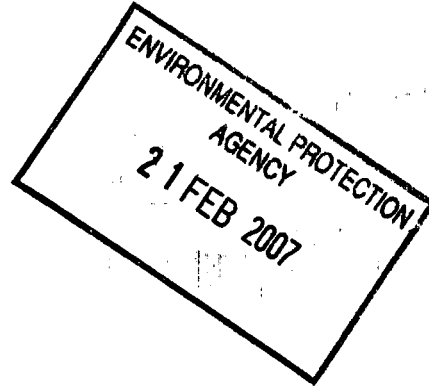


Obj No. 11

Dulra Nature Tours,  
Elly,  
Clogher,  
Ballina,  
Co. Mayo.

16 February 2007



The office of licensing and guidance  
EPA headquarters  
PO Box 3000,  
Johnston Castle Estate,  
Co. Wexford.

Dear Sir/Madam,

I am a wildlife tour operator based on the Mullet Peninsula, Co. Mayo and I wish to make an objection and a request for an oral hearing to the issuing of an IPCC licence to Shell E&P Ireland Limited, Corrib House, 52 Lower Lesson Street, Dublin 2 (Ref no. P0738 01). (inclosed is the fee of 226 euros)

I believe the issuing of this IPCC licence to Shell E&P Ireland Ltd, would be in breach of the following: EU Directive 96/61/EC IPCC and 97/11/EC EIA.

I believe the EPA have not given the following points due consideration in the proposed issuing of this license to Shell E&P Ireland Ltd.

- **Air Emissions**
- **Outfall pipe**
- **Carrowmore Lake**

## Air Emissions

### Cold Venting

Cold Venting has been described as “..The release of gas (usually primarily methane) out of a gas refinery vent stack in such a manner that it is not burned. Most streams of this gas will be methane, which is lighter than air (21 times worse than co2 as a green house gas). The fact that heavier than air components or toxic chemicals are dispersed into the atmosphere and can come to ground within the proximity of the site poses an unacceptable risk to the health of the local community and our drinking water. Cold venting can be very dangerous, not only for plant personnel but also for the neighboring population. ...Cold venting is usually the by-product of remote oil field design, but an over focus on capital reduction for gas field development can drive a company over wiser alternatives that require additional equipment”. This becomes even more worrying when it has been revealed that Shell did not include cold venting in their original EIA of which the decision to grant planning permission was based on. They have since included this information in the EIA used for the IPCC application. This is a direct breach of the EIA Directive (97/11/EC EIA). This means that Shell does not have planning permission to cold vent and subsequently the EPA is not in a position to issue a waste license for this operation.

### Gas Flaring

This is the intentional burning of gas before it is released into the atmosphere. The major problem with flaring occurs when plant operators flare their gas excessively due to poor planning or malfunction of equipment. Shell will routinely flare gas every 3 months; the whole plant will shut down and flare annually. Emergency flaring may occur non-stop day or night for, potentially, days at a time. In countries like Nigeria excessive gas flaring has taken its toll on the environment and the people in the vicinity of the refinery. The consequences of licensing this petrochemical industry will lead to light pollution, sound pollution and air pollution in a long established rural community. This is not environmental protection, but the destruction of rural Ireland.

According to World Bank figures gas flaring in just one area (Bayelsa state) in the Niger delta gas flaring has caused

- 49 premature deaths
- 4,960 respiratory illnesses among children,
- And 120,000 asthma attacks.

## General Emissions

According to article 11 of the council directive made by the European Parliament concerning integrated pollution prevention and control “*Member States shall ensure that the competent authority follows or is informed of developments in best available techniques*”. This entails that the government and the EPA should inform itself of the development of best available techniques. There are currently safer and more environmentally prudent technologies available (Twister technology, [www.twisterbv.com](http://www.twisterbv.com)), the EPA and the government are obliged by European legislation to be aware of and only except these technologies.

The proposed refinery will pump 250 million cubic feet of environmentally damaging emissions per day into the Erris atmosphere. This will have a detrimental effect on the quality of the air people breathe in North Mayo. The declining quality of the air would potentially add to cases of respiratory illness and asthma (Ireland is now one of the top four countries in the world for prevalence of asthma). This again is in breach of article 11 of the council directive (In gas fields such as Snohvit, Norway all emissions are pumped back under the sea bed to reduce the affect on local community and the effect of green house gases on the environment).

## Outfall Pipeline

The EIS covering aspects of the development from the refinery to the wellhead 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 has failed to take its findings into account or deliver new information to accompany the EIS currently under review. My enquiries with members of EPA staff also highlight the fact that Shell E&P Ltd. has failed to furnish the EPA with the relevant final scientific report published in March 2003. It is my 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 developer stated that an appropriate assessment of Annex 11 species, as required by the EU Habitats Directive was “*thought not to be necessary*” (see p.7-29 of EIS: Offshore Field to Terminal). While the EIS acknowledged loosely that marine mammal species (whales, dolphins, porpoises, seals, otters) are known to occur in the coastal waters of Mayo, the more recent University College Cork (UCC) study which commenced in August 2001 and is entitled Protected species and the EU Habitats

Directive "Marine mammal monitoring in the waters of Broadhaven Bay northwest Mayo: U#n-2002." Authors: O. Cadhla, A. Englund, E. Philpott, M. Mackey, S. Ingram. The University College Cork study demonstrated conclusively that the specific waters into which the developers wish to discharge harmful elements such as Arsenic, Cadmium, Lead, Mercury and Zinc constitute *"an important area for marine mammals and other species. There are few, if any, comparable examples of a relatively small, discrete bay in Ireland containing all five Annex II marine mammal species with such frequency. It was also clear in 2001-02 that the area contained important foraging habitats for numerous marine mammal species, plankton-feeding basking sharks and seabirds."*

In fact, the UCC study found a total of eight cetacean (i.e. whale and Dolphin) species occurring in the waters immediately surrounding the developer's proposed discharge/outfall, all of which are afforded strict protection under Irish (Irish Wildlife Act 1976, 2000) and European law (Habitats Directive) (see p.5 of the UCC report).

All conclusions in the EIS therefore, regarding the environmental risks and Potential effects of discharge on marine mammals in the area are not only outdated but also potentially in breach of Irish and European conservation laws. The UCC study further concluded, "that the biological significance of the area, both described and potential, should not be overlooked at this stage

Considering the study's findings and the publication of a new 3-volume body of work by UCC entitled "Cetaceans and Seabirds of Ireland's Atlantic Margin", there is no doubt that the EIS (October 2001) is now grossly deficient in its scientific content, And a serious review of all current marine data pertaining to the development And its discharges and incorporating the findings of research since August 2001 Should be undertaken by the relevant authorities and perhaps by an independent panel Of experts.

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 License Vetting Committee without any prior knowledge of the UCC 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 license 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 enclosed 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.

Many of the seabird species recorded in the waters of Broadhaven Bay (e.g. Guillemot, puffin) are strictly protected under the EU Birds Directive. Yet the EIS (October 2001) has made no scientific assessment of the numerical abundance or species occurrence in the waters directly affected by proposed waste discharge/outfall from the Corrib refinery. The current EIS therefore is negligent of the true facts pertaining to seabird life in Broadhaven Bay and no measures to protect these highly vulnerable species are offered therein. This situation is of very serious concern and, again, warrants a full expert review of all current marine data pertaining to the waters of Broadhaven Bay, thereby providing an independent detailed scientific assessment, before an EPA license should be considered.

At a recent meeting between the Erris Inshore Fishermen's Association and Shell E&P Ireland Ltd., Shell admitted that they do not know the quantity or composition of discharge from the outfall pipe until processing begins. They also admitted that there has been no hydrology surveys carried out at the position of the discharge and all dispersion and current modeling is predictions only. According to their predictions in their original offshore EIA this is the worst possible position for the outfall pipe in relation to the marine SAC and an important crab breeding ground as stated by BIM. I believe in light of this information the EPA are not in a position to issue an IPCC license (Minutes of meeting available on request).

#### **Route and Planning permission**

At present the on land section of the outfall pipe does not have a designated route or planning permission, therefore the EPA are not in a position to issue an IPCC license for this operation, as there is no guarantee that this planning permission will be obtained.

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## **Carrowmore Lake**

### **Chemicals stored on site**

There will be over 5000 tones of dangerous chemicals stored on the site of the gas refinery in Bellanaboy making it a SEVESCO site. In the event of a major fire or explosion there is no guarantee that the water of Carrowmore Lake which is the regional supply for approximately 10 000 would not be destroyed.

Methanol is a dangerous chemical, which is banned in several countries. Exposure to methanol can have adverse effects on the human nervous system; it can cause headaches, severe abdominal and back pain, loss of vision and even blindness. Over 2 000 tones of methanol will be lost to processing each year. We can only presume that this will be lost through a combination of flaring, cold venting and discharge through the outfall pipe. I believe that due consideration was not given to this in the proposed issuing of this license.

### **Local Industry and Environment**

The marine waters of Erris have been proven to be the cleanest open ocean waters in Europe. These same waters provide a livelihood for up to 150 local fisherman and their families. Broadhaven bay a marine (SAC) is unique in that it supports 8 species of whale and dolphin and 39 different species of fish. The decision to issue an IPCC license to allow Shell to discharge chemicals and heavy metals into this bay will illustrate blatant disregard for the livelihood of the local fisherman and for our unique marine environment.

In a recent assessment of the seaweed resources on the Belmullet peninsula carried out by LEADER it quantified and qualified the seaweed resources of Erris in support of the sustainable development of the seaweed coastal community enterprise. The very real potential threat of tainting of the valuable seaweed resources arising from the gas processing effluent was a completely overlooked issue to date. The EPA is the body responsible for the monitoring of seaweed under the EU Water Directive and must take this into account prior to the issuing of an IPCC license.

## Conclusion

As a resident of northwest Mayo and a tour operator in the area, whose health and livelihood and that of my family depends on the pristine environment we have always live in, I am very seriously concerned about the basis upon which the EPA might be making its judgment. The granting of an IPCC license to Shell E&P Ireland Ltd. with such vague information supplied by Shell would be a breach of Irish and European law.

Ireland is one of Europe's worst offenders when it comes to the emission of greenhouse gases. It is estimated that Ireland will face a 100 million euro bill by 2012 for failing to abide by its Kyoto limits.

The Irish government is proposing to spend 270 million on buying carbon credits from other countries. So rather than cutting down on its greenhouse gases and making Ireland a cleaner and healthier place to live in they will spend 270 million of tax payers money on buying carbon credits from abroad. The addition of the greenhouse gases from this proposed development will worsen Ireland's already abysmal environmental record.

A copy of this objection will be sent to the relevant European Union environmental bodies

I trust that the material herein is of use to the EPA in reaching a decision.

Yours sincerely

  
Anthony Irwin