

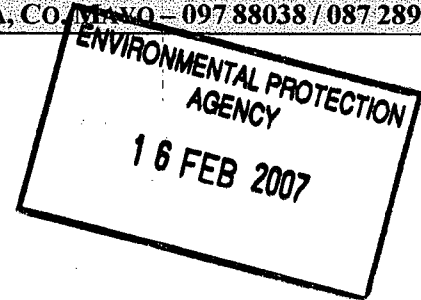
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ERRIS INSHORE FISHERMEN'S ASSOCIATION

CHAIRPERSON – ÉAMON Ó DUIBHIR, CORLCOUGH WEST, BELMULLET, CO. MAYO – 097 81182 / 087 1354507

SECRETARY – EAMON DIXON, CARNE NASH, BELMULLET, CO. MAYO – 097 81572 / 087 7743404

TREASURER – MELVIN TIGHE, KILGALLIGAN, CARRATIGUE, BALLINA, CO. MAYO – 097 88038 / 087 2896781



Environmental Protection Agency
Johnstown Castel Estate
Co. Wexford

15th February 2007

Dear Sir/Madam

RE : REG NO. PO738-01.

Please find attached objection in relation to the above application from our association.

In addition, we request an Oral Hearing on the Shell E&P Ireland Ltd application (Bellanaboy Bridge Gas Terminal).

Enclosed is the relevant fee of €226 (Third Party Fee €126 and Oral Hearing Request Fee €100).

Yours faithfully

A handwritten signature in dark ink, appearing to read 'E. Duibhir'.

EAMON Ó DUIBHIR
Chairperson

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Submission To Environment Protection Agency & Oral Hearing Request

E.P.A. Reference – PO738 - 01

RE: Corrib Gas Refinery Discharges To Broadhaven Bay & Surrounding Waters

The Erris Inshore Fisherman's Association (E.I.F.A.) Have never had nor do we now have any problem with Corrib Gas being brought ashore in Erris as long as it is done in a safe and environmentally friendly way. That is our position going forward.

We have no problem with Shell and its partners using our fishing waters to facilitate the exploitation of Corrib gas as long as they respect our traditional rights to harvest a healthy fish from the sea and when their day is done that they return our marine waters to us in the pristine condition in which they got them.

There are about 150 fishermen and their families who depend on 150 sustainable jobs in or around the waters of Broadhaven Bay for a major part of their income, if not all. In view of the present stresses and strains emanating from the need to impose quotas and preserve fish stocks, diversification into the harvesting and production of other sea foods is getting more attractive by the day. An unpolluted Broadhaven bay would be ideal for this purpose. Additionally, the marine is one of our most important leisure facilities that has the potential to, not only augment but to be the mainstay of our tourism industry. Erris is also rich in history, folklore and culture with An *Ghaeilge* still being the first and in daily use language of a sizeable portion of its residents.

Nár mhór an feall í a loiteadh nó a éagadh agus an imirce éigeanta a chur í réim athuair

The loss of economic benefits in the tourism industry, together with the demise of our traditional fishing industry would far outweigh the benefits, if any, bestowed by Shell by virtue of their presence in Erris. Their claim of creating additional jobs is but a fallacy. Any jobs created will be few and of short duration. (construction jobs)

Their claim of having Corrib gas available to incoming industries as an inducement to set up in Erris is also ludicrous. Corrib gas can be readily accessed by industry in any place where the Board Gais pipe network visits. There are no plans to have gas available in our area. Shell is a multinational corporation with a very doubtful environmental reputation. Their main purpose and arguably their only purpose for being in Erris is to enhance and maximise their own profits. There is no evidence or any reason to believe that Shell are about to change now .. It is incumbent on us and on our legislative authorities to be vigilant.

After the initial euphoria of having *clean natural gas* landed on our shores- Kinsale style-, little by little we learned that it was *raw natural gas* that was being brought ashore- Shell style-, traversing residential areas in a high pressure pipe line to be refined in a boggy terrain with resultant environmental pollution and problems

As residents of Erris we must be conscious of and consider the bigger picture but as fishermen, our main concern is the outfall pipe, with its cocktail of contaminants, both chemical and metallic being discharged into our fishing waters at a location where they will not disperse to open sea but will remain in Broadhaven bay and its surrounding waters to accumulate and do untold damage.

The E.I.F.A. have demonstrated to the satisfaction of all reasonable people that there are issues pertaining to the Corrib gas discharge pipe location that need to be addressed if damage to the inshore fishing industry and the environment is to be avoided. SEPIL have admitted in their EIS that contaminants will be discharged into Erris waters. The Marine Licence Vetting Committee (MLVC) have stated in their report that this treated effluent could do damage to the marine flora and fauna unless dispersed to open sea. The E.I.F.A. are adamant. From their knowledge of local tides and currents, that the discharges will back into Broadhaven Bay and remain there to do irreparable damage. Unfortunately, SEPIL refuse to accept the knowledge and expertise of the local fishermen. Instead they place their confidence in detached experts who make assumptions and deductions based on generally available data that is very creditable in its own right but may well be of little significance to some particular locations. Such expert reports are classified as *scientific fact* by SEPIL and presented as proof of the correctness of their decisions.

SEPIL's *scientific facts*, on numerous occasions, since the advent of the Corrib gas project, have been demonstrated to be just *disputed scientific data*.

For example:

- The first discharge location at the 4 Km mark within Broadhaven Bay.
- The second discharge location at the 7 Km mark within Broadhaven Bay

Both decisions were based on *disputed scientific data* and had to be changed

The presently proposed discharge location at the 12 Km mark, is also based on *disputed scientific data* but SEPIL refuse to accept that fact.

There are other similar examples, pertaining to the general project that need not concern us at this point. They had been based on *disputed scientific data* and had to be changed.

It is not a matter of disagreement any more that pollutants will be discharged into Erris waters. SEPIL admit, in their EIS, that this will be done at EQS. The MLVC describe that treated effluent and its potential to damage unless dispersed to open sea.

The only matter of contention any more is where open sea can be accessed. Surely the local fishermen, with their local knowledge, built up over a lifetime and handed down to them by the generations that went before are the experts in situations like this. They should be listened to.

In addition to the above, the E.I.F.A. are concerned about the discharge through the outfall pipe of methanol, rust inhibitor and other production chemicals as yet unidentified and used in the production of raw natural gas. It is a matter of some surprise to us that you have not dealt with them in your report or in the IPPC licence grant.

In conclusion, the E.I.F.A. respectfully request that you grant an oral hearing so that our dispute about the discharge location can be better explained and addressed.

Contacts: Éamonn Ó Duibhir,	Chairman.	097 81182	Mobile 087 1354507
Eamon Dixon	Secretary	097 81572	Mobile 087 7743403
Melvin Tighe	Treasurer	097 88038	Mobile 087 2896781