

[REDACTED]

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**From:** [REDACTED] <heritage@antaisce.org>  
**Sent:** 29 April 2019 10:11  
**To:** PADadmin  
**Cc:** [REDACTED]  
**Subject:** DCCAE 29 APRIL 2019 FORMERLY NEXEN  
**Attachments:** DCCCAE 29 APRIL 2019 FORMERLY NEXEN.docx

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Environment Advisory Unit,  
Department of Communications Climate Action and Environment,  
Custom House,  
Dublin,  
D01 W6 X0

Our ref : DCCCAE 29 APRIL 2019 FORMERLY NEXEN

Email [PADadmin@dccae.gov.ie](mailto:PADadmin@dccae.gov.ie)

**Re: Application for consent for exploratory drilling from CNOOC Petroleum Europe Limited  
(Formerly Nexen Petroleum UK Limited)**

SUBMISSION ATTACHED

Please acknowledge and advise of us of any determination

[REDACTED]

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Environment Advisory Unit,  
Department of Communications Climate Action and Environment,  
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Email [PADadmin@dccae.gov.ie](mailto:PADadmin@dccae.gov.ie)

**Re: Application for consent for exploratory drilling from CNOOC Petroleum Europe Limited (Formerly Nexen Petroleum UK Limited)**

29 April 2019

For the attention of [REDACTED]

Dear [REDACTED]

An Taisce notes that while further consultation has been invited on the Appropriate Assessment (AA) for this project, an Environmental Impact Assessment Screening (EIA) Determination (undated) has already been made in the absence of any further input from the public concerned. It is stated that the EIA screening decision document was posted to the Department's website on 12 April 2019 by means of an update. We would be obliged if you could please confirm the date of this decision.

It is of considerable disappointment to An Taisce that the Department has made a decision not to require an EIA in this case. Given the location of the project, the expected duration of drilling of up to 150 days, the scale of potential impacts to the environment from a blowout during drilling, the known and unknown discharges to sea, the potential impacts from noise, the cumulative impacts with other projects and the overall risk to European sites it is extraordinary that a decision has been taken at this stage not to proceed with an EIA.

We note that further consultation has been invited on the Appropriate Assessment (AA) only. The Natura Impact Statement (NIS) fails to provide the level of certainty beyond reasonable scientific doubt as to the absence of effects on conservation objectives of European sites. The broad reliance on historical event frequencies to determine the likelihood of accidental events is not appropriate and the mitigation measures proposed do not result in the level of scientific certainty that is required to protect the habitats and species concerned. The transfer of mitigation measures for underwater noise from the screening stage to the NIS and AA does remove the scientific doubt that is inherent in these measures. For example, the presence of a marine mammal observer on board the vessel

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EU Transparency Register No. 89747144047-77

**Directors:** Philip Kearney, Christopher Massi, Patricia Oliver, Judy Osborne (British), John Pierce (Chair), Charles Stanley-Smith (Secretary, British), John Sweeney

does not guarantee that vulnerable species are certain to be observed and avoided. Furthermore, there has been no proper assessment of cumulative effects with other projects.

As the Natura Impact Statement fails to provide the required level of certainty to meet the requirements under Article 6 of the Habitats Directive, the Department is precluded from granting a consent for this proposal unless invoking the requirements of Article 6(4) of the Directive and informing the European Commission accordingly.

An Taisce would appreciate advance notification of any intention to proceed with the project under Article 6(4) and/or any consent for the proposal.

Regards

 Advocacy Officer

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 26 April 2019 19:49  
**To:** PADadmin  
**Subject:** Submission on additional information for application from CNOOC Petroleum Europe Ltd

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.**

Dear Sir/Madam

I would like to make a submission on the additional information posted on April 9th in relation to the application for exploratory drilling by CNOOC Petroleum Europe Ltd.

I note the various habitats and species assessments undertaken. However, none of the documents or assessments refer to the chronic risks resulting from climate change caused by fossil fuel burning. While this is an exploratory drilling, should the drill be a success the logical next step would be extraction of fossil fuels.

The IPCC 1.5 degrees Celsius report of October 2018 cites the urgent need for all countries to immediately reduce greenhouse gas emissions. The report cites risks to marine environments if these cuts are not made.

While this may not be a specific requirement of the assessments provided it seems incomplete that the impacts of climate change would not be considered in assessments of risk to marine environments and species.

I would urge the Minister to refuse this application on the grounds that extraction of fossil fuels would exacerbate serious and chronic risks to our environment. I understand this is not an application to extract fuels but given the significance of the threat posed to our environment and climate by fossil fuels then there is no value in exposing ourselves to any risk associated with exploration when the safest thing to do with any oil or gas discovered at this site would be to leave it in the ground.

Kind regards

[REDACTED]

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