

Wholesale Electricity and Gas Policy Division, Department of the Environment,
Climate and Communications, 29-31 Adelaide Road Dublin 2, D02 X285

Public Consultation

Review of the security of energy supply of Ireland's electricity and natural gas systems

<https://www.gov.ie/en/consultation/dbe14-review-of-the-security-of-energy-supply-of-irelands-electricity-and-natural-gas-systems/>

Submission by

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1 Introduction

The Department of the Environment, Climate and Communications has published the policy options it is proposing as part of its [review](#) of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems.

This submission on the public consultation of the Energy Review Preferred Options focuses on the official government policy against the importation of fracked gas and the political lobbying seeking to undermine this policy.

'Safety Before LNG' strongly welcomes the fact that Shannon LNG's proposed type of project, a commercially-operated Floating LNG Terminal, has been specifically rejected for short listing as a gas mitigation option in the Technical Analysis of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems.

We expect that an outcome of this review will be a clear direction to An Bord Pleanála that the [planning application](#)¹ for a proposed fracked gas import terminal on the Shannon Estuary submitted by Shannon LNG must be rejected. There must be no equivocation on this question as any opening given to An Bord Pleanála in this decision would make a mockery of the energy review process currently being undertaken.

2 Issues for Consideration

2.1 The Policy on the Importation of Fracked Gas

The official government [Policy on the importation of fracked gas](#)² published on May 18th, 2021 states that

*"In order to implement the Programme for Government commitment that it **does not support the importation of fracked gas**, the Government has approved that pending the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems, it would not be appropriate for the development of any LNG terminals in Ireland to be permitted or proceeded with".*

However, it equally goes on to state that

*"the 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 the Government will work with*

¹ <https://www.pleanala.ie/en-ie/case/311233>

² <https://www.gov.ie/en/press-release/dbe48-policy-statement-on-the-importation-of-fracked-gas-published/>

international partners to promote the phasing out of fracking at an international level within the wider context of the phasing out of fossil fuel extraction".

The Department as part of this energy review must be mindful of all of the aspects of this official government policy that the government does not support the importation of fracked gas in also restricting its importation and promoting the phasing out of fracking globally. Allowing any construction of an LNG terminal which would even only temporarily import fracked gas would be a breach of this policy.

2.2 The European and International Energy Charters

There is an overriding issue here which relates to contracts and the [Energy charter](#)³ and terms. With New Fortress Energy, we would be entering the LNG market as a buyer at real disadvantaged terms. Signing off on the LNG terminal in effect signals that it is Government policy to enter the market on these terms. The Liquefied Natural Gas market threatens to derail carbonisation efforts and is a clear barrier to Net-Zero 2050.⁴

The length of any potential contract for supply of gas is normally 10 years (but it may even be 20 years) and while we have noted this will lead to a serious issue with regards to different sectors competing for carbon budgets, there is also the cost to the public and public purse to consider, whether that be a cost borne by the consumer, or by public finances.

There is a huge danger in divorcing the planning process - such as for the New Fortress Energy/Shannon LNG fracked gas import terminal planning application - from the huge lien and commitment being placed on the nation in entering into a policy with effectively the oil and gas industry if it entertains the notion that one can divorce planning from policy. The specific reason why An Bord Pleanála is involved is because the decision is so interwoven and so integrated with Government policy. It is also helpful to acknowledge that New Fortress Energy would likely get protection from the Energy Charter in terms of future plans, even if the Government were to approve on the basis of acknowledging short term measures for energy security. New Fortress Energy (NFE) would have the added protection of the Energy Charter Treaty rights. In short, granting any permission contrary to Government policy may result in an unforeseen lien and it is therefore clear that the outcome of this review process must be to give an unequivocal direction to An Bord Pleanála which it must adhere to.

2.3 Shortlisted Preferred options in the Energy Review Exclude Shannon LNG

The options shortlisted in the Energy Review Consultation do not include the type of project proposed by Shannon LNG. We welcome this.

³ <https://www.energycharter.org/>

⁴ <https://energytracker.asia/the-global-lng-market-and-long-term-contracts-a-barrier-to-net-zero-2050/>

Shannon LNG's proposed type of project, a commercially-operated Floating LNG Terminal, has been specifically rejected for short listing as a gas mitigation option in the Technical Analysis of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems under the following rationale:

- A floating LNG terminal could be leased for a limited number of years with the terminal being transported elsewhere at the end of the leasing period.
- Commercial operation is likely to result in the importation of fracked gas to Ireland. This would be in contradiction to the Government's opposition to the use of natural gas produced from fracking (the report notes: ""DECC (2021) 'Policy Statement on the Importation of Fracked Gas', available on gov.ie" and "We note that the Office of the Attorney General concluded in 2021 that it is not possible for Ireland under the European Treaties or EU Directive to ban the import into Ireland of fracked gas (available on gov.ie). Even if legally viable, it may be extremely difficult in practice to isolate fracked gas within global LNG supply chains. For example, the majority of US gas production is from fracking with injection into transportation infrastructure before it is exported. Restricting fracked gas would effectively mean banning US LNG imports, which would restrict imports from one of the largest and most reliable sources of LNG.")
- The additional energy requirements associated with LNG relative to natural gas supplies (including liquefaction, transport, and re-gasification) mean that the embedded emissions in LNG can exceed that of natural gas.
- As storage stocks would be driven by market fundamentals, there would be no guarantee that stored gas volumes would be sufficient to cover a security of supply shock. This risk could be partially mitigated by requiring the LNG facility to hold a minimum volume of LNG in reserve to meet any emergent security of supply risks.

ANNEX A: LONG-LIST OF MITIGATION OPTIONS

Long-list of gas mitigation options

The long-list of all gas-mitigation options reviewed for this report is presented in Table A.1 below. The rationale for whether the option is short-listed for further review or not is also outlined.

Table A.1: Long-list of gas mitigation options and short-listing decisions

Option	Short-listed?	Rationale for short-listing decision
Fixed LNG terminal (commercially operated)	No	<ul style="list-style-type: none"> Commercial operation is likely to result in the importation of fracked gas to Ireland.²⁶ This would be in contradiction to the Government's opposition to the use of natural gas produced from fracking.²⁷ The additional energy requirements associated with LNG relative to natural gas supplies (including liquefaction, transport, and re-gasification) mean that the embedded emissions in LNG can exceed that of natural gas.²⁸ As storage stocks would be driven by market fundamentals, there would be no guarantee that stored gas volumes would be sufficient to cover a security of supply shock. This risk could be partially mitigated by requiring the LNG facility to hold a minimum volume of LNG in reserve to meet any emergent security of supply risks.
Fixed LNG terminal (operated as a back-up facility ²⁹)	No	<ul style="list-style-type: none"> Low utilisation would imply a high cost per unit of gas imported. There is a risk that the terminal could become a stranded asset if/when the security of supply risk has been mitigated through other means. The risk of importing fracked gas would be limited to periods in which the back-up facility is utility.
Floating LNG terminal (commercially operated)	No	<ul style="list-style-type: none"> A floating LNG terminal could be leased for a limited number of years with the terminal being transported elsewhere at the end of the leasing period. Commercial operation is likely to result in the importation of fracked gas to Ireland. This would be in contradiction to the Government's opposition to the use of natural gas produced from fracking. The additional energy requirements associated with LNG relative to natural gas supplies (including liquefaction, transport, and re-gasification) mean that the embedded emissions in LNG can exceed that of natural gas. As storage stocks would be driven by market fundamentals, there would be no guarantee that stored gas volumes would be sufficient to cover a security of supply shock. This risk could be partially mitigated by requiring the LNG facility to hold a minimum volume of LNG in reserve to meet any emergent security of supply risks.

26 We note that the Office of the Attorney General concluded in 2021 that it is not possible for Ireland under the European Treaties or EU Directive to ban the import into Ireland of fracked gas (available on gov.ie). Even if legally viable, it may be extremely difficult in practice to isolate fracked gas within global LNG supply chains. For example, the majority of US gas production is from fracking with injection into transportation infrastructure before it is exported. Restricting fracked gas would effectively mean banning US LNG imports, which would restrict imports from one of the largest and most reliable sources of LNG.

27 DECC (2021) 'Policy Statement on the Importation of Fracked Gas', available on gov.ie

28 For example, the UK North Sea Transition Authority has estimated that LNG imports into GB are on average over double the emission intensity of UK gas production and pipeline gas imports from Norway. Available on nsauthority.co.uk

29 We assume that a back-up facility would only operate during periods in which there is a material risk of demand disruptions.

2.4 The supply of non-fracked LNG ruled out by Shannon LNG and the political lobbying of politicians and government bodies after the planning application was lodged

Shannon LNG and its owners New Fortress Energy have never assured in any of their official planning applications that the imported gas will not be from fracking - they have done quite the opposite in fact.

In its official planning [application](#)⁵ Shannon LNG stated that "***it is neither necessary nor appropriate to include particulars of any one place where source gas might be extracted***" (cf. [EIA Volume 2](#)⁶ page 7-18).

The outcome of the energy review must be cognisant of this position taken by Shannon LNG and not on what it might theoretically accept if it should obtain planning permission. For example, Councillor Jim Finucane claimed in the [Kerry County Council Meeting of October 18th, 2021](#)⁷, the minutes of which were submitted to An Bord Pleanála, that "**This company is committed to not using fracked gas**", whereas the company has never made this commitment to An Bord Pleanála where it counts.

In addition, the minutes of a meeting between Shannon LNG and the Shannon Estuary Economic Taskforce, on June 9th, 2022, note:

*"In response to a query about whether the LNG would be fracked or unfracked, NFE responded by saying **any gas it supplies would adhere to all European and Irish legislative requirements and specifications governing the supply of gas.**"*

⁵ <https://www.pleanala.ie/en-ie/case/311233>

⁶ https://www.pleanala.ie/publicaccess/EIAR-NIS/311233/EIAR%20Volumes%201%20to%204/STEP%20EIAR_Volume%20_Main%20Text.pdf?r=198166

⁷ <http://docstore.kerrycoco.ie/KCCWebsite/meetings/minutes/2021/minsoct21.pdf>

lodged, where assurances are being given that do not form part of the official planning application, is simply unacceptable.

This interference has even gone to the top of Government where a meeting was arranged by Kerry Fine Gael T.D. Brendan Griffin, between Minister Leo Varadkar and New Fortress Energy CEO Wes Edens which took place on June 29th, 2022. Deputy Griffin wrote to the Tánaiste's office that Wes Edens *"definitely does not intend to discuss the existing application in respect of the Shannon LNG project"*:

From: [REDACTED]
Sent: Thursday 21 April 2022 16:46
To: [REDACTED]
Subject: New Fortress Energy CEO Contact Details
Sensitivity: Confidential

This message originated from an external source. Be very cautious with any links or attachments that it contains.

Hey [REDACTED]

[REDACTED]

Many thanks,
[REDACTED]

However, the minutes of the meeting show that Wes Edens did in fact unacceptably discuss the existing application in respect of the Shannon LNG project with An Tánaiste Leo Varadkar:

Meeting between Tánaiste Leo Varadkar TD and New Fortress Energy

29/06/2022

Venue: Government Buildings.

In Attendance:

Tánaiste and Minister for Enterprise, Trade and Employment Leo Varadkar TD
Brendan Griffin TD

- [REDACTED] Advisor to the Tánaiste
- [REDACTED] Advisor to the Tánaiste
- [REDACTED] DETE official
- [REDACTED] – DECC official
- [REDACTED] – New Fortress Energy
- [REDACTED] – New Fortress Energy

Minutes

"Mr Eden then provided an overview of NFE's proposals for a development on the west coast of Ireland which they have significantly invested in".

We note that a formal complaint has been lodged by '[Safety Before LNG](#)'⁸ with the Standards in Public Office Commission against the Tánaiste following his agreement to meet with New Fortress Energy CEO Wes Edens on the grounds that it may constitute *"the exercise of undue influence and undermining of the planning process"*.

For all these reasons, it is imperative that the Department bases its Energy Review decisions on the official documentation submitted directly to An Bord Pleanála by Shannon LNG and not base any of its decisions on hearsay or the result of direct political lobbying and canvassing after the planning application was lodged.

2.5 Minister's most recent statements on the Energy Review

On September 18th, 2022, the day before the publication of the public consultation into the review of the security of energy supply of Ireland's electricity and natural gas systems the Minister for the Environment, Climate and Communications wrote in the Sunday Independent newspaper:

"On energy storage particularly, there has been much speculation on the Government's position - and indeed my own position - on liquefied natural gas (LNG) storage.

One of the options provided for in this review is LNG storage. Importantly, it outlines that the best gas storage option for Ireland is one that is state-owned, not commercially owned, which can be filled from the national grid and which is compatible with the use of hydrogen into the future.

The commercial LNG terminal proposed for Limerick/north Kerry would be based on the supply of imported fracked gas, which is not compatible with Irish policy, and it would be in business in the first instance to serve the needs of large energy users such as data centres.

This is not a model that we can rely on to provide security of supply for Irish householders and businesses as the priority customers. Neither is it a model that fits with our climate standards".

In the Dáil on [September 20th, 2022](#)⁹, the day after the publication of the public consultation into the review of the security of energy supply of Ireland's electricity and natural gas systems the Minister for the Environment, Climate and Communications, was asked:

"Friends of the Earth has said the expert review "signals the death knell of Shannon LNG". Is the Minister confirming or denying that?"

⁸

<http://safetybeforelng.ie/pressreleases/pressrelease20220615EthicsComplaintAgainstLeoOverShannonLNGMeeting.html>

⁹ <https://www.oireachtas.ie/en/debates/question/2022-09-20/55/>

The Minister replied:

*“The report is very clear that such a commercial LNG facility was not considered as an option to go to public consultation and be progressed. Friends of the Earth is correct in its reading - it is a very simple reading, in my mind - of the report. There is a range of strategic reasons behind that. From my perspective, first, there is real risk in following such an approach. **It would be very good for the developer but it would not be good for our carbon budget. On that criterion alone, it should not be pursued.** Second, what we were looking for in this report was to make sure we have a system that gives us energy security, which a commercial facility would not necessarily do. We would have to contract it separately. Third, we have shared the perspective that we could not guarantee the energy produced by such a facility would come from a non-fracked gas source. For a variety of strategic reasons, therefore, including climate, energy security and the environment, it was not included as one of the options to be pursued.”*

Safety Before LNG welcomes those statements by the Minister.

2.6 Carbon Budget concerns following the revelation that the Shannon LNG Emissions would be the same as the Methane emissions from almost 1 million beef cows

A further public consultation was triggered by An Bord Pleanála following what it considered [significant new information](#). The Board had demanded [clarifications](#) from Shannon LNG following its written admissions that the upstream emissions of LNG are 2.5 times greater than those of natural gas from the UK gas network currently supplying gas to Ireland. This question on emissions of Shannon LNG has raised a serious issue of concern regarding the effect *any* LNG project would have on the existing carbon budget where it would lead to higher carbon emissions than the gas Ireland currently sources from the Moffat interconnectors. In effect, unnecessary higher carbon emissions from Shannon LNG's fracked gas imports would mean other sectors of the economy having to reduce their production even further, such as the dairy sector.

Question 2(b) states *“The basis for the carbon emission factor of 184g per Kwh for natural gas electricity generation referenced on page 15-26 of Volume 2 of the EIAR should be clarified, and its appropriateness having regard to the observation on page 15-2 that the upstream emissions of LNG are greater than those of natural gas within the gas networks”*

We agree with the Technical analysis informing the Energy Review statement that *“The additional energy requirements associated with LNG relative to natural gas supplies (including liquefaction, transport, and re-gasification) mean that the use of LNG in Ireland may have an adverse impact on the Government’s medium-term*

decarbonisation targets – (e.g., the Programme for Government’s commitment to delivering a 7% reduction in emissions each year to 2030).”

We note the following:

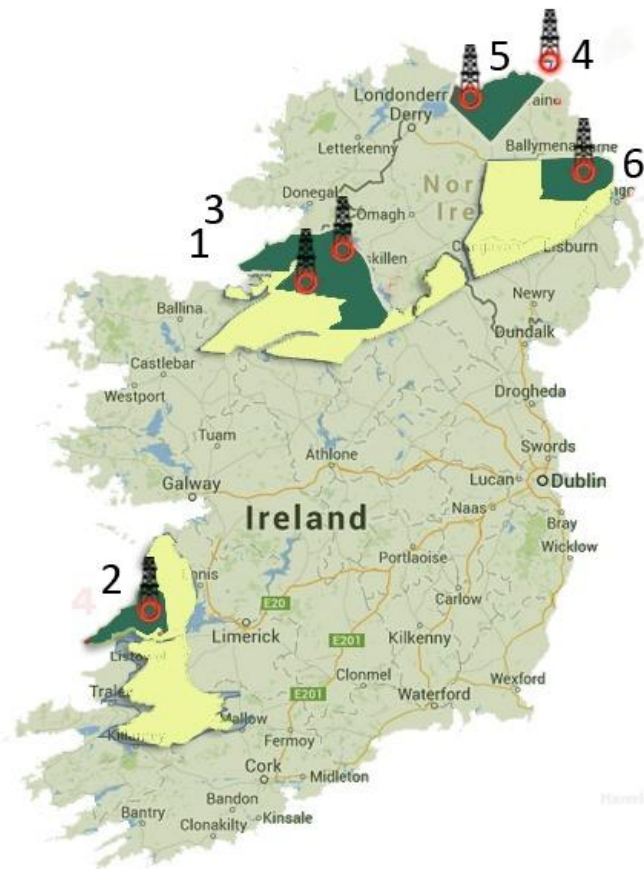
- Based on figures from the Intergovernmental Panel on Climate Change (IPCC)) it is calculated that the full lifecycle emissions for the 600 MW power plant proposed by Shannon LNG (to power the 8 data centres it plans for the site) would be the equivalent of the annual methane emissions of 450,000 dairy cows or 999,000 beef cows. Given that there currently is a budget for emissions, why should farmers suffer the brunt of emissions cuts while a US-based company, New Fortress Energy, run by the US King of Subprime lending Wes Edens, makes millions of dollars and emits large amounts of toxic gases at their expense?
- Shannon LNG itself admitted in its new [planning application](#)¹⁰ that the [upstream emissions of LNG are 2.5 times greater](#)¹¹ than those of natural gas from the UK gas network currently supplying gas to Ireland.
- 450,000 dairy cows represents 28% of the total number of dairy cows (1,603,721) in the country - and is more than the total number of dairy cows in Kerry, Limerick, Tipperary and Clare combined.
- 1 million beef cattle is more than the entire beef cow herd of 936,773 in Ireland.
- The Fugitive Methane Emissions alone (as separate from the carbon dioxide emissions) from the proposed Shannon LNG project would equal the methane emissions from 237,000 dairy cows (14.7% of the national herd and greater than the total number of dairy cows in Kerry and Limerick combined) or 530,000 beef cattle (over 56% of the national beef cow herd).
- Fracking pollutes and poisons water, land and people. Ireland banned fracking in 2017 and we feel it is not acceptable to impose fracking on other rural communities abroad for the same reason.
- Sectoral Carbon Budget: the more of the carbon budget assigned to fracked gas powering data centres, the less that goes into agriculture.
- Farmers understand that replacing Irish beef production with imported Brazilian beef has a worse impact on global emissions over the full life cycle. Likewise, it is the same with fracked gas, where importing US fracked gas to Tarbert would have a 44% higher carbon-equivalent footprint over a 20-year period than importing coal to Moneypoint power station in County Clare.
- North Kerry forms part of the Clare Gas Basin which gas companies targeted for fracking over 10 years ago. We fear that if fracked gas comes into Ireland, it would only be a matter of time before we see an attempt to start fracking here under the excuse that it would do less climate damage than importing US fracked gas. Cuadrilla has used that same argument in the UK to lobby for fracking there. Cuadrilla CEO Francis Egan [stated](#)¹² that “By replacing liquefied natural gas imports and continuing to decrease reliance on coal, with shale gas produced onshore, we will reduce the UK’s carbon footprint and provide a cost-effective source of energy for our homes, businesses and

¹⁰ <https://www.pleanala.ie/en-ie/case/311233>

¹¹ <http://www.safetybeforelng.ie/pressreleases/pressrelease20220715-ShannonLNG-admits-LNG-emissions-2-and-a-half-higher-than-UK-gas-network.html>

¹² <https://www.nsenegybusiness.com/news/fracking-cuadrilla/>

industry.” In 2011, an [options licence](#)¹³ was granted for the Clare Basin, which included large tracts of North Kerry. If the fracking ban is overturned in Ireland, using the logic that it would do less damage to the climate if we frack in Ireland instead of importing US fracked gas, then North Kerry may once again be opened up for fracking licenses.



6 areas planned for exploration: 1. Lough Allen Basin. 2. Clare. 3. Fermanagh. 4. Rathlin Island. 5. Rathlin Basin. 6. Larne Basin. Areas of yellow show the land to be explored.

Professor [REDACTED] of Cornell University confirmed those figures via email as follows:

On Tue, 16 Aug 2022, 19:01 [REDACTED] wrote:

Here are some numbers:

1) for a 200 MW electric generating facility, if it operates full time 24/7 (ie, 100% capacity), it produces 1.75 billion kwh of electricity in a year. According to the US EIA, it takes 8.04 MJ of natural gas to produce 1 kwh of electricity. So the plant would burn 14.1 billion MJ of natural gas. CO2 emissions are 50 g CO2/MJ,

¹³ <https://www.goodenergiesalliance.ie/campaigns/fracking/what-is-fracking/plans-for-ireland/>

so the plant is releasing 700 billion g of CO₂ per year at the site of combustion. If the gas is LNG coming from the US, then there are additional CO₂ emissions from liquifying and transporting the gas, which are probably in the range of 20% of the emissions on site, or 140 billion g CO₂ per year. So total CO₂ emissions are 840 billion g of CO₂ per year. Then of course there are the methane emissions; for the US, a good estimate is that 3.5% of methane in the gas consumed is emitted unburned to the atmosphere..... it is probably worse than this for LNG, since methane is allowed to evaporate ("boil off") from the tanker to keep the rest of the LNG in liquid form. Industry claims they capture all of this, but that is unlikely to be true. Still, we have no data, so let's give them the benefit of the doubt, ignore the boil off, and look only at the 3.5% emission rate. For the amount of gas burned to emit 840 billion g of CO₂ per year, and using a 20 year GWP of 86 from the IPCC (2013), then methane emissions are 950 billion g CO₂-equivalents per year. Total emissions from the 200 MW plant are 1.79 trillion g CO₂-equivalents/year.

2) for a 600 MW facility, emissions would be exactly 3X more.

3) for dairy cows in Western Europe, methane emissions are 142 kg of methane per cow per year, according to the IPCC (2006). Using the 20 yr GWP of 84 from the IPCC (2013), that is 12 million g of CO₂-equivalents per cow per year (note the GWP is slightly less for methane from cows than for methane from natural gas). Dividing 1.79 trillion by 12 million, it would take 150,000 cows to equal the emissions from the 200 MW plant.

4) for cows and cattle raised for meat rather than dairy, methane emissions are 64 kg per cow per year. Using the same logic as in #3, it would take 333,000 animals to equal the emissions from the electric plant.

I hope this helps,

██████████

████████████████████

██████████ Professor of
Ecology & Environmental Biology
Cornell University, Ithaca, NY USA
Co-Editor in Chief, OLAR, the journal of
Ocean-Land-Atmosphere Research
Faculty Fellow, Cornell Atkinson Center

Following on from Professor ██████████ calculations, we calculate that the Methane Emissions alone from the 600 MW Shannon LNG project would be equivalent to the following methane emissions from animals:

Number of Dairy cows: 950 billion divided by 12 million = 79,166 * 3 = 237,500.

Number of Beef Cattle: 950 billion divided by (64,000 * 84) = 176,711 * 3 = 530,133.

2.7 Shannon LNG payment of €2.4 million to Kerry County Council compromises and taints the Kerry County Development Plan

Kerry County Council requested and was paid over €2.4 million by Shannon LNG after its planning permission for an onshore LNG terminal expired¹⁴ in 2018 and before it lodged a new planning application¹⁵ on August 27th 2021 for a floating LNG terminal and 600 MW Power Station in Tarbert.

All of this €2.4 million was paid after Shannon LNG held its first formal pre-application planning meeting with Kerry County Council, on January 24th 2020, concerning the new application for Strategic Infrastructure Status it had lodged at An Bord Pleanála on March 20th, 2019 for a Floating LNG terminal and power station.

On one occasion, on January 19th 2021, Kerry County Council actually received €625,000 from Shannon LNG on the very same day it held another formal pre-application planning meeting with Shannon LNG on a planning application it had not yet lodged. At that meeting it was advised that *“the proposed site is referenced in the new Listowel MD LAP 2020-2026, and also advised that the existing policies of the Kerry County Development Plan remain in place”*.

The Listowel Municipal District Local Area Plan 2020-2026 was actually adopted¹⁶ on 21st September 2020 - stating how Shannon LNG would have a *“significant positive impact”* - just 8 months after the council received its first payment of €625,000 in over 10 years from Shannon LNG on the 25th February 2020.

In December 2021, Kerry County Council updated its Draft County Development Plan 2022-28 - which will be relied upon An Bord Pleanála in its LNG planning decision - to explicitly support the *“facilitation of a gas importation facility in the Tarbert/Ballylongford Landbank”* at a time when it was contrary to government policy¹⁷ to do so.

The policy statement¹⁸ declares:

“Ireland imports much of its natural gas via the two interconnector pipelines from Moffat in Scotland, which provide the majority of natural gas currently used in Ireland. Given the level of fracked gas in the imports from Scotland is considered very low, the highest risk of fracked gas being imported into Ireland on a large-scale would be via liquefied natural gas (LNG) terminals, if any were to be constructed”. The policy statement concludes that “pending the outcome of the review of the security of energy supply of Ireland’s

¹⁴ <https://archive.pleanala.ie/en-ie/case/PA0002>

¹⁵ <https://www.pleanala.ie/en-ie/case/311233>

¹⁶ <http://docstore.kerrycoco.ie/KCCWebsite/planning/listowellap/adoptedlap.pdf>

¹⁷ <https://www.gov.ie/en/press-release/dbe48-policy-statement-on-the-importation-of-fracked-gas-published/>

¹⁸ <https://www.gov.ie/en/publication/f3774-policy-statement-on-the-importation-of-fracked-gas/>

electricity and natural gas systems, it would not be appropriate for the development of any LNG terminals in Ireland to be permitted or proceeded with”.

The County Development Plan will be heavily depended upon by An Bord Pleanála as it decides on the Shannon LNG planning application.

Kerry County Council, a prescribed body, ended up supporting the planning application at An Bord Pleanála at its [October 18th 2021](#)¹⁹ meeting.

However, it can now be argued that the credibility of the Kerry County Development Plan in favour of Shannon LNG drafted at a time when it was and is contrary to current official government policy has been tainted and seriously brought into disrepute.

We ask you to consider the details and implications of these transactions in the interest of ethics, transparency and good governance, and argue that the outcome of this Energy Review must make it clear that An Bord Pleanála must now ignore all tainted decisions made supporting LNG in the Local and Draft County Development Plans which are contrary to the current government policy against LNG terminals..

Details of the monies received are attached for your convenience.

Planning permission, once given, cannot be removed later, so both the Department and An Bord Pleanála have a duty to act in good faith and not allow an abuse of process to grant development consent for the Shannon LNG fracked gas import terminal.

¹⁹ <http://docstore.kerrycoco.ie/KCCWebsite/meetings/minutes/2021/minsoct21.pdf>

By email safetybeforelng@hotmail.com16th September 2022

RE: Decision on Access to Information on the Environment Request 22007

Mr [REDACTED]

I refer to the request which you have made under the Access to Information on the Environment Regulations for records held by Kerry County Council.

In your application you sought the following:

"A list and details content of all monies received by Kerry County Council since 2006 from Shannon LNG and related companies in relation to developments of a proposed LNG import terminal and power station in Tarbert and associated activities such as gas pipelines and road widening of the L-1010 low road from Tarbert to Ballylongford.

Please enumerate the list, clearly displaying date of receipt, sender and name of sender, recipient(s) and amounts, along with a meaningful description such as the related development or other reference, denoting if, for each, whether or not the monies have been paid in full or remain outstanding.)"

I have decided in my capacity as a decision-maker under the regulations to grant access to your request. The table below shows all monies requested by Kerry County Council and paid by Shannon LNG.

TransNo	Trans.date	EURO	Description
65191201	19/01/2021	-500,000.00	Partial Road Upgrade Works L-1010
65067634	08/12/2009	-1,500,000.00	Land Acquisition Road Widening L-1010
65181864	25/02/2020	-625,000.00	Partial Road Upgrade Works L-1010
65194887	06/05/2021	-625,000.00	Partial Road Upgrade Works L-1010
65197767	18/08/2021	-578,625.00	Partial Road Upgrade Works L-1010
65063344	22/06/2009	-150,000.00	Land Acquisition Road Widening L-1010
65191201	19/01/2021	-125,000.00	Partial Road Upgrade Works L-1010
		-4,103,625.00	

Right of Appeal:

You may appeal this decision by writing to the FOI Unit, Kerry County Council, Corporate Affairs Department, County Buildings, Tralee, Co. Kerry or alternatively by sending an e-mail to aie@kerrycoco.ie You must make your appeal within 1 calendar month of receiving this letter. The making of a late appeal may be permitted in some circumstances.

The appeal process, known as Internal Review, will involve a complete reconsideration of the matter by a more senior member of staff of Kerry County Council. The decision on Internal Review will be given to you within 1 calendar month of the receipt by this Council of your request for Internal Review

Yours sincerely

A large black rectangular redaction box covering the signature of the Freedom of Information Officer.

FREEDOM OF INFORMATION OFFICER

TEL.:

A black rectangular redaction box covering the telephone number.

EMAIL: FOI@kerrycoco.ie