracking, the Compendium documents the serious harm fracking holds for pregnant women, children, and those with respiratory disease," Walter Tsou, MD, MPH, interim executive director of Philadelphia Physicians for Social Responsibility, said in a statement. "We need to ban fracking."

The sixth edition of the Compendium comes just days after more than 100 environmental groups [sent a letter](#) urging Pennsylvania Gov. Tom Wolf to investigate the link between fracking and the emergence of rare childhood cancers in rural Pennsylvania counties.

As Steingraber — one of the letter's signatories — [told](#) online environmental outlet The Daily Climate on Wednesday, much of the data in the Compendium comes from Pennsylvania, which is [home to](#) over 100,000 active oil and gas wells.

"What makes fracking different from any other industry I've studied in public health is that there's no industrial zone," Steingraber said. "It's taking place literally in our backyards, and unfortunately some of the best evidence for both polluting emissions and emerging health crises is coming out of southwestern Pennsylvania."