

Submission to Petroleum Affairs Division,

Department of Communications, Marine & Natural Resources

re: Irish Offshore Strategic Environmental Assessment

by

Edward & Imelda Moran

Chapel Street,

Belmullet.

The stated objectives of the Irish Offshore Strategic Environmental Assessment are:

- “First, it will inform the public and provide a mechanism for consultation;
- Second, it will inform the Irish Government of specific environmental consideration in its forthcoming licensing process;
- Third, it will be a more efficient means to provide oil companies working offshore with an operational baseline.....
- Finally, reflection on the conduct and success of various aspects of IOSEA 1 will point the way for future IOSEAs.

It would appear from reading the Draft Report that those objectives have been turned on their head revealing a most superficial and hypocritical attitude overall, especially in regard to the first stated objective, that is, to:

“inform the public and provide a mechanism for consultation.”

This is most graphically revealed in the ‘Schedule for Preparing the Environmental Report’ which shows start-up of preparation commencing 12th December 2005, that is ten days before the Christmas-New Year holiday period. Effectively it means start-up commenced in early January, at best, and begs the question as to whether creating the appearance of a 2005 start-up was not an early manifestation of the inherent hypocrisy.

However, it is the date for ‘Consultation Announcement’ (11th April 2006) which, taken in conjunction with the final report date (25th May 2006), most blatantly reveals how superficial and hypocritical the first objective – informing the public – is. In short, the ‘announcement’ was scheduled for the 11th April 2006, immediately prior to the Easter Holiday weekend and all the ‘Consultation Workshops’ were scheduled for the following week. In effect ‘announcement’ **and** ‘consultation’ took place entirely within the shadow of that major holiday period - just as ‘commencement’ of the process coincided with the even more extensive Christmas-New Year period.

The possibility that this scheduling was mere coincidence – two coincidences – is belied by the common awareness of the extent to which public holiday periods are used and abused to eclipse or divert attention from statutorily acquired notices as well as other commercially/politically sensitive matters. Why did the PAD list ‘informing the public’ as its number one objective when in fact both ‘scheduling’ and ‘time allocated’ point so glaringly to the opposite being intended? Is democracy merely a sacred cow to which superficial, popular obeisance is due, and is our constitution just an inconvenient though protected dolmen to be circumnavigated?

What is clear and certain is that the EU directive (2001/42/EC) which underlies this assessment process has been in existence for five years. This afforded ample time for the PAD to initiate the consultation process in plenty of time for its scheduled 2006 Licensing Round. Or is it possible that the whole 2006 Licensing Round has been cobbled together in the same makeshift manner as the 'consultation' process? If so then it reflects most negatively not only on the PAD but on the manner in which a most crucial ministry of our government is being mismanaged.

Certainly the text of the Draft Report suggests haste and piecemeal approach

“there is now some urgency about the need to make further discoveries of independent gas.”

Elsewhere in the Draft Report it is made perfectly clear that this overall project is not amenable to 'urgent' action - in fact can only be distorted and disjointed by such approach:

“Under the maximum drilling scenario, a maximum of 19 wells [or a minimum of 6 wells] may be drilled over the period 2006-2011”

and furthermore states that

“the total level of drilling activity will be similar to or only slightly higher than that seen on average since 1978.”

So who is fooling whom? Five years to prepare for this report and now the process is being pushed through on the basis of an 'urgency' which does not stand up to even minimal examination. It is typical of the common administrative strategy of creating an artificial deadline so as to bulldoze through matters which scrutiny might uncover.

Likewise, the public consultation meetings which were in the circumstances inevitably poorly attended, are being taken as fulfilling the legislative requirement regarding involving the public. The perception is thus established that the public were not interested enough to participate, whereas in actual fact the public have essentially been precluded from participation by the entirely inadequate consultation period put in train by the PAD.

By rights there should initially have been long-term and on-going awareness raising among all environmentally active groups countrywide so that when general public announcements were made (in stages and over several months) a receptive background context would have been in place. No such consideration was given to the public and consequently it is hard not to conclude that the 'first objective' must necessarily mean 'first out of the way' - that is, inform them the public that they have been consulted, and then forget about them.

It may well be that the stated 'Final' objective of the Draft Report, as suggested at the outset of this submission, should be taken as the 'First';

Finally, reflection on the conduct and success of various aspects of IOSEA 1 will point the way for future IOSEAs

That says it all: this process is being treated merely as a trial run, a learning exercise. However, as the old adage says: "the way you start is the way you go". This underscores how misguided and ill-conceived the current approach is. Only the naive or the devious fail to recognise that initial standards invariably get lowered in practice, not raised.

For our part, while we have read through the Draft Report we have not had time to assimilate it as fully as a comprehensive submission would require. We have therefore largely confined this submission to the 'Non-Technical Summary' and consider consequently that as members of the public we have been abused by the PAD; that the EU Directive (2001/42/EC) has been abused by the PAD; and ultimately that our democratically-based constitution is being abused.