

Sub No 5



North Western Regional Fisheries Board

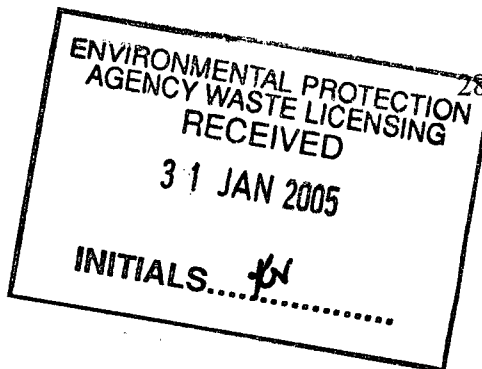
Bord Iascaigh Réigiúnach an Iarthuaiscirt



Fisheries Ireland

Our Natural Heritage

Ms Catherine O'Keefe
Office of Licensing & Guidance
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford



28 January, 2005

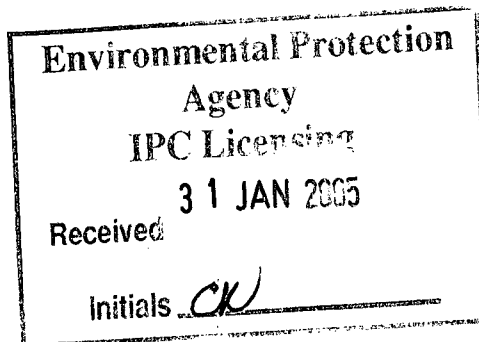
RE: IPPC L – Shell E & P Ltd. - Ref: 738

Dear Ms. O'Keefe

With reference to the application for the IPPC licence in respect of the proposed gas refinery at Ballinaboy, Co. Mayo, ref. no. 738, I enclose herewith the Board's comments on this application.

Yours sincerely


Vincent Roche
Chief Executive Officer



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EPA

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2005-01-28 18:33:49

The North Western Regional Fisheries Board

Submission to EPA re IPPC Licence for Shell E & P – Reg. No. 7383

The Board wishes to make the following comments in respect of the above application.

1. Importance of Local Fisheries

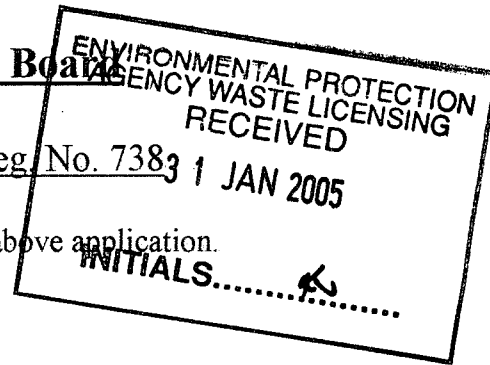
Carrowmore Lake is a very productive and important salmon and sea trout fishery which makes a major contribution to the local economy by way of angling tourism. It is also a very important local amenity. The Glenamoy River is also a valuable salmonid fishery which has been developed in recent years by the Board, in conjunction with the local community, at considerable expense. Both of these river and lake systems also contribute to the commercial salmon fishing industry which provides seasonal employment for approximately one hundred fishermen around the coast of north west Mayo. Broadhaven Bay is a highly important for commercial fishing for a wide range of species including white fish, lobsters, crab and other species of shellfish. The bay is also an internationally known location for sea angling which is a major tourism attraction in the Belmullet area and a significant contributor to the local economy.

2. Protection of Sensitive Area

The location of a large gas refinery at Bellinaboy will result in major industrial activity in a very sensitive area. The production processes involved, including the importation of substantial volumes of raw materials and chemicals have the potential to result in accidental discharges to adjacent watercourses during the routine operations at the terminal. It is imperative that stringent measures are put in place, as part of any IPPC Licence, for monitoring of the proposed industry to ensure that the various production processes, and any discharges (licensed and unlicensed), do not result in any negative impact on the aquatic environment.

3. Need for Baseline Survey of Broadhaven Bay

The Board is seriously concerned about the possible impact of the proposed effluent discharge on fish stocks in Broadhaven Bay. It has previously requested that a full baseline survey of the bay be carried out in advance of any processing operations. Unfortunately, no such condition was included in the licence granted by the Minister for the Marine though some survey work was required. The Board now requests, as a condition of any IPPC Licence, that the company be required to carry out a comprehensive baseline survey to establish the ecological status of Broadhaven Bay in the widest possible sense. Such a survey is necessary in order to measure any negative impacts that the effluent discharge may have on the ecology of the bay in the medium to long term. The Board understands that some survey work has already been carried out on foot of the company's operating licence but that related only to the "licensed area" which, in the Board's view, is insufficient. We believe that a much wider survey is required to enable any impacts on the wider bay, in years to come, to be assessed. We understand the company have recently indicated their willingness to have such a survey carried out, in the course of a recent meeting of the Environmental Monitoring Committee set up on foot of the licence issued by the Minister for the Marine. The parameters for the survey should be agreed with the Marine Institute, Bord Iascaigh Mhara, this Board, the Heritage



Service of the Dept. of Environment, Heritage and Local Government, and Mayo Co. Council as well as the EPA.

4. Survey of Fish in Bellinaboy River and Carrowmore Lake

Due to the sensitivity and importance of the adjacent watercourses, the Board also suggests that baseline levels of heavy metals in fish populations in the Bellanaboy River and littoral zone of Carrowmore Lake be established before the terminal is commissioned. Subsequent analysis should be repeated as appropriate over the lifetime of the terminal operations, depending on the results obtained from the surface water discharges, and taking account of the life history of the species or organisms to be used for this purpose.

5. Location of Discharge Point

Notwithstanding the above, the Board believes that the discharge point for the treated effluent should be located well outside Broadhaven Bay. While the company argue that the discharge will have no negative impact on the bay, the Board believes that a precautionary approach should be taken in this case given the scale and type of industry involved and the importance of the bay in terms of its fisheries resource. Clearly, any accidental discharge of a dangerous substance, not covered by the IPPC Licence, i.e. a discharge which is outside the limits permitted by the IPPC, would have a less detrimental effect the further out to sea it took place. While it has been argued that the treated effluent should be piped back to the location from which the gas is extracted, the company have stated that this would involve a prohibitive cost. However, the Board considers it reasonable that the company be required to pipe the effluent to a location which is at least several kilometres beyond the too headlands that form the outer boundaries of the bay.

6. Monitoring of Discharges and their Effects

- 6.1 The Board suggests that a requirement for the occasional monitoring of the constituents of the unprocessed gas be incorporated in to the IPPC licence. This would ensure that the concentrations of all of the chemical elements of the gas are recorded as these are expected to vary over the lifetime of the abstraction.
- 6.2 The treated waste discharge should be regularly monitored and should have appropriate flow meters installed in order that a mass balance of all elements in the discharge can be accurately determined and reported on an annual basis.
- 6.3 Appropriate tests should be carried out on the flora and fauna of Broadhaven Bay in order to establish whether discharges from the plant are having any detrimental effect on fish life or on the bay's ecosystems having regard to the findings of the baseline survey recommended in section 3 above.
- 6.4 Consideration should be given to the possible utilisation of strategically placed consignments of shellfish, located at various distances from the discharge pipeline, in order that the biological effect of the discharge can be assessed.
- 6.5 Regular monitoring of the surface water discharges from the terminal to local watercourses should also be undertaken and analysed for all elements that have potential to cause damage to the aquatic habitat having regard to the survey proposed in section 4 above.

- 6.6 Annual inspection of the company's on site wastewater treatment unit, and its percolation area, should be carried out to ensure that it continues to operate to a high standard and does not result in any polluting discharges to adjacent watercourses.

7. Recording of Materials on Site

The Board suggests that records be maintained of the volumes of chemicals imported on to the site and that their use and disposal be fully documented. A qualitative account of all chemicals, and other waste or hazardous substances to be imported and exported off the terminal site, should be maintained and ensure that the method of transport, delivery schedule and destination are fully auditable.

8. Site Rehabilitation

The Board should be consulted, as an affected party, in advance of the adoption of any rehabilitation plan for the terminal site.



Vincent Roche
Chief Executive Officer

28 January, 2005

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