



**CALIFORNIA COASTAL PROTECTION NETWORK**  
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November 28<sup>th</sup>, 2008

An Bord Pleanála  
64 Marlborough Street  
Dublin 1.

**RE: Support for Submission File by Safety Before LNG  
Challenging Permissions for Shannon LNG Project**

Dear Sir/Madam,

The California Coastal Protection Network is a non-profit environmental advocacy organization based in the United States. Our organization is one of the top experts on Liquefied Natural Gas (LNG) in the United States and undertook the successful campaign to stop the largest mining company in the world, BHP Billiton, from building a massive offshore LNG import terminal off the California Coast.

It has come to our attention that Ireland is considering the construction of an LNG import terminal on the Shannon Estuary between Tarbert and Ballylongford in County Kerry. However, it is clear from a review of the approval process so far that this proposal has been fast-tracked and piecemealed by bifurcating the terminal itself from its associated pipeline and that no coherent assessment of the serious and significant risks to public health and safety has been undertaken. This is both contrary to Irish law and basic commonsense.

LNG Terminals have been touted by the resource extraction industry as the cheap, safe, reliable and clean way to increase energy supply. Unfortunately, this industry mantra is contrary to the hard facts:

**LNG is not safe:** Despite industry protestations to the contrary, it has

been effectively proven and acknowledged by the US Government that LNG terminals and tankers are both terrorist targets and significant safety risks. In the case of the BHP Billiton proposal that was to be located roughly 12 miles offshore, a top independent LNG safety expert hired by CCPN determined that the resulting vapor cloud flash fire from a release of LNG would extend up to 7.3 miles from the terminal and would engulf the nearby shipping lanes and anything else in its path. In the case of Shannon LNG, D. Jerry Havens, one of the most conservative and foremost experts on LNG safety in the world, has determined that residents and property within 3 miles of the terminal would be at serious risk for death and injury. These are not risks that should be borne by local residents without a serious consideration of other alternative LNG sites if, indeed, the country is committed to constructing an LNG terminal on or off its shores.

**LNG will not be cheap or reliable:** LNG companies make many promises but the fine print protects the companies who stand to profit – in this case Hess LNG and Poten and Partners. These two companies are in the LNG business and have met stiff opposition for their attempts to build another LNG import terminal at Weaver's Cove, Massachusetts. Further, recent price fluctuations in the international market for LNG mirror those for oil and LNG shipments have already been diverted to those countries willing to pay the highest price for the cargo. When one considers that over sixty percent (60%) of global natural gas reserves lie within three countries, Russian, Iran and Qatar, it is clear that increased reliance on LNG is a risky economic proposition. Talks of an LNG cartel have been revived and it is likely that LNG purchasing nations will have little if any control over the future cost of LNG imports. Creating a dependency on imported LNG for over 40% of Ireland's natural gas supply creates a serious economic vulnerability for a country when other potential alternatives exist.

**LNG is not clean:** One of the most specious claims made by the industry is that LNG is clean and should be part of our global 'clean energy future.' What the LNG industry does not tell you is that the green house gas (GHG) emissions generated by the extraction, liquefaction, transportation, regassification and combustion of LNG far exceeds the emissions generated by the extraction and combustion of domestic natural gas. The bottom line is that like oil, LNG is an

imported fossil fuel. When all of its emissions of its life cycle are accounted for, it is much closer to coal than clean, renewable energy sources. Further, depending on terminal design, LNG pollutes the marine environment by consuming and discharging massive amounts of seawater for storage and regassification damaging the marine environment.

CCPN urges that Shannon LNG's proposal to build an LNG terminal and its associated pipeline be reviewed in its entirety for its cumulative impacts on the Shannon Estuary and on the people who will reside in proximity to the proposed terminal. If the project can withstand the scrutiny of appropriate environmental and security review, it will be approved. If, however, it is found that the proposed LNG terminal carries unacceptable risks to both human health and safety, as we believe it does, it will be denied and alternatives will be found.

In the United States as coastal states like California, Oregon, Massachusetts, Connecticut, New York and others have become better educated about LNG terminals and tankers and the long-term significant impacts they pose, they have objected to top down approvals by the federal government. Given the risks associated with these proposals, it is imperative that local, state and federal government abide by the law and require that these terminals undergo the serious scrutiny they deserve. Further, understanding the financial consequences that a renewed reliance on an imported fossil fuel will bring to all countries should be given serious weight in any decision to allow an outside, profit-oriented entity to control LNG imports.

CCPN would be happy to provide the extensive documentation compiled during its 4 year review of the proposed BHP Billiton LNG terminal and to convey the many documents and reports that have been compiled by the U.S. Government on the subject of LNG terminals and tankers.

Thank you for consideration of our remarks on this important subject.

Sincerely,

A handwritten signature in black ink that reads "Susan Jordan". The signature is written in a cursive style with a long, sweeping tail that extends to the right.

Susan Jordan, Director