

Shell's pollution licence application, coupled with the states contempt for north Mayo's Gaeltacht a real test of EPA principles.

My name is Adrian Nally. Mr. Chairman, the development of the Corrib gas field 80km off the Mayo coast, need not result in the Erris peninsula being put in peril. Shell's IPPC licence application to pollute this pristine environment requires careful handling. The unconvincing licence application has few ~~many~~ references to the contentious 'cold venting' of raw gas, glaringly omitted from the EIS.

As this may be my only opportunity to speak publicly on this serious issue, I would request that when considering the fallout potential from emissions and discharges, ~~the EPA~~ ^{the EPA} should place themselves in the shoes of any of the Rosspoint five. Erris dwellers will face the daily reality of your decision. It is unlikely if you or Shell personnel will ever choose to even holiday in Erris in the future. Schedule B, of the recommended licence only gives Emission Limit Values for three activities, none of which include 'flaring or cold venting'. Will 'flaring or cold venting' be licensed? The many practical alternatives to the development of a Seveso site in Ballinaboy, Co. Mayo, must be teased out in a professional way. For those who find the word Seveso unfamiliar, spell explosion and disaster. It is within your gift to rightly prevent such a hazardous development. They say prevention is better than the cure, and so it is. The discharge of a cocktail of dangerous gases and chemicals into the ambient air need not happen in Erris. Erris's flora and fauna must be preserved for future generations. This is our collective responsibility. As it is illegal for a householder to dump harmless waste on the side of the road, so too it ~~is~~ illegal for Shell or their partners, to inject tonnes of their hazardous waste onto our pristine environment. The roughshod exploitation of Corrib gas reserves must be remedied for our mutual benefit. Anything less is simply not on.

Must be

Ms. McLaverty has stated that no appraisal has been done for the implementation of Shell's pioneering technology of a supersonic-cleaning twister. The EPA should refuse to issue this IPPC licence without Twister appraisal. Did the 'Exploration and Production' licence which Shell received not stipulate that the extraction of natural resources must comply with best available technology? See www.twisterbv.com

The non-appearance of the EPA's inspector at these proceedings surely would not be tolerated by pioneering Scandinavian countries as an aid to pollution prevention or pollution control. I would certainly have been interested in listening to the inspector's views on her one and only visit to Ballinaboy. Contrary to what the inspector thinks, the villages of Glenamoy, Barnatra, Pullatomish and Rosspoint, are all within closer proximity to the intended gas refinery, than is Bangor-Erris. The village of Bunowna is closer still, nestled as it is close to the proposed development. The local geography could easily have been clarified by consulting (this) Ordnance Survey Discovery Series number 23. That Ms. Donlon did not, poses the question what else has the inspector failed to consider in her recommendation on Shell's IPPC licence application?

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We hope that Ms. Donlon's continued absence does not suggest indifference to such a crucial issue for these communities. It is not too late for Ms. Donlon to clarify the contents of her inspector's report. Surely, using best available technology, Ms. Donlon could spare us a half an hour via a video link.

Public confidence in this development has been seriously eroded over the past number of years. The non-appearance of the EPA inspector, Mayo County Council, An Bord Pleanála and the Health & Safety Authority, cheapens this oral hearing and exacerbates ~~the~~ ^{THAT} situation. What's needed here is an integrated and right minded approach by these relevant bodies. We may all pay a heavy price for this neglect. Shell with their powerful legal representation have an unfair advantage over local people who don't.

Is it not possible in the interests of fair-play that the EPA make the digital recordings of this oral hearing available to all parties? Surely these records should be made instantly available at the end of each day to all participants. 'No camera's, ~~no photographs~~ and no digital recording.' Is this a good way to conduct a fair public oral hearing? ~~Many~~ ^{have} concluded that this hearing is a foregone conclusion in favour of Shell. Surely, this forum is the place for open discussion where all our many questions will be taken into account. The public is genuinely concerned by the shifting responsibility within this whole process. This at times leaves the public at a loss to know where real responsibility begins and ends.

Does Shell realise what disruption and worry their actions have inflicted on the native population? Because of Shell decent people have seen the value of their property plummet by up to 80%. It may not seem important to the EPA but they or some other office must give it serious thought. Some locals are so concerned about the threat of pollution that they have had to cancel plans to build a house on their own property. This licence if granted will ruin the fabric of this neighbourly locality.

As in all communities, people here would like to rear their children free from health concerns, free from harm and danger. People may no longer be able to take fresh drinking water or unpolluted air for granted. I would like to support those who felt that this oral hearing should have been in Gaelic or bilingual. It's regrettable that no documents were translated into Gaelic for the purposes of this oral hearing. Undoubtedly, this discriminates against this fragile Gaeltacht. This oral hearing was an opportunity for the implementation of government policy to promote the heritage of the Irish language in this Gaeltacht. Regrettably, this is an opportunity lost.

Is the EPA not concerned that Mayo County Council have recently failed to make available water sample test results from Carrowmore lake within the mandatory seven days? What action, if any, will the EPA take against Mayo County Council to protect the strategically important drinking water supply of Carrowmore lake, which is the main source of water for the region? Has the EPA any contingency plans in place, to replace Carrowmore lake water supply should it become unsuitable for human consumption? As some senior ex-

Mayo County Council staff have been on Shell's books for some time now, does this not weaken the local authorities impartiality? The excavation and disposal of upwards of 450,000 tonnes of bog/humus which is currently ongoing in close proximity to Carrowmore lake is a cause of concern. Which EPA representative sits on the Project Monitoring Committee, in respect of the proposed gas refinery in Ballinaboy? Are they present at this hearing? Is the EPA not concerned that the Scottish Environmental Protection Agency have claimed they would not allow a gas refinery within a water catchment?

The press release which informed the public on Monday 16th of the commencement of this oral hearing, included the message that Shell intend to start the development of the gas refinery in October 2007. Subliminally, the message read don't bother attending, you are wasting your time. From the oral hearing's day two, Mayo's many newspapers had a disturbing four page supplement of Shell propaganda. Its unthinkable that an area of such pristine beauty should have such an ominous threat hanging over it. Do Shell's experts realise what pain they are inflicting on the local population? Noordbroek, Holland, is Shell's suggested comparison to Ballinaboy. To be absolutely sure of this, should the EPA not visit Noordbroek and examine records and the operation of the refinery. These findings should be made public, allowing for public consultation prior to giving Shell any IPPC licence. If Shell do not have a comparable accomplished and operational gas refinery in the world, this must be stated. Shell's global reputation precedes them from Sakhalin, Russia, to the Niger Delta in Africa. We do not want a repetition in Ballinaboy.

Statoil, Shell's partners in the Corrib gas project, have recently relocated the 'Sedco 711 rig' and begun searching for further natural resources adjacent to the current development. This is very disturbing news for local people. Any IPPC licence must stipulate that other gas finds must not be rerouted through Shell's proposed upstream Corrib gas pipeline. As Judge Laffoy ruled on Wednesday the 18th, Shell's attempted imposition of their originally conceived upstream pipeline is defunct. This project is far from a fait accompli.

To comply with the conditions of planning, should the EPA not ensure that the HSA execute an appropriate Safety Audit for the proposed gas refinery prior to issuing any IPPC licence? Is it prudent for the EPA to issue an IPPC licence for the proposed gas refinery without planning permission being granted for the 9 kilometres of inland upstream supply pipeline, as proposed to convey the raw gas from the production wells? Does the EPA believe that it is not necessary that the 'cold venting' of raw gas as proposed must be assessed by the Health & Safety Authority, in the interest of public health and safety? Buildings close to the fence-line would be in serious jeopardy from gases trapped by the surrounding forests.

Should the EPA have continued with this oral hearing in the absence of crucial objectors who had to attend High Court proceedings in Dublin. Is this not a blatant oversight by the EPA? And has it not damaged the public perception of fairness and transparency of this oral hearing? Might this not

have been a ploy to deprive the Rosspoint five of fully participating in this oral hearing? It's not good enough for the EPA to confine and limit itself to the pollution effects on land. Who will take responsibility for the discharge of effluent into Broadhaven Bay? Is the EPA a competent authority to judge gas mixtures being conveyed onto land? Which integrated authority has the power to authorise this upstream pipeline, or pipelines? No pollution causing gas will come ashore if the EPA refuse to issue Shell with a IPPC licence. Shell's proposal to treat the gas at source by the addition of unspecified chemicals, should be endorsed to continue that process only in or over the Atlantic Ocean, at the source of their entrepreneurial activities. Why should we suffer gaseous pollution or petrochemical pollution when Ireland will gain nothing in monetary terms. Should the EPA issue an IPPC licence will they stipulate that the proposed gas refinery in Ballinaboy, only relates to the Corrib gas find and only extends to gas refinement and not to liquid gas or crude oil?

In conclusion without prejudice to the chair, it is a cause of great concern that the terms of reference of this oral hearing are, it seems, at their discretion. The pollution licence application and this oral hearing cannot be a mere formality to hand Shell carte blanche to pollute our community. It is deplorable that the EPA have complete control over the terms of reference of this oral hearing. This does not inspire confidence. The hard labour by Erris residents in their efforts to secure justice should have awoken the EPA to the sleeping monster they may well unleash with devastating consequences for our environment.

The chairperson has already acknowledged that there appears to be a major flaw in the legislation which empowers the EPA to review their own proposed determination. This matter must be stringently raised by both Mr. Frank Clinton's and Mr. Andrew Fanning's respective reports to the EPA's ruling board. I would also request Mr. Clinton to bring this issue to the attention of the appropriate government minister and all relevant government bodies. Perhaps they, like I, may actually believe that this whole project requires a full and transparent 'independent review' to establish the explicit nature of the proposed development in its entirety. The extent of hazardous pollution which this development could impose as presently configured needs vital expert appraisal. Expertise which goes beyond the EPA's current working knowledge. This project must not be restricted to advancing Shell's annual multi-billion profits at the expense of both the pristine environment of the Erris peninsula and surrounding waters. The ad hoc IPPC licence application: P0738-01 is frightening in its nature. Multiple submissions, hundreds of pages, with additions, omissions and meaningless revisions galore. Please make available your legal advice on the constitutionality of the public's rights to be protected against the ruthless ravages of this most dangerous form of intensive pollution, as per the present proposal in the midst of vulnerable communities. The people effected are appalled at having such grave risks looming over their children's health and safety, with their own lives put in jeopardy and the purity of their unique environment. I urge you to recommend that the Board refuse Shell this IPPC licence application P0738-01. And I urge the EPA Board to refuse Shell an IPPC licence. Thank you for your time.

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