

Green Paper on Energy Policy in Ireland – Submission

Priority 1: Empowering Energy Citizens

I am interested to learn that the DCENR wishes to “encourage citizens to be part of our transition to future energy paths and the policymaking process that goes with it” and is keen to “engage citizens”. This has not been my experience of the DCENR to date.

I live in County Clare, large parts of which were offered by the DCENR to any company willing to license them for shale gas exploration/extraction. Prior to this offer being made, I do not recall any public meetings about shale gas being held in the county by the DCENR. I discovered in late 2011 that a license option had ultimately been granted by the DCENR for the Loop Head peninsula. Since then I have been following this issue quite closely. I do not recall ever hearing that a representative from the DCENR came out to discuss this issue with local residents. There are quite a lot of concerned residents in Clare (and throughout the country), but our letters expressing this concern to the ministers with responsibility for this issue are invariably responded to with form letters that do not address our specific concerns. To my knowledge, the public has never been asked whether or not we want fracking in Ireland. So that kind of thing might be a good place to start.

Also, a number of county councils have passed motions opposing shale gas extraction/exploration, and two have even amended their county development plans to ban this practice within their county borders. However, everyone involved knows that this is a primarily symbolic gesture, as Minister Pat Rabbitte has made it clear that it is going to be the central government that makes all the decisions. Listening to and respecting the will of local people as expressed through their representative assemblies might be another thing to try.

Actually, I think the DCENR’s strategy to date – namely, keeping local communities completely in the dark about what is being planned for their area – has been quite effective if the goal is indeed to engage the public in energy policy. As the government has failed to inform us about what is involved in shale gas extraction, we have educated ourselves, and continue to work to educate our fellow citizens. Thanks to the DCENR in a way, a lot of us have become quite well-informed on this issue, and very “engaged”.

For the record, I oppose shale gas and oil extraction for the following reasons (among others):

- This is not the time to be investing our precious economic resources in fossil fuels. Climate change requires that we start shifting now from the fossil fuels that we currently use, not go after new ones. Especially, it has been shown that due to the methane emissions over the life cycle of shale gas production, this form of natural gas is dirtier than coal in terms of greenhouse gas emissions. *It is not a bridge fuel.*
- Hydraulic fracturing is known to pollute groundwater, surface water, and the air with substances that are extremely toxic to humans, livestock and wildlife.
- Hydraulic fracturing wastes enormous volumes of fresh water, removing it permanently from the water cycle. It pollutes this water with heavy metals, salts, and radioactive substances, not to mention the toxic chemicals used in the fracking fluid. Many of the substances found in fracking wastewater are known to be endocrine disruptors, which cause serious health problems even at very low concentrations. Ireland does not have the facilities to treat enormous quantities of radioactive, highly toxic wastewater.
- Hydraulic fracturing causes earthquakes, even in areas that are relatively seismically stable, like Ireland.
- Economically, shale gas/oil extraction makes no sense. The rapid decline in well production from the first year requires that more and more wells be drilled just to keep production stable, and even then, the return is not enough to cover costs. At a time when the oil majors are pulling out of shale because they are “losing their shirts”, Ireland would be foolish to embark on shale gas extraction.
- Ireland’s agriculture and tourism sectors, two of the only reliable sources of income in some rural areas in times of economic crisis, depend enormously on Ireland’s “green” image. If fracking is ever allowed here, that will go out the window. People know what fracking does to a place.

I call for a permanent ban on unconventional fossil fuel exploration and extraction in Ireland.

The green paper asks about how other countries have effectively engaged citizens in infrastructural development. This may not relate specifically to infrastructure, but I

have heard of a system in the US state of Illinois whereby residents can install solar panels that they can either purchase outright (grants are available) or lease from companies that sell any excess power produced – the total of the reduced electricity bill to the homeowner, due to the power generated, plus the lease of the equipment, works out to be less than the original electricity bill, so there is no payback period for the equipment. As I have heard the system described, it seems to work well and is encouraging the development of sustainable energy. There are similar schemes in place in other states.

In general, I favour local production of sustainable sources of energy, and I think these should be collectively owned and operated wherever possible. The DCENR seems to be having trouble getting the Irish people to accept large-scale wind farm projects from which the power would be exported to the UK. This opposition seems reasonable to me, but I think it is too bad that such massive projects are giving wind farms a bad name in Ireland. Wind farms of an appropriate scale, which would provide local homes and businesses with power and possibly profits (by selling power back to the grid), would take off here I believe, but this sort of project does not seem to me to be being promoted or facilitated by the DCENR. Indeed, someone I know who is involved in a locally-owned project in Clare has told me that they are planning to export their power as the system here is not set up to buy it from them.

I do not favour smart meters, as from what I have heard they are too expensive for the benefits they offer. I also have privacy and security concerns. I think the priority should be a system that would allow small, even individual producers of power to sell their power to the grid at attractive rates. If such a system were in place, domestic power generation would surely take off here, as it has in Germany and elsewhere.

One thing I find as an individual consumer is that the rates system does not really favour the use of night-time/off-peak electricity. It seems that the only way to benefit from lower rates at off-peak times is to set up a night-rate meter. When I looked into it, the cost put me off. If the system were more flexible, so that consumers would be charged at the applicable rate depending on what time they used electricity, people would no doubt adjust their behaviour accordingly. I would. Even without smart meters, it would not be complicated to let people know which were the most expensive (peak) hours – consumers would automatically adjust their usage.

Priority 2 – Markets, Regulation and Prices

On the question of regulation, I was frankly astonished to learn that the CER had been given the power to regulate the safety of onshore and offshore oil and gas facilities, and that the same safety framework was being proposed to cover both. It was only after significant public outcry that any mention was made of onshore facilities and of hydraulic fracturing at all in the safety framework. The final framework still seems to me incredibly insufficient, given the safety problems (for workers and local residents) that are known to be associated with onshore oil and gas infrastructure. The idea of managing risks “as low as reasonably practicable” does not fill me with confidence. And I am not convinced that the CER has the expertise or the resources to monitor the safety of onshore shale gas extraction.

Priority 3 – Planning and Implementing Essential Energy Infrastructure

As I mentioned above, the most important infrastructure change, in my view, would be to require electricity providers to purchase surplus power from private/individual producers, and at higher than market rates, to incentivise the production of local, sustainable sources of energy. It has to be economically attractive, and easy. The Germans seem to understand how to do this.

In terms of connection to the European market, I do not think Ireland should consider exporting any electricity or natural resources until after our own energy needs have been met. As I mentioned, the focus on large-scale production of power for export to the UK is counter-productive, in my opinion. I favour small-scale, locally/collectively owned and operated sources of energy that provide power/heat primarily to the communities in which they are located. In general, I would like to see a lot more creativity and forward thinking from the DCENR. Policy seems to be far too oriented toward projects that generate profits for large international companies but do not serve Ireland.

Priority 4 – Ensuring a Balanced and Secure Energy Mix

If energy security is a priority, shale gas and oil have no part to play. The resources (if

there are any) will probably play out in about a decade, if experience from the US is anything to go by, and the pollution will remain for generations. As will the health consequences.

Nuclear energy should not even be considered. At a time when other countries are working to make the transition away from nuclear, and shut down their reactors, there is no justification for Ireland to consider this technology.

Ireland does not have the economic resources to waste on developing energy sources that are outdated. Ireland needs to be smart about its investment, and be *ahead* of the curve in developing clean, sustainable sources of energy that can directly benefit local communities (i.e., smaller scale, and not destined for export). I have heard that Ireland has extraordinary potential for tidal power and offshore wind power generation, but I have not heard that the DCENR is investing much time, effort, or money in these new fields. I recently heard of a project in northern France (Brittany, I think) to install underwater turbines for capturing tidal energy. The turbines were being developed by *an Irish company*. Why are we not installing them here?

A country the size of Ireland could easily go 100% renewable, with technology that is now available. See the work of Dr. Mark Jacobson at Stanford, who has created plans for each of the 50 US states to go 100% renewable *for all energy uses* by 2050. His team might be willing to create such a plan for Ireland. See www.thesolutionsproject.org.

“What further efforts are required to pursue indigenous development of hydrocarbons”? Come again? What century is that question from? Ireland’s energy security (and economic security) depends on turning away from fossil fuels now. Much greater energy efficiency is required urgently, to reduce demand, and an all-out shift must be made to renewable sources. *Now*. The IPCC report that came out in April 2014 was fairly insistent about the need to *immediately* shift away from fossil fuels. I trust their judgment.

I am completely opposed to the use of my tax money to develop any kind of fossil fuels. *That era is OVER*. Incidentally, I think Ireland should also divest from fossil fuels, from an ethical, moral, and economically prudent standpoint. (If most of these resources will need to be left in the ground, as experts predict, they are not a prudent investment as they will never yield a return—they are effectively worthless.)

Priority 5 – Putting the Energy System on a Sustainable Basis

“Putting the energy system on a sustainable basis”...while still pursuing fossil fuel development and considering nuclear power? Interesting mix of priorities there.

I absolutely support putting the energy system on a sustainable basis, but I want it to be done properly: 100%, and without delay.

Yes, there is clearly a “role for solar, offshore wind, wave, tidal or other technologies”. I am a bit surprised to find that the DCENR is only now posing the question. We are further behind than I thought. Dr. Jacobson at Stanford could tell you more about the possibilities for Ireland.

In terms of economic models, please see my previous comments on the need to supply Irish energy needs before exporting power, and for a grid that can and is required to buy back privately/individually produced power at advantageous rates. Subsidies/grants for installing private/individual sustainable power generating facilities should also be established and maintained for long enough to make them meaningful as an incentive and to make a difference.

I also favour the introduction of the Cap and Share scheme, to reduce energy demand and carbon emissions equitably. See www.capandshare.org. This scheme seems to me fair, simple, transparent, and effective for reducing carbon emissions. It seems to me a better system than emissions trading schemes.

Thank you for considering this submission.