

[email to [bord@pleanala.ie](mailto:bord@pleanala.ie)]  
Mr Dave Walsh, Chairperson  
An Bord Pleanála  
64 Marlborough Street,  
Dublin 1  
D01 V902

Friends of the Earth  
Mount Street  
Dublin 2  
D02 X285

2 September 2022

Dear Mr Walsh,

**RE Case PA08.311233 – Compliance with Government Policy Statement on the Importation of Fracked Gas**

I write to you on behalf of Friends of the Earth to raise concerns regarding the July letter of An Bord Pleanála to the applicant in Case PA08.311233 and to clarify omissions which risk non-compliance with Government policy.

Last year we wrote to you, Minister Ryan and Minister Burke regarding compliance with the Government's Policy Statement on the Importation of Fracked Gas. In these letters we highlighted our concern that, notwithstanding the Policy Statement, as well as communications from the Minister Ryan and D/Housing to An Bord Pleanála, the Board appeared to have taken a decision to progress with the consideration of the planning application. We are mindful of subsequent responses of both Ministers which highlighted the Board's necessary consideration of the Policy Statement and also noted that the application should not be proceeded with pending the outcome of the energy security review, in accordance with the Policy Statement.

We remain concerned that the Board are continuing to progress the application without regard to the Policy Statement. You are aware that on the 5<sup>th</sup> of July 2022, the Board sought further information from the applicant. [The letter](#) (circulated for information to all relevant parties) is positive to the extent that the Board questions conflicting emissions factors noted in the planning application. The Board also addresses information provided in the EIAR that upstream Well-to-Tank emissions are significantly higher than those from fossil gas imports from GB. The Board also highlights the ongoing energy security review, as well as the expected send-out capacity from such a terminal in light of expected gas demand. Further information is also requested including on habitat loss, blasting and oil spillage.

However, this letter does not suggest that correspondence from D/Housing has been taken into account. It refers to the 2021 Climate Action Plan, the Policy Statement on Security of Electricity Supply and the National Energy Security Framework and requests that the applicant review these documents '*to address how the different elements of the proposed development comply with national policy, including these most recent policy documents, and the degree of interdependence between those elements*'.

**We note with concern that the Board's letter fails to address:**

- **The May 2021 Policy Statement on the Importation of Fracked Gas in the first instance.**
- Compliance with the Government's agreed carbon budgets and the (then forthcoming) sectoral emissions ceiling for the energy sector.
- Impacts caused by gas obtaining from hydraulic fracturing in the US (environmental, as well as human rights violations).
- The Government's new 'Statement on the Role of Data Centres in Ireland's Enterprise Strategy', July 2022 in relation to the proposal to develop data centres on the site.
- The new Public Sector Climate Action Mandate and its applicability to An Bord Pleanála or the Shannon Foynes Port Company.
- Ireland's international partnerships and commitments, including the Global Methane Pledge, the Climate and Clean Air Coalition and the Beyond Oil and Gas Alliance.

We ask that you clarify why the Policy Statement and the other areas noted above were not addressed in this latest correspondence. We also ask that the Board ensures that the application is not proceeded with in accordance with the Policy Statement.

We underline that any approval, or conditional approval, of the application, given the Government's position to ensure that it is not proceeded with pending the energy security review, would fly in the face of Government policy.

We ask that this letter is also passed to Board members for their attention.

Is mise le mórmheas

Jerry Mac Evilly,  
Head of Policy  
Friends of the Earth