

Department of Communications, Energy and Natural Resources (DCENR) Written Statement for the An Bord Pleanála (ABP) Oral Hearing to be held at Broadhaven Bay Hotel, Belmullet, County Mayo from Tuesday 24th August 2010.

To be presented on Wednesday 8th September as a one of the prescribed body

1.0 Qualification and Experience

1.1 My name is Jonathan Hancox. I am a Manager with the environmental consultancy ENVIRON. I have 19 years experience in environmental management and assessment. I have undertaken numerous independent reviews of environmental impact assessments for oil and gas development projects, including pipelines, worldwide.

2.0 Review of Adequacy of the Environmental Impact Statement

2.1 ENVIRON is assisting the Department of Communications, Energy and Natural Resources (DCENR) to undertake its statutory assessment of the Environmental Impact Statement (EIS) for the Application to construct the Corrib gas pipeline as submitted in accordance with Section 40 of the Gas Act, 1976, as amended. The scope of ENVIRON's role is to:

- Examine the submitted EIS and assess whether or not it meets the scope and quality requirements set out or implied by specific European and Irish Environmental Impact Assessment (EIA) legislation and guidelines;
- Appraise the EIS highlighting any deficiencies in respect of the statutory requirements of the EIS and detailing the outcome and resolution of any such deficiencies;
- Undertake a high level examination of the pipeline design documentation elements of the EIS;
- Review third party submissions made to DCENR in regard of the Application, and
- Propose any relevant conditions arising from the assessment of the EIS that should be considered for inclusion in any Ministerial consent which may issue on foot of the section 40 application.

2.2 In undertaking these tasks, ENVIRON has reviewed on behalf of the DCENR the following Environmental Impact Statement and supplementary updates:

- Corrib Onshore Pipeline Environmental Impact Statement 2010
- Corrib Offshore Supplementary Update Report 2010
- Corrib Offshore Environmental Impact Statement 2001

2.3 However, for the purpose of this Oral Hearing our focus is on the Onshore Pipeline Environmental Impact Statement 2010.

2.4 We have reviewed and appraised the whole of the Onshore Pipeline EIS 2010 and have given particular attention to the new elements of the current routing proposal relative to the previous north shore options.

2.5 A key feature that distinguishes the new route from that previously proposed in the 2009 Application, is that the pipeline route is no longer proposed to run on land north of Swruaddacon Bay but instead is now routed in a tunnel underneath Swruaddacon Bay. From an environmental perspective we note that:

2.6 The new proposed route has no direct physical footprint on the north side of Swruaddacon Bay and hence:

- There is now no requirement for tunnelling compounds on the north of the bay; and
- There is now no physical footprint in the protected peat area of Glenamoy Bog Complex to the north of the bay.

2.7 However, we also note that:

- A larger compound is proposed on the southern side of the bay at Aghoos;
- The overall duration of the construction period will increase due to the proposed tunnelling route and methodology;
- The management of waste and traffic elements will increase due to waste arising from the proposed tunnelling and associated compound areas; and
- The activities and potential impacts associated with tunnelling activities differ from those associated with the previously proposed construction techniques.

2.8 Our review and appraisal of the EIS documentation identified a number of issues with the information and assessments provided in the EIS. To enable us to fully assess the adequacy of the EIS and to assess whether all Project impacts can be adequately managed and maintained to acceptable levels, we have sought further information from the Applicant, in form of additional data, assessment or proposed mitigation controls, on a number of topics primarily:

- Traffic assessment and management: in particular aspects related to:
 - construction traffic volumes;
 - construction traffic management procedures;
 - traffic monitoring; and
 - the assessment of construction traffic impacts on:
 - road safety (including pedestrians and cyclists)
 - public transport
 - network and junction capacity.
- Waste management: in particular, regarding specific clarifications on the volumes of waste being produced during site clearance and tunnelling activities and the transportation and final disposal of the waste;
- Air quality and nitrogen deposition: in particular in relation to clarifications of the extent of such impacts within the Swruaddacon Bay Special Area of Conservation (SAC) and Special Protection Area (SPA) from the activities at the Aghoos compound;

- Noise and vibration: in relation to clarification of the noise and vibration sources assumed in the assessment presented in the EIS
- Flooding: clarifications in regard to consistency in data relating to tide and tide surge levels, flood return periods, and land elevation of the project facilities;
- Peat restoration: clarifications regarding restoration of peat at the tunnelling compounds and along the pipeline route:
- Intervention pits: in relation to an event where the developer requires an intervention pit to access the tunnel or pipeline either during construction or maintenance of the pipeline under Sruwaddacon Bay.
- Property insurance: in relation to whether the Applicant has assessed any potential impacts on property insurance premiums.

2.9 The Applicant has subsequently provided a suite of addenda and errata to the EIS and these materials were submitted to this Oral Hearing. We are currently in the process of completing our review of these materials in order to assess:

- The adequacy of the overall EIS material and whether it has been demonstrated by the Applicant that all Project impacts can be adequately managed and maintained to acceptable levels
- Whether any Consent Conditions would be appropriate in the event that consent is granted for the Applicant under the Gas Act Section 40. Examples of issues where we may recommend that Consent Conditions would be appropriate include:
 - Various monitoring requirements to be performed during and post construction;
 - Design conditions for the construction of stone road, in relation to specifics for the placement of re-worked peat at the base of the pipeline trench/stone road; and
 - At water crossings, conditions in relation to consulting with appropriate authorities on proposed river crossing methodologies and timing in relation to both river flow conditions and sensitive ecological seasons.
- Whether any offset measures would be appropriate for discussion and agreement between various stakeholders in relation to any residual impacts.

2.10 We will provide any further updates on the progress and findings of our review during the Oral Hearing process should such be considered helpful.

2.11 As a separate general point, it should be noted that any requirements or mitigations resulting from the review of security or safety which result in any design changes will need to be assessed in relation to their environmental and social impacts. This may well affect our final assessment of the suitability of the EIS.

That completes my statement.

