

Hi,

I can imagine there will be a lot of submissions in relation to this consultation so I will focus on one particular point in relation to policy measures, which I think best falls under question 10 “What further tools and measures do you think would contribute the most to Ireland’s energy security of supply?”.

I have read both CEPA’s technical and non-technical analysis and I feel one point is glaringly missing.

First let me highlight the following statement in the report:

- “Ireland’s indigenous natural gas production has ceased at the Kinsale field and is expected to decline at Corrib over the next decade. However, since gas will be needed as the principal source of non-variable electricity generation, and current policy includes a ban on the granting of new exploration licences, Ireland’s dependency on gas imports from GB will significantly increase”.

My point is the following needs to be considered and honestly discussed:

- **There is a high likelihood that Ireland’s dependency on gas imports from the GB will increase. Ireland has no ability to control where GB sources its gas (be its own fracked gas production or LNG from other fracked gas sources, as North Sea gas production declines).**
- From an Irish perspective, given the current scientific consensus that fracked gas “can have additional negative impact, in comparison to natural gas extracted without hydraulic fracturing, on both the global climate and the local environment where the gas is extracted”<sup>i</sup> and it is government policy “not to support the importation of fracked gas from other countries”<sup>ii</sup>, I think it is important to emphasise the above point that Ireland has no control on where the gas supplied from GB is ultimately sourced. It is likely Ireland will be importing fracked gas from the UK (given their government’s current policies), moreover I think the question is more around on what the quantities will be.
- **As a very generalised statement, from an overall climate change perspective with the assumption that gas will still be required as a transition fuel, I believe that government policies need to be re-examined considering the following (whole picture):**
  - **The first gas sources that need to be used/developed is natural gas extracted without hydraulic fracturing (traditional gas fields) as they have lower climate impacts. The closer to Ireland this happens the more control the government has to limit production, processing and transmission emissions.**
  - **If LNG is relied as a gas source, either directly or indirectly (through the UK) it would be substantially better if the government could control where the gas is sourced, as per government policy<sup>iii</sup> “Government will work with like-minded European States to promote and support changes to European energy laws – in particular the upcoming revision of the European Union’s Gas Directive and Gas Regulation – in order to allow the importation of fracked gas to be restricted”, and if this could be done by legislation or licencing agreements.**

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<sup>i</sup> May 2021 Policy Statement on the Importation of Fracked Gas, see <https://www.gov.ie/en/press-release/dbe48-policy-statement-on-the-importation-of-fracked-gas-published/>

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<sup>iii</sup> May 2021 Policy Statement on the Importation of Fracked Gas, see <https://www.gov.ie/en/press-release/dbe48-policy-statement-on-the-importation-of-fracked-gas-published/>