# Mobuoy Road Waste Site

# Review of Public Consultation Feedback – Other Consultation Responses

# 787-B030252

# V2

**NIEA**

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# 1.0 INTRODUCTION

## 1.1 INSTRUCTION

Tetra Tech Consulting NI Limited (Tetra Tech or TT) were appointed by Northern Ireland Environment Agency (NIEA), an executive Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA), under the Mobuoy Road Waste Site Remediation Project to undertake a review of the Consultation Responses 1-18 and 20-25 of the Draft Remediation Strategy for the Mobuoy Road waste site in Co. Londonderry.

A site location plan is provided in Figure 1.

## 1.2 PROJECT BACKGROUND

The Mobuoy Remediation Project herein referred to as the 'site' is located on the outskirts of the city of Derry/Londonderry on the Mobuoy Road. It encompasses an area of approximately 46ha and currently consists of two distinct parcels of land either side of Mobuoy Road identified as City Industrial Waste (CIW) and Campsie Sand and Gravels (CS&G) as shown on Figure 1. The surrounding land use is agricultural, and the site is bounded to the west by the River Faughan.

The CIW site is located to the east of Mobuoy Road and covers an area of approximately 14Ha. It comprises of a former Materials Recycling Facility (MRF), closed landfill and an area of former sand and gravels extraction located approximately 100m east of the River Faughan. The CS&G site is located to the west of Mobuoy Road and adjacent to the River Faughan which was subject to extensive sand and gravel extraction over a number of years.

Historical context (Mills Report[1]) indicates a landfill was present on the site from at least 1980. CIW was granted a waste disposal licence in 1996 and by 2004 the MRF was established. A landfill Closure Notice was issued in 2007. In 2012 the NIEA Environmental Crime Unit investigated alleged illegal waste activities, and the waste management licence for the MRF was revoked in June 2013. A Departmental investigation in 2015 estimated that large volumes of illegally deposited waste remained on the site.

TT joined the Integrated Consultancy Team (ICT) for Mobuoy in 2021. Between 2021 and 2022 TT reviewed historical environmental risk assessments, carried out supplementary intrusive ground investigations, completed follow-up monitoring to improve site characterisation, and prepared an updated Detailed Quantitative Risk Assessment (DQRA, October 2022) which recommended remediation. A Remediation Options Appraisal was produced in March 2023, and a Draft Remediation Strategy was prepared in June 2023. The Draft Strategy was subject to public consultation which opened on 13th June 2025 and closed on 2nd October 2025.

[1] A review of waste disposal at the Mobuoy site and the lessons learnt for the future regulation of the waste industry in Northern Ireland, Christopher Mills, December 2013

## 1.3 LAND CONTAMINATION TECHNICAL FRAMEWORK

The land contamination management approach at the Mobuoy Road Waste Site Remediation Project follows the Land Contamination Risk Management (LCRM[2]) published by the Environment Agency (8th October 2020, last updated 12th June 2025). These procedures provide a structured framework for making decisions in the assessment and management of contaminated sites such as the Mobuoy waste site. LCRM uses a staged risk-based approach with 3 stages, each stage further broken down into steps.

**Stage 1: Risk assessment**

1. Preliminary risk assessment.
2. Generic quantitative risk assessment.
3. Detailed quantitative risk assessment.

Stage 1 establishes whether contamination poses a plausible risk to receptors and, if so, quantifies that risk. The Preliminary Risk Assessment compiles site history, conceptual site model (CSM) and identifies potential contaminant–pathway–receptor linkages. Where needed, Generic Quantitative Risk Assessment (GQRA) uses screening-level contaminant concentrations and conservative assumptions to test likely risks. If GQRA indicates potential unacceptable risk or uncertainty, a Detailed Quantitative Risk Assessment (DQRA) refines the CSM with site-specific data, targeted sampling and modelling to produce more defensible risk estimates and to inform remediation requirements.

**Stage 2: Options appraisal**

1. Identify feasible remediation options.
2. Do a detailed evaluation of options.
3. Select the final remediation option.

Stage 2 identifies and evaluates feasible remediation and management options to address the risks identified in Stage 1. The process begins with a longlist of technically feasible measures, narrows to a short-list through screening (technical, environmental, health & safety, deliverability), and then carries out a detailed appraisal (effectiveness, cost, sustainability, timescale, residual risk). The objective is to select a practicable, proportionate and cost-effective remediation approach that meets the risk-based remediation objectives and regulatory expectations. The Mobuoy Road Waste Site Remediation Project currently sits within Stage 2/3, whereby the Draft Remediation strategy has been produced but subject to further refinement following the public consultation.

**Stage 3: Remediation and verification**

1. Develop a remediation strategy.
2. Remediate.

[2] Land contamination risk management (LCRM) - GOV.UK

3. Produce a verification report.
4. Do long term monitoring and maintenance, if required.

Stage 3 delivers the selected remedial work and demonstrates that the remediation objectives have been achieved. This begins with preparation of a detailed remediation strategy and works specification (method statements, health & safety, environmental controls, waste management). During remediation, actions are implemented and monitoring/controls applied. On completion, a verification report documents the work, presents confirmation sampling and demonstrates compliance with the remediation objectives. Where appropriate, a long-term monitoring and maintenance plan is prepared to manage residual risks and ensure continued protection of receptors.

## 1.4 PURPOSE OF REPORT

The purpose of this document is to present Tetra Tech's review of Consultation Responses 1-18 and 20-25 in relation to the Draft Remediation Strategy for the Mobuoy Road site. This review will:

- Summarise the key points raised in the responses, including technical aspects;
- Identify outcomes, implications or issues arising from those points in relation to the Draft Remediation Strategy and the LCRM process; and
- Where relevant, suggest clarifications, further actions or follow-up by the ICT, NIEA or other parties.

This review is intended to inform decision-making and next steps.

## 1.5 LIMITATIONS, TERMS AND CONDITIONS

Attention is drawn to the report conditions, included in Appendix A, and the terms and conditions of the engagement as detailed in our accepted proposal.

# 2.0 CONSULTATION RESPONSE 1

Consultation Response 1 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 2.1 POINTS RAISED

From review of the consultation response there was no key points raised which warranted any significant issues or concerns of the draft Remediation Strategy, however there was comment on detail within the remediation strategy pertaining to;

- Surface water management needs to be considered as an objective within the remediation strategy; and,
- Careful management of ecology is needed, as to not adversely impact species that have established at the site.

**TT Commentary**

TT have reviewed Consultation Response 1 and determined no major issues identified that would require an immediate update to the draft remedial strategy, however attention is brought to the management of surface water and ecological adversity is recommended to be incorporated within the draft Remediation Strategy.

## 2.2 FURTHER ACTIONS

It is recognised that further ecological assessment and integration are needed, at the appropriate time. Until public consultation on the draft Remediation Strategy had been completed, agreed remediation proposals have been available to fully assess ecological impacts to support future ecological management. It is also recognised that ecology has high potential to change over time. It is planned that further detailed ecological assessments will be scoped and completed to inform detailed design and the production of an EIA. Surface water management will also be considered during future design phases of the remediation strategy and subject to further detailed assessment.

# 3.0 CONSULTATION RESPONSE 2

Consultation Response 2 comprised an independent review of the draft Remediation Strategy prepared by an anonymous member of the public. The written response provided detailed a wide range of matters, including clarification as to whether the site will be vested without compensation for the remediation works to be carried out, how the protection of the River Faughan is the most important factor of the remediation as river health should be a priority. Additionally, a proposed extended scope to include the adjacent Category A tarry waste sites was suggested, with the removal of tarry waste in one mobilisation. Moreover, it is acknowledged that the site be left to rewild with no tolerance for public hunting or amenity present, with a memorial/signage present for the whistle blower. Finally, the proposed A6 through Mobuoy required review under current EIA or Habitat Regulations to meet the 2022 Climate Act should be halted until complete remediation/ continued monitoring is completed.

## 3.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Clarity whether the site will be vested without compensation for remediation work to be carried out;
- The protection of the river Faughan is the most important goal of the remediation;
- Adjacent category A tarry waste sites left out;
- The site should be left to rewild, with no public amenity or hunting, plus interpretive signage/memorial (e.g. for whistle-blower Joe Ferguson) and formal “Rights of the River” for the Faughan; and
- The proposed A6 alignment through Mobuoy was never assessed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act before any works proceed.

**TT Commentary**

TT have reviewed the Consultation Response 2 and acknowledge the points raised, and attention is brought to the management of the site (tenure), river sensitivity/ protection, tarry waste removal and ecological adversity, all recommended for consideration.

## 3.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

With regards to land tenure and vesting and the potential for expanding the scope of the of tarry waste removal to adjacent sites, will be a consideration of DAERA.

# 4.0 CONSULTATION RESPONSE 3

Consultation Response 3 comprised an independent review of the draft Remediation Strategy prepared by the River Faughan Anglers (RFA). The review scope covered a wide range of matters, including the disappointment in the level of progress the Department has made on the proposed remediation strategy, with specific emphasis on paragraph 5.8.3, stating the uncertainty of how an initial ground water monitoring phase relevant to the tarry waste deposition would support the direction presented by the Department. Additionally, costs/ funding for the remediation is a primary concern, especially since it has been seventeen years since its discovery. The elongated timescale and funding costs gives the RFA little confidence that remediation will take place. Moreover, concerns regarding the A6 through Mobuoy requires review under current EIA or Habitat Regulations to meet the 2022 Climate Act should be halted until complete remediation/ continued monitoring is completed. Additionally, Hot Spot detection, stressing vigilance to the prospect of undetected sources of contamination being present at Mobuoy. It is also mentioned that the illegal landfill is emitting significant volumes of greenhouse gasses, and it is unclear how this will be addressed, and whether the draft Remediation Strategy has been climate proofed. The River Faughan has previously burst its banks into the former Campsie Sand and Gravel site, which raises concerns regarding the structural integrity of the riverbank and potential for future flooding, of which the remediation strategy needs to be planned for. Finally, the RFA detail to sensitivity of the Faughan and how it should remain protected under the Habitats Regulation 1995. Concern remains that the Faughan will be used as part of the remediation solution by providing dilution of contaminants. The RFA see this as unacceptable. All discharges to the river should conform to required water quality standards.

## 4.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Detail within draft Remediation Strategy;
- Finance / Costs;
- Project Timeline;
- A6 Road Scheme;
- DQRA;
- Landfill Gas;
- Climate Change / Flooding; and
- Detail within draft Remediation Strategy.

## 4.2 FURTHER ACTIONS

It is recognised that, due to the passage of time, further action may be required in the form of updating the DQRA, with a review of current EMP data and trends, with an integration of new monitoring results. It is planned that TT will consider this during any future design phases of the Remediation Strategy.

It is recognised that the published DQRA pre-dates some of the monitoring of emerging pollutants that has been carried out by NIEA. A review of emerging pollutants potentially present in groundwater at the site is planned.

A review of gas management plan, adding Greenhouse-Gas Management Sub-Plan (capture/ vent protocols) will also be considered. Flood defence including a Flood-Risk and Climate- Resilience Plan (barrier integrity checks, extreme-event response) will be considered.

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider the further actions during any future design phases of the remediation strategy, subject to the A6 Road, and discharges to the River Faughan.

The issues surrounding projected cost and project timeline, will be a consideration of DAERA.

# 5.0 CONSULTATION RESPONSE 4

Consultation Response 4 comprised an independent review of the draft Remediation Strategy prepared by The Gathering. The review scope covered a wide range of matters, including clarification as to whether the site will be vested without compensation in order for the remediation works to be carried out, how the protection of the River Faughan is the most important factor of the remediation as river health should be a priority. Additionally, a proposed extended scope to include the adjacent Category A tarry waste sites was suggested, with the removal of tarry waste in one mobilisation. Moreover, it is acknowledged that the site be left to rewild with no tolerance for public hunting or amenity present, with a memorial/signage present for the whistle blower. Finally, the proposed A6 through Mobuoy required review under current EIA or Habitat Regulations to meet the 2022 Climate Act should be halted until complete remediation/ continued monitoring is completed.

## 5.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Clarity whether the site will be vested without compensation in order for remediation work to be carried out;
- The protection of the river Faughan is the most important goal of the remediation;
- Adjacent category A tarry waste sites left out;
- The site should be left to rewild, with no public amenity or hunting, plus interpretive signage/memorial (e.g. for whistle-blower Joe Ferguson) and formal “Rights of the River” for the Faughan; and
- The proposed A6 alignment through Mobuoy was never assessed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act before any works proceed.

**TT Commentary**

TT have reviewed the Consultation Response 4 and acknowledge that five major issues have been identified, and attention is brought to the management of the site (tenure), river sensitivity/ protection, tarry waste removal and ecological adversity, all recommended for consideration.

## 5.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

With regards to land tenure and vesting and the potential for expanding the scope of the of tarry waste removal to adjacent sites, will be a consideration of DAERA.

# 6.0 CONSULTATION RESPONSE 5

Consultation Response 5 comprised an independent review of the draft Remediation Strategy prepared by Friends of the Earth (FOE). The review raised multiple concerns: the remediation strategy is overly complex and depends on poorly-defined interactions between many technologies; remedial categories are misleading because some on-site ex-situ processes (e.g., sorting/testing of excavated material) are not recognised; The remediation strategies for each zone/ group of zones are overlapping and potentially redundant. Worse, some could interfere with the performance of others. FOE made comment to the intent to contain and treat residual tarry wastes rather than removing them. They suggest clearer criteria that can be operationalized for which tarry waste will be removed and which will be treated. Additionally, the FOE states that while the use of 'short rotation crop willow' can be a barrier to preventing contaminant contact but should not be adopted as a means to deal with a contaminant source. Additionally, FOE identify the risk of promoting renewable energy via short rotation cropping which does not recognise the risk of using biomass that has been grown in potentially contaminated land.

Moreover, FOE state that monitored natural attenuation (MNA) is claimed "site-wide" but not mentioned in any of the proposed remediation for specific zones or for which contaminants MNA is being invoked. Additionally, landfill gas handling could result in greenhouse-gas emissions to atmosphere; and many technologies lack supporting justification. FOE also called for a cost–benefit analysis, clearer mapping of the highest-risk zones, sharper and more measurable objectives (so 'moderate' risks can be driven to 'low' or 'negligible'), and confirmation that facilitating works for the A6 will not drive remediation objectives. Finally, modelling indicates potential exceedances at the river boundary, the strategy appears to rely on river dilution for drinking-water standards, site reuse endpoints are undefined, outstanding designs must confirm zonal approaches remain optimal, and no Materials Management Plan (MMP) or NIEA sign-off on DoWCoP use has been demonstrated.

## 6.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- The proposed remediation strategy is overly complicated with explicit or implicit inter relationships between various individual technologies that need careful integration if the envisaged synergies are to be delivered;
- The documentation suggests that a range of remedial solutions, which will work together, are proposed. These solutions fall under two broad categories – "Off-Site Disposal" and "In-Situ treatment" – which is not strictly accurate as there are some on site ex-situ processes as well, such as sorting and testing of excavated waste. The claim that *"In-Situ treatment is less disruptive to the surrounding environment and infrastructure, uses natural processes to break down contaminants"* is not true for all the in-situ treatments proposed – for example barriers and containment processes do not involve contaminant break down;
- The remediation strategies for each zone/ group of zones are overlapping and potentially redundant. Worse, some could interfere with the performance of others;

- Residual tarry waste is not being removed: “Containment/stabilisation of residual in-situ tarry wastes”;
- There are too many ungrounded technologies implicated in the remediation strategy. Monitored natural attenuation is referred to “site wide” yet not mentioned in any of the proposed remediation for specific zones or for which contaminants MNA is being invoked;
- "The Markham Willows project, indicates that “short rotation crop willow” can be a barrier preventing contact with contaminants but is not a means of dealing with contaminant source areas;
- Promoting renewable energy via short rotation cropping does not recognise the risk of using biomass that has been grown in potentially contaminated land;
- One of the possibilities is that greenhouse gases including methane could be vented to atmosphere: “collection of landfill gas and transfer to a blower or flare for dispersal or treatment”;
- A cost-benefit analysis is needed to ensure optimal return on investment in the form of remediation expenditure;
- The reports do not spell out the location and extent “zones of highest environmental risk”;
- The objectives are both too vague and not necessarily likely to result in the necessary management of risk. The Updated DQRA is clear in its ambition in the absence of any “high risks” when it sets the challenge to the ROA to discern remediation strategies that would “reduce 'moderate' risks to 'low' or 'negligible'”;
- Facilitating works for the A6 cannot be a key aim of the Mobuoy remediation project;
- DQRA says low impact, but modelling shows exceedances at river boundary;
- Strategy relies on river dilution to meet drinking-water standards;
- Site reuse criteria undefined; endpoints may not be protective;
- Outstanding plans/designs need to validate Zonal draft Remedial Strategy remains optimal; and,
- No Materials Management Plan (MMP) or NIEA sign-off on DoWCoP use.

**TT Commentary**

TT have reviewed the Consultation Response 5 and acknowledge the issues that have been identified, and attention is brought to the remediation of the site, treatment opinions, river sensitivity/ protection, tarry waste removal, greenhouse gasses, cost-benefit analysis, zoning areas of highest environmental risk, a materials management plan, are all recommended for consideration.

## 6.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

# 7.0 CONSULTATION RESPONSE 6

Consultation Response 6 comprised an independent review of the draft Remediation Strategy prepared by The Ireland Brownfield Network (IBN). The review raised one key point, which includes the development of a detailed Waste Management Plan (WMP) in compliance with the CL:AIRE's Code of Practice - *The Definition of Waste: Development Industry Code of Practice (March 2011).*

## 7.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Development of a detailed Waste Management Plan (WMP) in compliance with CL:AIRE CoP.

**TT Commentary**

TT have reviewed the Consultation Response 6 and acknowledge the key points raised, with the need for a detailed Materials Management Plan, and is recommended for consideration.

## 7.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

# 8.0 CONSULTATION RESPONSE 7

Consultation Response 7 comprised an independent review of the draft Remediation Strategy prepared by Indaver. The review welcomed the publication of the remediation strategy for Mobuoy, stating it is evident that significant technical and economic resources have been applied to reach this point in the remediation of the site.

## 8.1 OTHER POINTS RAISED

No key points raised, however there is one comment in relation to the remediation strategy pertaining to;

- The complexity of sites like Mobuoy that require specialist input. Indaver points to its multi-phase Roche Clare castle project as an example of the scale and technical capability needed.

Four other points unrelated to the remedial strategy were outlined by Indaver. This included the waste management sector in Northern Ireland and its vulnerability to waste crime.

**TT Commentary**

TT have reviewed the Consultation Response 7 and acknowledge the specialist input required to deliver the remediation strategy in full and will consider a phased approach within remediation works.

## 8.2 FURTHER ACTIONS

Further actions will be under consideration of DAERA.

# 9.0 CONSULTATION RESPONSE 8

Consultation Response 8 comprised an independent review of the draft Remediation Strategy prepared by CIWM. Their review raised multiple concerns including the risk to ecological receptors on site. CIWM state that both the Campsie Sand and Gravel, and City Industrial Waste are both assessed as ecologically favourable, with many species residing onsite or with the River Faughan. CIWN states that the Faughan must be protected as a potable drinking supply.

Additionally, CIWM welcome the revision of Objective no. 2 which states "*the Faughan groundwater body has been polluted from wastes deposited at the Mobuoy site. This resulted in the reclassification of the Faughan Groundwater body from 'good' to 'poor' status in 2021 under The European Water Framework Directive (2000/60/EC) (WFD*", to report on the naturally occurring and upgradient diffuse sources that are emitted into the groundwater body, feeding into the River Faughan, and not just recently deposited materials.

Moreover, Objective no. 4 in the context of the most recent published landfill gas risk assessment that finds '*perceived low risk via potential off-site lateral migration is low'*. The acceptability of the 'low risk' from the landfill gas risk assessment in the context of remediation being required, or not, has not been made clear in the referenced report and CIWM Northern Ireland suggests this ambiguity should be clarified.

CIWM recommends that future land use remediation options be reviewed to ensure they remain appropriate for the agreed final use of the site. CIWM also states that a collaborative approach to the construction of the A6 through the Mobuoy site is welcomed, without creating unacceptable risk to the environment.

## 9.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- 'Ecology' should be considered a high environmental risk;
- Welcome (Improvement in the quality of the Faughan groundwater body) being revised to refer to sources other than the (relatively recently) deposited wastes;
- The acceptability of the 'low risk' from the landfill gas risk assessment in the context of remediation being required, or not, has not been made clear in the referenced report and CIWM Northern Ireland suggests this ambiguity should be clarified;
- CIWM Northern Ireland recommends that future land use remediation options be reviewed to ensure they remain appropriate for the agreed final use of the site; and
- A 'joined up', collaborative approach to ensuring the construction of this section of the A6 without creating unacceptable risks or impacts to the environment is welcomed by CIWM Northern Ireland.

**TT Commentary**

TT have reviewed the Consultation Response 8 and acknowledge the issues have been identified, including considering the ecology of the site as high risk, revising the improvement of the quality of the Faughan groundwater body to include other sources, reducing the ambiguity of the gas risk classification for the site,

ensuring future land use remain appropriate, and to instil a collaborative approach to the construction of the A6, without unacceptable environmental risk.

## 9.2 FURTHER ACTIONS

The further actions will be considered during future design phases of the remediation strategy and subject to further detailed assessment.

# 10.0 CONSULTATION RESPONSE 9

Consultation Response 9 comprised a response from the Loughs Agency to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review raised multiple concerns including, ensuring that Zones 5-9 are fully remediated to prevent the leachate of deleterious matter into the River Faughan, to investigate methods of capturing greenhouse gasses for electricity generation, rather than allowing the escape of gasses on site.

## 10.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Zones 5–9 border the River Faughan SAC and must be fully remediated to prevent leachate ingress;
- Consider can the site be remediated whilst restricting the release of greenhouse gases; and
- Methane could power site operations or feed carbon - capture systems, opportunity for renewable energy recovery.

**TT Commentary**

TT have reviewed the Consultation Response 9 and acknowledge the issues that have been identified, including the remediation of zones 5-9 to prevent leachate into the Faughan, and methods to utilise greenhouse gasses for electricity generation. Further considerations to be given at detailed design stages.

## 10.2 OTHER POINTS RAISED

The consultation response noted a strong potential for post-remediation social and educational programs via Loughs Agency outreach.

## 10.3 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider further actions during any future design phases of the remediation strategy.

As for educational outreach post-remediation, TT/ DAERA will seek to engage with the Loughs Agency for future site vision works.

# 11.0 CONSULTATION RESPONSE 10

Consultation Response 10 comprised a response from Ulster Wildlife to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review raised one key point, pertaining to the continuous appraisal of options to ensure the decision processes retain sufficient flexibility to respond to aspects of risk and opportunity.

## 11.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Continuous appraisal of options to ensure the decision processes retain sufficient flexibility to respond to aspects of risk and opportunity.

**TT Commentary**

TT have reviewed the Consultation Response 10 and acknowledge the point raised and will incorporate this consideration into further actions.

## 11.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider further actions during any future design phases of the remediation strategy.

# 12.0 CONSULTATION RESPONSE 11

Consultation Response 11 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review raised multiple key points, including the prioritisation of sealing, wrapping and extracting tarry waste, with essential long-term monitoring to verify the stability of residual impacts. This was deemed the highest risk by this individual, recommending it be treated first. It was also stated that the community should be involved in all major phases to build trust and local support. A gap was identified with respect to the proposed A6, with the development of a risk assessment deemed necessary. Conclusively, an inquiry to review illegal dumping and future oversight was recommended.

## 12.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Prioritise sealing, wrapping, or extracting tarry waste as remediation methods;
- Long-term monitoring is essential to verify ongoing stability and detect any residual impacts;
- Tarry-waste areas represent highest risk; secure dedicated funds to remediate these first;
- Involve community representatives at all major phases to build trust and local support; and
- Risk assessment needed for A6 routing through.

**TT Commentary**

TT have reviewed the Consultation Response 11 and acknowledge the issues that have been identified and will incorporate this consideration into further actions.

## 12.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider further actions during any future design phases of the remediation strategy.

# 13.0 CONSULTATION RESPONSE 12

Consultation Response 12 comprised a response from Keltbray to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review did not contain any key or other points to be discussed within this report. However, they had responded 'Yes', to all but the seventh question (No Response).

# 14.0 CONSULTATION RESPONSE 13

Consultation Response 13 comprised a response from CDE Gorup to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review outlines several key points, including methods for processing valuable inert soils and emphasising their current market value.

## 14.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Recommend wet processing to segregate and recover valuable inert fractions and cleaning/washing of polluted soils;
- Inert fraction has £15–30 million value; recover and reuse can offset costs for building of the A6;
- Aerobic stabilization technologies can reduce gas-generation period from decades to 3–5 years;
- Material recovery plus accelerated stabilization enables < 10-year site reinstatement and community reuse;
- Sand and gravel can be recovered from soil which could be used for portions of the A6 work; and
- Recovered sand and gravel can supply part of the A6 works, reducing external material demand.

**TT Commentary**

TT have reviewed the Consultation Response 13 and acknowledge the issues that have been identified and will incorporate this consideration into further actions.

## 14.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

# 15.0 CONSULTATION RESPONSE 14

Consultation Response 14 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review outlines several key points, including the removal of all waste to an appropriate facility, especially in close proximity to waterways, while also ensuring that the remediation does not delay the A6 development.

## 15.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Suggested to remove all of the waste and move it to a properly designed landfill site;
- Leaving any waste adjacent to waterways risks continued contamination;
- Current objectives too narrow; must include full waste removal as a primary goal;
- Fixing the Drumahoe bottleneck is critical; remediation should not delay A6 completion; and
- Emphasised total waste removal from site.

**TT Commentary**

TT have reviewed the Consultation Response 14 and acknowledge the issues that have been identified and will incorporate this consideration into further actions.

## 15.2 FURTHER ACTIONS

The issues highlighted formed part of the original Remedial Options Appraisal process, these objectives will be reviewed as part of the detailed design including further sensitivity analysis and review of all objectives The Consultation Response does not require any immediate amendments to the Draft Remedial Strategy.

# 16.0 CONSULTATION RESPONSE 15

Consultation Response 15 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy. Their review outlines several key points, including the concern over the nature and composition of deposits on site, with anecdotal evidence of gas emitting from the 'lake' onsite. Further concern is displayed in regard to the containment of contaminants in the event of flooding on site, respondents are fearful of leachate escaping not only to the River Faughan but elsewhere. With this in mind, it is suggested that carcinogenic/tarry waste zones bear the cost first, but all waste should be treated eventually. Additionally, the response indicates safety of drinking water for local community, with queries as to why a dump could develop without any containment in place prior.

## 16.1 KEY POINTS RAISED

The key points raised from the consultation are listed below:

- Concerns over the nature and composition of deposits on site;
- Flood risk threatens containment;
- High-risk (tarry/carcinogenic) areas demand immediate action; legacy polluters should bear remediation costs first;
- Existing objectives are valid but lack proactive water - supply safeguards; stakeholder (landowner) option should be included; ranked priorities;
- The paramount community benefit is safe drinking water; regulatory bodies must answer for past failures;
- Current road alignment of the A6 assumes containment; it is better to reroute or remediate first to reduce future liability; and
- Without flood defences, any containment (capping, bunds) will be overtopped, releasing leachate downstream.

**TT Commentary**

TT have reviewed the Consultation Response 15 and acknowledge the issues that have been identified and will incorporate this consideration into further actions during the detailed design stages. The Consultation Response does not require any immediate amendments to the Draft Remedial Strategy

## 16.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.
With regards to concerns regarding the future A6 this will be addressed via continued A6 collaboration and detailed designs. Further actions regarding the safe drinking water, regulatory bodies answering for past failures and high-risk (tarry/carcinogenic) areas demand immediate action and will be under consideration of DAERA.

# 17.0 CONSULTATION RESPONSE 16

Consultation Response 16 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 17.1 POINTS RAISED

From review of the consultation response there was no key points raised which warranted any significant issues or concerns of the draft Remediation Strategy. The author of the response commended the public engagement events in Eglinton and Derry, saying they feel well informed by these sessions and reassured by the progress of the remediation work. They expressed confidence that the strategy's objectives will be successfully achieved.

**TT Commentary**

TT have reviewed Consultation Response 16 and note that no issues or concerns have been identified, positive feedback was provided on engagement and therefore there are no changes deemed necessary to draft Remediation Strategy from this response.

# 18.0 CONSULTATION RESPONSE 17

Consultation Response 17 comprised a response from an anonymous member of staff from Queens University Belfast to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 18.1 KEY POINTS RAISED

From review of the consultation response the following key points were raised:

- The response indicated that the draft Remediation Strategy currently does not allow for an effective technical appraisal of the favoured options, nor does it contain enough synthesised information that would allow a remediation contractor to effectively design and cost such a project.
  **TT commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response noted that even though extensive site investigation work and ongoing monitoring has occurred that the data collected needs to be synthesised into a calibrated 3D groundwater flow and contaminant transport model that will allow the following remediation design parameters to be considered. It was also noted that at present it is assumed that all groundwater is travelling towards the river Faughan and that little consideration has been given to a groundwater flow regime down the Faughan river valley in the general direction of the Foyle. The response detailed that carrying this out would allow identification of potential offsite receptors (e.g. the larger groundwater body - a controlled water) and / or provide assurance that all contaminant pathways have been considered.
  **TT Commentary**
  Tetra Tech recommends a review of proposed groundwater monitoring network onsite and consideration of additional offsite monitoring locations.

- The response noted that the current conceptual site model does not consider the effect of current ground gas generation and its effect on pore water expulsion, leachate generation and the site groundwater flow regime.
  **TT Commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The respondent highlighted that more consideration of emerging pollutants, such as PFAS or microplastics, need to be made within the draft Remediation Strategy and the effect of climate change events that could cause future releases of contaminated material during and post remediation.

**TT Commentary**
It is recognised that the published DQRA pre-dates some of the monitoring of emerging pollutants that has been carried out by NIEA. A review of emerging pollutants potentially present in groundwater at the site is planned.

- Contaminated groundwater residence times for effective remediation in proposed PRBs needs to be considered within the design.
  **TT Commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response detailed that the siting of pumping wells, identification of effective capture zones and pumping rates for the proposed leachate/ groundwater circulation systems should be considered within the draft Remediation Strategy.
  **TT Commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response indicated that collaboration between the roads service and the environmental consultants is required at the design stage to promote circular, lean engineering and carbon saving opportunities around the site and proposed transport infrastructure
  **TT Commentary**
  Tetra Tech acknowledges the point raised and this will be addressed via ongoing collaboration with DfI A6 team.

- The response requested that opportunities for research collaborations around long term monitoring and future management of the site should be realised.
  **TT Commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response stated that 'future use' should be allowed on the site, should be clearly defined within the report.
  **TT Commentary**
  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response detailed that within the remediation strategy there are several educational opportunities such as:
    - Co-design with the remediation strategy around the final use of the site and public interaction with it.
    - Proposed Citizen Science programs where the public can take part in the long-term monitoring of technologies, compliance points at the site boundaries and surrounding areas.
    - All site monitoring data should be available and for easy public access through a clear and transparent web page / app / other social media.

  **TT Commentary**

  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response detailed an expectation for DfI and Tetra Tech to adopt best practice and a circular economy approach around reuse of clean / remediated / recovered materials at the site such as the utilization of the WRAP guidance ""Designing out Waste: A Design team guide for civil engineering"" and relevant Quality Protocols on the recovery of aggregates etc.

  **TT Commentary**

  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

- The response requested that consideration be made for the proximity principal throughout the design process, that locally sourced materials are used and the creation of jobs for the local community. The response asked that the use of local biochar in the proposed wetlands, nature-based solutions or as alternative to granular activated carbon in PRBs be considered.

  **TT Commentary**

  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

## 18.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider key points during any future design phases of the remediation strategy.

Tetra Tech recommends a technical task to complete a review of the proposed groundwater monitoring network, including consideration of additional off-site monitoring locations to better define flow directions, capture zones and potential off-site receptors.

It is recognised that the published DQRA pre-dates some of the monitoring of emerging pollutants that has been carried out by NIEA. A review of emerging pollutants (for example PFAS and microplastics) and climate-change driven release scenarios is planned.

Ongoing collaboration with the A6 project team will also be pursued to ensure design integration with transport infrastructure.

Further actions include the opportunities for research partnerships, public engagement (including citizen-science monitoring) and clear public access to monitoring data will be explored and documented as part of the next design phase.

# 19.0 CONSULTATION RESPONSE 18

Consultation Response 18 comprised of two responses from an anonymous member of staff from Soil Treatment Systems to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

Both responses were similar in their responses.

## 19.1 POINTS RAISED

From review of the consultation response the following key points were raised in Response 1 and Response 2:

- The response commented that the success of the draft Remediation Strategy will be determined by budgetary constraints.

  **TT Commentary**

  TT acknowledges the comment from the consultation response and budgetary constraints will be considered as part of the Economic appraisal.

- The response noted that a phased contract approach would be easier to fund over a longer period and could provide for utilization of treatment processes options currently under development.
- Highlighted that the A6 road scheme could provide the site with a good transport link which could potentially enhance future development and that the A6 road scheme could also be a source of capping material for the site.
- The response advised that current technologies, such as PRBs, treatment cells or flushing reactors, would reduce the overall cost of the project.

  **TT Commentary**

  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

## 19.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future design phases of the remediation strategy.

# 20.0 CONSULTATION RESPONSE 20

Consultation Response 20 comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 20.1 POINTS RAISED

From review of the consultation response there was no key points raised which warranted any significant issues or concerns of the draft Remediation Strategy. The author of the response agreed with Questions 1 – 6 and supplied no response for Question 7. No further commentary was provided on any of the questions supplied.

**TT Commentary**

TT have reviewed Consultation Response 20 and note that no issues or concerns have been identified, positive feedback was provided on engagement and therefore there are no changes deemed necessary to draft Remediation Strategy from this response.

# 21.0 CONSULTATION RESPONSE 21

Consultation Response 1comprised a response from an anonymous member of the public to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 21.1 POINTS RAISED

From review of the consultation response the following key points were raised:

- The response noted that the proposed solutions are “extremely expensive, complex, unproven, maybe not capable of being implemented” and may take too long to implement before contamination happens with potential to eventually fail over time.

  **TT Commentary**

  Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

- The response stated that the proposed remediation is too complex and prone to failure and that the River Faughan should just be rerouted instead.

  **TT Commentary**

  Tetra Tech has not considered this to be a practical approach, and no further action is justified.

# 22.0 CONSULTATION RESPONSE 22

Consultation Response 22 comprised a response from an anonymous member of the Construction Employers Federation to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 22.1 POINTS RAISED

From review of the consultation response there was no key points raised which warranted any significant issues or concerns of the draft Remediation Strategy. The author of the response agreed with Questions 1 – 6 and supplied no response for Question 7. No further commentary was provided on any of the questions supplied.

**TT Commentary**

TT have reviewed Consultation Response 20 and note that no issues or concerns have been identified, positive feedback was provided on engagement and therefore there are no changes deemed necessary to draft Remediation Strategy from this response.

# 23.0 CONSULTATION RESPONSE 23

Consultation Response 23 comprised a response from an anonymous member of Envirotreat Solutions Ltd. to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 23.1 POINTS RAISED

From review of the consultation response the following key points were raised:

- Remediation relies on specialist-designed Permeable Reactive Barriers (PRBs) and further focused hydrogeological investigation to underpin effective design is required;
- Remediation needs experienced, specialist input to ensure the best value and technical robustness;
- Proposed capping layers are practical and cost-effective but need detailed design;
- Detailed engineering and remedial design work is still required;
- A balance must be struck between environmental benefit and affordability; and
- The response indicated that the zone-based splitting is sensible approach but must be followed by detailed, zone-specific design and detailed design work is critical to deliver best value for money and to address site-specific pollution risks.

**TT Commentary**

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognized that further detailed design work is planned. TT will consider during any future phases of the project.

- Transport infrastructure typically falls outside a remediation strategy's scope unless there is a specific, site-driven rationale.

**TT Commentary**

Tetra Tech acknowledges the point raised and no further action is justified.

## 23.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

# 24.0 CONSULTATION RESPONSE 24

Consultation Response 24 comprised a response from an anonymous local resident to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 24.1 POINTS RAISED

From review of the consultation response there was no key points raised which warranted any significant issues or concerns of the draft Remediation Strategy. The author of the response agreed with Questions 1 – 7. There are two comments provided;

- Suggests part of the grounds could be converted into a walking path similar to that on the Bay Road; and
- Suggests main objective to be protection of the drinking water and the Faughan.

**TT Commentary**

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

# 25.0 CONSULTATION RESPONSE 25

Consultation Response 25 comprised a response from an anonymous member of Londonderry YMCA to the seven consultation questions provided by the NIEA in relation to the draft Remediation Strategy.

## 25.1 POINTS RAISED

From review of the consultation response the following key points were raised:

- Respondents noted that the area where the site abuts the river is the highest priority for remediation and suggested installing a wall or other containment barrier to prevent contaminants reaching the river or being released during a flood.
- Objection was raised to locating a road at this position on environmental grounds.

**TT Commentary**

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

- In response to whether the strategic objective will be achieved by the draft Remediation Strategy, the response noted that the extent of the dump or its composition is not known and that they think it's best left alone and managed.
- Noted that funding should be focused only on the areas where it abuts the river Faughan
- The respondent believes that the site should be left alone and managed as it would be unsettled again if tampered with.

**TT Commentary**

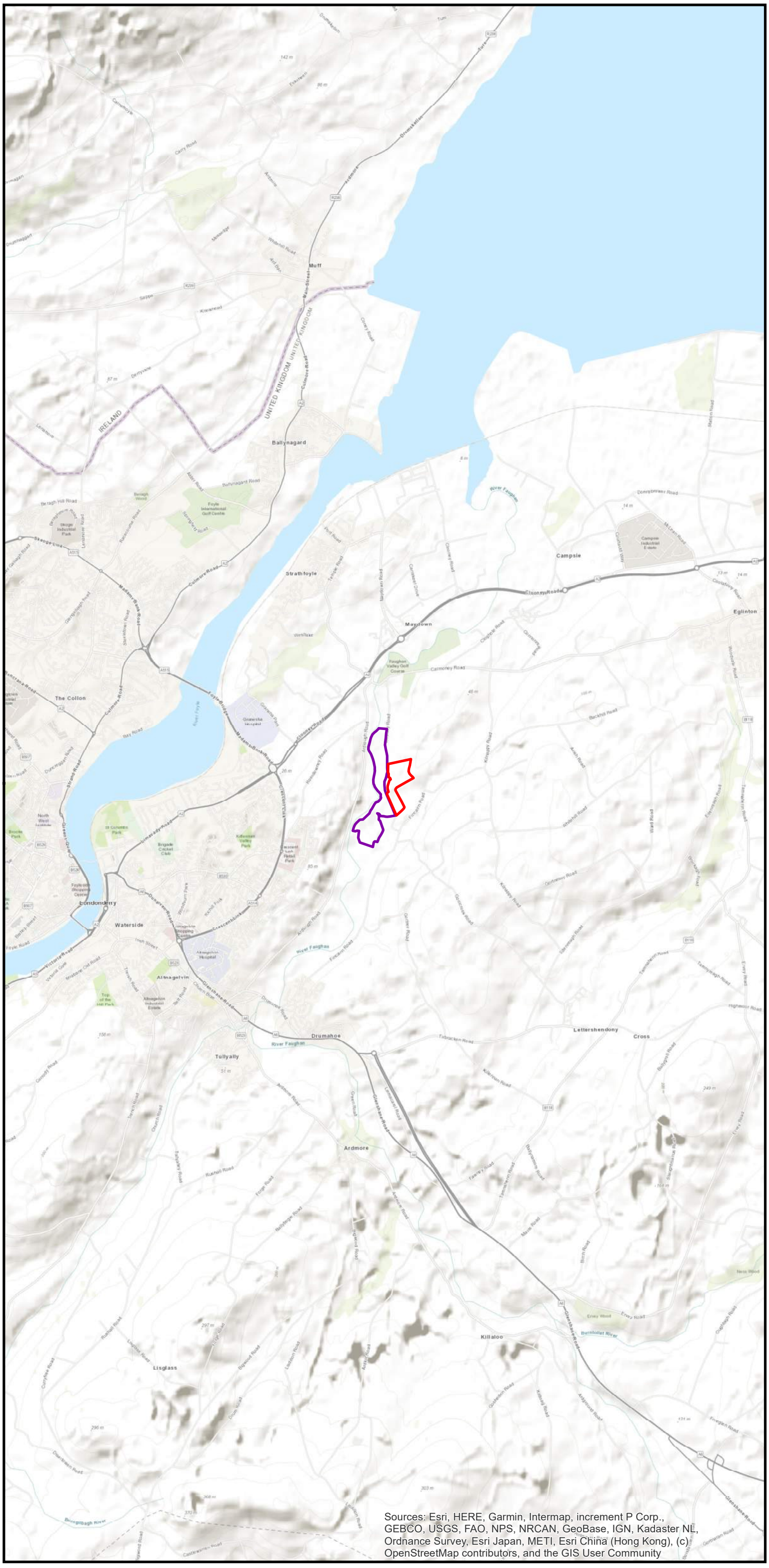
Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

## 25.2 FURTHER ACTIONS

Following public consultation on the draft Remediation Strategy, which is an outline of proposed remediation solutions for the site, it is recognised that further detailed design work is planned. TT will consider during any future phases of the project.

# FIGURE 1: SITE LOCATION PLAN

# Figure 1. Site Location Plan




Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

N

## Legend

- City Industrial Waste
- Campsie Sand Gravel

Note:

Drawn by: [redacted]

Checked by: [redacted]

Office: Belfast Revision: No.1

Client: NIEA Project: B030252 - Mobuoy Road Remediation

0 850 1,700 3,400 Meters

Date: 30/06/2022


Locksley Business Park
Montgomery Road
Belfast
BT6 9UP
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# APPENDIX A: REPORT CONDITIONS

**REPORT CONDITIONS**

This report is produced solely for the benefit of ***NIEA,*** and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise.

This report is prepared for the proposed uses stated in the report and should not be used in a different context without reference to Tetra Tech. In time improved practices, fresh information or amended legislation may necessitate a re-assessment. Opinions and information provided in this report are on the basis of Tetra Tech using due skill and care in the preparation of the report.

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections. Environmental conditions can vary, and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times.

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment. It is necessarily restricted, and no liability is accepted for any other aspect. It is based on the information sources indicated in the report. Some of the opinions are based on unconfirmed data and information and are presented as the best obtained within the scope for this report.

Reliance has been placed on the documents and information supplied to Tetra Tech by others but no independent verification of these has been made and no warranty is given on them. No liability is accepted, or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report.

Whilst skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions.

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions. Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model and the assumptions inherent within the approach used. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions.

The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accepts no liability for issues with performance arising from such factors.

# APPENDIX B: CONSULTATION RESPONSE SCREENING TABLE

| Report (Respondent) | Consultation Question | Response | Additonal Information Provided | Theme | Main Issues Identified in Consultation Response | Screen | Actions / Recommendations in Consultation Response | Update to dRS Required ? | Action Required? | Detail of further action / justification for no further action | Screen | Additional Information - Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Response 1: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | None | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | Yes | Detail within draft Remediation Strategy | | | Surface water management needs considered as an objective within the remediation strategy | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Detail within draft Remediation Strategy | | | Surface water management needs considered as an objective within the remediation strategy | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | No Response | | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Additional information provided | Yes | Detail within draft Remediation Strategy | | | careful management of ecology is needed to not adversely impact species that have established at the site | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 9: Loughs Agency** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Targeted Remediation | Zones 5–9 border the River Faughan SAC and must be fully remediated to prevent leachate ingress. | Remediation Strategy - DAERA and ICT to jointly consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | Emphasise protection of SAC water quality. |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Landfill Gas | Consider can the site be remediated whilst restricting the release of greenhouse gases | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | Align with NI carbon-reduction targets. |
| | | | | Landfill Gas | Methane could power site operations or feed carbon-capture systems; opportunity for renewable energy recovery. | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | Assess technical and economic viability. |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | For Information | Strong potential for post-remediation social and educational programs via Loughs Agency outreach. | Comment of support | | No | Yes | Ensure engagement with Loughs Agency for future site vision works | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | No Response | | | | | | | | | | |
| **Response 10: Ulster Wildlife** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Finance / Costs | Recommend a flexible, continuous-appraisal process to adapt as new data/funding/regulations arise. | LCRM Process - ICT to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | No Response | | | | | | | | | | |
| **Response 11: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | Yes | Tarry Waste | Prioritise sealing, wrapping, or extracting tarry waste | Remediation Strategy - ICT to consider | Include removal or containment of tarry waste as a primary remedial method in detailed design. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Unsure | Yes | Remediation Objectives | Long-term monitoring is essential to verify ongoing stability and detect any residual impacts. | Remediation Strategy - DAERA and ICT to jointly consider | Post remediation monitoring | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Finance / Costs | Tarry-waste areas represent highest risk; secure dedicated funds to remediate these first. | Remediation Strategy - ICT to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | Public Consultation | Involve community representatives at all major phases to build trust and local support. | | Schedule community-sector workshops and updates through the project. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | | Risk assessment needed for A6 routing through | | Conduct a site-specific A6 risk assessment and adjust alignment as required. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Public Enquiry | Recommend an independent community inquiry to review past illegal dumping and future oversight. | Outside Remediation Strategy Scope - DAERA to consider | Facilitate an independent Mobuoy Community Enquiry under DAERA oversight. | No | Yes | DAERA to consider | | |
| **Response 12: Keltbray** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | No Response | No Response | | | | | | | | | |
| **Response 13: CDE Group** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | Yes | Detail within draft Remediation Strategy | Recommend wet processing to segregate and recover valuable inert fractions and clean polluted soils. | Remediation Strategy - DAERA and ICT to jointly consider | Specify wet processing in tender documentation to maximize material recovery. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | The polluted materials can be washed clean and the water then treated for PAH, Heavy metal etc. |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Finance / Costs | Inert fraction has £15–30 million value; recover and reuse can offset costs for building of the A6. | | Model revenue from inert recycling and apply offsets against project costs. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Proposed Remediation Methods | Aerobic stabilization technologies can reduce gas-generation period from decades to 3–5 years. | | | No | No | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | Proposed Remediation Methods | Material-recovery plus accelerated stabilization enables < 10 year site reinstatement and community reuse. | | Add aerobic landfill-gas acceleration technologies to the remediation toolbox. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | Sand and gravel can be recovered from soil which could be used for portions of the A6 work. | | Integrate material recovery and rapid restoration into site-vision metrics. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Proposed Remediation Methods | Recovered sand and gravel can supply part of the A6 works, reducing external material demand. | | Allocate recovered aggregate to A6 project under a formal supply agreement. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 14: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | No | Yes | Proposed Remediation Methods | Remove all of the waste and move it to a properly designed landfill site | | | No | No | Considered as Part of ROA | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | No | Yes | Implementation | Leaving any waste adjacent to waterways risks continued contamination. | | | No | No | Considered as Part of ROA | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | | | | | | | | | At least it will make a start to get the waste removed |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | No | Yes | Implementation | Current objectives too narrow; must include full waste removal as a primary goal | | | No | No | Considered as Part of ROA | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | | | | | | | | | Turning a dumping disaster into a positive legacy ("bring some good"). |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | Fixing the Drumahoe bottleneck is critical; remediation should not delay A6 completion. | | | No | No | Not related to the Mobuoy Remediation project | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Additional information provided | Yes | Implementation | Emphasised total waste removal from site. | | | No | No | Considered as Part of ROA | | |
| **Response 15: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | No | Yes | | concerns over builders/inert waste deposits between road and river | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | No | | Climate Change / Flooding | flood risk threatens containment. | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Finance / Costs | High-risk (tarry/carcinogenic) areas demand immediate action; legacy polluters should bear remediation costs. | | | No | No | DAERA to consider | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | | Existing objectives are valid but lack proactive water-supply safeguards; stakeholder (landowner) option should be included; ranked priorities. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | | The paramount community benefit is safe drinking water; regulatory bodies must answer for past failures. | | | No | No | DAERA to consider | | |

| Report (Respondent) | Consultation Question | Response | Additonal Information Provided | Theme | Main Issues Identified in Consultation Response | Screen | Actions / Recommendations in Consultation Response | Update to dRS Required ? | Action Required? | Detail of further action / justification for no further action | Screen | Additional Information - Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | Current road alignment assumes containment; better to reroute or remediate first to reduce future liability. | | | No | No | Continued A6 collaboration and detailed design | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Climate Change / Flooding | Without flood defences, any containment (capping, bunds) will be overtopped, releasing leachate downstream. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 16: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | | | Comment of support | | | | | | commended the public engagement events in Eglinton and Derry, saying they feel well informed by these sessions and reassured by the progress of the remediation work. They expressed confidence that the strategy's objectives will be successfully achieved. |
| **Response 17: QUB** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | Yes | Detail within draft Remediation Strategy | The draft strategy in it's current state does not allow for an effective technical appraisal of the favoured options nor does it contain enough synthesised information that would allow a remediation contractor to effectively design and cost such a project. | Remediation Strategy - ICT to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | | | DQRA | While there is extensive site investigation<br>work and on going monitoring this data needs to be synthesised into a calibrated 3D groundwater flow and contaminant transport model that will allow the following remediation design parameters to be considered.<br><br>Regional groundwater flow along the alluvial / glacial outwash plain of the Faughan valley. At present it is assumed that all groundwater is travelling towards the river Faughan, little consideration has been given to a groundwater flow regime down the Faughan river valley in the general direction of the Foyle. This would allow identification of potential offsite receptors (e.g. the larger groundwater body - a controlled water) and / or provide assurance that all contaminant pathways have been considered.<br><br>Groundwater / Contaminant transport travel times from identified source areas to proposed remediation / compliance points | LCRM Process - ICT to consider | | No | Yes | Review of proposed groundwater monitoring network onsite and consideration of additional offsite monitoring locations | | Reduction of landfill gas to acceptable levels to protect site users |
| | | | | DQRA | The current conceptual site model does not consider the effect of current methane / soil gas generation and its effect on pore water expulsion, leachate generation and the site groundwater flow regime. | LCRM Process - ICT to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | Improvement in the quality of the Faughan groundwater body |
| | | | | DQRA | | | More consideration needs to be given to emerging pollutants (e.g. PFAS and microplastics) and the effect of climate change events (major flooding of the<br>site during and post remediation) that could cause future releases of contaminated material during and post remediation. | No | Yes | Review of emerging pollutants to be undertaken, | Remediation Strategy - DAERA and ICT to jointly consider | Protection of surface water quality at the River Faughan and feed tributaries |
| | | | | Detail within draft Remediation Strategy | | | For consideration in design: Contaminated groundwater residence times for effective remediation in proposed PRBs | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to concider | Protection of the quality of the NI Water's raw water abstraction at Cloghole (for Carmoney WTW) |
| | | | | Detail within draft Remediation Strategy | | | For consideration in design: Siting of pumping wells, identification of effective capture zones and pumping rates for proposed leachate / groundwater circulation systems | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to concider | |
| | | | | A6 Road Scheme | | | There needs to be closer collaboration with roads service and the environmental consultants at the design stage (e.g. NOW) to promote circular, lean<br>engineering and carbon saving opportunities around the site and proposed transport infrastructure | No | Yes | Ongoing collaboration with A6 team | Remediation Strategy - DAERA and ICT to jointly consider | |
| | | | | Detail within draft Remediation Strategy | | | Opportunities for research collaborations around long term monitoring and future management of the site should be realised. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to concider | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | Yes | For Information | See response to Q1. | None | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | DQRA | Where pollutant linkage(s) have been correctly identified and there is the significant possibility of significant harm there is a legal obligation to manage that risk. This should not be seen as an opportunity to avoid doing what is ethically and professionally correct. | Remediation Strategy - DAERA and ICT to jointly consider | | No | Yes | DAERA to consider | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Remediation Objectives | I would also expect that any remediation on the site considers its future use and the proposed remediation strategy makes the site 'suitable for use'. | Remediation Strategy - DAERA and ICT to jointly consider | The strategy should also clearly define what 'future use' should be allowed on the site. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Remediation Strategy - DAERA and ICT to jointly consider | |
| | | | | Remediation Objectives | I would also expect that the strategy ensures that any identified pollutant linkages are effectively broken and verified and identified risks are clearly managed. | Remediation Strategy - DAERA and ICT to jointly consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | Future Land Use / Site vision | | | There are several educational opportunities within this site remediation strategy and the surrounding area.<br><br>There should be an element of Co-Design within the remediation strategy around the final use of the site and how the public will interact with it.<br><br>There are opportunities for Citizen Science programs where the public can take part in the long term monitoring of technologies adapted on site and at compliance points at the site boundaries and surrounding areas.<br><br>The public should have access to all site monitoring data in an easy to access, and clear and transparent web page / app / other social media. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to concider | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | | | I would expect that the Roads service together with the environmental consultants adopt best practice and a circular economy approach around reuse of clean / remediated / recovered materials at the site. e.g. By Best Practice utilising the WRAP guidance "Designing out Waste: a Design team guide for civil<br>engineering" and relevant Quality Protocols on the recovery of aggregates etc.<br><br>There are also opportunities for some of the proposed remediation designs e.g. the constructed wetlands to also deal with runoff from the proposed A6<br>scheme (heavy metals / microplastics / tyre rubber / PAHs) rather than discharge to sewer or the nearest water body (River Faughan) | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Remediation Strategy - DAERA and ICT to jointly consider | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Detail within draft Remediation Strategy | | | Please consider the proximity principal throughout the design process and use locally sourced materials and create jobs for the community. e.g. Consider<br>the use of local biochar in the proposed wetlands, nature based solutions or as alternative to granular activated carbon in PRBs. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | Remediation Strategy - DAERA and ICT to jointly consider | |
| **Response 18: Public (Soil Treatment Systems) Response 1** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Implementation | This phased contract approach would be not only easier to fund over a longer period but could provide options for utilization of treatment processes currently under development. | | phased approach to be considered | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Finance / Costs | success will be determined by budgetary constraints | | | No | No | For comment | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | For Information | | | | | | | | Waste to Energy plant which could provide long-term gains for the local economy and help with the recovery of the investment cost of the site remediation. |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | A6 road scheme could provide the site with an exceptional transport link to the site and would enhance the possibility of future site development. The a6 works could be a source of material to complete the capping of the entire site. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Implementation | current technologies to reduce the overall cost of the project - PRBs,<br>Treatment Cells, Flushing Reactors, etc | Remediation Strategy - DAERA and ICT to jointly consider | | | | | | |
| **Response 18: Public (Soil Treatment Systems) Response 2** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | Yes | Proposed Remediation Methods | | | | | | | | Hydro Insulation Barrier 3.5 Kilometre's in length between the river and the mobuoy site to a depth of 10 meters below EGL would be sufficient to protect the river |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | Yes | Proposed Remediation Methods | | | | | | | | considered is the use of Best Available Technologies. |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Implementation | Phased approach to remediation, to focus on current risk to Faughan river first. | LCRM Process - ICT to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | Yes | Finance / Costs | Funding is required in a phased manner to help eliminate the short term risks to the primary receptor being the River Faughan | Outside ICT Scope - DAERA to consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | For Information | | | | | | | | Waste to Energy plant which could provide long-term gains for the local economy and help with the recovery of the investment cost of the site remediation. |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | Yes | A6 Road Scheme | A6 road scheme could provide the site with an exceptional transport link to the site and would enhance the possibility of future site development. The a6 works could be a source of material to complete the capping of the entire site. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Implementation | current technologies to reduce the overall cost of the project - PRBs,<br>Treatment Cells, Flushing Reactors, etc | Remediation Strategy - DAERA and ICT to jointly consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |

| Report (Respondent) | Consultation Question | Response | Additonal Information Provided | Theme | Main Issues Identified in Consultation Response | Screen | Actions / Recommendations in Consultation Response | Update to dRS Required ? | Action Required? | Detail of further action / justification for no further action | Screen | Additional Information - Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Response 20: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | No Response | No Response | | | | | | | | | |
| **Response 21: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | No | Yes | Finance / Costs | The proposed solutions are extremely expensive, complex, unproven, maybe not capable of being implemented, may take too long to implement before contamination happens, and may eventually fail over time. | | | No | No | For Comment | | rerouting the Faughan River away from the contaminated site, there is plenty of open farmland which could be purchased and a new channel dug for the river. |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | No | Yes | Finance / Costs | it's too complex and prone to failure. Reroute the River Faughan instead. | | | No | No | Not considered practicable | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | | river should be rerouted instead of using the proposed solutions. | | | No | No | Not considered practicable | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | No | Yes | | | | | | | | | Reroute the river, maybe add a riverside walk or other amenities. |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | No | Yes | | | | | | | | | reroute the Faughan River. |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | | | | | | | | | | The simplest, least expensive, most permanent solution is to reroute the Faughan River away from the contaminated site. |
| **Response 22: Construction Employers Federation** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | No | | | | | | | | | |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | No Response | No Response | | | | | | | | | |
| **Response 23: Envirotreat Solutions** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | Yes | | Reliance on specialist-designed Permeable Reactive Barriers (PRBs) requires further focused hydrogeological investigation to underpin effective design. | Remediation Strategy - DAERA and ICT to jointly consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | | | | Necessity for experienced, specialist input to secure best value and technical robustness. | Remediation Strategy - DAERA and ICT to jointly consider | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | | | | Capping layers are practical and cost-effective but need detailed design. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | | | Detailed engineering and remedial design work is still required. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | | | A balance must be struck between environmental benefit and affordability. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | | | | | | | | | | social and community gains are a valid strategic aim. |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | No | | | transport infrastructure typically falls outside a remediation strategy's scope unless there is a specific, site-driven rationale. | | | No | No | For Comment | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | | | Zone-based splitting is sensible but must be followed by detailed, zone-specific design. Detailed design work is critical to deliver best value for money and to address site-specific pollution risks. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 24: Public** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | Yes | No | | | | | | | | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | Yes | No | | | | | | | | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | No | | | | | | | | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | No | | | | | | | | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | Yes | Yes | Future Land Use / Site vision | | | | | | | | Perhaps part of the grounds could be converted into a walking path similar to that on the Bay Road |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | Yes | No | | | | | | | | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | Yes | Remediation Objectives | | | | | | | | Main objective in my opinion is to protect the drinking water and the Faughan. It would be nice if the grounds were able to be converted into some kind of walking park if safe to do so. |
| **Response 25: Public (Londonderry YMCA)** | 1. Do you think the draft Remediation Strategy is the right way to remediate the Mobuoy site? | No | Yes | Targeted Remediation | The area where it abuts the river would be the most important area to remediate, if a wall or a barrier could be installed to stop the toxins leaking to the river or to stop it over flowing during a flood | | | No | No | For Comment | | |
| | 2. Do you believe that implementation of the draft remediation Strategy will achieve the remediation strategic objectives? | No | Yes | DQRA | nobody knows the extent of this dump or what's in it, I think its best left alone and managed | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 3. Where difficult decisions around funding need to be made to allocate resource, should funding be focused on the zones of highest environmental risk? | Yes | Yes | Targeted Remediation | only at the areas where it abuts the river Faughan | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 4. Are the four environmental strategic objectives for the Mobuoy site what you would expect to see in the remediation strategy for the Mobuoy site? | Yes | | | I think if its left alone and managed would be best, as no one knows what's in it and it would be unsettled again if tampered with | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | 5. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Creation of long-term benefit to the site and the wider community which aligns to the site vision. | No | | | | | | | | | | its my opinion that the site should be closed off and left alone for decades |
| | 6. Would you expect to see the following strategic objective included in the draft remediation strategy for the Mobuoy site?<br><br>Allow integration with the future A6 road scheme and wider public interests | No | | | object to the road at this location for environmental reasons | | | No | No | For Comment | | |
| | 7. Please provide any additional, thoughts, comments, or relevant information to help inform the next steps and completion of the remediation strategy. | Yes | | | | | | | | | | dont touch the dump , close it off and let it settle for many years to come |

| Respondent | Theme | Main Issues Identified in Consultation Response | Screen | Actions / Recommendations in Consultation Response | Update to dRS Required ? | Action Required? | Detail of further action / justification for no further action | Screen | Additional Information - Comments |
|---|---|---|---|---|---|---|---|---|---|
| **Response 2: Public Consultation Response** | | clarity whether the site will be vested without compensation in order for remediation work to be carried out | Outside Remediation Strategy Scope - DAERA to consider | Land tenure and vesting to be included? | No | Yes | DAERA to consider | | |
| | Detail within draft Remediation Strategy | the protection of the river Faughan is the most important goal of the remediation | Comment of support | Make clear "Protect the River Faughan" to primary objective and add river-health KPIs in EMP | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | Tarry Waste | adjacent category A tarry waste sites left out | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to consider | Expand scope to include removal of the four nearby Category A sites in one mobilisation | No | Yes | DAERA to consider | | |
| | Future Land Use / Site vision | The site should be left to rewild, with no public amenity or hunting, plus interpretive signage/memorial (e.g. for whistle-blower Joe Ferguson) and formal "Rights of the River" for the Faughan. | Remediation Strategy - DAERA and ICT to jointly consider | Considerations of final designs | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | A6 Road Scheme | The proposed A6 alignment through Mobuoy was never assessed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act before any works proceed. | Outside Remediation Strategy Scope - DAERA to consider | A6 proposals to be reviewed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 3: River Faughan Anglers** | Detail within draft Remediation Strategy | ORS progress slow; June 2023 draft missing recent groundwater and design data | | Integrate all new monitoring results, finalize detailed remediation design, publish updated project timeline | No | Yes | Review of current EMP trends and data | | |
| | Finance / Costs | RFA fears no clear funding source or commitment for the high cleanup costs. | | | No | Yes | DAERA to consider | | |
| | Project Timeline | Undefined project timeline - 17 years since raising concerns of illegal dumping. | | Publish a detailed schedule with milestones for monitoring, design, permits, works. | No | Yes | DAERA to consider | | |
| | A6 Road Scheme | Proposed A6 road through Mobuoy lacks up-to-date EIA, Habitats & Climate-Act review. | | Pause A6 planning; commission fresh EIA, Habitats appraisal & Climate-Act compliance. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | DQRA | vigilant to the prospect of as yet undetected sources of contamination that may exist | | | No | Yes | Strategy for undetected sources of contamination discovery protocol to be incorportated into future detailed design | | |
| | Landfill Gas | GHG emissions management unclear | | Add a Greenhouse-Gas Management sub-plan (capture/vent protocols) | No | Yes | Review of gas management plan scoping | | |
| | Climate Change / Flooding | No climate-proofing / flood resilience plan | | Include a Flood-Risk & Climate-Resilience Plan (barrier integrity checks, extreme-event response) | No | Yes | Update as part of FRA review assess current flood defences | | |
| | Detail within draft Remediation Strategy | discharges to river Faughan should be conforming with required water quality standards before being allowed to leave the site. | | Define SAC discharge limits & monitoring in the EMP | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 4: The Gathering (Part 1 & 2)** | | clarity whether the site will be vested without compensation in order for remediation work to be carried out | Outside Remediation Strategy Scope - DAERA to consider | Land tenure and vesting to be included? Or is this outside of the RS scope | No | Yes | DAERA to consider | | |
| | Detail within draft Remediation Strategy | the protection of the river Faughan is the most important goal of the remediation | Comment of support | Make clear "Protect the River Faughan" to primary objective and add river-health KPIs in EMP | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | Tarry Waste | adjacent category A tarry waste sites left out | Outside Remediation Strategy Scope - Scope for future planned work - Project Team to consider | Expand scope to include removal of the four nearby Category A sites in one mobilization | No | Yes | DAERA to consider | | |
| | Future Land Use / Site vision | The site should be left to rewild, with no public amenity or hunting, plus interpretive signage/memorial (e.g. for whistle-blower Joe Ferguson) and formal "Rights of the River" for the Faughan. | Remediation Strategy - DAERA and ICT to jointly consider | Considerations of final designs | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | A6 Road Scheme | The proposed A6 alignment through Mobuoy was never assessed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act before any works proceed. | Outside Remediation Strategy Scope - DAERA to consider | A6 proposals to be reviewed under current EIA or Habitats Regulations and must also meet the 2022 Climate Act | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | | | | | | | | |
| **Response 5: Friends of the Earth (FOE)** | | The proposed remediation strategy is overly complicated with explicit or implicit inter relationships between various individual technologies that need careful integration if the envisaged synergies are to be delivered. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | The documentation suggests that "a range of remedial solutions, which will work together, are proposed. These solutions fall under two broad categories – Off-Site Disposal and In-Situ treatment" – which is not strictly accurate as there are some on site ex-situ processes as well, such as sorting and testing of excavated waste. The claim that "In-Situ treatment is less disruptive to the surrounding environment and infrastructure, uses natural processes to break down contaminants" is not true for all the in situ treatments proposed – for example barriers and containment processes do not involve contaminant break down. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | The remediation strategies for each zone/ group of zones are overlapping and potentially redundant. Worse, some could interfere with the performance of others. | | tarry waste needs to be removed before any boreholes are installed in that location or the strategy needs to make it clear that the boreholes and the area from which tarry waste is to be removed are separated. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | residual tarry waste, is not being removed: "Containment/stabilisation of residual in-situ tarry wastes." | | Meaning clear criteria that can be operationalised for which tarry wastes will be removed and which will be contained or stabilised on site are needed. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | There are too many ungrounded technologies implicated in the remediation strategy. monitored natural attenuation is referred to "site wide" yet not mentioned in any of the proposed remediation for specific zones or for which contaminants MNA is being invoked. | | make clear which contaminants MNA is being invoked | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | The Markham Willows project, indicates that "short rotation crop willow" can be a barrier preventing contact with contaminants but is not a means of dealing with contaminant source areas. | | The opportunity to "promote renewable energy via e.g. short rotation cropping" identified in the ROA (page 29) does not recognise the risk of using biomass that has been grown on and potentially taken up contaminants. | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | One of the possibilities is that greenhouse gases including methane could be vented to atmosphere: "collection of landfill gas and transfer to a blower or flare for dispersal or treatment." | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | A cost-benefit analysis is needed to ensure optimal return on investment in the form of remediation expenditure.<br>The reports do not spell out the location and extent "zones of highest environmental risk". | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | The objectives are both too vague and not necessarily likely to result in the necessary management of risk. The Updated DQRA is clear in its ambition in the absence of any "high risks" when it sets the challenge to the ROA to discern remediation strategies that would "reduce 'moderate' risks to 'low' or 'negligible'." | | Ensure that discharges in to the River Faughan and feed tributaries do not exceed relevant environmental quality standards. Ensure that the Faughan groundwater body does not exceed relevant environmental quality standards. Ensure that groundwater in source protection zone 2 does not exceed relevant drinking water standards. Reduction of landfill gas to acceptable levels to protect site users. Remedial options should fully consider the potential effects of extreme weather events including storm and drought and should take account of the likely effects of medium-term climate projections, which suggest that more frequent extreme weather events are likely". | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | facilitating works for the A6 cannot be a key aim of the Mobuoy remediation project. | | | No | No | for comment | | |
| | | DQRA says low impact, but modelling shows exceedances at river boundary | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | Strategy relies on river dilution to meet drinking-water standards | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | Site reuse criteria undefined; endpoints may not be protective | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | Outstanding plans/designs need to validate Zonal ORS remains optimal | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | No Materials Management Plan (MMP) or NIEA sign-off on DoWCoP use | | Draft a site-specific MMP for capping earthworks; obtain NIEA approval for DoWCoP application | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| **Response 6: Ireland Brownfield Network** | Detail within draft Remediation Strategy | prior to any earthworks commencing on the site, there is a commitment to produce a detailed MMP in compliance with the CoP. | Remediation Strategy - DAERA and ICT to jointly consider | detailed MMP to be incorporated at detailed design stage | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | one-day courses on the apploication of COP are free to DAERA staff |
| | | | | | | | | | |
| **Response 7: Indaver** | | waste management sector in Northern Ireland is vulnerable to criminality and the Environment Agencies limits in preventing and enforcing waste crime. | | Not relevant to remedial strategy? | No | Yes | DAERA to consider | | |
| | | Unimplemented Mills Report recommendation - Recommendation 8 (to limit the number of waste authorisations and build more-regulatable waste infrastructure) has still not been delivered, despite being made over 12 years ago. | | Not relevant to remedial strategy? | No | Yes | DAERA to consider | | |
| | | Up to 87% of NI's waste streams are poorly classified or untracked, undermining NIEA's ability to monitor licensed and unlicensed sites. | | Not relevant to remedial strategy? | No | Yes | DAERA to consider | | |

| Respondent | Theme | Main Issues Identified in Consultation Response | Screen | Actions / Recommendations in Consultation Response | Update to dRS Required ? | Action Required? | Detail of further action / justification for no further action | Screen | Additional Information - Comments |
|---|---|---|---|---|---|---|---|---|---|
| | For Information | NI needs larger, more transparent waste-processing facilities (e.g. the proposed arc21 residual-waste plant) to meet circular-economy targets and deter illegal operators. | | Not relevant to remedial strategy? | No | Yes | DAERA to consider | | |
| | Detail within draft Remediation Strategy | Complex sites like Mobuoy require specialist input—Indaver points to its multi-phase Roche Clarecastle project as an example of the scale and technical capability needed. | | Consider phased approach to remediation works | No | Yes | DAERA to consider | | |
| **Response 8: CIWM NI** | Detail within draft Remediation Strategy | 'ecology' should be considered a high environmental risk | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | Detail within draft Remediation Strategy | CIWM Northern Ireland would welcome Objective no. 2 (Improvement in the quality of the Faughan groundwater body) being revised to refer to sources other than the (relatively recently) deposited wastes. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | The acceptability of the 'low risk' from the landfill gas risk assessment in the context of remediation being required, or not, has not been made clear in the referenced report and CIWM Northern Ireland suggests this ambiguity should be clarified. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | CIWM Northern Ireland recommends that future land use remediation options be reviewed to ensure they remain appropriate for the agreed final use of the site. | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | A 'joined-up', collaborative approach to ensuring the construction of this section of the A6 without creating unacceptable risks or impacts to the environment is welcomed by CIWM Northern Ireland | | | No | No | Will be considered during future design phases of the remediation strategy and subject to further detailed assessment. | | |
| | | | | | No | No | DFI A6 comments will be dealth via the ongoing colaboration and scoping excercsies | | |