

ERRIS INSHORE FISHERMEN'S ASSOCIATION

SUBMISSION TO ORAL HEARING

RE : OBJECTION TO IPPA LICENCE
ISSUED BY EPA TO SHELL E&P
IRELAND LTD (SEPIL) FOR CORRIB
NATURAL GAS FIELD PROJECT

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Broadhaven Bay Hotel

Monday 16th April 2007

The Erris Inshore Fishermen's Association (EIFA) strongly object to the Environmental Protection Agency's (EPA) decision to grant an IPPC Licence to SEPIL to operate a refinery at Ballinaboy and to dump toxic waste at sea. Both of which will do enormous damage to our environment and consequently to our health and our way of life.

For many generations now, the EIFA have sustained a living from Broadhaven Bay and its surrounding waters. In recent years, however, that livelihood has come under threat from quotas and the need to conserve fish stocks. This is understandable and the need is understood by all fishermen, though the methods may not always be agreed. The need to diversify into other sea exploitation methods have been identified and accepted. An unpolluted Broadhaven Bay would suit our propose admirably.

With the advent of Shell, things have changed, changed drastically. They have intruded into our lives, not on any invitation from us but by permissions from our administrative authority to exploit and develop the natural resource off our shores for their own benefit, and it seems to their own advantage. They came to us with a very doubtful environmental reputation on a global scale, but we were willing to accept them. We did not mind their intrusion provided it was done gently with dignity and consideration for our needs. Unfortunately, their claim of wanting to be 'good neighbours' sounds very hollow in view of their methods and practices since their arrival. We have asked questions of them and got answers that were contemptuous of our intelligence. We have responded to their calls for dialogue only to find out that 'Dialogue Shell Style' is that we sit down with them, make our points, accept their explanations and understand that they were right all along!!

Shell's only reason for being in Erris is to make a profit. They will maximise that profit by taking whatever shortcuts official Ireland will allow them. To date they have had more than their fare share of concessions. We depend on you, the EPA and we urge you to do the right thing. Send Shell back to the drawing board and to meaningful dialogue with the local people.

Any benefits accruing to Erris from SEPIL's presence is either short term or delutionary. Their promised jobs will be during the construction phase only. The Environmental Resources Management (ERM) in their assessment of the EIS in relation to Shell's prediction of local employment benefits, states it to be *"a prediction which as no foundation*

in regard to matching available skills in the local economy with those required by the project". On the other hand, the loss of 150 sustainable jobs among the fishing community is very real and the pollution is permanent.

As residents of Erris, we are conscious of the bigger picture and how the operation of the refinery at Ballinaboy will affect our environment and health. We are aware of how the fallback from the atmospheric emissions will find their way into our drains and waterways and eventually to the sea to add to the pollution already there.

As fishermen, however, our main concern is the discharges to sea through the outfall pipe and their consequences. Frank Doyle of the Irish Fishermen's Association (IFO) in a letter to the EIFA in August 2001 stated, *"in general we see the discharges having an adverse effect on a) fisheries and related activities in the area and b) public health generally, as the quality of the marine environment deteriorates"*.

Donald Anderson, skipper of the "Glenugie" a Peterhead Seiner, at the AGM of the European Association of PO's in Amsterdam in 2002, asked why the stocks of fish in the North Sea, a once lucrative fishing ground *had been so drastically reduced?*" He also said that *"rigs now often warn boats to close down any sea water purification plants within a 15 mile radius. This indicates high levels of chemical pollution in sea-water, with undisclosed implications for fish stocks"*.

Broadhaven Bay and its surrounding waters is where the fishermen of Erris ply their trade. Oliver Ó Cadhla (Coastal & Marine Resources Centre – CMRC, University College, Cork), in his report commissioned by Enterprise Energy Ireland (the forerunner of SEPIL) in 2003 – 'Marine Mammal Monitoring In The Waters of Broadhaven Bay in North West Mayo', stressed its importance as a breeding/rearing habitat for several cetacean species and many marine mammal species, plankton feeding, basking sharks and sea birds. *"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"*. Broadhaven Bay is also an important sea angling and marine activity area, containing 35-37 species of fish. It is also a breeding and spawning ground for many species. Any threat or fear of pollution must be strenuously opposed.

The discharges from the gas processing plant at Ballinaboy offers, not so much of a threat, but a certainty of pollution. This is not disputed any more. The only matter in contention is whether or not dispersion will occur at the discharge location. SEPIL have admitted in their EIS and other publications that they will discharge at or below Environmental Quality Standards (EQS). The MLVC have stated in their report and advice to the Minister that *"this treated effluent will still retain a number of toxic heavy metals and other components including mercury and cadmium that have the capacity to accumulate in sediments and biota with potential negative consequences for marine organism and public health"*. Later on they stated that dispersion to open sea would render the pollutant's potential damage as acceptable.

The local fishermen are adamant that, at the presently proposed discharge location, no dispersal will take place. Instead it will back into Broadhaven Bay, there to stay and render untold damage. In situations like this, local knowledge should supersede generally published data. There are many examples to bear this out. To name but a few;

- a) A recent tragic episode in the vicinity of the discharge location. A yacht, under full sail, in a force 7 onshore wind, was maintained in the area overnight by eddy currents. In the same event, an object, floating one foot below the surface also stayed in the same area.
- b) A pleasure craft, "Cabin Fever", near Tory Island, off Donegal, though crewed by competent sea personnel with up to date navigational data and equipment, perished because it is feared that its crew were either unaware of or ignored local conditions.

The outfall pipe is located a little more than 12km from landfall and slightly outside the SAC boundaries. It is barely 1km from the nearest land and in line with the North-South coastline. Its effect on the marine ecology has not been assessed, scrutinised or deliberated on by any statutory authority. The MLVC, the panel of experts appointed by our government to advise them, did investigate its content's potential to do damage and recommended dispersion to open sea, and the discharge location no nearer than 12km from landfall. That allows you, the EPA, a lot of leeway to access open sea and ensure dispersions of those heavy metals and toxic chemicals, the by-products of natural gas refining. If there is to be an error in your decision, let it be on the side of caution. The

issue to be decided is the size of a multinational corporations profit against the well being of a rural population and in particular the livelihood of 150 fishermen and their families.

The close nature of Broadhaven Bay is well documented as follows;

- i) The knowledge of the local fishermen.
- ii) The Mayo County Council report on the location of the discharge pipe from the proposed Belmullet Sewage Treatment Plant.
- iii) The report compiled by Shane O Boyle, Glen Nolan and Robin Raine for the Martin Ryan Institute of NUI Galway on the variability of the Irish coastal currents along the west coast of Ireland.
- iv) The report of a local boatman used by EEI in a survey of the tides and currents within Broadhaven Bay (copy attached).

It is widely accepted that 'dilution is the solution to pollution', and so it is in a limited sense, because, according to Dr Roger Payne, President of the Ocean Alliance – *"then an insidious thing happens. The oils of the ocean plankton absorb the pollution and it gets passed up the food chain, increasing and magnifying at an alarming rate"*.

According to the American Food & Drug Administration, some species of fish, including shark and swordfish, now contain 1 parts per million (p.p.m.) of methyl-mercury. This level can rise to 8 (p.p.m.) in some species of whale. It can rise even more in some human beings and can be passed on to the next generation by mother's milk, the most natural of food sources that would be so contaminated in these circumstances that it would not be allowed in any of the States of America for human consumption. How more catastrophic it would be to the people of Erris if the pollutants were allowed to be contained locally.

In addition to the foregoing, we strongly object to SEPIL being allowed any increase in the level of the discharge, from E.O.S. to E.L.V., as requested. This would create a completely new situation that would have to be assessed from the beginning.

Monitoring is a process that is of paramount importance to this project. It should not be done by any of the stakeholders or any combination thereof. Ideally it should be carried out by a competent and independent body such as the Science Faculty of a university. It must be operated as an instrument to ensure strict appliance by the promoter of the safety

checks, set out by the EPA. It must not be used solely as a tool to monitor the increase of pollution concentration in a body of water. By then the checks would have been shown to be inadequate and the remedy difficult, if not impossible.

This submission is made on the assumption that best available water purification techniques will be used in extracting the pollutants from the produced waters to EQS. It must be noted that EQS can be achieved by dilution in fresh water, such as rainwater. This must not be allowed to happen.

It deals only with planned and scheduled discharges. It does not allow for unplanned discharges or for the discharges of accidental spillages or fire fighting liquids. Such discharges would exacerbate the marine situation and must be dealt with separately.

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SURVEY FOR WASTE PIPE IN BROADHAVEN.

On the 14th Aug 2001 I anchored my boat in position.

N 54° 14' 9125

N 009° 55' 1188

Winds were from the Southeast between 12-15 miles per hr.

Tides 08.20 = 4.4 MTS High
15.25 = 0.2 MTS Low.

Depth at anchor 25 fathoms approx.

My boat was used to take readings at different depths every 1/2 hr.
= Current + temp. readings.

Every 2 hrs. 1/3 gal of dye was put into the sea, the dye was red & purple in colour. This went on from 8 AM to 15.00 hrs.

When the dye was put in the sea the other boat used dropped a drogue with a danbuoy in the middle of the dye.

This was done so you could see the danbuoy from a distance. My boat being anchored, I could only see what direction the danbuoy went.

First direction was towards Kid Is.

Second direction between Kid Is and Benwee hel (Kilgalligan cliffs).

Third direction between Kilgalligan cliffs and Sluggagh rock

Fourth direction ~~between~~ ^{towards} Sluggagh rock

Fifth direction between Sluggagh rock and Runree Pt.

Sixth direction between Runree Pt. and Brandy Pt.

It seemed to be coming around in a circle but staying in the bay.

On Friday 24 Aug 2001.

My boat was used to follow the die that was put out

at Position N 54° - 14' 9.125
W 009° - 55.1188

Winds were South - South westerly with a slight swell
winds 15 - 16 mph

Tides 10.24 - 4.1 M
16.50 - 0.9 M

When the anchored boat put out the die I dropped a diver with
dredging in the die. I towed a sender unit which was attached
a computer, that picked up the reading from the die. This unit picked
up what the human eye would not see.

The die went in the direction of Kild Is the first time
the 2nd time it went slightly between Kild Is and the sound of Kild Is
the 3rd time it went towards Kilgalligan cliffs
the 4th time it went towards the Sluggagh Rocks
the 5th time it went between Rinroe Pt and Brandy Pt.
The 6th time it came towards Ballyglan lighthouse 1.8 miles from

Position 54° - 14' 9.125
009 - 55.1188 in 2 hrs.

from the 2 days that I was on the survey the die never left
Broadhaven bay. I would like to see a 24hr survey done
in sure the die would keep going around inside the bay.
The surveyor said that the waste pipe should not be put in
the bay when I told him that the waste was of heavy metals.
This report is what I saw in the two days

P. Sheeran.