

## Environmental Pillar submission on EPA Consultation re TOR for Fracking Research

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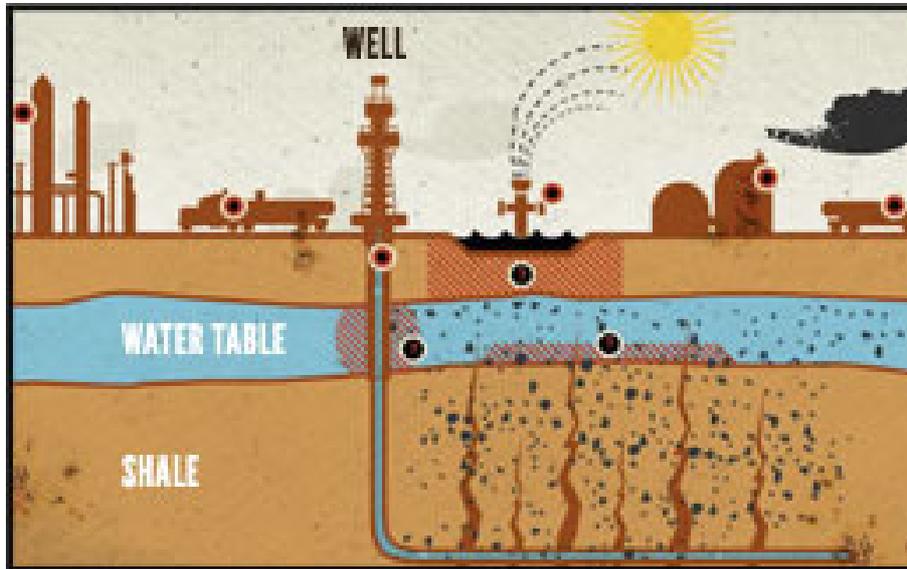


Image: Darthpedrius

- 1. This research should not just be aimed at answering the question: can we undertake Fracking in Ireland without causing environmental damage here, and without increasing Ireland's Green House Gas (GHG) emissions.**

The research should also address the question of the environmental impact of the extraction of global shale gas reserves for the agreed target of containing global warming to 2C. Total GHG emissions must be one of the points that feature in the study. If all global reserves of shale gas extractable through fracking are burned what are the estimated GHG emissions and what would the impact of that be on the 2C target? Methane leakage in production should be a part of this equation.

The latest scientific calculations suggest we can only burn 20% of total fossil fuel reserves globally, if we are to give ourselves a decent chance of avoid exceeding a 2 degree temperature rise. Therefore it makes sense to determine which 20% of fossils are burned having regard to, among other factors, the GHG burden. These questions must be part Ireland's political decision-making process around shale gas extraction by fracking. And therefore it is imperative that the EPA research provides the independent evidence base to inform that decision-making process.

Moreover, given Ireland's high carbon dependence, the study should also examine how shale gas production would impact on the public perception of the urgency of replacing fossil fuels.

**2. The range of the draft TOR is far too narrow.**

The key questions for this research limit the range of the research to very narrow though important concerns. Viz:

*1) Can this technology be used whilst also fully protecting the environment and human health?*

*If the answer is yes, then:*

*2) What is best environmental practice in using the technology?*

In order to fulfil the purpose of the research in enabling the two Governments to decide on whether to allow fracking to be permitted, the full range of socio-economic-environmental issues need to be identified and base line studies done to identify and measure the scale of likely impacts. It is not good enough only to look at best practice in mitigation of potential impacts as described in B2 (page 6). Instead the work packages must cover the following:

- a. The full range of potential environmental impacts as defined in the EIA Directive, during build-up, operation and decommissioning, on:
  - i. human beings, fauna and flora;
  - ii. soil, water, air, climate and the landscape;
  - iii. material assets and the cultural heritage;
  - iv. the interaction between the factors referred to in points i, ii, or iii
- b. The economic impacts, short and long-term on the local economies
- c. The social impacts resulting from potential community conflict and the industrialisation of rural communities.
- d. The regulatory environment.

**3. Whilst the text used regarding conflict of interest in Para 6 of the draft TOR is helpful, it doesn't remove the responsibility of the EPA in seeking contractors that have a track record of independence.**

The research produced needs to be above reproach.

Whilst recognising that the researchers may be drawn from limited pools of expertise, it is essential that at the least the team leaders in each work package are seen to be free of links with fossil fuel industries, and to have demonstrated their independence.

*Environmental Pillar members:* An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan Ireland, Gluaiseacht. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland

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