

Energy Green Paper Submissions,
Energy Planning Division,
Department of Communications, Marine and Natural Resources,
Adelaide Road,
Dublin 2.

EnergyGreenPaper2006@dcmnr.ie

SUBMISSION TO GREEN PAPER 1ST OCTOBER 2006

'TOWARDS A SUSTAINABLE ENERGY FUTURE FOR IRELAND'

Shell to Sea represents the people of Erris and Ireland who are concerned with the path Ireland's energy policy is following in relation to the continued exploitation of Ireland's dwindling fossil fuel reserves in light of Kyoto Protocol agreement and the current world energy crisis situation.

We welcome the opportunity to respond to the Green Paper 'Towards A Sustainable Energy Future for Ireland' launched on 1st October, 2006 and wish to discuss the policy in areas including:-

- Direction of future Energy Policy in Ireland (page 2)
- Kyoto Agreement obligations/Emissions trading (page 4)
- Alternative Energy Resources for the future (page 5)
- Future of Co. Mayo in Energy Production in Ireland (page 7)
- Enhancing contingency measures with relation to the west coast and Co. Mayo in particular (page 13)
- CO₂ Capture & Storage projections in the future (page 14)
- Government Policy on Natural Gas is not sustainable (page 15)

We understand:

*'Ireland's Energy Agency is Sustainable Energy Ireland. Its mission is to promote, assist and encourage the development of sustainable energy. This encompasses environmentally and economically sustainable production, supply and use of energy in support of Government policy, across all sectors of the economy. Its remit relates mainly to improving energy efficiency, advancing the development and competitive deployment of renewable sources of energy and combined heat and power and reducing the environmental impact of energy production and use, particularly in respect of greenhouse gas emissions'*¹

Sustainable Energy Ireland has put forward much documentation relating to energy management in Ireland. The Green Paper does not seem to reflect SEI's recommendations in relation to the energy future of Ireland! So, where did the Minister get his 'policy for the future' from?

The Green Paper describes the 'three pillars' of energy policy as: *security of supply, environmental sustainability and energy market competitiveness.*²

This submission agrees with this statement.

¹ SEI, Energy in Ireland 1990 – 2004 Trends, Issues, Forecasts & Indicators

² Green Paper, p.11

Direction of Future Energy Policy in Ireland

The Green Paper 1st October, 2006, '*Towards a Sustainable Energy Future for Ireland*', is an inconsistent document which fluctuates from supporting Kyoto Protocol measures to wholeheartedly endorsing a negative policy of exploiting Ireland's dwindling fossil fuel reserves as soon as possible. It highlights the necessity of bringing alternative 'green' sustainable energy resources (AER's) to the fore in one chapter, and insists that natural gas and oil from indigenous sources is the (fossil) fuel of the future for the Irish economy in the next.

*'Renewable energy will continue to play a central role in the energy sector's contribution to meeting the Kyoto target, reducing the carbon intensity of electricity production'*³

*"In Ireland natural gas has become the 'fuel of choice'"⁴..... 'Encouraging Investments in hydrocarbon resources by creating an attractive environment for exploration chapter'*⁵

*Policy measures and behavioural changes can improve our situation. Government and consumers could take additional measures to switch away from fossil fuels and promote more efficient energy use to achieve security of supply and environmental objectives. Among other things, this would require additional research and development on alternative energy technologies.*⁶

*"In terms of natural gas networks, Bord Gais Eireann is also engaged in a significant investment programme with €1.53 billion invested in the period 2001 - 2005 and a further €1.25 billion scheduled for investment between 2006 and 2010..... The natural gas market is maturing in terms of economic extension into new areas. Consideration will be given to further extensions to the gas network where they are shown to be economically viable"*⁷

*Threats to the environment and climate change have to be addressed. We are giving priority to energy research. Renewable energy is set to play a major role in addressing our energy challenges.*⁸

Despite, SEI being the Government appointed 'Energy Agency' and therefore the acknowledged 'expert consultants' in the field of energy policy, there is little sign that recommendations from SEI have been taken into consideration in drawing up this Green Paper. In fact there is little sign that any submissions to Government from other sustainable energy sources,⁹ prior to the Green Paper being drawn up were taken any notice of as they, in the main, suggested excellent ideas for turning energy policy around. It seems that the Government's own stated aim of '*Energy policy of yesterday will not suffice for tomorrow*'¹⁰ was ignored as the Green Paper proposed future is indeed the 'energy policy of yesterday'. Government acknowledges that different policies in relation to the energy future for Ireland must be pursued. Therefore, why does it persist in pursuing outdated and unsustainable measures? It is a major decision but a necessary one to call a halt to the wrong policies of the past. It is very wrong to seek to sustain those policies into the future. It can only lead the public to wonder if Shell and other global corporations are better paymasters than those poorly funded organisations endeavouring to bring alternative energy resources into full operation.

A basic misunderstanding in the Green Paper comes in the form of the terms 'alternative', 'renewable' and 'sustainable'.

³ Green Paper, 2006 p.15

⁴ SEI, CHP Trends and Issues 1991 - 2002

⁵ Green Paper 2006 p.14

⁶ Green Paper 2006 1.1.5

⁷ Green Paper 2006 p.13

⁸ Green Paper, foreword note by Dempsey

⁹ Green Paper Chapters, No. 9 (submissions from interested parties)

¹⁰ Green Paper, 2006, Executive Summary, p.7

The difference is:

'Alternative' sources of energy encompass areas such as wind and water (hydro and ocean technology) which are carbon neutral. There are NO emissions associated with generating power from these sources. They don't have to be 'renewable' because they are natural forces, present all the time and are eminently available as such. The financial support put into the Research and Development of these technologies by the Irish Government is negligible. This needs to be addressed with undue haste. **Alternative Energy is 'sustainable'** in the long term. It is the opinion of this writer that this is the only way forward for energy production in the future.

'Renewable' means that the source is replenishable within a humankind time scale. That includes biomass and wood (wood pellet burners etc..). However, these are not 'alternatives' insofar as the Kyoto Agreement, toxic emissions into the atmosphere and problems of climate change are concerned.

Burning biomass pollutes the atmosphere in a similar way to fossil fuel burning with CO₂ and other toxic emissions at high levels from these sources. However, unlike traditional fossil fuels (coal, peat, oil and gas) a balance can be struck from these renewables in ensuring that for every tree cut down and burnt for fuel, there is another one planted to reach maturity. This is the only way in which renewables can be 'sustainable'. Fossil fuels of course are totally non-sustainable because they have formed over time, normally counted in millions of years.

The using of willow coppice to deal with sludge from cities may seem to be an ecologically sound practice, however, the processing of this willow coppice some years later, with its cells saturated full of chemical toxins, into "environmentally friendly pellet fuel" certainly is not.

Green Paper asks the question *'What actions should be taken domestically to reduce the cost of electricity and gas to consumers?'*

Treat important energy conferences in Finland on future gas and oil supplies from Russia seriously and send experts in the field of energy to represent Ireland who have training in such matters, know what is required and have the knowledge to be able to reach equitable agreements with countries such as Russia where those resources are in plentiful supply for the intervening period until Ireland can become a leader in the field of AER's.

No community based alternative initiatives are envisaged as part of this green paper. The focus is on economies of scale, private and big business interests. Many people and communities, particularly in the west of Ireland want to become involved. This vital area has not been given any cover within the remits of the Green Paper Energy Policy for the Future. Glaring omission!

Short-term cost issues are clouding the global importance of major change in energy policy for the future.

Kyoto Agreement obligations / Emissions Trading

'The Kyoto Protocol was adopted in 1997 and entered into force in Feb 2005 as an international legally binding agreement to mitigate the adverse impacts of climate change by reducing greenhouse gas (GHG) emissions. GHG's include CO₂, methane CH₄, Nox, HFC's, PFC's and SF₆. Developed countries agreed legally binding targets.....' Ireland is obliged to limit the growth in its annual emissions to 13% above 1990 levels in the period 2008 - 2012....translates into an emissions target of approx 63 million tonnes of CO₂ per annum. 'Energy efficiency must become a key priority for Ireland'¹¹

Why is Ireland failing abysmally to keep its legally bound commitments? It appears that rather than change the basic massive flaws in its energy policy while it still can, it persists in bowing to pressure from the world's oil companies who will, especially with incentives offered to encourage them by this disillusioned and inept Government, continue to exploit new fossil fuel reserves of this country with the one way benefits all going into their own pockets, as admitted in the Green Paper -

'The Government will continue to encourage investment in oil and gas exploration. The Government is also encouraged by technological developments in the field of petroleum exploration and development'¹²

Global oil giants seek out countries with weak Governments who will allow them, in fact encourage them, to exploit the indigenous resources from the people of that country, in total contravention of what they have legally signed up to elsewhere. It appears that the Government of Ireland should be taken to court for its blatant flouting of Global Kyoto Agreement to which it is committed. It is unbelievable that the Government cannot seem to see its major error of judgement. The benefits of strong, early action considerably outweigh the costs which will accrue due to inaction.

The EU Emissions Trading Scheme is basically a safety valve for countries unable to meet their requirements. *'The Kyoto Protocol provides for three additional mechanisms - clean development mechanism - industrialised countries acquire emissions credits by supporting projects in other industrialised countries, - finance projects in developing countries - emissions trading whereby participants are able to trade quotas to meet targets. Ireland's legal and regulatory framework allows for the use of these mechanisms.'¹³*

Ireland has incorporated these mechanisms into its energy policy for the future to cover for the fact that it has no intention of meeting its Kyoto Agreement legalities. This is a disgraceful situation for a country in Ireland's economic situation and is in no way acceptable to the people of North Mayo. Global warming will have severe consequences which will hit the poorest countries most, so the idea of supporting projects in developing countries is nonsense as those countries will be utterly unsustainable due to the most basic of requirements, the climate, being destroyed for human life to be sustainable there.

'the electricity generation sector as a whole is unlikely to be able to meet carbon reduction targets in the 2008 - 2012 period and will have to absorb the associated cost of carbon.'¹⁴

'Continued use of these fuels (fossil fuels) in the electricity generation sector without the ability to reduce associated GHG emissions means that prices will be affected by the cost of purchasing carbon allowances in the EU emissions Trading Scheme.'¹⁵

¹¹ Green Paper 2006 p8

¹² Green Paper 2006 2.1.33

¹³ Green Paper 2006

¹⁴ Green Paper 2006 1.2.11

¹⁵ Green Paper 2006 1.2.30

Alternative Energy Resources for the future.

'Renewable' and 'alternative' energy resources must be brought to a standard of efficiency on a par with traditional energy derived from fossil fuels as quickly as possible.

The Government, through its Green Papers on energy, pays lip service *'energy policy of yesterday will not suffice for tomorrow'*¹⁶ *The Government is substantially increasing Exchequer funding for energy RTDI. The new capital budget line for 2006 of €3.5 million is set to increase over the period to support energy research initiatives.*¹⁷..... but its actions speak louder than words. Look for comparison at expenditure on expansion of fossil fuels – billions of euros rather than millions. €7 million to SEI for the research and development of all alternatives and renewables in total while BGE gets 1.53 billion and 1.25 billion in a ten year period?? Why would this be if gas is only an interim fuel until the alternatives can be brought on line???

A major problem exists in relation to Government spending on research and development for bringing alternative energy resources into reality as rapidly as possible. This area would appear, (SEI publications) to be grossly under funded in respect of finance being put into the upgrading of infrastructure in order to support old technology (by which this submission refers to the burning of fossil fuels of all types) which is not sustainable into the future by general consensus. *'support is provided for research, development and demonstration. At present much of the support for energy RTDI in Ireland is provided through SEI. According to SEI, the volume of energy RTDI carried out in Ireland in 2004 was nearly €24 million, of which approx 63% was funded by private sector or individual resources and the rest was funded through Irish and or EU mechanisms. In terms of priorities, conservation and renewable technologies together accounted for more than 80% of total funds. Within renewable technologies, wind and biomass had the largest shares (approx. €1.2 million each).....' Sustainable Energy Ireland (SEI) has already committed €7 million in grant funding towards renewable energy research, development and demonstration projects in Ireland.....'focus on programme on wind and biomass.....'*¹⁸

There is an admittance of utter inefficiency on the part of Government in this quote: *'Renewable sources are achieving greater penetration. Increased from 1.8% in 1990 to 2.2% in 2004. Biomass and wind energy sources were largely responsible for this increase. By May 2006 the installed renewable generation capacity was approx 850 MW. Wind accounted for 575 MW. Nearly 3,000MW of wind capacity application is waiting to be processed.'*¹⁹

AER's: The approach of the Government to Alternative Energy (via AER programmes) is not anywhere near enough. The issue of alternative energy needs a massive injection of R & D funding. This area has and still is only receiving token funding in comparison with that spent in the 'old' and known areas of energy. Six competitions have been held, but the amount of alternative and renewable energy projects resulting from these have fallen far short with many winners of such competitions even failing to set up at all. *'The Alternative Energy Requirement (AER) – six competitions have been completed. By June 2005, 250MW of renewable generation capacity had been commissioned'*²⁰

A new and much more assertive approach needs to be taken as soon as possible. The Irish Government needs to invest hugely in a programme of alternative energy installation on a massive scale such as seen in recent days in the new solar farm in Spain.

In all Government papers on Renewable Energy Development there is no mention of gas fields being developed. Of course not! Gas is not a sustainable nor a renewable energy resource.

¹⁶ Green Paper 2006 Executive Summary p.7

¹⁷ Green Paper 2006 p 17

¹⁸ Green Paper 2006 p.10

¹⁹ Green Paper 2006 1.2.31

²⁰ Green Paper 2006 1.2.33

Therefore why is there an inordinate emphasis on its development to provide the bulk of the electricity production in Ireland for the next fourteen years and beyond? Inequitable!

Green Paper asks the question: *What can be done to improve the pace and range of development of renewable energy resources for electricity on a sustainable basis?*

Look to world wide inventions for harnessing the power of the ocean rather than the present concentration on seeking Irish made inventions to try out. Get the present global technology up and running and then look to Irish inventions to improve matters if necessary when updating.

Siting of windfarms should be a farm diversification scheme. The current situation where the assessing of applications for 3,000 MW of AER is pending is unacceptable.

The infrastructure for the generation of electricity on site in Erris has to be a matter of great urgency - the site at Bellanaboy and the disused Bellacorick would be prime contenders.

It would be an outrageous injustice if Alternative Energy Resources (Ocean Wave and Tidal Technology and offshore wind projects) producing a totally alternative, sustainable, form of energy were to be stopped from proceeding further on the grounds that Shell had got there first!!

Future of Co. Mayo in Energy Production in Ireland

BENEFITS: There are NO benefits for Co. Mayo from the development of the Corrib Gas Field. There are many disadvantages:

POLLUTION: Allowing the exploitation of natural gas reserves via Glengad, Rossport and Bellanaboy in Erris brings pollution problems to the area where the drinking water supply for the whole area is situated within an unacceptably short distance from the proposed refinery, destroys the area already identified as a prime area in clean, sustainable, green alternative energy production in the future, ruins North West Erris as a potential unique and incomparable tourist destination, destroys potential to declare this area a National Park, full of archaeological treasures and unsurpassed coastal beaches suitable for water sports. The Pollatomais NHA is situated between Faulagh and the proposed refinery at Bellanaboy.

OIL?: The people of Rossport, Glenamoy and Glengad areas have a strong belief that bringing the gas inland to Bellanaboy has very suspicious undertones that the so called gas refinery at Bellanaboy is planned for the dual purpose of bringing ashore both gas and any future oil discoveries, especially with new technology available of cleaning up previously unusable oil resources. This may account for Shell's insistence of it being 9 km inland. As all Shell's activities are carried out covertly and without transparency, this suspicion has not been refuted.

ECONOMY: Exploitation of Corrib field appears to be totally economically/financially beneficial only to those at Government, European and Global levels. Local considerations of residents and fishermen have never been a concern of those who gave permissions for the exploitation of Sruwaddacon Bay by foreign interests for the good of nobody known in Ireland. *'Encouraging investments in hydrocarbon resources by creating an attractive environment for exploration'*²¹ *'Government is committed to realising the commercial potential of oil and gas resources that exist offshore Ireland.government will continue to encourage investment in oil and gas exploration....'*²²

- *'Continued promotion of Ireland as a location for oil and gas exploration*
- *Maximising the value of any oil and gas finds for the Irish people*
- *Revise and consolidate the regulatory procedures and institutional arrangements for bringing oil and gas ashore.'*²³

*'major regional resource assessment studies ...have quantified the undiscovered oil and gas potential west of Ireland. This yet-to-find resource potential is substantial and places the region on a par with neighbouring Atlantic Margin frontier exploration provinces. Because of the enhanced potential it is now timely to review the terms of our exploration and licensing regime. Ireland last revised these in 1992 (fiscal) and non-fiscal in 1987.'high cost of deepwater exploration and development in offshore Ireland'.....work will be augmented by further analysis into the importance and value of indigenous gas.....'*²⁴

Gas prices in Britain have been falling. Why then have gas prices in Ireland just risen to the tune of 34% in October, the latest rise of several recently?

LOCAL INFRASTRUCTURE & DECENT JOBS: Why then, is there no infrastructure in Co. Mayo to generate electricity at the source of the natural gas supply from the Atlantic Ocean, to be delivered to the rest of the country? The ESB has put in place no essential infrastructure to allow the generation of electricity (the relatively non-polluting part of this whole business) in Co.

²¹ Green Paper 2006 2.1.32

²² Green Paper 2006 p.14

²³ Green Paper 2006 2.1.32 Summary Policy targets

²⁴ Green Paper 2006 1.12.18

Mayo. All the natural gas from the Corrib Field is destined for use many miles away in areas of full employment already suffering lack of workers to fill positions and having to bring in foreign workers to fill positions. In Erris, local workers are suffering lack of jobs due to this Government's inability to lay infrastructure for people who live outside of the cities of Ireland, and many have to travel great distances from their homes to the county towns or to Dublin for employment daily.

The very basic problem with the exploitation of fossil fuel reserves off the North Erris coast is that the Government thinks it is acceptable to pipe our fossil fuels reserves away from source to where they will be processed well over 100 miles from this area. The Government should have planned for laying the necessary infrastructure prior to telling Shell that Erris was open to be exploited. This they failed to do and therefore Erris is not open for dirty industry to be carried out here. This is not Siberia! Locals here are a hard working and well educated population. Mayo has the capability of and the prospect of being the beginning of power generation rather than the end of the energy chain. It is not acceptable for this area to be bypassed in this fashion by the Government.

LOCAL ELECTRICITY GENERATION: If natural gas is being used mainly for production of electricity for the future as the Green Paper suggests then that electricity should be generated in Erris at source and provide employment in Erris. Corrib gas must not be brought in at Bellanaboy and piped directly to Galway without the benefits of electricity production being in Erris at Bellanaboy or other suitable site preferably within a 5 mile radius of Rosspoint and Glengad.

Infrastructure should be immediately upgraded to allow this to happen in Erris in the future. No consideration has been given to this option which must be completed prior to any further action happening at Bellanaboy.

*'Ireland faces considerable supply challenges. The National Competitiveness Council, Forfas, IBEC, the Irish Academy of Engineering and others have pointed to Ireland's energy infrastructure and potential economic impacts, indicating that Ireland compares poorly in this area relative to other developed countries. A substantial and near-term investment in energy infrastructure is required, particularly in the electricity and natural gas sectors.'*²⁵

COUNTY INFRASTRUCTURE: There is no infrastructure in any part of Co. Mayo for giving the people the benefit of natural gas. In all the time – 1980's, 1990's, into the new millennium, that the people of Dublin and other cities connected to the BGE network were benefiting from cheap natural gas heating for their homes, the people of Mayo had no option but to heat their homes and run their businesses from much dearer electricity or use much more expensive bottled gas. Recent rises have been phenomenal, 34% rise in this month alone. Do the people of Mayo want the expense of refitting their homes to make them capable of benefiting from natural gas now when the price is sky high? Not likely!

*'BGE (Bord Gáis Éireann) is currently completing the Mayo-Galway pipeline to deliver gas from the Corrib field and the south North Pipeline, linking the Irish and Northern Irish markets which will enhance security of supply to NI.'*²⁶

*'BGE as transmission systems operator and owner and operator of the natural gas interconnectors, operates the network to international standards. BGE has plans in place to deal with emergency events on the natural gas transmission network swiftly and effectively to avoid or mitigate supply disruptions.'*²⁷

²⁵ Green Paper 1.1.15

²⁶ Green Paper 2006 1.2.18

DANGER: Safety is an issue of prime concern in the location of Shell's pipeline. Sruwaddacon Bay, the proposed route of Shell's pipeline has excessively strong and dangerous currents. The ability of BGE to deal with leakages in the pipeline while underwater prior to going overground to the proposed refinery at Bellanaboy is strongly contested. When two men were drowned in Sruwaddacon Bay after an accident just a few years ago, it took professional diving teams three weeks to get the last body out of Sruwaddacon Bay due to its inhospitable currents. If leakages were to occur, (because there would be no smell added to the raw gas until it reached 9 kms inland to the proposed refinery) leakages would not be realised by the people living in the area except in terms of illness or death. Internet research would suggest that a leakage of up to 35% is quite acceptable to gas and oil companies. It is not acceptable to the people living on either side of Sruwaddacon Bay. It is highly doubtful that Shell et al would send any staff from their bases wherever that might be - Zurich, London, Dublin?? to deal with 'minor' problems in Sruwaddacon Bay if the weather were in the slightest bit inclement. They say that a refinery based at sea is just too dangerous for personnel in this area. They may well find that Sruwaddacon Bay is an even more inhospitable site for the deployment of personnel to repair a problem in the future.

COVERT PROJECT: This submission does not accept the exploitation of gas from the Corrib field/s off the North Mayo coast to be acceptable in its present form. The process is covert without any evidence of accountability or openness and transparency. There appears to be nobody monitoring this project on behalf of the national interest and this project must be stopped immediately until the facts concerning its exploitation is in the public domain for all to see. Unless this happens immediately, deep suspicion and blockages of the site will continue as at present.

Industry must prove itself to be above board, and public on all its activities. Shell and the Irish Government have failed miserably in this regard since this project was first mooted almost ten years ago. Shell says it is changing the route of its pipeline but won't tell anyone where they propose to change it to. Hardly the actions of a mature and confident company! Mocking the local people of an area being exploited by Shell for failing to understand technical explanations, the deployment of the State's police force for protection of Shell workers and the actions of the appropriate Government minister refusing to visit an area he intends to allow foreigners to exploit, seem to be the actions of bullies who are losing the battle.

CONDESCENDING ATTITUDE OF SHELL: There has been little meaningful consultation on this project with local people living in the area. The people directly affected by this pipeline are not trained in engineering nor similar qualification therefore, there is a strong opinion and belief that Shell staff did not treat them with due courtesy, telling them just what suited Shell's purposes at the time they held some meetings in North Mayo area and then complained that the people did not understand *"We use terminology that is not accessible to everyone. This has contributed enormously to the lack of understanding and the genuine concerns that the Corrib Gas Project has created. We used numbers and technical vocabulary to tell our story - and we failed to reassure people"*²⁸

Since that time 'people' have had some time to research and what they have discovered in relation to Shell's (and other oil companies) activities world wide does not make for the mutually beneficial community spirit Shell et al think can prevail in North Erris.²⁹

²⁷ Green Paper 2006 1.2.19

²⁸ Terry Nolan of Shell, 'Crux of Corrib Problem is a lack of real dialogue', Irish Times, 21st October 2006 p.15

²⁹ Ibid

PLANNING ISSUES: Shell is lying to the people through the media: *"The Corrib gas project has every necessary government and regulatory consent and planning permission".*³⁰ It hasn't. Shell have carried out several illegal activities for which planning permission was required, without same. Oil corporations lie. It is the nature of the business – they are unable to tell the truth because they don't know what the truth is.³¹

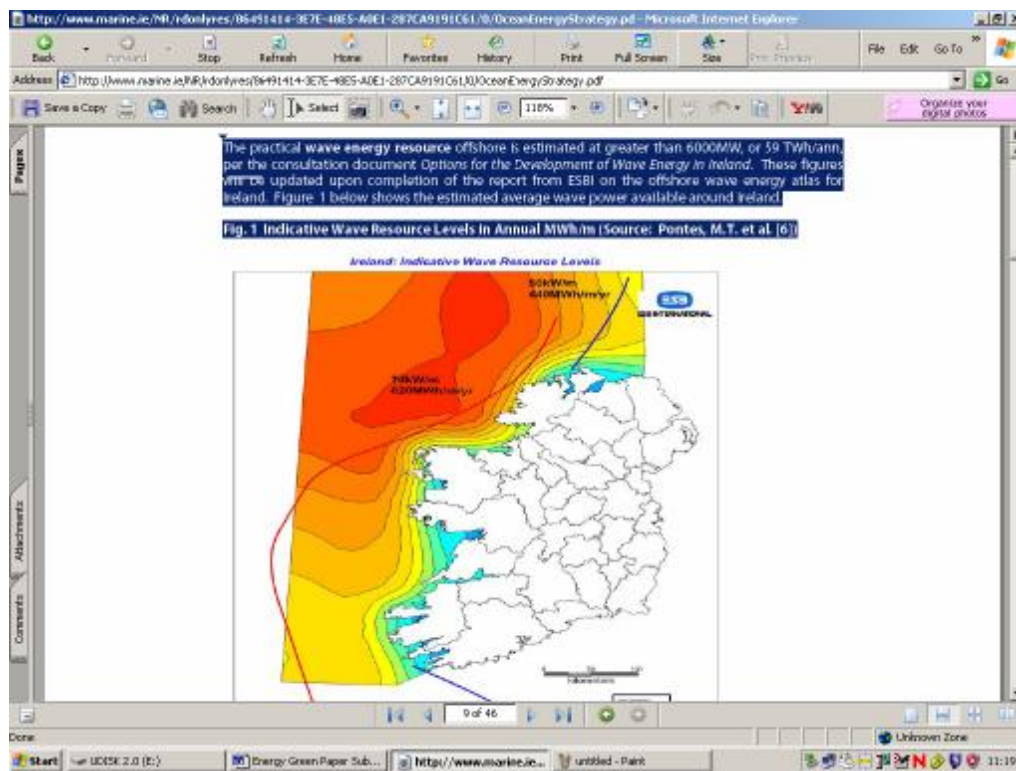
UNKNOWN AREA? The Minister who is in charge of energy in Ireland has never been to this part of the country³². He has been invited and does not wish to come here. How can he take on to make orders for a part of his very small country to which he has never been? The Minister is not fit to comment or make decisions for Erris because he does not know what he is talking about.

OPPORTUNITIES/ALTERNATIVES FOR ERRIS: There are many preferable energy related industries for North Mayo – these include wind energy, both onshore and offshore, ocean wave technology, and the generation of electricity from other sources until the alternatives can be brought into full production.

Consultation Document on options for the development of wave energy identified two favourable strategy options for Ireland;

1. *To become a technology leader in the field of ocean energy by committing a significant development programme for ocean wave and tidal energy*
2. *To provide Ireland with the means to utilise the Irish wave resource and develop an exportable core of research excellence*³³

From the 'Accessible Wave Energy Resource Atlas Ireland, ESBI (Draft 2005 comes the following figure – Indicative Wave Resources Levels in Annual MW/h (Source Pontes, M. T. et al)



34

³⁰ Ibid

³¹ A Day in the life of a barrel of Oil – RTE 2 documentary October, 2006

³² Jerry Crowley, TD, Meeting Glenamoy 29.10.06

³³ Ocean Energy In Ireland, October 2005. SEI, p.8

CONFLICTS: It can be seen above that the greatest resource for ocean wave energy off Ireland lies exactly where the proposed Corrib gas fields are situated. It would appear therefore that the Government is destroying the potential for carbon neutral AER's, especially offshore wind and ocean technology, the 'green' valuable future of the energy industry by encouraging the exploitation of the Corrib gas field by foreign corporate interests in this area off the coast of North Mayo.

CONFLICTS: It is extremely unlikely that companies would work in tandem to harness two different types of energy in this small area. The most likely situation would be that ocean energy technology would be pushed aside in order to allow the unfavourable exploitation of fossil fuel resources from the Atlantic Ocean for the simple reason that they pushed in first with no regard being given to all the problems associated with undesirable fossil fuel extraction.

CONFLICTS: We have been here before in this area. There is a similar problem concerning the Civil Aviation Authority tower on Dooncarton Mountain which has been anything but transparent in its operations. Suspicions of danger from this tower are commonplace. Courtesy of the Government and the Local Authority, this tower needing no planning permission and enquiries ended up with the threatened of locals who dared to question their taking over of commonage which belongs to local landowners, not belonging to them. Irish Government must not allow this situation to occur yet again!

PRIORITIES: More funding for Ocean Energy Technologies and other alternative energy projects, the future of world energy, has to be Ireland's priority. Only this can assist towards reducing Ireland's shameful situation in failing to take any action towards meeting their commitments on global climate change. Why pay fines for polluting the world when the same money could be put into R & D of clean energy technology to make Ireland a world leader of up to date non-polluting technology? Ireland should not be reduced to buying credits for polluting the world to cover for the ineffectiveness and inefficiencies in their energy policies because of inept policy. Ireland must look to countries such as New Zealand and Scandinavia for their future.

Traditional power generation cannot continue into the future unchanged as it has since the time of the industrial revolution due to problems of huge global significance having been identified by its deployment. Unfortunately, this seems to have escaped the Government's attention. *'Working together with BGE and CER, the Government has put in place a framework to ensure the adequacy of gas supplies and transportation infrastructure into the country. Within Ireland the Government's commitment to offshore exploration is critical. The Corrib field will bring significant volumes of gas into the Irish system and significantly enhance the security of Irish gas supplies until 2018. The UK market is now the source of some 80% of our natural gas'*³⁵

EUROPEAN INTERCONNECTORS: Ireland has the interconnectors from Europe already in place, there is no need for indigenous supply of natural gas which, if it were indeed exploited, would simply be incorporated into the rest of the European supply and be priced identically to the end customer Irish or not. Ireland must keep the supply lines open from the east until proper consultation with the people and full modern infrastructure has been put in place on the west coast of Ireland to allow associated industries such as generation of electricity in situ, servicing of installations at sea for alternative technologies such as ocean wave and offshore windpower etc.... to be completed.

³⁴ DCMNR, Marine Institute & SEI Ocean Energy in Ireland October 2005 p.8

³⁵ Green Paper, 2006 2.1.12

Noel Dempsey in April 2006 report – Renewable Energy Development states: *'Never before has the development and management of our energy resources been more critical. Sustainable energy now plays a key, central role in the development of policies to ensure security of supply, environmental protection and a competitive economy'*³⁶

AN INTERIM SOLUTION?: If exploiting the Corrib field is just a way of looking after energy needs in Ireland until the alternatives can be got up and running, then a better option would seem to be to take the natural gas which Norway/Russia is offering and meanwhile pour massive financial backing and resources into the research and development of new technology in the fields of alternative energy resources therefore enabling Ireland to become a leader in the field of alternative energy technology.

Could it be that our Government is under some sort of obligation to the multi-nationals such as Shell, Marathan and Statoil? Maybe our Government is under so much pressure from the corporate giants that they now have to see plans through in order that it does not get sued? Is our Government so incompetent that it has not seen this coming?

CORRUPTION: Shell has been paying cash for all sorts of things in Erris in order to get the support of those it sees as the economic leaders in this area. More covert and deceitful practices. It is only the occasional person who is brave enough to come forward and report that Shell has tried to pay them off – pay bribes for their support of bringing the gas in at Glengad, Rossport and Bellanaboy. Surely if all the businesses in the area support Shell, then the few protestors will be forced to give in and let Shell over run their lands and property? How many businesses and individuals in Mayo and beyond have been 'bribed' for their support of Shell? We will never know!

Green Paper states, *'thus reducing Ireland's reliance on imported fossil fuels, creating opportunities for rural communities and protecting the environment'*³⁷ Fossil fuels being mined from the Mayo coast, being brought overland before being refined and the building of a refinery for both the gas and the crude oil that will undoubtedly exist at the same gas 'holes' will certainly not protect the environment – to the contrary it will destroy it, creating opportunities is a joke! This project has no licence for Cold Venting of emissions from its operations, nor does it have planning permission in several other areas contrary to the assertions of its 'locally planted' Managing Director, Mr. Terry Nolan in the Irish Times of 21st October, 2006. Lies and more lies!

³⁶ Renewable Energy Development, April 2006, Dempsey

³⁷ Renewable Energy Development April 2006, Dempsey

Enhancing contingency measures with relation to the west coast and Co. Mayo in particular

Green Paper asks *“Given the existing level of dependence on imported fossil fuels, what needs to be done to enhance contingency measures?”*

Obviously, many things outlined in this submission need to be done. The Government needs to give serious consideration and increase hugely its financial support of both wind and ocean technology instead of pandering to giant corporations intent on destroying Ireland's prospects of ever being world leaders in these fields due to them having 'got there' first to destroy future prospects. How can we ever hope to explore and benefit fully from the huge 'green' energy reserve which having the Atlantic Ocean the full length of our West coast gives us, if we allow this area, identified as a very major player in the field of the future supply of world energy which is clean 'green' and free to be exploited by old fashioned and outdated 'dirty' industry in the 21st century!

If the Corrib gas field is allowed to progress as planned, gas and oil reserves in the Atlantic Ocean will undoubtedly destroy our premier location to benefit from these resources in the fields of Ocean Wave Energy and other alternative ocean energies in the future.

The Irish Government must now tell Shell et al that it has withdrawn its permission for the Corrib field until further notice and instead of fluffing about with 'Irish' prototypes in small scale, it should immediately put in place a major wave energy project such as 'Pelamis' off the North West coast, an area identified as eminently suitable for ocean wave energy, similar to projects in progress elsewhere in the world currently. It is imperative that laying down the basic infrastructure to Co. Mayo to be a major player in the production of 'green' electricity in the future, begin immediately, bringing immediate employment and a new sense of importance to the west coast of Ireland that will bring it with its head up into the future.

CO2 Capture & Storage projections in the future

The question of carbon capture & storage (advanced technologies coming on line appear to implicate Corrib field in potentially dangerous future developments):

'Carbon Dioxide Capture and possible storage of it in depleted Corrib Gas Field'?³⁸ 'Ireland possesses gas fields with more currently unexploited. These could conceivably be used for EGR (enhanced gas recovery)'³⁹

If excess CO₂ was stored in Corrib instead of being released into the air as toxic emissions, as is suggested, and escapes as may be a prospective likelihood, either gradually or with an explosion, it is denser than air and remains at ground level. Carbon dioxide displaces air and suffocates all living things that breathe air. (In 1986 in Cameroon, CO₂ was released from where it had pocketed naturally from volcanic activity. 1,700 people and thousands of animals died). This is not a prospective scenario Shell to Sea would welcome off the Erris coast.

Why does the case study⁴⁰ of viables use depleted Corrib gas field when Corrib gas is gas not oil. Report says 'old oil fields' yet uses Corrib as its example.

Carbon dioxide separation and storage as advocated in 'A Focus on Carbon Capture and Hydrogen' only delays the problems by dreaming of storing excess carbon dioxide and other emissions in depleted gas and oil fields such as Corrib fields. Maybe you could also do some research into how you can grow trees in those same holes so that they will be able to photosynthesise the carbon dioxide emissions stored therein into oxygen?????!!!! This hardly complies with the idea of installing AER's in this area, therefore it is obvious that the installation of AER's in this area has been given nil consideration. Short term nonsense for long term disaster!

Page 57 of Green Paper: 'Clean Coal technology... Carbon Capture and Storage (CCS). In certain instances the process of pumping carbon into depleting oil fields can lead to operators being able to recover further amount of oil which is known as Enhanced Oil Recovery (EOR) The intergovernmental Panel on Climate Change has estimated that there is the potential for some 25 years worth of current CO₂ emissions to be sequestered in one of these ways.'⁴¹

³⁸ SEI Report – Emerging Energy Technologies in Ireland – A Focus on Carbon Capture, p.12

³⁹ SEI Report – Emerging Energy Technologies in Ireland – A focus on Carbon Capture, p.35

⁴⁰ SEI Report – Emerging Technologies in Ireland – A Focus on Carbon Capture,

⁴¹ GP p.57

Government Policy on Natural Gas is not sustainable

'Since 1990, Ireland has become increasingly dependent on oil and natural gas, most of which is imported. The country's total energy import dependency in 2004 was 87% with imported oil and natural gas accounting for 73% of primary energy use (45% in 1990).'⁴².....'Dependence on fossil fuels, currently about 50% is forecast to grow with natural gas accounting for 30% of final demand by 2030.'⁴³

The Green Paper throughout extols the virtues of the use of Natural Gas and stresses the importance of the use of Natural Gas as in:-

- *'Natural gas releases less CO2 into the atmosphere than comparable amount of other fossil fuels.'*
- *'Natural gas is available in 'packaged units' for CHP purposes.'*
- *'Natural gas flows constantly on demand – no variability as with wind etc.'*
- *'Construction costs reduced for plants in comparison with other fossil fuel types'*
- *'Virtually no ash with natural gas – lowers cost.'*
- *'Flexible 'turn down' or 'turn up' ratio with natural gas'*
- *'More energy efficient.'*

What about balancing these extolled virtues with the negative statements? Some of these are:

1 High levels of toxic emissions released on burning in common with all fossil fuels:

| | | | | | |
|---------------|--|---|---|---|---|
| • Natural gas | 197.8 g CO2 emissions per KWh of electricity generated | | | | |
| • Oil | 263.9g | " | " | " | " |
| • Coal | 340.6g | " | " | " | " |
| • Peat | 414.0 g | " | " | " | " |

2 No available indigenous supplies left without exploitation of entirely new areas

'Ireland has serious disadvantages with regard to offshore exploration compared with other locations.....include water depth, harsh climatic conditions, lack of infrastructure and distance from shore, coupled with low perceived prospectivity – 4 discoveries declared commercial from 121 exploration wells drilled over the last 35 years. ...9 exploration wells drilled west of Ireland in past 10 years and these led to two substantial discoveries – the Corrib gas field, the Slyne Basin in 1996 and the Dooish gas condensate accumulation in the Rockall basin in 2002'⁴⁴

3 No infrastructure in West of Ireland to support moral exploitation of possible natural resources.

'Uncertainty exists regarding indigenous sources of supply, Ireland's demand for natural gas is increasing but its indigenous production peaked in 1995 and decreased by 63% between 1990 and 2004. Over 80% delivered from Britain through the connectors. Result of the depletion of existing Kinsale and Ballycotton fields, lower than expected.....and delays in bringing the Corrib field into production'.⁴⁵'The energy outlook for Ireland.....relatively small market, low levels of interconnection and limited indigenous fuel supplies'⁴⁶

Over 80% of our natural gas is imported from the UK which has become a net importer of gas.'security of supply impact of this level of reliance will depend critically on the level of indigenous supply.....The Government's commitment to offshore exploration is critical. The Corrib field when it is developed will bring significant volumes of gas into the Irish system enhancing the security of Irish gas supplies until 2018.'

⁴² Green Paper 2006 1.1.14

⁴³ Green Paper 2006 European trends p.8

⁴⁴ Green Paper 2006 2.1.34

⁴⁵ Green Paper 2006 1.2.17

⁴⁶ Green Paper 2006, Ireland Trends, p.8

4 Irish Government has signed away all rights to a share in the profits for its people. In its pursuance of encouraging exploitation by foreign interests, it has forgotten about its duties to the people of Ireland and especially the people of the West of Ireland.

*'Government is committed to ensuring an increasingly competitive natural gas market in the interest of consumers, enterprise and the economy as well as regional development.....Progress to date includes the phased opening up of the retail gas market, the actions taken by CER to stimulate competition and to regulate BGE and the emerging competition in the supply segment.....Security of gas is a shared all-island concern. Ongoing investment in infrastructure, north and south will contribute to enhanced security of supply as will the joint review of gas storage and LNG potential on the island as a whole. The completion of full gas market opening is a key deliverable in the immediate term.'*⁴⁷

*'Government fully supports the achievement of full gas market liberalisation by mid 2007. Provisions are contained within the Energy (Miscellaneous Provisions) Bill 2006 to allow this to proceed. In this context, the Government will also seek to ensure that the legal unbundling of BGE's, (Bord Gais Eireann) TSO (Transmission System Operator) and DSO (Distribution System Operator) and the establishment of a new BGE subsidiary to function as the Irish system operator takes place before the end of 2006.'*⁴⁸

⁴⁷ Green Paper 2006 2.3.5

⁴⁸ Green Paper 2006 2.3.6