



Sub No. 13

Blacksod,
Ballina,
Co. Mayo
9th Feb. 2005

The Secretary,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Ref. 738 - Corrib Gas Development Application for Waste Licence

Dear Sir/Madam,

We wish to make the following observations on the EIS (Offshore Field to Terminal) submitted by Shell E&P Ireland Ltd. on their application for a waste/emissions licence applicable to the waters surrounding and including Broadhaven Bay, Co. Mayo.

We believe the EPA should take the following points into consideration when processing the application by Shell E&P Ireland Ltd (formerly Enterprise Energy Ireland Ltd.):

The highly questionable scientific integrity of the EIS currently under review by the EPA.

The inappropriate positioning of the Corrib refinery's discharge/outfall pipe.

EIS under review by the EPA

The EIS covering aspects of the development from Offshore Field to Terminal was published in October 2001 and has not been updated since. This is a grievous matter of considerable environmental concern because Shell E&P Ireland Ltd. since commissioned a marine biological study by University College Cork and have failed to take its findings into account or deliver new information to accompany the EIS currently under review.

We believe that Shell E&P Ltd. have failed to furnish the EPA with the relevant final scientific report published in March 2003. It is our opinion that this information is highly relevant (i) to the EIS; (ii) to the marine area proposed for development under the Corrib project, and (iii) to the protection of several marine species under Irish and

European law.

The position of the Corrib refinery's discharge/outfall pipe

The general location of the Corrib refinery's discharge/outfall pipe is a highly critical matter. This was determined by the Department of Communication, Marine and Natural Resources' Marine Licence Vetting Committee **without any prior knowledge of the ICC study and before its findings became available in 2003**. UCC's final report to Enterprise Energy Ireland Ltd. now yields irrefutable independent scientific evidence attesting to the significance of these marine habitats. It indicates that **a review of the DCMNR marine licence is urgently required to place all new applications, including the location of the discharge/outfall pipe, in the correct and up to date context**. Observational information alone (*see Fig. 3 and others in UCC report*) clearly indicates the presence of protected marine species throughout Broadhaven Bay and in the immediate vicinity of the proposed discharge/outfall pipe. Yet **no reference** has been made to this new information and it has been **given no consideration in the application before the EPA**.

As residents of northwest Mayo, who wish to continue to enjoy a clean, healthy and safe marine environment, we are very seriously concerned about the basis upon which the EPA might be making its judgement on this application. The granting of an EPA licence to Shell E&P Ireland Ltd. must surely be in breach of Irish and European law if all current information is not adequately considered or based on an up to date Environmental Impact Assessment.

Yours sincerely,

Doreen Hurst & Vincent Sweeney
Doreen Hurst
Vincent Sweeney