

Sub No. 18

ERRIS INSHORE FISHERMEN'S ASSOCIATION
CHAIRPERSON – CORCLOUGH WEST, BELMULLET, CO. MAYO
SECRETARY – EAMON DIXON, CARNE NASH, BELMULLET, CO. MAYO

Catherine O Keeffe
Office of Licensing & Guidance
EPA
Environmental Protection Agency Headquarters
PO Box 3000
Johnstonwn castle Estate
County Wexford

EPA

MAIN FILE ☒

PUBLIC FILE ☒

EVALUATION FILE AND ☒

DATE 28/2/05 (CK)

14th February 2005

Dear Ms O Keeffe

RE : Shell E&P Ireland Ltd - IPPC Licence Application.

Thank you for your letter of 12th January. Please find attached submission from our group in the following format;

- i) Copy of original submission to Mayo County Council.
- ii) Copy of letter to Mayo County Council and Department of Communications, Marine & Natural Resources.

As per our concerns outlined, it is essential that these details are addressed in the approval of any licensing for the above application for the Corrib Natural Gas Field Project.

Regards.

E. Dixon

EAMON Ó DUIBHIR
Chairperson

Environmental Protection Agency
IPC Licensing
Received
23 FEB 2005
Initials <i>CK</i>

1.0 INTRODUCTION

- 1.1 The Corrib Gas Field is located about 70km due west of Erris Head. The depth of water is approximately 320 metres and it is a fairly unfriendly environment. The gas is to be found at a depth of 3500 metres below the sea bed, where it has been forming undisturbed for millions of years. It is inevitable that any product that formed for so many years in such a setting, would contain some impurities. Corrib Gas is no exception.
- 1.2 It is quite an achievement and a testament to modern technology that gas can be extracted from the bowels of the earth in such circumstances and distributed as clean natural gas to so many homes and businesses in Ireland and abroad. It is reasonable to assume that the same technology can extract the impurities and dispose of them in an environmentally friendly method.
- 1.3 Can it be done?
Will it be done?
If not, why?
Where there is a will, there is a way!

2.0 ERRIS AREA PROFILE

- 2.1 Erris is situated in the North West corner of Co. Mayo. It is divided by two major bays - Broadhaven Bay, reaches in from the North and Blacksod Bay reaches in from the South. They come together at Belmullet, the capital of Erris, where they are connected by a manmade canal. Because of this connection, the tides do not follow the trend of those in the open sea.
- 2.2 With the exception of Belmullet Town and Bangor Erris to the East, Erris is a rural area. Its land area is 90,000 hectares with a population of less than 10,000, a large population of which use "an ghaeilge" as their daily language. In contrast to the rest of the country where there is an average population density of 50.3 people per square kilometre, Erris has an average of only 10.
- 2.3 The geographic location of Erris designs it to be remote. Its remoteness is accentuated by the mountains and the vast tracts of mainly uninhabited bog that divides it from the rest of the country. This fact and the perception mitigates against it having any worthwhile manufacturing industry located in the area.

3.0 POTENTIAL FOR DEVELOPMENT

3.1 Erris is now at a crucial stage of development. Despite the fact that the population has fallen by 8% in recent years, the unemployment has increased by 20% in the same period. Its peripherality, poor infrastructure and an ageing population makes it unattractive to national and international companies.

3.2 It is inevitable that Erris must depend on the development of its natural resources in order to survive as a vibrant community. Its very remoteness is in itself an asset. It guarantees peace and tranquillity to the stressed out and city dwellers.

Its pure environment, rugged mountains, vast unspoiled beaches, serrate coastline and clean crystal clear waters acts as a magnet to the environmentalist and nature loving tourist.

Its abundant and vastly varied species of fish make it a veritable paradise for the angler whether he may be a sea or fresh water enthusiast.

3.3 For many years, farming and fishing have been the mainstays of the Erris economy, both of which are now under threat due to over production on quotas. Viable alternatives and supplementary activities are aquaculture, shellfish, rural and cultural tourism.

3.4 If the Erris people are to survive as a vibrant community, they must depend heavily on their natural environment. It must remain pure and unspoilt.

Gas is of great economic benefit to our country. We welcome it to our shores. However, it cannot be allowed to pollute the people of Erris out of existence. We will not allow it.

4.0 CLEAN NATURAL GAS

4.1 There is no doubting the fact that the gas will be of great economic benefit to the country and to those who are served by the Bórd Gáis Éireann Network.

We have been listening for some time now to the media advertising "Clean Natural Gas" - YES, IT CAN BE CLEAN NATURAL GAS, BUT AT WHAT PRICE?

4.2 It is a fact that natural gas contains impurities from the information available to us to date. The formation waters of the Corrib Gas contain dissolved metals such as manganese, zinc and copper. It also contains dissolved solids of sulphates and chlorides. Formation water will increase as the well produces. The gas also contains organic, inorganic and dissolved mercury and other heavy metals. There are also a number of

other gases present such as methane, ethane, nitrogen. Some chemicals are also introduced for the extraction of the gas and its delivery to Ballinaboy such as methanol and others yet to be decided. Hydraulic fluids will be used to operate the controls. The system used will be the 'Open Loop System'. Additionally the salinity of the waters is very high.

- 4.3 In order to become clean natural gas, all the impurities have to be extracted at Ballinaboy. Of all the impurities, from the marine point of view, mercury is the most detrimental. As of yet there is no treatment identified or agreed by Enterprise Energy Ireland Ltd to deal with it. It is our fear that it will be discharged to Broadhaven Bay.

Of the other impurities, the treatment available is dilution at Ballinaboy to bring them within the E.I.V. or E.Q.S. limits before discharge to Broadhaven Bay.

Gaseous waste will be emitted to the atmosphere.

- 4.4 As residents of Erris, we are concerned about the emissions to the atmosphere and its consequent knock on effect on our lives.

We are concerned about the impurities that have the potential to seep into our fresh water systems and their knock on effects. We are also concerned about the impurities that may seep into and damage our wild salmon and sea trout stocks.

We also have to be concerned about other wild life, flora and fauna.

- 4.5 As fishermen, we are concerned about the impurities that are planned to be discharged into Broadhaven Bay, with inevitable damage to marine life and in particular to filter feeders. Blacksod and Broadhaven Bays is where we earn our livelihood. Both bays are also ideally suited to shellfish farming, a necessary supplement to our income due to depletion in fish stocks. There are natural oyster beds in Blacksod Bay, administered by a local co-operative for its 165 members. There is an experimental oyster farm in Broadhaven Bay and an abalone farm in its development stage.

- 4.6 The physical location of the pipe lines on the sea bottom has been selected by the company on economics and ease of laying grounds. Unfortunately that route coincides with our best fishing grounds and presents problems for all kinds of fishing that we engage in. There is no insurmountable reason for not re-routing the pipe line.

5.0 TIDES AND DISPERSAL.

5.1 Because of the canal connection at Belmullet, and the flow direction of Achill Sound, Broadhaven and Blacksod Bays do not empty to the open sea on the ebb tide nor fill from the open sea on the flood.

Broadhaven Bay empties into Blacksod Bay and fills in the reverse direction. Any seepage that may happen occurs through Achill Sound. Therefore it is not reasonable to assume that the dispersal qualities claimed by Enterprise Energy Ireland Ltd is sufficient for even mild impurities. Therefore any discharge into Broadhaven Bay cannot be countenanced.

5.2 A discharge pipe further out to sea or back to source may be of some benefit in the disposal of some of the less harmful impurities. A comprehensive study of the tides and their dispersal qualities would have to be undertaken, in addition to a baseline study. A 24-hour survey and computer modelling does not suffice. This is not our preferred option. Under no circumstances should mercury, heavy metals or harmful chemicals be discharged into the sea.

5.3 To the people of Erris for many generations now, fishing and marine activities have become a tradition, a way of life and a means of livelihood. The marine has the potential to become more important if not crucial to our survival.

In addition, we have a moral, a God given and constitutional right to live and bring up our children in a clean and healthy environment. There is no need to deny us that right. With modern technology and a little good will, it can be assured.

5.4 During the Feasibility Study of the Corrib project, initial appraisals considered several land fall locations on the West Coast of Ireland, extending from the mouth of the Shannon to Sligo Bay. Erris was selected because of its proximity to the gas field, its ease of access from the sea and from an economical point of view. Other areas were rejected, not for the foreground reasons but on the grounds of the "unsuitability of the coastal terrain, environmental sensitivities and the importance of tourism and aquaculture to these areas" - OS E.I.S. 8-5.

6.0 OBJECTIVES AND PROPOSALS

6.1 We are not opposed to the landing of the gas in Erris or the necessary process to deliver clean natural gas.

We are strongly opposed to pollution of any kind to our environment.

If the CLEAN NATURAL GAS can be delivered without pollution, we welcome it.

If not, we must revisit the option of having the gas purified at source.

6.2 Our objectives are simple and achievable. We want to stay a living and vibrant community. We want to stay a pollution free zone as was accepted by our authorities when most of Erris was designated Special Areas of Conservation (SPA), or Natural Heritage Areas (NHA) or areas of scientific interest.

6.3 Our proposals to Enterprise Energy Ireland Ltd, the Department of the Marine & Natural Resources, Mayo County Council and to all our environmental and heritage protection agencies are;

- a) That all impurities are extracted on land and disposed of on land.
- b) That any discharge from the plant at Ballinaboy should be disposed of through sump and filter beds.
- c) That the incoming pipeline is routed as proposed by the Erris Inshore Fishermen's Association.
- d) That adequate precautions are taken to prevent accidental spillage or seepage to our water ways.
- e) That pipe laying is carried out during fishing off-season.
- f) That a Monitoring Committee is set up with authority to close down the operation if agreed procedures are breached. The Monitoring Committee to have adequate local representation.

6.4 We object to the granting of any Petroleum Licence, Foreshore Licence or Planning Permission to Enterprise Energy Ireland Ltd until such time as our environmental and heritage agencies, in co-operation with local residents and concerned groups are satisfied that our concerns have been addressed and acted upon.

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Cllr Frank Chambers MCC
Chairperson Mayo County Council
Main Street
Newport
Co. Mayo

19th April 2004

Dear Frank

RE : CORRIB NATURAL GAS FIELD DEVELOPMENT.

Thank you for your letter of 7th April, and copy of correspondence you received from Dermot Ahern TD (Minister for Communications, Marine & Natural Resources), regarding the discharge pipe line for the above proposed development.

The letter itself is disappointing in its content and factually incorrect on two counts;

1. Our primary concern is for Broadhaven Bay since it is the most at risk from the discharge pipe and its content. Blacksod Bay is also at risk, mostly from pollution entering from Broadhaven Bay through the connecting canal at Belmullet.
2. The comprehensive Foreshore Licence issued by the Department on 17th May 2002, (and signed into law by the then Minister on 6th June 2002), we believe does not set the discharge point "*not less than 12km from shore*". It states that it should be "*not less than 12km from landfall*".

The discharge location as defined in the Foreshore Licence is situated in the jaws of Broadhaven Bay, no more than 2km from land and in line with the North/South coastline/shore of the west of Ireland. However, if the Minister is happy that the discharge point should be located 12km from shore, we will gladly accept that.

The Marine Licence Vetting Committee are the scientific and technical experts referred to by the Minister. To our knowledge they based their findings on already published general information on West of Ireland tides and currents, together with data supplied by the Corrib Gas company. As far as we are aware, local conditions and the effect of weather on local tidal movements were not adequately addressed. They had no Department of Marine study to consider as there was none then, nor is there any now.

It is our belief that the Marine Licence Vetting Committee included the words "*not less than 12km from landfall*" to allow the Minister to set the location of the discharge point in consultation with local experts – the fishermen and marine users. We respectfully suggest to the Minister before he finally decides on the discharge location point that he consults;

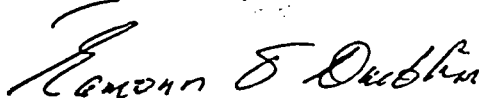
- a) The local fishermen and marine users.
- b) The cetacean report compiled by Dr Oliver Kiely of University College Cork for Enterprise Energy (Irl) Ltd (the then company in charge of the Corrib Gas Project).
- c) The report compiled by Shane O'Boyle, Glen Nolan and Robin Raine for the Martin Ryan Institute, NUI Galway, on the "Variability In the Irish Coastal Current Along The West Coast Of Ireland".

In their deliberations, the Marine Licence Vetting Committee established that the content of the discharge pipe, even at Environmental Quality Standards, could be damaging to the ecology and marine life of Broadhaven Bay if not properly dispersed. This will not happen at the 12km point, it will need to go to 18km from landfall.

It is reasonable to assume that the Department would want to locate that discharge point at a place where local experts would deem it to be relatively safe. It is also reasonable to assume that a multi-national corporation that is set to make a handsome profit out of the project would want to safeguard the ecology of a marine waterway that is of vital importance to the local community. After all, what is being asked can be financed from the "petty cash drawer". The alternative is irreparable damage to a body of water that is of some significance to the local, national and international community.

We look forward to your response.

Yours sincerely



EAMON Ó DUIBHIR
Chairperson

cc: Dermot Ahern TD, Minister for Communications, Marine & Natural Resources.