

Sub No 23

Chapel Street,
Belmullet,
Co. Mayo.

19th August, 2005.

Ms. Ann Marie Donlon,
Inspector,
Environmental Protection Agency,
Cork.

Dear Ms. Donlon,

Re: Reg. No. 738

I refer to my submission of 1st February, 2005; my e-mail of 26th July; and your reply of 29th July, 2005. In that context I have subsequently referred the matter to NAOSH under Article 137(1)(a) of the 2001 planning and development regulations, as you had not done so.

The crucial point in this is that 'cold-venting' represents a fundamental change. This is new information. It was not included in the EIS and therefore NAOSH did not include the toxic effects of gas in its risk assessment (see p.21 of their report to MCC and ABP).

Venting of gas is first and foremost a 'health and safety' issue and as such must be mediated by the Planning Authority. Shell improperly applied to the EPA for permission to 'cold-vent' under IPPC licence having by-passed the essential planning permission necessary for doing so. This pattern of evasion is typical of the 'project-splitting' strategy adopted by Shell throughout this project.

In that light it was wrong of you to undertake to mediate this issue. Your remit does not cover 'health and safety'. It must be addressed as per Seveso II Directive.

Therefore please bring this specific matter to the urgent attention of the Competent Authority, as I requested over six months ago. Likewise direct Shell, as a matter of record, regarding their fundamental breach of procedure.

Thanking you for your attention,

Yours sincerely,

Imelda Moran.

cc: NAOSH

EPA
MAIN FILE ☒
PUBLIC FILE ☒
EVALUATION FILE ☒
DATE 19/8/05 (LM)